

# ASIAN HOTELS (EAST) LIMITED

CIN : L15122WB2007PLC182762

Regd. Office : Hyatt Regency Kolkata Hotel, JA-1, Sector - III, Salt Lake City, Kolkata - 700 106, W.B., India  
Tel: 033 6820 1344 / 1346, Fax : 033 2335 8246, E-mail : clocs@sarafhotels.com, Website : www.ahleast.com

27<sup>th</sup> May, 2022

<b>The Manager</b> <b>Listing Department</b> <b>BSE Limited</b> <b>Phiroze Jeejeebhoy Towers,</b> <b>Dalal Street, Mumbai- 400001</b> <b>Tel: (022-2272 8013)</b> <b>Fax: (022-2272 3121)</b>	<b>The Manager</b> <b>Listing Department</b> <b>National Stock Exchange of India Ltd.</b> <b>Exchange Plaza</b> <b>Plot No. C/1, G Block,</b> <b>Bandra – Kurla Complex</b> <b>Bandra (E), Mumbai – 400 051</b> <b>Tel: (022) 2659 8235/36</b> <b>Fax: (022) 2659 8237/38</b>
<b>Type of Security: Equity shares</b> <b>Scrip Code : 533227</b>	<b>Type of Security: Equity shares</b> <b>NSE Symbol : <u>AHLEAST</u></b>

Dear Madam/Sir,

**Sub: Submission of Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2022.**

Pursuant to Regulation 24A of the SEBI Listing Regulations, 2015, please find attached the Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March, 2022, issued by Mr. Abhijit Majumdar, Practicing Company Secretary.

This is for your information and ready reference.

Please acknowledge the receipt and take the above on record.

Thanking you.

Yours truly,

For Asian Hotels (East) Limited

  
**Saumen Chatterjee**  
**Chief Legal Officer &**  
**Company Secretary**



Encl.: as above

OWNER OF



**HYATT**  
**REGENCY™**  
KOLKATA HOTEL

## **CS ABHIJIT MAJUMDAR**

**Practicing Company Secretary, Corp. Law & MSME Consultant  
(A Peer Review Certified Practice Unit)  
M.Com. (Gold Medalist), LLB,  
Cost & Management Accountant and Company Secretary**



### **SECRETARIAL COMPLIANCE REPORT OF ASIAN HOTELS (EAST) LIMITED (CIN- L15122WB2007PLC162762) FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2022**

I, Abhijit Majumdar, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by ASIAN HOTELS (EAST) 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 financial year ended 31<sup>st</sup> March, 2022 ("Review Period") in respect of compliance with the provisions of :

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) 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, to the extent applicable, whose provisions and the circulars/ guidelines issued thereunder, as amended from time to time, have been examined, include: -

- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

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Mob: - 9874481010/9433179166**

  
**Abhijit Majumdar**  
Company Secretary in Practice  
C.O.P. No.- 18995

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- (h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;  
(i) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/ guidelines issued there under;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, I hereby report that, during the Review Period:

- (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
NIL			


- (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) The following are the details of action 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 (BSE)	Violation of Regulations 19(1) & 20(2A) of the SEBI (Listing Obligations and Disclosure	BSE vide letter no. SOP-C Review-(20-Aug-2021) dated 20th August, 2021 imposed a fine of Rs.2,26,560/-	The Company vide its letter dated 1st September, 2021 has

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Abhijit Majumdar  
Company Secretary in Practice  
C.O.P. No.- 18995

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		Requirements) Regulations, 2015		requested the stock exchanges to waive the said fines
2.	The National Stock Exchange of India Limited (NSE)	Violation of Regulations 18(1), 19(1) & 20(2A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	NSE vide letter no. NSE/LIST- SOP/COMB/FINES/0821 dated 20th August, 2021 imposed a fine of Rs.3,39,840/-	

(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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The board of directors has not met four times in the financial year ended 31.03.2021	2020-21	Company has availed the relaxation provided in the MCA General Circular No. 11/2020 dated 24th March, 2020 which provided that the gap between two consecutive meetings of the Board may extend to 180 days, instead of 120 days as required in the Companies Act, 2013, till next two quarters i.e. till 30th September, 2020.	BSE Limited has already waived off this fine.

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**Abhijit Majumdar**  
Company Secretary in Practice  
C.O.P. No.- 18983

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2.	<p>i. The Audit Committee does not have minimum 3 (three) directors as members;</p> <p>ii. The Audit Committee has not met four times in the financial year ended 31.03.2021;</p>	2020-21	<p>i. The Board of Directors of the listed entity at their meeting held on 19 May, 2021 re-constituted the Committee to comprise of three members.</p> <p>ii. Company has availed the relaxation provided in the MCA General Circular No. 11/2020 dated 24th March, 2020 which provided that the gap between two consecutive meetings of the Board/Audit Committee may extend to 180 days, instead of 120 days as required in the Companies Act, 2013, till next two quarters i.e. till 30th September, 2020.</p>	Observations were complied with.
3.	<p>The Nomination &amp; Remuneration Committee comprise of less than 3 (three) directors</p>	2020-21	<p>The Board of Directors of the listed entity at their meeting held on 19 May, 2021 re-constituted the Committee to comprise of three members.</p>	Observations were complied with

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4.	The Stakeholders Relationship Committee comprise of less than 3 (three) directors	2020-21	The Board of Directors of the listed entity at their meeting held on 19 May, 2021 re-constituted the Committee to comprise of three members in terms of the said Regulation.	Observations were complied with
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Date: 25/05/2022

Place: Kolkata

**Abhijit Majumdar**  
Company Secretary in Practice  
C.O.P. No.- 18995

  
Abhijit Majumdar  
(Practicing Company Secretary)

ACS No: 9804

CP No.:18995

UDIN: A009804D000385181

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