May 27, 2022

National Stock Exchange of India Limited,
Compliance Department,
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai - 400051,
Maharashtra, India

BSE Limited,
Compliance Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400001,
Maharashtra, India

Dear Sir/Madam,

Subject: Intimation under Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ('PIT Regulation')

Stock Code: BSE – 539787 and NSE - HCG

In pursuance to the provisions of Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ('PIT Regulations'), please find enclosed herewith a copy of the amended 'Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information', as approved by the Board of Directors of the Company at its meeting held on May 26, 2022.

We request you to take the same on record.

Thanking you,

For **HealthCare Global Enterprises Limited**

Sunu Manuel
Company Secretary & Compliance Officer

Enclosure: as above

HEALTHCARE GLOBAL ENTERPRISES LIMITED

INSIDER TRADING POLICY AND CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UPSI

1. INTRODUCTION

Securities and Exchange Board of India ("SEBI") has promulgated the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and SEBI Prohibition of Insider Trading Amendment Regulations, 2018 and SEBI Prohibition of Insider Trading Amendment Regulations, 2019 (collectively referred to as "Regulations").

The Regulations envisage listed companies or proposed to be listed companies to formulate a new code of conduct to regulate monitor and report trading by its Designated persons and Connected Persons by adopting the prescribed minimum standards for achieving compliance with these Regulations and establishing principles for fair disclosure of Unpublished Price Sensitive Information (UPSI).

Insider Trading Policy and Code of Practices and Procedures for Fair Disclosure of UPSI of HealthCare Global Enterprises Limited (HCG) ("Code") has been framed in accordance with the Regulations. The Regulations prohibit an Insider from Trading in the securities of a Company listed on any stock exchange on the basis of any UPSI.

The Code is applicable to the following persons:

a) Promoters including member(s) of Promoter group;
b) Directors;
c) Designated Persons; and
d) Connected Persons.

2. Definitions.

(1) In this Regulation, unless the context otherwise requires, the following words, expressions and derivations therefrom shall have the meanings assigned to them as under:

(a) **"Act"** means the Securities and Exchange Board of India Act, 1992 (15 of 1992);

(b) **"Board"** means the Securities and Exchange Board of India;

(c) **"Board of Directors"** means Board of Directors of the Company;

(d) **"Code"** means the Insider Trading Policy and Code of Practices and Procedures for Fair Disclosure of UPSI as notified hereunder, including any amendments/ modifications made from time to time;

(e) **"Company"** means HealthCare Global Enterprises Limited;

(f) **"Compliance Officer"** means the Company Secretary of the Company or in absence of Company Secretary, any senior officer, designated so or in absence of both, the Executive Director or such other senior officer, who is financially literate and is capable of appreciating requirements of legal and regulatory compliance under these regulations and who shall be responsible for compliance of

policies, procedures, maintenance of records, monitoring and adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in this Code of Conduct and Compliance officer shall function and carry out his responsibilities under the overall supervision of the Board of Directors of the Company. (Explanation: For the purpose of this Regulation "financial literate" shall mean a person, who has ability to read and understand basic financial statement like Balance Sheet, Statement of Profit and Loss, Cash Flow statement etc.)

(g) "**Connected Person**" means:

(i) Any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,

a. an immediate relative of connected persons specified in (i) above; or
b. a holding company or associate company or subsidiary company; or
c. an intermediary as specified in section 12 of the Act or an employee or director thereof; or
d. an investment company, trustee company, asset management company or an employee or director thereof; or
e. an official of a stock exchange or of clearing house or corporation; or
f. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
g. a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
h. an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
i. a banker of the company; or
j. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest;

(h) **"Designated Person(s)"** shall have the meaning ascribed to such term in Clause 5 of this Code

(i) "**Dealing in securities**" means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or as an agent.

(j) **"Director"** shall have the meaning assigned to it under the Companies Act, 2013.

(k) **"Employee"** means every employee of the Company whether permanent or contractual basis including the Directors in the employment of the Company.

(l) "**Generally Available Information**" means information that is accessible to the public on a non-discriminatory basis.

(m) **"Immediate Relative"** means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

(n) **"Insider"** means any person who is (a) Connected Person or (b) in possession of or having access to UPSI.

