

# SANJAY GROVER & ASSOCIATES

## COMPANY SECRETARIES

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### **Annual Secretarial Compliance Report of Max India Limited (Formerly Advaita Allied Health Services Limited) for the financial year ended 31 March, 2021.**

We Sanjay Grover & Associates have examined:

- (a) all the documents and records made available to me and explanation provided by **Max India Limited (Formerly Advaita Allied Health Services Limited)** (“the listed entity”)
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **31 March, 2021** (“Review Period”) in respect of compliance with the 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;
  - (d) \*Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
  - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
  - (f) \*Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
  - (g) \*Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
  - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- and circulars/ guidelines issued thereunder;

\*No event took place under these regulations during the review period.

and based on the above examination, I hereby report that, during the Review Period:



- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. No	Compliance (Regulations/ guidelines including clause)	Requirement circulars / specific	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	None			

- b) The listed entity 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.
- c) The following are the details of actions taken against the listed entity/ 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 action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	None			

- d) The listed entity has taken the following actions to comply with the observations made in previous reports: **This is first Annual Secretarial Compliance Report being issued to the listed entity as the Company got listed on the Stock Exchanges on August 28, 2020.**

**I further report that** the Company in its Annual General Meeting (AGM) held on May 5, 2020, approved the appointment of M/s. Ravi Rajan & Co LLP, Chartered Accountants, as Statutory Auditors of the Company to hold office till the conclusion of the Annual General Meeting to be held in the Calendar year 2022 and the terms of the appointment are in compliance with Para 6(A) and 6(B) of Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.



New Delhi  
22/06/2021

For Sanjay Grover & Associates  
Company Secretaries  
Firm Registration No.: P2001DE052900

*Vijay K. Singhal*

Vijay K. Singhal  
Partner  
CP No.: 10385, M. No. A21089  
UDIN: A021089C000497281