

CIN: L15421TN1960PLC004255

30.05.2019

To,

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
MUMBAI - 400 001

Scrip Code: BSE - 500016

Dear Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report for Financial Year ended March 31, 2019 pursuant to Regulation 24A of SEBI (listing Obligations and Disclosure Requirements), 2015.

With reference to the above, please find enclosed herewith the copy of the Annual Secretarial Compliance Report for Financial Year ended March 31, 2019 issued by M/s.. Jeevan Jyoti Nayak& Associates Secretarial Auditors of the Company pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), 2015.

This is for your information and record.

Thanking you,

Yours faithfully,

Ajay shukla

Company Secretary

JEEVANJYOTI NAYAK & ASSOCIATES

COMPANY SECRETARIES



Secretarial compliance report of Aruna Hotels Limited for the year ended 31st March 2019

We, Jeevanjyoti Nayak & Associates, have examined:

- a) all the documents and records made available to us and explanation provided by Aruna Hotels Limited (" the listed entity");
- b) the filings/submissions made by the listed entity 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 31st March, 2019 ("Review Period") compliance with respect to provisions of:
 - the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
 - the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, , guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

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

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)
 Regulations, 2015;
- b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents)
 Regulations, 1993 regarding the Companies Act and dealing with client;
- f) Securities and Exchange Board of India (Stock Brokers & Sub- Brokers) Regulations, 1992:
- g) Securities and Exchange Board of India (Portfolio Managers) Regulations, 1996;
- h) Securities and Exchange Board of India (Research Analysts) Regulations, 2014
- i) Securities and Exchange Board of India (Investment Advisers) Regulations, 2013
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/guidelines issued there under;

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and based on the above examination, We hereby report that, during the Review Period:

i) 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:-

| Practicing Company Secretary |
|------------------------------|
| |

- The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.
- iii) 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 there under:

| Sr. No | Action taken by | Details violation | of | Observations/ remarks of the Practicing Company Secretary, if any |
|-----------|-----------------|----------------------|-----|---|
| | | | NIL | |

iv) 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 (The years are to be mentioned) | Different control of the same | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|---|---|--|
| | | NA | | |

Date:28.05.2019 Place: Chennai For Jeevanjyoti Nayak & Associates Company Secretaries (ICSI Reg. No. S2016MH423600)

> Jeevaniyoti Nayak Proprietor M. No. A39658 CP No. 17143