(o) **"Insider Trading Compliance Committee"** shall mean the Committee constituted under the Code, for considering and approving any proposed trade or providing pre-clearance of any proposed trade, received under the Rules. The Insider Trading Compliance Committee shall consist of the following members:

(i) Chairman
(ii) Chief Financial Officer
(iii) Company Secretary

(p) **"Key Managerial Personnel"** shall have the meaning assigned to it under the Companies Act, 2013.

(q) **"Legitimate Purpose"** shall include sharing of unpublished price sensitive information in ordinary course of business by an Insider with Partners, Collaborators/ Lenders, Customers, Suppliers, Merchant Banker, Legal Advisors, Auditors, Insolvency Professionals or other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

(r) **"Officer"** shall have the meaning assigned to it under the Companies Act, 2013.

(s) **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

(t) **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 or any modification thereof except units of a mutual fund.

(u) **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

(v) **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

(w) **"Unpublished Price Sensitive Information (UPSI)":** UPSI means any information, which relates directly or indirectly, to the Company or its securities, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of the Company. UPSI includes, without limitation, information relating to the following:

i. Financial results;
ii. Dividends;
iii. Change in capital structure;
iv. Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions; and
v. Changes in Key Managerial Personnel.

vi. such other information as determined by the Board of Directors/Chief Executive Officer/Chief Financial Officer/Compliance Officer from time to time.

(x) Words and expressions used and not defined in these Rules but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or any other SEBI Regulation(s) as amended from time to time.

3. Prohibition on communicating or procuring UPSI

An Insider shall not communicate, provide, or allow access to any UPSI, relating to the Company or its Securities, to any person including other insiders, except to the extent allowed by the Regulations and the Code; or procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities. Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

(i) in furtherance of Legitimate Purpose, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed; or
(ii) in the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company; or
(iii) within a group of persons, if such persons have been identified and secluded within a "Chinese wall" or information barrier by the Insider Trading Compliance Committee from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the "Chinese wall", and the execution of an undertaking by such persons to abstain and / or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI.

4. Prohibition on Insider Trading

Except as provided under the Regulations, an Insider shall not, directly or indirectly, –

i. Trade in securities that are listed or proposed to be listed when in possession of UPSI;
ii. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

5. Dealing in Securities by Designated Persons and their Immediate Relatives

(i) In addition to the prohibitions on Insider described in Clause 4 above, this Code imposes certain additional responsibilities and restrictions on certain categories of persons, who are defined below as Designated Persons.

(a) Promoters of the Company;
(b) Directors of the Company and its Material Subsidiaries;
(c) Employees upto two levels below the Whole Time Director/CEO of the Company and its Material Subsidiaries;
(d) KMPs of the Company and its Material Subsidiaries;

(e) Employees named in the Corporate Organization Chart of the Company from time to time;
(f) Executive secretaries of Directors, KMPs, and Senior Management Employees of the Company;
(g) Permanent invitees/invitees to the board meeting and committee meetings
(h) Every employee in the Corporate - Finance, Accounts, Treasury, Taxation, Secretarial, IT, Legal, Enterprise Risk Management, Compliance, Internal Audit, Investor Relations and Corporate Communication departments, irrespective of their role, designation etc.,
(i) Any other employee /person as may be determined by the Board from time to time in consultation with the management of the Company considering the objectives of the Code; and
(j) Immediate Relatives of all the above persons.

(ii) Designated persons shall disclose names and PAN or other identifier authorized by law, of the following persons on annual basis and as and when the information changes;

(a) Designated person himself/herself;
(b) Immediate relatives of Designated Person;
(c) Persons with whom such designated person(s) has a material financial relationship; and
(d) Phone/cell numbers which are used by them.

Explanation: The term "material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

6. Additional Responsibilities and Restrictions on Designated Persons:

The Code imposes additional responsibilities and restrictions on Designated Persons, which are as under but which shall be subject to any exceptions provided or permitted under the Regulations:

(i) Designated Persons shall ensure and take necessary precaution to preserve Unpublished Price Sensitive Information.
(ii) Designated persons shall not communicate, provide or allow access to any unpublished price sensitive information, relating to the Company or Securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligation.
(iii) Not to communicate Price Sensitive Information in situation in which there would be an uncertainty as regards conflict of interest or the possibility of misuse of the information.
(iv) Not to discuss or disclose Price Sensitive Information in public places.
(v) Not to disclose Price Sensitive Information to any Employee who does not need to know the information for discharging his or her duties or responsibilities.
(vi) Not to apply for pre-clearance and trade plan when in possession of Unpublished Price Sensitive Information even though the closed period is not notified till such time the Unpublished Price Sensitive Information becomes generally available.
(vii) All Designated Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, or during any other period as may be specified by the Company from time to time.

