



GUJARAT HOTELS LTD.

R. C. Dutt Road, Alkapuri, VADODARA-390 007, Gujarat, India.
Phone : (0265) 2330033 Fax : (0265) 2330050

**The General Manager
Dept. of Corporate Services
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001**

30th July, 2020

Dear Sirs/Ma'am,

Subject: Annual Secretarial Compliance Report (Scrip Code: 507960)

We hereby enclose, in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, the Annual Secretarial Compliance Report of the Company issued by Messrs. P B & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2020.

Thanking you,

**Yours truly,
For Gujarat Hotels Limited**

**Parinita Bhutani
Company Secretary**

Encl: A/a.

Annual Secretarial Compliance Report

(Issued pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019)

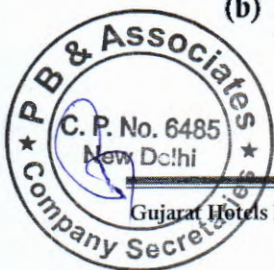
For Gujarat Hotels Limited for the year ended 31st March 2020

We M/s P B & Associates have examined:

- (a) All the documents and records made available to us, based on management representation and explanation provided by Gujarat Hotels Limited (“the company”),
- (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 31st March, 2020 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 there under; and
 - (ii) The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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 (Prohibition of Insider Trading) Regulations, 2015;

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

- (a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued there under.
- (b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.
- (c) No actions were 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 there under.
- (d) The Company has taken the following actions to comply with the observations made in previous reports. – Not Applicable

This Certificate is issued within, the limited available resources under the situation of COVID-19 Pandemic

For P B & Associates
Company Secretaries

Pooja Bhatia
Mem. No.: FCS- 7673
COP: 6485



Dated: 27th July 2020
Place: New Delhi

UDIN: F007673B000509493