



ORIENTAL HOTELS LIMITED

Corporate Office : No.47, Paramount Plaza, Mahatma Gandhi Road, Chennai - 600 034. India.

OHL:SEC:SCR2021/2021/22

May 25, 2021

The Manager – Listing
National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor, Plot No. C/1 G
Block, Bandra Kurla Complex
Bandra (E), Mumbai : 400051
Symbol : ORIENTHOT

The Manager – Listing Department
Bombay Stock Exchange Ltd.
II Floor, New Trading Ring
Rountana Building P J Towers,
Dalal Street, Mumbai : 400001
Scrip Code : 500314

Dear Sir,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021 pursuant Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).


With reference to the captioned subject, please find enclosed the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021 issued by M/s.S.Sandeep & Associates, Company Secretaries.

Kindly take on record the above.

Thanking you,

Yours faithfully,

For ORIENTAL HOTELS LIMITED


Tom Antony
Company Secretary

cc.: Luxembourg Stock Exchange
Societe de la Bourse
De Luxembourg S A B.P.165
L-2011 Luxembourg



S SANDEEP B Com, FCS, LLB
Managing Partner

S SANDEEP & ASSOCIATES

Company Secretaries

No.20, "F" Block, Ground Floor, Gemini Parsn Apts.,
New No. 448, Old No. 599, Cathedral Garden Road,
(Behind Hotel Palmgrove), Anna Salai,
Chennai - 600 006. Tel : 044 - 4305 7999
Sandeep@sandeep-cs.in
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Secretarial Compliance Report of Oriental Hotels Limited (CIN: L55101TN1970PLC005897) for the year ended 31st March 2021

(Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI's Circular CIR/CFD/CMD1/27/2019 dated 8th Feb 2019)

We, S. Sandeep & Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by Oriental Hotels Limited (CIN: L55101TN1970PLC005897) ("the listed entity"),
- (b) the filings/submissions made by the listed entity to the stock exchanges,
- (c) the 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 Securities and Exchange Board of India;

The specific Regulations, whose provisions and the Circulars / Guidelines issued thereunder, to the extent applicable to the listed entity 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- d. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements), 2018; (Not applicable to the Company during the review period)
- e. The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company during the review period)





- f. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company during the review period)
- g. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the Company during the review period)
- h. The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the Company during the review period).
- i. Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;
- j. (other regulations as applicable) and circulars/ guidelines issued thereunder;

and based on the above examination, We 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 Practicing Company Secretary
	NIL	NIL	NIL

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from our 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 thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment	Observations/ Remarks of the Practicing Company Secretary, if any
	NIL	NIL	NIL	NIL





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

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in previous reports	Observations made in the secretarial compliance report for the ended 31 st March 2020 (The years are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the action taken by the listed entity
1	<p>Fine was imposed by BSE Ltd (BSE) and National Stock Exchange of India Ltd (NSE) for delay of 22 days from 01.07.2019 to 22.07.2019 in complying with Reg 17(1) of The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.(LODR)</p> <p>The Company paid the fine and also has made representation for waiver of fine.</p> <p>NSE has accepted the request made by the company for waiver of fine.</p>	31 st March 2020	<p>Paid the amount of fine imposed and also made suitable representation to both NSE and BSE for waiver of the fine.</p> <p>Reg 17(1) of LODR has been complied from 23.07.2019.</p>	<p>Both NSE and BSE had based on the representation submitted by the Company waived the fine imposed and communicated it to the Company vide letter</p> <p>Ref.No.NSE/LIST/S OP/98945 dated January 23, 2020 and BSE vide its e-mail dated September 28, 2020.</p> <p>Reg 17(1) of LODR has been complied from 23.07.2019.</p>





	Response from BSE is still expected			
2	<p>Fine was imposed by BSE and NSE for delay in filing prior intimation of Board meeting as required under Reg 29(2) of LODR.</p> <p>The Company submitted a representation to condone delay stating delay was unintentional and due to unavoidable reasons and paid the fine imposed</p>		<p>The Company submitted representation to the Stock Exchanges to condone the delay stating that it was unintentional and due to unavoidable reasons which was not accepted. The Company paid the fine.</p>	<p>As the Stock Exchanges rejected the representation made by the Company to condone delay, the Company paid the fine and settled the matter.</p>

For S Sandeep & Associates

Place: Chennai
Date: 20/05/2021



S Sandeep
Managing Partner
FCS No.: 5853
C P No.: 5987
PR : 1116/2021
UDIN: F005853C000349977