

ASIAN HOTELS (EAST) LIMITED

Registered Office : Hyatt Regency Kolkata, JA-1, Sector III, Salt Lake City, Kolkata - 700 098, W.B., India

Phone : 033 2335 1234/2517 1012 Fax : 033 2335 8246/2335 1235 www.ahleast.com

CIN: L15122WB2007PLC162762

28th June, 2021

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

Dear Madam/Sir,

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended 31st March, 2021.

Pursuant to Regulation 24A of the Listing Regulations, as amended from time to time, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find attached the Annual Secretarial Compliance Report of the Company issued by M/s. Abhijit Majumdar & Associates, Practicing Company Secretaries, for the financial year ended 31st March, 2021.

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

CS ABHIJIT MAJUMDAR

Practicing Company Secretary, Corp. Law & MSME Consultant
Proprietor of Abhijit Majumdar & Associates
M.Com. (Gold Medalist), LLB,
Cost & Management Accountant and Company Secretary



SECRETARIAL COMPLIANCE REPORT OF ASIAN HOTELS (EAST) LIMITED (CIN- L15122WB2007PLC162762) FOR THE YEAR ENDED 31ST MARCH, 2021

I, Abhijit Majumdar, of M/s Abhijit Majumdar & Associates, Company Secretaries in Practice, 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 year ended 31st March, 2021 ("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:-

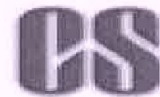
- (a) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Substantial Acquisition 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;
- (h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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

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(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
1.	Regulation 17(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The board of directors has not met four times in the financial year ended 31.03.2021	The Board of Directors of the listed entity met on 31.07.2020, 10.11.2020 and 10.02.2021 and could not ensure compliance of Regulation 17(2) due to ensuing pandemic situation, as represented by the management of the listed entity
2.	Regulation 18(1)(a) and 18(2)(a) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	1. The Audit Committee does not have minimum 3 (three) directors as members; 2. The Audit Committee has not met four times in the financial year ended 31.03.2021;	1. The Audit Committee was composed of 2 (two) members after the death of Rama Shankar Jhavar on 14 October, 2020; 2. The Audit committee met on 31.07.2020, 10.11.2020 and 10.02.2021 and

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

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			could not ensure compliance of Regulation 18(2)(a) due to ensuing pandemic situation, as represented by the management of the listed entity.
			3. 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
3.	Regulation 19(1)(a) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Nomination & Remuneration Committee comprise of less than 3 (three) directors	The Nomination & Remuneration Committee was composed of 2 (two) members after the death of Rama Shankar Jhawar on 14 October, 2020. 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.

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4.	Regulation 20(1)(a) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Stakeholders Relationship Committee comprise of less than 3 (three) directors	The Stakeholders Relationship Committee was composed of 2 (two) members after the death of Rama Shankar Jhawar on 14 October, 2020. 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.
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- (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 17(2), 18, 19 and 20 of the SEBI (Listing Obligations and Disclosure Requirements)	BSE vide letter No. SOP-CReview-May2021 dated May 17, 2021 imposed a fine of Rs. 5,56,960/- (Rupees Five Lakh Fifty-Six Thousand Nine Hundred and Sixty only)	The listed entity vide its letter dated 25 May, 2021 has requested the stock

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		Regulations, 2015		exchanges to waive the said fine
2.	The National Stock Exchange of India Limited (NSE)	Violation of Regulations 17(2), 18, 19 and 20 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	NSE vide letter No. NSE/LIST-SOP/COMB/FINES/0815 dated May 17, 2021 imposed a fine of Rs. 5,56,960/- (Rupees Five Lakh Fifty-Six Thousand Nine Hundred and Sixty only)	

- (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
Not Applicable				

- (e) During the year under review no appointment/ re-appointment/ resignation of statutory auditor of the Company had occurred. Further the terms of appointment of its existing statutory auditor has been modified in accordance with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019. In this regard, we report that the Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

For Abhijit Majumdar & Associates,
Practicing Company Secretaries

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

Abhijit Majumdar
(Proprietor)
ACS No: 9804
COP No.:18995

Date: 23-06-2021
Place: Kolkata

UDIN: A009804C000500426