



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 Ltd.  
1st Floor, New Trading Ring  
Rotunda Building  
P.J. Towers, Dalal Street, Fort  
Mumbai 400 001**

**09<sup>th</sup> May, 2022**

**Dear Sirs,**

**Annual Secretarial Compliance Report**

We enclose, in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, the Secretarial Compliance Report of the Company from Messrs. P B & Associates, Practicing Company Secretaries, for the financial year ended 31<sup>st</sup> March, 2022.

Thanking you.

**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 31<sup>st</sup> March, 2022**

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 filing/ submission 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 31<sup>st</sup> March 2022 in respect of compliance with the provision of:
  - i. The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulation, circulars, guidelines issued thereunder; and
  - ii. The Securities Contract (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulation, circulars, guidelines issued thereunder by Securities and Exchange Board of India (“SEBI”)

The specific Regulations, whose provisions and the circulars/guidelines issued there under, have been examined, include:-

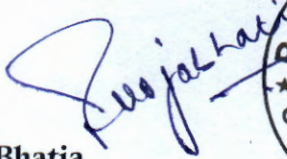
- a) Securities and Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulation, 2015;
- b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 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 Regulation and circulation/ guidelines issued there under.
- b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued in so far 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 observation made in the previous reports-Not Applicable

For P B & Associates  
(Company Secretaries)

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



Dated: 9th May 2022  
Place: New Delhi

UDIN: F007673D000290175