(viii) Not to execute contra trade within a period of 6 months from the date of last transaction either by self or through Immediate Relatives. If the opposite transactions are executed in violation of this provision, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI. Such persons may however apply to the Compliance Officer and Insider Trading Compliance Committee in for waiver of the restriction on contra trade, which may be granted in accordance with the Regulations.

(ix) In case of Employee Stock Options (ESOPs), exercise of option may be allowed also in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.

Any of the restrictions mentioned above may be waived by the Compliance Officer to the extent permissible under and in the manner provided for in the Regulations.

7. Determination of Legitimate Purpose

(i) Any person in receipt of UPSI for a "Legitimate Purpose" shall be considered as "Insider" for purposes of the Regulations and the Code.

(ii) The Designated Person who shares UPSI with anyone shall ensure that the same is shared for Legitimate Purpose.

(iii) The Designated Person shall simultaneously provide details of the person [i.e. Name of the person, Entity, Medium of sharing, Purpose of sharing etc.] with whom such UPSI is shared to the Compliance Officer.

(iv) Upon receipt of UPSI for Legitimate Purpose, such person shall be obliged to maintain the confidentiality of UPSI in compliance with the Regulations and the Code.

(v) The Company shall execute Non-Disclosure Agreement with parties with whom the Company intends to share any UPSI for Legitimate Purpose.

(vi) A structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for Legitimate Purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available.

(vii) Adequate and effective system of internal controls shall also be laid out to ensure the compliance of maintenance of a digital database for sharing UPSI for said Legitimate Purposes.

8. Trading Window

(i) The Compliance Officer shall notify a 'trading window' during which the Designated Persons may Trade in the Company's Securities after securing pre-clearance from the Compliance Officer and Insider Trading Compliance Committee in accordance with these Rules.

(ii) Designated Persons shall not Trade in the Company's securities when the trading window is closed, except in accordance with the exceptions provided in the Regulations.

(iii) The trading window shall generally be closed for all Insiders from the first day of the succeeding month of any financial period for which results are required to be announced by the Company till the second trading day after disclosure of such financial results.

(iv) Additionally, the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer and Insider Trading Compliance Committee determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI, for such periods as determined by the Insider Trading Compliance Committee, subject to any exceptions provided in the Regulations.

(v) The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

9. Pre-clearance of Trading

(i) Designated Persons may Trade in the securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer and Insider Trading Compliance Committee by submitting an application as per Annexure 1 along with an undertaking as per Annexure 2.

(ii) The Compliance Officer and the Insider Trading Compliance Committee shall not approve any proposed Trade by Designated Person if the Insider Trading Compliance Committee determines that such Designated Person is in possession of UPSI even though the trading window is open, except in the manner prescribed by the Regulations.

(iii) The Compliance Officer and the Insider Trading Compliance Committee may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval.

(iv) The Designated Person shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer as per Annexure 3. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.

(v) If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.

(vi) A Designated Person who Trades in securities without complying with the preclearance procedure as envisaged in these Rules or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in these Rules.

(vii) Nothing in this Clause shall apply to any Trade involving a value of less than Rs. 10 Lakhs or such other amount as may be specified by the Board of Directors from time to time (a "de minimis Trade") provided the Designated Person is not in possession of UPSI while executing the de minimis Trade.

10. Trading Plan

(i) A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a "Trading Plan") and present it to the Compliance Officer and the Insider Trading Compliance Committee for approval and public disclosure pursuant to which Trades may be carried out in his behalf in accordance with such plan.

(ii) The Compliance Officer and the Insider Trading Compliance Committee shall review and approve the Trading Plan if it complies with the SEBI Regulations and shall disclose the Trading Plan to the stock exchanges.

