



# ARUNA HOTELS LIMITED

CIN: L15421TN1960PLC004255

May 30, 2022

To,

BSE Limited  
Phirozejeejeebhoy Towers,  
Dalal Street,  
Mumbai 400001

Scrip code: 500016

Dear Sir/Madam,

**Sub: Submission of Annual Secretarial Compliance Report for Financial year ended March 31, 2022 pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 – reg.**

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 and Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report for the Financial year ended March 31, 2022.

Request you to kindly take the same on record.

Thanking you,

Yours faithfully,  
for **ARUNA HOTELS LIMITED**



**K. LAKSHMI**  
**COMPANY SECRETARY & COMPLIANCE OFFICER**

Encl: a/a



**J. JOTHI & ASSOCIATES**  
Practicing Company Secretaries

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**SECRETARIAL COMPLIANCE REPORT OF ARUNA HOTELS LIMITED (CIN: L15421TN1960PLC004255)**  
**FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2022**

We, J. Jothi & Associates, have examined:

- a) all the documents and records made available to us and explanation provided by **ARUNA HOTELS 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 2022 ("Review Period") in respect of compliance with the provisions of:

- 1) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 2) 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c) Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- f) Securities and Exchange Board of India (Stock Brokers & Sub- Brokers) Regulations, 1992;
- g) Securities and Exchange Board of India (Portfolio Managers) Regulations, 1996;
- h) Securities and Exchange Board of India (Research Analysts) Regulations, 2014
- i) Securities and Exchange Board of India (Investment Advisers) Regulations, 2013
- j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;
- k) Securities and Exchange Board Of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;



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

- I. 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 Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	As per regulation 33 (3)(a) Every listed entity shall submit quarterly and year-to date standalone financial results to stock exchange within forty-five days of end of each quarter, other than the last quarter	Non-submission of the financial results for the quarter ended June 2021.	<p>The company had received a stay of operations and implementation of impunged order dated 23.07.2021 from supreme court of India and the order was disposed as withdrawn vide dated 15.09.2021.</p> <p>Meanwhile, the company had received an email dated 14.09.2021 from BSE for non-compliance of certain provisions of SEBI (Listing Obligations and Disclosure Requirements) (LODR) Regulations, 2015 and standard operating procedure for suspension and revocation of trading of specified securities of listed entities levying a fine of Rs.1,45,000/- plus GST amounting to total amount of Rs.1,71,100/- for non-submission of financial results within prescribed period as per regulation 33 of LODR.</p> <p>The company has made the compliances with the said regulation by making an payment via net banking of Rs.1,71,100/- on 16.09.2021</p>





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			and submitting the financial results to the stock exchange for the quarter ended June 2021 on 22.09.2021. Also, the company had received waiver of fine levied approved by the BSE vide its email dated 06.05.2022
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- II. The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.
- III. 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.	BSE Limited	As per regulation 33 (3)(a) Every listed entity shall submit quarterly and year-to-date standalone financial results to stock exchange within forty-five days of end of each quarter, other than the last	Fine of Rs.1,45,000/- plus GST. Total amounting to Rs. 1,71,100/- vide letter dated 14.09.2021	It was informed by the company, that the company had received a stay of operations and implementation of impugned order dated 23.07.2021 from supreme court of India and the order was disposed as withdrawn dated 15.09.2021. The company has made the compliances with the said regulation by making a payment via net banking of Rs.1,71,100/- on 16.09.2021 and submitting the



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		quarter. The company had not submitted the financial results for the quarter ended June 2021 within the prescribed time limit.		financial results to the stock exchange for the quarter ended June 2021 on 22.09.2021. Also, the company had received waiver of fine levied approved by the BSE vide its email dated 06.05.2022
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The company had received an order dated 11.03.2022 in compliance with directions of the Hon'ble Bombay high court vide order dated November 01,2021 in the matter of writ petition No.24095 for violation of SAST Regulations and action against AHL for violation of regulation 30(12) of LODR regulation for various matters for the year 2015. As informed, the Company is awaiting the final order for appropriate course of action in this matter as on date of this report.

- IV. 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... (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
				NA

PLACE: CHENNAI  
DATE: 30.05.2022

FOR J. JOTHI & ASSOCIATES  
PRACTICING COMPANY SECRETARIES  
FRN: P2015TN070400

UDIN: F011703D000430209



KARTHIK, FCS  
PARTNER  
M. No. F11703  
CP No. 17899