

NEVILLE DAROGA & ASSOCIATES

Practicing Company Secretary
Regd. Office : 8-D, Mhatre Niwas,
Harishankar Mhatre Lane,
Gamdevi, Mumbai-400007.
Tel.: 022 - 2380 6379/80/81
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Secretarial Compliance Report of "The Indian Hotels Company Limited" for the year ended 31st March, 2022

I Neville Daroga & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by "The Indian Hotels Company 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, 2022 ("Review Period") in respect of compliance with the provisions of:

- (i) The Companies Act, 2013 (the 'Act') and the Rules made thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 and the Rules made thereunder;
- (iii) The Depositories Act, 1996 and the Regulations and by-laws framed thereunder; and
- (iv) Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Overseas Direct Investment and External Commercial Borrowing;

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 (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



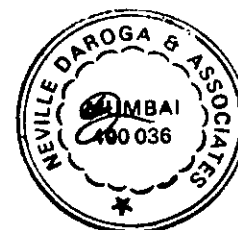
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 are not applicable to the Company;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021 are not Applicable to the Company.
- (f) Securities and Exchange Board of India (Issue and Listing of Non – Convertible Securities) Regulations, 2021;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 are not applicable to the Company; and
- (i) The Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment is not applicable to the Company;
- (v) Other laws specifically applicable to the Company are:
- Food Safety and Standards Act, 2006 and Food Safety and Standards Rules, 2011; and
 - Food Safety and Standards (Packing & Labeling) Regulations, 2011.

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

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
-	-	-	-

- (a) 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/our examination of those records.
- (b) 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.
	NA			

(c) 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: Mumbai

Signature:

UDIN:A008663D000289328

Date: May 9, 2022



For: Neville Daroga & Associates

Neville Daroga

ACS: 8663

C P No.: 3823

PR Cert No:1285#2021

NEVILLE DAROGA & ASSOCIATES
PRACTICING COMPANY SECRETARY
 B-D, MHATRE NIWAS, HARISHANKAR MHATRE LANE
 GAMDEVI, GRANT ROAD, MUMBAI-400 007
 C. P. No. 3823