

***EIH Associated Hotels Limited***  
A MEMBER OF THE OBEROI GROUP

CIN: L92490TN1983PLC009903

Delhi Office: 7, Sham Nath Marg, Delhi – 110 054, India

Telephone: +91-11-2389 0505 / Website: [www.eihassociatedhotels.in](http://www.eihassociatedhotels.in)

E-mail: [isdho@oberoigroup.com](mailto:isdho@oberoigroup.com)

29<sup>th</sup> May 2025

|   |   |
|---|---|
| <b>The National Stock Exchange of India Limited</b><br>Exchange Plaza, 5 <sup>th</sup> Floor<br>Plot No. C/1, G Block<br>Bandra Kurla Complex Bandra(E)<br>Mumbai – 400051<br><br><b>Code: EIHAHOTELS</b> | <b>The BSE Limited</b><br>Corporate Relationship Dept.<br>1 <sup>st</sup> Floor, New Trading Ring,<br>Rotunda Building<br>Phiroze Jeejeebhoy Towers<br>Dalal Street, Fort<br>Mumbai – 400001<br><br><b>Code: 523127</b> |
|---|---|

**Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March 2025**

Dear Sir / Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular no. SEBI/HO/CFD/PoD2/CIR/P/0155 dated 11<sup>th</sup> November 2024, we are enclosing herewith Annual Secretarial Compliance Report of the Company for the Financial Year ended 31st March 2025, issued by M/s. JUS & Associates, Company Secretaries.

The above may please be taken on record.

Thank you,

Yours faithfully

**For EIH Associated Hotels Limited**

**Tejasvi Dixit**  
**Company Secretary**

**ANNUAL SECRETARIAL COMPLIANCE REPORT  
For the Financial Year ended March 31, 2025**

*[Pursuant to Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 issued by  
Securities and Exchange Board of India, as amended]*

To,  
The Members,  
**EIH Associated Hotels Limited**  
1/24, GST Road, Meenambakkam,  
Chennai-600027

We have examined:

- a) all the documents and records made available to us and explanations provided by **EIH Associated Hotels 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 financial year ended March 31, 2025 (“Review Period”) in respect of compliance with the provisions of :
  - i) the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) as amended from time to time and the Regulations, circulars, guidelines issued there under; and
  - ii) the Securities Contracts (Regulation) Act, 1956 (“SCRA”) as amended from time to time, rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”).

The specific Regulations, whose provisions have been examined, include:

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time (SEBI ICDR Regulations);
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.
- d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018, as amended from time to time; these regulations were not applicable to the Company during the review period since the Company did not buy-back any of its securities.
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021, as amended from time to time; these regulations were not applicable to the Company during the review period since the Company does not have any such scheme in operation.
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021, as amended from time to time; these regulations were not applicable to the Company during the review period since the Company did not raise any money through non-convertible securities.

# Jus & Associates

Company Secretaries

- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.

and circulars/ guidelines issued there under;

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 there under, except in respect of matters specified below:

| S. No | Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)   | Regulation/ Circular No.                   | Deviations         | Action Taken By | Type of Action (Advisory/ Clarification /Fine/Show Cause Notice/ Warning, etc.) | Details of Violation   | Fine Amount          | Observations/ Remarks of the Practicing Company Secretary (PCS)   | Management Response | Remarks |
|-------|---|--|--------------------|-----------------|---|--|----------------------|---|---------------------|---------|
| 1.    | Bonus issue should be implemented within a period of two months from the date of meeting of Board of Directors of the Company approving the bonus issue | Regulation 295(1) of SEBI ICDR Regulations | Delay of nine days | BSE and NSE     | Both BSE and NSE levied Fine of Rs 1,80,000 each plus GST.                      | Delay of nine day beyond the stipulated period of two months (including trading of bonus shares) | Rs 1,80,000 plus GST | The listed entity paid Fine of Rs. 1,80,000 plus GST as levied by BSE and NSE for non-compliance of Regulation 295 (1) of SEBI ICDR Regulations | NA                  |         |

