



## **GIAN LIFE CARE LIMITED**

Regd Office:- 7/216 (6) Swaroop Nagar (Infront of L.L.R. Hospital), Kanpur, Uttar Pradesh-208002

CIN: U85100UP2018PLC110119; Mobile: 8808051576

Website: [www.gianpathlabs.com](http://www.gianpathlabs.com);

Email: [gpxreport@gmail.com](mailto:gpxreport@gmail.com)

**July 31, 2020**

**To,  
Corporate Relations Department,  
Bombay Stock Exchange Limited,  
2<sup>nd</sup> Floor, PJ Towers,  
Dalal Street,  
Mumbai - 400001.**

**Scrip Code:- 542918**

**Sub: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020**

Dear Sir/Madam,

Please find attached herewith Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020 under Regulation 24A of SEBI (LODR) Regulations, 2015 of GIAN LIFE CARE LIMITED for the year ended 31<sup>st</sup> March, 2020.

Thanking You,

Yours faithfully,

For **GIAN LIFE CARE LIMITED**

  
  
**(Arun Kumar Gupta)  
Managing Director  
DIN:- 01331593**

**Encl:- As above**

# ALAKH PANDEY & Co.

COMPANY SECRETARIES

## Annual Secretarial Compliance Report of Gian Life Care Limited For the Financial Year ended 31<sup>st</sup> March, 2020

I have examined:

- a) All the documents and records made available to us and explanation provided by Gian Life Care Limited ("the company") having CIN U85100UP2018PLC110119,
- b) The filings/ submissions made by the company to the stock exchanges,
- c) Website of the company,
- d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31<sup>st</sup> March, 2020 in respect of compliance with provisions of:
  - a. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder and
  - b. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India("SEBI");

**The specific Regulations whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-**

- a. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011- No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;



- d. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- f. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- g. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013- No comment offered as there was no event covered under these Regulations during the period ending on 31.03.2020;
- h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- j. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 were not applicable during the period under review;

Based on my above examination and verification of the documents and records produced to me, and according to the information and explanations given to me by the Company, I hereby report that, during the period under review:

- a. The equity shares of the Company are listed on Bombay Stock Exchange on 13<sup>th</sup> Day of January, 2020.
- b. The Company has complied with all the provisions of the above Regulations and Circulars/ guidelines issued thereunder except in respect of matters specified below:-



| Sr. No. | Compliance Requirement (Regulations/ Circulars/ Guidelines Including specific clause) | Deviations   | Observation/ Remarks of the Practicing Company Secretary  |
|---------|---|--|---|
| 1       | Reg. 46 of SEBI (LODR) Regulations, 2015  | After listing, various documents as envisaged under Regulation 46 are required to be uploaded on the website of the Company but has not been uploaded. | <ul style="list-style-type: none"> <li>➤ The Company though has maintained a functional website and has a separate section in the form of "Investor Desk" but after listing, various documents as envisaged under Regulation 46 are required to be uploaded on the website of the Company but has not been uploaded.</li> <li>➤ The Company has informed us that policies and information as per Regulation 46 were being finalised but due to the ongoing COVID-19 Pandemic and are in the process of finalisation and shall be uploaded accordingly.</li> </ul> |
| 2       | Use of proceeds from the objects stated in the offer document.                        | There was deviation/ variation in the use of proceeds from the objects stated in the offer document  | <ul style="list-style-type: none"> <li>➤ There was deviation/ variation in the use of proceeds from the objects stated in the offer document.</li> <li>➤ The Company has informed us that deviation/ variation in the use of proceeds from the objects stated in the offer document was primarily due to the ongoing COVID-19 Pandemic and to save the Company for any possible financial crisis.</li> </ul>  |

A handwritten signature in blue ink is written over a circular blue stamp. The stamp contains the text "PRACTISING COMPANY SECRETARY" around the perimeter and "INDIA" at the bottom. The signature is written across the center of the stamp.

- c. The company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.
- d. There were no instances for actions to be taken against the Company/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.

| Sr. No. | Action taken by | Details of Violation | Details of the Action taken, Eg., fines, warning letter, debarment, etc. | Observations/ Remarks of the Practicing Company Secretary |
|---------|-----------------|----------------------|--|---|
|         | Nil             | Nil                  | Nil  | Nil   |

- e. The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable.

| Sr. No. | Observations of the Practicing Company Secretary in the previous reports | Observations made in the secretarial Compliance report for the year ended .....(The Years are to be mentioned) | Actions taken by the listed Entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|--|--|--|
|         | Not Applicable   | Not Applicable   | Not Applicable                             | Not Applicable   |



- f. The company has complied with para 6(A) and 6(B) of the SEBI Circular no. CIR/CFD/CMD1/114/2019 dated October 18, 2019.
- g. There was deviation/ variation in the use of proceeds from the objects stated in the offer document.
- h. Since the Company got listed on Bombay Stock Exchange on 13<sup>th</sup> Day of January, 2020, our Report is limited only to compliances between 13.01.2020 to 31.03.2020.

**Disclaimer:** "Verification of documents has been conducted virtually due to Covid-19 pandemic. This certificate is issued on the basis of information provided by the company through electronic mode and verified with requirements. "

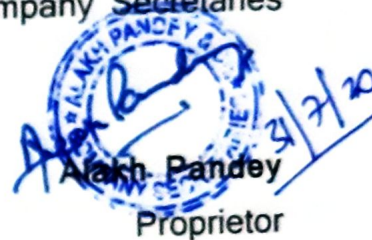
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Place: Kanpur

Date: ~~August 23, 2020~~

July 31, 2020

For Alakh Pandey & Co.  
Company Secretaries

  
Alakh Pandey  
Proprietor

M. No. A21581

CP No. 9191