(iii) The Trading Plan once approved shall be irrevocable and the Designated Person shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the Trading Plan. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the Designated Person is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information. Further, the Designated Person shall also not be allowed to Trade in securities of the Company, if the date of Trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

11. Disclosure requirements

(i) Initial Disclosure:

(a) Every Promoter, member of promoter group, Key Managerial Personnel, director of the Company and each of their Immediate Relatives shall disclose his holding of securities of the Company within thirty days of these Regulations taking effect as per Form A set out in Annexure 4.

(b) Every person on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a Promoter or member of promoter group shall disclose his / her and Immediate Relatives' holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter, as per Form B set out in Annexure 5.

(ii) Continual Disclosure:

(a) Every Promoter, member of promoter group, Designated Persons, director of the Company shall disclose as per Form C set out in Annexure 6 to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lakhs or such other value as may be specified.

(b) The disclosure shall be made within two working days of the acquisition or sale of shares or voting rights, as the case may be.

(iii) Disclosure to the Stock Exchange: The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or from becoming aware of suchinformation.

(iv) Disclosures by other Connected Persons. The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per Form D set out in Annexure 7 at such frequency as he maydetermine.

12. Principles of Fair Disclosure with respect to Unpublished Price Sensitive Information

(i) The Chairman & Chief Executive Officer, the Chief Financial officer, the Company Secretary of the Company, Head – Investor Relations or any person, which the Board may deem fit, are entitled to deal with dissemination of information and disclosure of unpublished price sensitive information.

(ii) The Company would make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

(iii) The Company would ensure uniform and universal dissemination of unpublished price sensitive information like publication of policy(s) related to dividend, if any, inorganic growth pursuits, etc. to avoid selective disclosure, thereby providing equality of access to such price sensitive information to all concerned.

(iv) Once the Unpublished Price Sensitive Information is made public i.e. post dissemination to the stock Exchange(s), such information may be shared with media, analysts, investors etc.

(v) The Company shall promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

(vi) The Chairman & Chief Executive Officer, the Chief Financial officer, the Company Secretary of the Company, Head – Investor Relations or any person, which the Board may deem fit, shall jointly and/or severally give appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

(vii) The above said personnel of the Company to ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

(viii) The Head – Investor Relations shall ensure that the best practices are developed to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences and to host such transcripts, etc. on the official website of the Company to ensure official confirmation and documentation of disclosures made, within 15 working days of the event.

(ix) The Company to ensure that all Unpublished Price Sensitive Information to be handled and shared only on a need-to-know basis

13. Periodical Reporting to Board/Audit Committee:

The Compliance Officer shall report on Trading in Securities by Designated Persons to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee and to the Chairman of the Board of Directors, at least at half yearly intervals.

14. Penalty for Insider Trading

(i) Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).

(ii) Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.

(iii) Any instance of leak of UPSI should be subject to enquiry under the Whistle Blower Policy, as well.

(iv) Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans etc.

(v) The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

15. Miscellaneous

(i) The Board of Directors shall be empowered to amend, modify, interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.

(ii) The Compliance Officer shall maintain (a) updated list of Designated Persons, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years and (c) a confidential list of any 'restricted securities' to which the Compliance Officer and the Insider Trading Compliance Committee may require Designated Persons to seek pre- clearance before Trading in such 'restricted securities'.

(iii) The Company shall require all Connected Persons to formulate and adhere to a code of conduct to achieve compliance with these Rules. In case such persons observe that there has been a violation of these Rules, then they shall inform the Board of Directors of the Company promptly.

(iv) This policy is only internal code of conduct and one of the measures to avoid insider trading. Every insider is required to familiarize himself with the SEBI regulation as it will be the responsibility of each insider to ensure compliance of this code, SEBI regulation and other related statutes fully.

(v) Please note that in case the SEBI regulation or any statutory provisions are more stringent than those contained in the code, the SEBI regulations/ statutory provisions will prevail.

