

Annexure XV

LIST OF ONGOING MATERIAL INVESTIGATIONS, ADJUDICATION AND RECOVERY PROCEEDINGS, PROSECUTIONS INITIATED, AND ALL OTHER ENFORCEMENT ACTIONS TAKEN AGAINST THE APPLICANT COMPANIES AND ITS DIRECTORS AND PROMOTERS AS ON FEBRUARY 28, 2026

All material ongoing investigations, adjudication and recovery proceedings, prosecution initiated and all other material enforcement action taken, against the Applicant Companies, its promoters and directors have been disclosed in line with the requirements under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the Industry Standards on Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 notified vide SEBI Circular dated February 25, 2025 as below:

For Dr. Agarwal's Eye Hospital Limited (Applicant Company No.1 / Transferor Company / AEHL), 'material' implies where the monetary amount of claim against AEHL in any such pending proceedings is in excess of the lowest of: (a) 2% of the turnover of AEHL as per the audited financial statements for FY 24-25 (i.e., ₹ 7.94 crores); or (b) 5% of the average of the absolute value of the profit/loss after tax of AEHL as per the audited financial statements for the last three financial years i.e. [2022-23; 2023-24; 2024-25] (i.e., ₹ 2.29 crores).

For Dr. Agarwal's Health Care Limited (Applicant Company No.2 / Transferee Company / AHCL), 'material' implies where the monetary amount of claim against AHCL in any such pending proceedings is in excess of the lowest of: (a) 2% of the turnover of AHCL as per the audited consolidated financial statements for FY 24-25 (i.e., ₹ 34.22 crores); or (b) 5% of the average of the absolute value of the profit/loss after tax of AHCL as per the audited consolidated financial statements for the last three financial years i.e. [2022-23; 2023-24; 2024-25] (i.e., ₹ 5.14 crores).

Accordingly, all outstanding litigation proceedings where the aggregate monetary claim made against the Transferor Company and Transferee Company is equal to or in excess of ₹2.29 Crores and ₹5.14 crores respectively have been disclosed:

Direct Tax Litigations	
Sr. No.	Case Summary
1.	<p>Dr. Agarwal's Health Care Limited (Applicant Company No.2 / Transferee Company)</p> <p>i. Details of violations/observations/matters requiring attention or action: TP Issue, Disallowance of depreciation claimed on intangible assets, Disallowance under section 36(1)(iii)</p> <p>ii. Period: 2020-21</p> <p>iii. Details of regulatory/relevant authority: Assessing Officer</p> <p>iv. Action taken: Appeal filed before CIT(A)</p> <p>v. Status: Currently pending at Chennai Bench of ITAT for appeal hearing.</p> <p>vi. Total Amount Involved: 7,99,68,740</p>
2.	<p>Dr. Agarwal's Health Care Limited (Applicant Company No.2 / Transferee Company)</p> <p>i. Details of violations/observations/matters requiring attention or action: Tax payable on the under reporting of incomes of Rs. 4,70,74,787/- and Rs.20,92,35,267/ @ 30% + cess</p> <p>ii. Period: 2020-21</p> <p>iii. Details of regulatory/relevant authority: Assessing Officer</p> <p>iv. Action taken: Appeal filed before CIT(A)</p> <p>v. Status: The Company has filed its appeal with CIT(A) and got stay order on 20th August 2025 on the demand (paid 20% of the demand amounting to ₹ 2.73 Cr on 4th April 2025)</p> <p>vi. Total Amount Outstanding: 10,92,64,358</p>
3.	<p>Dr. Agarwal's Health Care Limited (Applicant Company No.2 / Transferee Company)</p> <p>i. Details of violations/observations/matters requiring attention or action: Penalty @50% on Tax payable on the under reporting of income of Rs.25,46,263- @ 30% + cess, Tax payable on the misreporting of income of Rs.15,27,68,559/- @ 30% + cess</p> <p>ii. Period: 2021-22</p> <p>iii. Details of regulatory/relevant authority: Assessing Officer</p> <p>iv. Action taken: Appeal filed before CIT(A)</p> <p>v. Status: Currently, pending before Commissioner of Income Tax (Appeals) for hearing. Stay order received dated June 16, 2025 passed by the Assessing Officer with a condition to pay INR 10 Lakhs per quarter. First instalment of INR 10 Lakhs deposited on June 18, 2025</p> <p>vi. Total Amount Outstanding: 9,47,24,797</p>



Direct Tax Litigations	
Sr. No.	Case Summary
4.	<p>Dr. Agarwal's Health Care Limited (Applicant Company No.2 / Transferee Company)</p> <p>i. Details of violations/observations/matters requiring attention or action: Interest under section 36(1)(iii) in relation to our investments made in group entities, Depreciation on Intangible Assets, Bogus Liabilities as Creditors, Depreciation on Plant & Machinery, Short-term Capital Gain adjusted against Unabsorbed Depreciation</p> <p>ii. Period: 2023-24</p> <p>iii. Details of regulatory/relevant authority: Assessing Officer</p> <p>iv. Action taken: Appeal filed before CIT(A)</p> <p>v. Status: In response to notice u/s 250 (First appeal proceedings) dated 11 June 2025, response was provided on 3 July 2025. The proceedings are pending disposal.</p> <p>vi. Total Amount Outstanding: 17,55,90,144</p>

