October 19, 2020

National Stock Exchange of India Limited
Exchange Plaza, Plot C-1, Block G,
Bandra Kurla Complex,
Bandra (E),
MUMBAI - 400 051
Symbol: MAXHEALTH

BSE Limited
25th Floor,
Phiroze Jeejeebhoy Towers,
Dalal Street,
MUMBAI - 400 001
Scrip Code: 543220

Sub: Intimation of violation of the Company's Code of Conduct under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended ("SEBI PIT Regulations")

Dear Sir/Ma'am,

We are submitting herewith the intimation of violation of the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons ("**Code of Conduct**"), and the action taken by the Company in this regard, in compliance with Schedule B read with Regulation 9(1) of the SEBI PIT Regulations, as amended from time to time.

Please take on record the intimation annexed as Annexure-A to this letter in the format prescribed under Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 issued by the Securities and Exchange Board of India (SEBI).

Thank you.

For Max Healthcare Institute Limited

RUCHI MAHAJAN
Digitally signed by RUCHI MAHAJAN
Date: 2020.10.19 12:59:50 +05'30'

Ruchi Mahajan
Company Secretary & Compliance Officer

Encl: As above

Max Healthcare Institute Limited
(CIN: U72200MH2001PLC322854)
Regd.Office: 401, 4th Floor, Man Excellenza, S. V. Road, Vile Parle (West),
Mumbai, Maharashtra-400056
Phone: +91- 22-26101035,
E-mail:secretarial@maxhealthcare.com,
investors@maxhealthcare.com
Corporate Office: 5th & 6th Floor, Tower-A, DLF Centre Court, DLF City Phase-V,
Sector-42, Golf Course Road, Gurugram - 122002, Haryana Phone: +91-124-620 7777
www.maxhealthcare.in

Annexure-A

Report by Max Healthcare Institute Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 **[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]**		
Sr. No.	**Particulars**	**Details**
1.	Name of the listed company/ ~~Intermediary/Fiduciary~~	Max Healthcare Institute Limited
2.	Please tick appropriate checkbox Reporting in capacity of : ☑ Listed Company Intermediary Fiduciary	
3.	**A. Details of Designated Person (DP)**	
	I. Name of the DP	Dr. Sandeep Singh Tanwar
	II. PAN of the DP	AEEPT0232P
	III. Designation of DP	Vice President- Hospital Operations- Dehradun
	IV. Functional Role of DP	Hospital Operations- Dehradun
	V. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	I. Name of the immediate relative of DP	NA
	II. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	I. Name of the scrip	Max Healthcare Institute Limited NSE: MAXHEALTH/ BSE: 543220
	II. No. of shares traded and value (Rs.) (Date- wise)	Purchase of 16,900 shares @ Rs. 114 per share for an aggregate consideration of INR 19,26,600 on September 29, 2020
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	I. Date of intimation of trade(s) by concerned DP~~/director/promoter/promoter group~~ to Company under regulation 7 of SEBI (PIT)	October 16, 2020

Max Healthcare Institute Limited
(CIN: U72200MH2001PLC322854)
Regd.Office: 401, 4th Floor, Man Excellenza, S. V. Road, Vile Parle (West),
Mumbai, Maharashtra-400056
Phone: +91- 22-26101035,
E-mail:secretarial@maxhealthcare.com,
investors@maxhealthcare.com
Corporate Office: 5th & 6th Floor, Tower-A, DLF Centre Court, DLF City Phase-V,
Sector-42, Golf Course Road, Gurugram - 122002, Haryana Phone: +91-124-620 7777
www.maxhealthcare.in

	Regulations, 2015	
	II. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	October 16, 2020
4.	Details of violations observed under Code of Conduct	• Purchase of shares without obtaining pre-clearance from the Compliance Officer as required under Code of Conduct to regulate, monitor and report trading by DP. • Disclosure as required under Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for purchase of shares was not given within the prescribed time of two trading days from the date of purchase.
5.	Action taken by Listed company/ ~~Intermediary/ Fiduciary~~	• The Company has issued a warning letter to the DP and instructed the DP to sell off the purchased shares immediately upon expiry of period of six months from the date of said acquisition/purchase, subject to compliance with applicable laws, including that the date of the sale transaction should not fall within any period of trading window closure for said shares of the Company. • Further, the DP has been directed that in the event the DP makes any profit out of such sale transaction, he will inform the Company about the same and the Company will deduct an amount equivalent to the profit earned by him pursuant to sale of said shares from his salary and the same shall be remitted to SEBI-IPEF account.
6.	Reasons recorded in writing for taking action stated above	The DP has confirmed in writing and the Company acknowledges that this is the first instance of violation of the Code of

Max Healthcare Institute Limited
(CIN: U72200MH2001PLC322854)
Regd.Office: 401, 4th Floor, Man Excellenza, S. V. Road, Vile Parle (West),
Mumbai, Maharashtra-400056
Phone: +91- 22-26101035,
E-mail:secretarial@maxhealthcare.com,
investors@maxhealthcare.com
Corporate Office: 5th & 6th Floor, Tower-A, DLF Centre Court, DLF City Phase-V,
Sector-42, Golf Course Road, Gurugram - 122002, Haryana Phone: +91-124-620 7777
www.maxhealthcare.in

			Conduct on the part of the DP, and was unintentional and committed without any malafide intention. The DP has further confirmed in writing that the trade was not undertaken while the DP was in possession of any unpublished price sensitive information, and that the DP will be more cautious in the future and will ensure compliance with the SEBI PIT Regulations and the Code of Conduct. The Company believes that the action indicated above would be an appropriate measure to address the violation of the Code of Conduct committed by the DP and also serve to discourage any future instances of violation by any DP or their relatives.
7.	Details of the previous instances of violations, if any, since last financial year		NA
8.	If any amount collected for Code of Conduct violation(s)		NA
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)		
	ii. Details of transfer/payment: In case of Online:		
	Particulars	**Details**	
	Name of the transferor		
	Bank Name, branch and Account number		
	UTR/Transaction reference Number		
	Transaction date		
	Transaction Amount (in Rs.)		
	In case of Demand Draft (DD):		
	Particulars	**Details**	
	Bank Name and branch		
	DD Number		
	DD date		
	DD amount (in Rs.)		

Max Healthcare Institute Limited
(CIN: U72200MH2001PLC322854)
Regd.Office: 401, 4th Floor, Man Excellenza, S. V. Road, Vile Parle (West),
Mumbai, Maharashtra-400056
Phone: +91- 22-26101035,
E-mail:secretarial@maxhealthcare.com,
investors@maxhealthcare.com
Corporate Office: 5th & 6th Floor, Tower-A, DLF Centre Court, DLF City Phase-V,
Sector-42, Golf Course Road, Gurugram - 122002, Haryana Phone: +91-124-620 7777
www.maxhealthcare.in

9.	Any other relevant information	-

Date: October 19, 2020

Place: Gurugram

RUCHI MAHAJAN Digitally signed by RUCHI MAHAJAN Date: 2020.10.19 13:00:32 +05'30'

Name and Signature of Compliance Officer: Ruchi Mahajan

PAN: AKBPM3071E

Email ID ruchi.mahajan2@maxhealthcare.com

Max Healthcare Institute Limited
(CIN: U72200MH2001PLC322854)
Regd.Office: 401, 4th Floor, Man Excellenza, S. V. Road, Vile Parle (West),
Mumbai, Maharashtra-400056
Phone: +91- 22-26101035,
E-mail:secretarial@maxhealthcare.com,
investors@maxhealthcare.com
Corporate Office: 5th & 6th Floor, Tower-A, DLF Centre Court, DLF City Phase-V,
Sector-42, Golf Course Road, Gurugram - 122002, Haryana Phone: +91-124-620 7777
www.maxhealthcare.in