Annexure 1

APPLICATION FOR PRE-TRADING APPROVAL

To,

The Compliance Officer and Insider Trading Compliance Committee,
HealthCare Global Enterprises Limited

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time and the Company's Insider Trading Policy and Code of Practices and Procedures for Fair Disclosure of UPSI ("Code"), I seek approval to purchase / sell / subscribe_____equity shares of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.	
5.	The proposal is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be purchased/subscribed/sold	
8.	Current market price (as on date of application)	
9.	Whether the proposed transaction will be through stock exchange or off-market trade	
10.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the Undertaking signed by me.

Signature:

Name:

Date:

Annexure 2

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRECLEARANCE

To,
The Compliance Officer and Insider Trading Compliance Committee,
HealthCare Global Enterprises Limited.

I,_____,_____of the Company residing at _____, am desirous of trading in_____shares of the Company as mentioned in my application dated_____for pre-clearance of the transaction.

[I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information as defined in the Company's Insider Trading Policy and Code of Practices and Procedures for Fair Disclosure of UPSI ("Code"), up to the time of signing this Undertaking] [*note: if not applicable, appropriate regulatory exception to be specified*]

[In the event that I have access to or receive any Unpublished Price Sensitive Information after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from trading in the securities of the Company until such information becomes public] [*note: if not applicable, appropriate regulatory exception to be specified*]

I declare that I have not contravened the provisions of the Rules as notified by the Company from time to time.

In the event of this transaction being in violation of the Rules or the applicable laws, (a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons, (b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and (c) I authorize the Company to recover from me, the profits arising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the trade within seven days of the receipt of approval failing which I shall seek pre-clearance afresh.

I declare that I have made full and true disclosure in the matter.

Signature:

Name:

Date:

Annexure 3

DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / trading in securities of the Company)

To,

The Compliance Officer,
HealthCare Global Enterprises Limited

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to_____securities as mentioned below on_____(date)

(Strike out whichever is not applicable)

Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.)

I declare that the above information is correct and that no provisions of the Company's Rules and/or applicable laws/regulations have been contravened for effecting the above saidtransactions(s).

Signature:
Name:
Date:

Annexure 4

Form A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) - Initial Disclosure to the Company]

To,
The Compliance Officer,
HealthCare Global Enterprises Limited
(ISIN:_____)

Details of Securities held by Promoter, Key Managerial Personnel, Director and other such persons as mentioned in Regulation 6(2) of SEBI Regulations.

Name, PAN No., CIN/DIN & address with Contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ Others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures Etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

Note: "Securities" shall have the meaning as defined under Regulation 2(1) (z) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Signature:
Designation:
Date:

Annexure 5

Form B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) - Disclosure on becoming promoter, key managerial personnel, director, designated person}

To,

The Compliance Officer,
HealthCare Global Enterprises Limited
(ISIN:_____)

Details of Securities held on appointment of Key Managerial Personnel or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2) of SEBI Regulations.

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP	
			Type of Security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts* lot size)	Notional value in Rupee terms	Number of units (contracts* lot size)	Notional value in Rupee terms

Note: "Securities" shall have the meaning as defined under Regulation 2(1) (z) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Signature:
Designation:
Date:
Place:

Annexure 6
FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]

To,

The Compliance Officer,
HealthCare Global Enterprises Limited
(ISIN:_____)

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2) of the SEBI Regulations.

Name, PAN/ CIN/DIN, & address of Promoter/ Employee / Director with Contact nos.	Category of Person (Promoter/ KMP/ Directors/ immediate relatives/ Others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition n of shares/ sale of shares specify		Date of intimati on to company	Mode of acquisition (market purchase/ public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants Convertible Debenture s etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No .	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contract s * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	15

Note: "Securities" shall have the meaning as defined under Regulation 2(1) (z) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Signature:
Designation:
Date:
Place:

Annexure 7

FORM D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by other connected persons as identified by the company

Name, PAN No., CIN/DIN, & address of connected persons, as identified by the company with Contact nos.	Connection with the company	Securities held prior to acquisition /disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/ public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type ofcontract, Futures or Options etc.)				Exchange on which the trade was execute d
		Type of security (For e.g. Shares, Warrants Convertible Debentures etc.)	No.	Type of Security (For e.g. Shares, Warrants Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contract s * lot size)	Value	Number of units (contract s * lot size)	

Note: “Securities” shall have the meaning as defined under Regulation 2(1) (z) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Name

Signature:

Designation:
Date:
Place: