

# ASIAN HOTELS (EAST) LIMITED

CIN : L15122WB2007PLC162762

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

28<sup>th</sup> May, 2024

<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 : AHLEAST</b>

Dear Madam/Sir,

**Sub: Submission of Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2024.**

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, 2024, 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**  
Digitally signed by  
Saumen Chatterjee  
Date: 2024.05.28  
18:14:48 +05'30'  
**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



## Annual Secretarial Compliance Report of Asian Hotels (East) Limited for the financial year ended 31st March, 2024

I, PCS Abhijit Majumdar 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 Report.

for the financial year ended **31st March, 2024** ("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 SEBI;

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

- (a) Securities and Exchange Board of India (LODR) 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (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;

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

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(h) other regulations as applicable.

and circulars/ guidelines issued thereunder

and based on the above examination, 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:

S r. No.	Compliance Requirement (Regulation / circulars / guidelines including specific clause)	Regulation/ Circular No.	Devi- ation s	Actio n Take n by	Type of Actio n	Details of Violatio n	Fine Amou nt	Observation s /Remarks of the Practicin g Compan y Secretar y (PCS)	Manage -ment Response	Remark s
	NIL	NIL	NIL	NIL	Advisory/ Clarificatio n/ Fine/ Show Cause Notice/ Warning etc.	NIL	NIL	NIL	NIL	NIL

  
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(b) 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 the previous reports (PCS)	Observations made in the secretarial compliance report for the year ended 31st March, 2023	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1.	Non-compliance with Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 has been observed.	Non-compliance with Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 has been observed.	The promoter of every target company shall declare on a yearly basis that he, along with persons acting in concert, has not made any encumbrance, directly or indirectly, other than those already disclosed during the financial year.	The Company has not submitted the declaration within the due date.	The Company has submitted the said declaration vide its email dated 12th May, 2023.	The Company has duly complied with the requirement.

  
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I. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<b>Secretarial Standards:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	Yes
2.	<b>Adoption and timely updating of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI.</li></ul>	Yes Yes	Yes Yes
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The listed entity is maintaining a functional website.</li><li>Timely dissemination of the documents/ information under a separate section on the website.</li><li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and</li></ul>	Yes Yes Yes	Yes Yes Yes

  
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/Remarks by PCS*
	specific which redirects to the relevant document(s)/section of the website.		
4.	<b>Disqualification of Director(s):</b> None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	Yes	Yes
5.	<b>Details related to subsidiaries of listed entities have been examined w.r.t.:</b> (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA Yes	NA Yes
6.	<b>Preservation of Documents:</b> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of preservation of documents and archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	Yes
7.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	Yes

  
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8.	<b>Related Party Transactions:</b>  (a) The listed entity has obtained prior approval of audit committee for all related party transactions;  (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	Yes  NA	Yes  NA
9.	<b>Disclosure of events or information:</b> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	Yes
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Yes

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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
11.	<p><b>Actions taken by SEBI or Stock Exchange(s), if any:</b></p> <p>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	<p>Yes</p> <p>NA</p>	<p>Yes</p> <p>NA</p>
12.	<p><b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b></p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	<p>NA</p>	<p>NA</p>

  
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13.	<b>Additional non-compliances, if any:</b> No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	Yes	Yes
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Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Kolkata

Date: 20<sup>th</sup> May, 2024

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

Signature:

**(Abhijit Majumdar)**  
**Practicing Company Secretary**  
**ACS No: 9804**  
**CP No: 18995**  
**UDIN:A009804F000406365**  
**PR No: 1341/2021**