

Date: 31/07/2020

To,  
BSE Limited,  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai 400001.

To,  
National Stock Exchange of India,  
Exchange Plaza,  
Bandra Kurla Complex,  
Bandra (East), Mumbai 400051.

Dear Sir/(s),

**Subject : Submission of Annual Secretarial Compliance Report for the financial year ended March 31, 2020.**

**Stock Code: 526683 - BSE**  
**HOTELRUGBY - NSE**

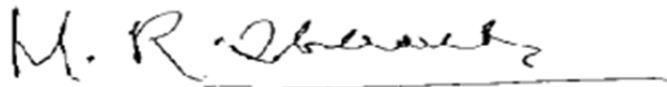
In compliance with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, we are enclosing herewith a copy of the Annual Secretarial Compliance Report issued by M/s. Sindhu Nair & Associates, Practising Company Secretaries, for the year ended 31<sup>st</sup> March, 2020.

Please take note of the same in your records.

Thanking you,

Yours truly,

For **HOTEL RUGBY LIMITED**



**MAHENDRA THACKER**  
**DIRECTOR & CEO**  
**DIN – 01405253**  
**ADDRESS - 2, GROUND FLOOR, 9, DEV BHUVAN,**  
**GAZDAR STREET, CHIRA BAZAR,**  
**KALBADEVI, MUMBAI — 400002.**

**Encl : As above**



# SINDHU NAIR & ASSOCIATES

*Practising Company Secretaries*

102, First Floor, Kshitij Annpurna CHS Ltd, Shilvsa Bhavan Path, Shivaji Park, Dadar (W), Mumbai - 400 028  
9920790002 / 022 24320208/09 [sindhu.nair.cs@gmail.com](mailto:sindhu.nair.cs@gmail.com) [www.cssindhu.com](http://www.cssindhu.com)

## ANNEX-A

Secretarial compliance report of HOTEL RUGBY LIMITED  
(CIN L55101MH1991PLC063265) for the year ended 31<sup>st</sup> March, 2020

I, SINDHU G NAIR, Practising Company Secretary have examined:

- all the documents and records made available to us and explanation provided by HOTEL RUGBY LIMITED ("the listed entity"),
- the filings / submissions made by the listed entity to the stock exchanges,
- website of the listed entity,

for the year ended 31<sup>st</sup> March, 2020 ("Review Period") in respect of compliance with the provisions of:

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder ; and
- The Securities Contract (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulation, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI Act");

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 Requirement) Regulations, 2015;
  - Securities and Exchange Board of India ( Issue of Capital and Disclosure Requirement ) Regulations, 2018;
  - Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
  - Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
  - Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
  - Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
  - Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
  - Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) (Amendment) Regulations, 2018;
  - Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- 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

Sr. No.	Compliance Requirement (Regulations/Circulars/Guidelines including specific clause)	Deviations	Observations /Remarks Of The 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 insofar as it appears from my /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, Etc.	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:

In the last Report it was mentioned about the non appointment of Company Secretary and Compliance officer of the Company which the Company has appointed with effect from 22<sup>nd</sup> April, 2019 and thus complied with the said provisions of LODR.

Further we have to state that we have not carried out the physical inspection of any records maintained by the Company due to prevailing lock down conditions owing to COVID 2019 across the country. We have relied on the records as made available by the Company by digital mode and also on the Management Representation Letter issued by the Company

For SINDHU NAIR & ASSOCIATES

  
(SINDHU G NAIR)  
Practicing Company Secretary  
Proprietor  
(FCS- 7938, CP-8046)  
UDIN: F007938B000536356

Place: Mumbai  
Date : 31-7-2020