Indirect Tax Litigations				
Sr. No.	Summary of the particulars of issue	Relevant Authority	Total amount in dispute (₹ in crores)	Status / Action Taken
5.	<p>Dr. Agarwal's Eye Hospital Limited (Applicant Company No.1 / Transferor Company)</p> <p>Excess availment of ITC / Irregular availment of ITC - under wrong tax head / ITC found reversible on account of Non filing of 3B or credit note issued by vendor / Inadequate Tax paid on RCM supplies</p>	Commissioner (Appeals)	4.10	Appeal hearing was attended before the office of Commissioner (Appeals) who has requested for submission additional data which is pending.

Civil Matters	
Sr. No.	Case Summary
6.	<p>Dr. Agarwal's Health Care Limited (Applicant Company No.2 / Transferee Company)</p> <p>An appeal has been filed by Dr. Pranay Kumar Singh and others before the Madras High Court (who had sold their eye hospital business to the Transferee Company and were in a dispute over contract breaches and alleged competition) against the Arbitral Award dated 28.02.2024, which was passed in favour of the Transferee Company, awarding ₹10.37 crores to be paid by Dr. Pranay Kumar Singh and others.</p> <p>Court: Madras High Court</p> <p>Case Year: 2024</p> <p>Status: The appeal proceedings are pending for disposal before the Madras High Court</p>
7.	<p>Dr. Agarwal's Health Care Limited (Applicant Company No.2 / Transferee Company)</p> <p>The Complainant (Mr. Ashish Taneja) was advised by Dr. Neeraj Verma for bilateral Corneal Collagen Cross-Linking (C3R) surgery. Surgery was performed on the Right Eye (RE) by Dr. S.K. Khanna and the Left Eye (LE) by Dr. Neeraj Verma. The Complainant alleged that the hospital failed to obtain proper informed consent or perform mandatory pre- and post-operative vision assessments. The patient reported severe pain. Examination revealed suspected infection and the presence of foreign bodies (dust particles) under the bandage contact lens. A critical piece of evidence—the bandage lens intended for microbiological culture/testing—was negligently discarded by an intern, preventing precise diagnosis of the infection source. The patient has developed corneal opacities, resulting in persistent blurred vision, chronic pain, and a high risk of permanent visual impairment. The patient has claimed ₹6.27 crores as compensation.</p> <p>Court: District Consumer Disputes Redressal Commission</p> <p>Case Year: 2025</p> <p>Status: Written Statement has been filed by all OP's. Copy given to complainant. Pending the filing of rejoinder by the Complainant.</p>



Criminal Matters	
Sr. No.	Case Summary
8.	<p>Dr. Agarwal's Health Care Limited (Applicant Company No.2 / Transferee Company)</p> <p>A complaint under section 156(3) of Cr. P C was filed by the Company against the Accused (Vinayak Nethralaya & Ors.) for offences punishable under sections 403, 405, 406, 409, 415, 416, 420, 463, 471, 477 A, 485 r/w 120B and 34 of the IPC along with section 72 of the I T Act 2000. The complaint was decided in the favor of the Complainant on 22nd July 2023, and the directions were issued by the Ld. Magistrate to Tukhoganj Police Station, Indore to register and investigate the said Complaint. In response to which the accused had filed a petition u/s 482 of Cr PC before the High Court of Madhya Pradesh for quashing the FIR.</p> <p>Court: Indore Magistrate Court Case Year: 2023 Status: Matter has been kept in abeyance since there is a stay ordered by the High Court. The reply on behalf of the Company is filed.</p>

There are no ongoing investigation, adjudication proceedings, litigations, recovery proceedings, prosecutions, etc. initiated against the Directors of the Applicant Companies, acting in the capacity of a director, except otherwise stated above.

With regards to Dr. Sunita Agarwal and Mr. Pankaj Sondhi (Promoters of the Transferor Company), we hereby declare that despite repeated attempts by the Transferor Company and its management to seek the relevant information from them, the Transferor Company has been unable to obtain any information, confirmations, or undertakings from them in their capacity as the Promoters of the Transferor Company and their relationship with the other promoters of the Transferor Company has strained. All correspondences from the Transferor Company to them in this regard has remained unanswered, and they have been unwilling to provide the requisite information.

Given the above, we most humbly request the Hon'ble Tribunal to take on record this declaration made in relation to Dr. Sunita Agarwal and Mr. Pankaj Sondhi, based on the information available in the public domain.

For Dr. Agarwal's Eye Hospital Limited

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Meenakshi Jayaraman
Company Secretary and Compliance Officer



For Dr. Agarwal's Health Care Limited

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Company Secretary and Compliance Officer

