



# Lotus Eye Hospital And Institute Limited

CIN No. : L85110TZ1997PLC007783

770/12, Avinashi Road, Civil Aerodrome Post, Coimbatore - 641 014.

Tel : 0422 - 4229900, 4229999 Fax : 0422 - 4229933



## R.S. PURAM

155B, East Periasamy Road, Near Chinthamani,  
North Coimbatore, R.S. Puram,  
Coimbatore - 2. Phone : 0422 - 4239900, 4239999

## METTUPPALAYAM

No. 28, Coimbatore Main Rd,  
Opp. Bus Stand, MTP - 634 301.  
Phone : 04254 - 223223, 224224

## TIRUPUR

No. 5(2) Gajalakshmi Theatre Road (Backside)  
Near Valarmathi Bus Stop, Tirupur - 641 601.  
Phone : 0421 - 4346060, 4219999

## SALEM

86, Brindhavan Road, Fairlands  
Salem - 636 004.  
Ph. : 0427 - 4219900, 4219999

E-mail : [info@lotuseye.org](mailto:info@lotuseye.org)

Website : [www.lotuseye.org](http://www.lotuseye.org)

Date: 30.06.2021

<b>National Stock Exchange of India Ltd.</b> Listing Department, Exchange Plaza, 5 <sup>th</sup> Floor, Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (E), Mumbai – 400051	<b>BSE Limited</b> The Corporate Relationship Department 1 <sup>st</sup> Floor, New Trading Wing, Rotunda Building, Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai - 400001
<b>Scrip Code: LOTUSEYE</b>	<b>Scrip Code: 532998</b>

Dear Sir/Ma'am,

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2021, under Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements), Regulation, 2015.

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find attached the Annual Secretarial Compliance Report from Practicing Company Secretary for the year ended March 31, 2021

Kindly take this on record and acknowledge.

**For Lotus Eye Hospital and Institute Limited**

Sd/-

**CS Aakanksha Parmar**

**Company Secretary and Compliance Officer**

## Kochi

533/33A-33F, Tejas Tower  
SA Road, Kadavanthara,  
Kochi, Kerala - 682 020.  
Tel. : 0484 - 2322333, 2322444

*Always for you*

## Kochi

229A, Kurisingal House  
Mulanthuruty Post  
Kochi, Kerala - 682 314.  
Tel. : 0484 - 2743191, 2743121



# P. Eswaramoorthy and Company

Company Secretaries

CS P. Eswaramoorthy B.Sc., LLB., FCS.,

## Secretarial Compliance Report of Lotus Eye Hospital and Institute Limited for year ended 31<sup>st</sup> March, 2021

I, **P Eswaramoorthy (FCS 6510, CP No. 7069)** of M/s. P Eswaramoorthy and Company, Company Secretaries have examined:

(a) all the documents and records made available to me and explanation provided by Lotus Eye Hospital and Institute 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<sup>st</sup> March, 2021 (herein after referred as "review period") in respect of compliance with the provisions of:

(i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

(ii) 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;



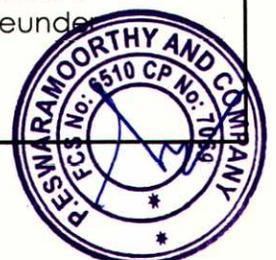
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (e) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (f) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and circulars / guidelines issued by various Authorities whatever applicable thereunder;

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

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

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company
1.	As per Regulation 31(2) of SEBI (LODR) Regulations, 2015, the listed entity shall ensure that Hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board.	200 Equity Shares of the Company's promoter(s) group have not been dematerialized, which are still in physical form. Non-Compliance of Regulation 31(2) of SEBI (LODR) Regulations, 2015.	According to the Information and explanation given to me, Company has two promoters in the promoter group holding 100 shares each which are in physical form and hasn't been dematerialized. Shares which were sold in physical mode have not been lodged for transfer. The whereabouts of the respective promoters are being difficult to pin down, but the management will apprehend the matter to the best of its abilities.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from my examination of those records.



(c) No action was taken against the Listed Entity / its Promoters / Directors / 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 Except warning letter dated 14/12/2020 issued by the SEBI in relation to disclosure dated 24/09/2020 made under regulation 30 of the SEBI (LODR) Regulation, 2015 for not correctly mentioning the educational qualification of the Managing Director of the listed entity.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	NA	The company has not submitted the disclosures of related party transactions on a consolidated basis as required under the regulation 23(9) of SEBI (LODR) Regulations, 2015 during the aforesaid reporting period under review.	Company is in compliance with the required disclosure under Regulation 23(9) of SEBI (LODR) Regulations, 2015 from the half-year ended March, 2020.	Complied with the regulation 23(9) of SEBI (LODR) Regulations, 2015.
2.	NA	As per Regulation 31(2) of SEBI (LODR) Regulations, 2015, the listed entity shall ensure that Hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board. 200 equity shares of the Companies promoter(s) group not been dematerialized, which are still in physical form.	According to the Information and explanation given to me, Company has two promoters in the promoter group holding 100 shares each which are in physical form and hasn't been dematerialized. Shares which were sold in physical mode have not been lodged for transfer. The whereabouts of the respective promoters are being difficult to pin down,	Non-Compliance of Regulation 31(2) of SEBI (LODR) Regulations, 2015.



			will apprehend the matter to the best of its abilities.	
3.	NA	As per Regulation 47(4) of SEBI (LODR) Regulations, 2015, Advertisement in the Newspaper shall be published in at least one English language national daily newspaper circulating in the whole or substantially the whole of India and in one daily newspaper published in the language of the region, where the registered office of the listed entity is situated. The Company has not published in the language of the region where the registered office of the listed entity is situated	The Company has published subsequent publications in the language of the region where the registered office of the listed entity is situated.	Complied with the Regulation 47(4) of SEBI (LODR) Regulations, 2015.

- (e) There was no event of appointment/re-appointment/resignation of Statutory Auditor of the listed entity during the period under review. Further, the listed entity has modified the terms of appointment of its existing Statutory Auditor in compliance of the Para 6(A) and 6(B) of the SEBI Circular No.CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019.

**P. ESWARAMOORTHY AND COMPANY**  
Company Secretaries



Place: Coimbatore  
Date: 30.06.2021  
UDIN: F006510C000551351  
Peer review Cert. No.933/2020

P. Eswaramoorthy  
Proprietor  
FCS No.: 6510, CP No.: 7069

**Note:** Due to COVID – 19 Pandemic and travel restrictions are imposed, I have electronically examined/verified the documents, records, filings/submissions shared and maintained by the Company for the purpose of issuance of this Certificate.