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

| S. No          | Observations/ Remarks of the Practicing Company Secretary (PCS) in previous reports | Observations made in the Secretarial Compliance Report for the year ended.... | Compliance Requirement (Regulations/ circulars/ guidelines including specific clause) | Details of violation/ deviations and action taken/ penalty imposed, if any, on the listed entity | Remedial actions if any, taken by the listed entity | Comments of the PCS on actions taken by the listed entity |
|----------------|---|---|---|--|---|---|
| Not Applicable |   |   |   |  |   |   |

# Jus & Associates

Company Secretaries

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

| S. No | Particulars   | Compliance Status<br>(Yes/No/NA) | Observations/<br>Remarks by PCS              |
|-------|---|----------------------------------|--|
| 1.    | <u>Secretarial Standards:</u><br><br>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).   | Yes                              |  |
| 2.    | <u>Adoption and timely updation of the Policies:</u> <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 Entity</li><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/ circulars issued by SEBI</li></ul>  | Yes<br><br>Yes                   |  |
| 3.    | <u>Maintenance and disclosures on Website:</u> <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 specific which re-directs to the relevant document(s)/ section of the website</li></ul> | Yes<br><br>Yes<br><br>Yes        |  |
| 4.    | <u>Disqualification of Director:</u><br><br>None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.   | Yes                              |  |
| 5.    | <u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u><br><br>(a) Identification of material subsidiary companies<br>(b) Disclosure requirement of material as well as other subsidiaries   | NA                               | The listed entity has no subsidiary company. |
| 6.    | <u>Preservation of Documents:</u><br><br>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents  | Yes                              |  |

# Jus & Associates

Company Secretaries

|     |   |                |  |
|-----|---|----------------|--|
|     | and Archival policy prescribed under SEBI LODR Regulations, 2015  |                |  |
| 7.  | <u>Performance Evaluation:</u><br><br>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees during the check the minutes and report of financial year as prescribed in SEBI Regulations   | Yes            |  |
| 8.  | <u>Related Party Transactions:</u><br><br>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (RPTs);<br><br>(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<br><br>Yes | RPTs in the ordinary course of business and at arm's length basis and not being material as per RPT Policy which could not be anticipated at the time of seeking omnibus approval or where its pre-approved limit has fallen short are brought up before AC for its approval /ratification.<br><br>For material RPTs, the Listed Entity has obtained approval of shareholders. |
| 9.  | <u>Disclosure of events or information:</u><br><br>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            |  |
| 10. | <u>Prohibition of Insider Trading:</u><br><br>The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015   | Yes            |  |
| 11. | <u>Actions taken by SEBI or Stock Exchange(s), if any:</u><br><br>No action(s) 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.                    | NA             | No action taken either by SEBI or by Stock Exchanges.  |
| 12. | <u>Resignation of Statutory Auditors from the listed entity or its material subsidiary:</u>   | NA             | The statutory auditors of the listed entity did not resign during the financial year.  |

# Jus & Associates

Company Secretaries

|    |  |    |  |
|----|--|----|--|
|    | In case of resignation of statutory auditors 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 Master Circular on compliance with the provisions of LODR Regulations by listed entities. |    | Further, the listed entity has no material subsidiary. |
| 13 | <u>Additional Non-compliances, if any:</u><br><br>No additional non-compliance observed for all SEBI regulation/circular/guidance note etc.  | NA |  |

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations. (Not Applicable)

## **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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.

## **For Jus & Associates Company Secretaries**

AJAY  
KUMAR JAIN

Digitally signed by  
AJAY KUMAR JAIN  
Date: 2025.05.16  
17:32:25 +05'30'

## **Dr. Ajay Kumar Jain**

Proprietor

Membership Number: FCS -1551

Certificate of Practice Number: 21898

Firm Registration Number: S2010DE695800

Peer Review Certificate Number: 1325/2021

UDIN: F001551G000311971

Date: May 16, 2025

Place: New Delhi