

Date: 28/06/2021

To,

National Stock Exchange of India Ltd
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai- 400 051
Tel No: (022) 26598100- 8114
Fax No: (022) 26598120
Symbol: BLUECOAST

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai- 400 001
Phones: 91-22-22721233/4
Fax: 91-22-2272 3121
Scrip Code: 531495 |

Dear Sir,

Subject: Annual Secretarial Compliance Report for the year ended March 31, 2021

Dear Sir/Ma'am,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read along with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith Annual Secretarial Compliance Report of the Company, issued by **Mr. Aakash Jain** proprietor of M/s Aakash Jain & Associates, Practicing Company Secretary, for the year ended 31st March, 2021.

You are requested to take the same on record.

Thanking you.

Yours faithfully,

For Blue Coast Hotels Limited



Kapila Kandel
Company Secretary



Encl. as above

Blue Coast Hotels Ltd.

Regd. Office: Shop No. BG/1, Shanta Kunj, Cooperative Housing Society Ltd., Comba, Margao, Goa- 403601
415-417, Antriksh Bhawan, 22, K.G. Marg, New Delhi-110 001 | Tel.: +91 11 23358774-75 | E-mail : info@bluecoast.in | www.bluecoast.in
CIN No.: L31200GA1992PLC003109

**AAKASH JAIN
FCS, LL.B.**

**AAKASH JAIN & ASSOCIATES
COMPANY SECRETARIES
F-18, Street No. 6, West Jyoti Nagar,
Shahdara, Delhi-110094
Phone: 9582094545
Email: csaakash@outlook.com**

Annual Secretarial Compliance Report

Secretarial compliance report of **Blue Coast Hotels Limited** for the year ended **31st March, 2021**

I Aakash Jain proprietor of M/s Aakash Jain & Associates, Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by **Blue Coast 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 **31st March, 2021** ("**01st April, 2020 till 31st March, 2021**") ("**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 there under; and

(2) 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 as amended;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; Not Applicable
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) (Other regulations as applicable)

And circulars/ guidelines issued there under;

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

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by AAKASH JAIN
Date: 2021.06.25
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AAKASH JAIN
FCS, LL.B.

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Email: csaakash@outlook.com

(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 Requirement (Regulations/ circulars /guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1.	As per Regulation 17(c) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 Being top 2000 listed companies on NSE The Minimum number of Directors on the board shall be Six.	Only five directors were on the Board as stipulated time from 1 st April, 2020	The company had appointed non-executive director on 24 th July, 2020

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under 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 there under

S.No	Action Taken By	Details of Violation	Details of Action Taken e.g. Fines warning letter, debarment, e.t.c	Observation/Remarks of PCS if Any.
1.	NSE	As per Regulation 17(c) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 Being top 2000 listed companies on NSE The Minimum number of Directors on the board shall be Six.	The fine of Rs. 6,72,600/- was imposed by NSE.	The Company had already initiated the procedure to comply with the requirements of Reg. 17(1)(c) of SEBI(LODR), Reg. 2015 but could not comply with the same due to the Covid-19 pandemic. Further, The NSE granted the waiver to the Company from the payment of Penalty vide its letters dated 19.03.2021 & 13.04.2021.

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by AAKASH JAIN
Date: 2021.06.25
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(d) The listed entity has taken the following actions to comply with the observations made in previous reports

S.No	Observation of the PCS in Previous Reports	Observation Made in the Secretarial Compliance Report for the Year	Action taken by the Listed Entity (if Any)	Comments of PCS on Action Taken by the Listed Entity
1.	Regulation 13(3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 relating to the furnishing of the Statement of investor grievance for the Quarter ended 30 th September, 2019. Penalty imposed by BSE Limited and National Stock Exchange.	2019-20	The Company has paid the penalty on 07 th November, 2019 to both Stock Exchanges	Penalty imposed upon the Company by NSE as well as BSE.

(Note:

1. Provide the list of all the observations in the report for the previous year along with the actions taken by the listed entity on those observations.

2. Add the list of all observations in the reports pertaining to the periods prior to the previous year in case the entity has not taken sufficient steps to address the concerns raised/ observations. E.g. In the report for the year ended 31st Mar, 2021, the PCS shall provide a list of:

- all the observations in the report for the year ended 31st Mar, 2020 along with the actions taken by the listed entity on those observations.
- the observations in the reports pertaining to the year ended 31st Mar, 2020 and earlier, in case the entity has not taken sufficient steps to address the concerns raised/ observations in those reports.)

For Aakash Jain & Associates
(Company Secretaries)

AAKASH Digitally signed by
JAIN AAKASH JAIN
Date: 2021.06.25
17:09:00 +05'30'

Date: -25th June, 2021
Place: - Delhi
UDIN: - F011155C000514361

Aakash Jain
Practicing Company Secretary
Mem. No. F11155
CP No. 21327