

May 23, 2026

To,
Listing Department,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

To,
Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G,
Bandra –Kurla Complex,
Bandra (E), Mumbai – 400 051

Code: 526668
ISIN: INE967C01018

Symbol:- KAMATHOTEL

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2026, as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”)

Pursuant to the Regulation 24(A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2026, duly issued by M/s. DM & Associates Company Secretaries LLP, Mumbai.

Please take the same on your record.

Thanking you,

Yours faithfully,

For Kamat Hotels (India) Limited

**NIKHIL
SINGH** Digitally signed
by NIKHIL SINGH
Date: 2026.05.23
17:08:02 +05'30'

Nikhil Singh
Company Secretary & Compliance Officer

Encl. a/a.

DM & ASSOCIATES COMPANY SECRETARIES LLP

(LLPIN NO. AAI-4743)

[Firm Registration No: L2017MH003500] [Peer Review Certificate: 6584/2025]
REGD. OFFICE: # 205, NADIADWALA MARKET, PODDAR ROAD, MALAD (EAST), MUMBAI-400097
Tel No.: 7304705485 Email: dmassociatesllp@gmail.com

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
Secretarial Compliance report of
KAMAT HOTELS (INDIA) LIMITED for the year ended MARCH 31, 2026

We have examined:

- (a) all the documents and records made available to us and explanation provided by **KAMAT HOTELS (INDIA) LIMITED** ("the company / listed entity"),
- (b) the filings / submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other document(s) / filing(s), which were relevant and relied upon to make this report.

for the year ended March 31, 2026 ("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 Securities and Exchange Board of India ("SEBI");

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

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) 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 - **Not Applicable**;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - **Not Applicable**;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - **Not Applicable**;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and
- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021- **Not 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 the matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Publishing of notice regarding opening of special window for re-lodgement of transfer requests through print	SEBI Circular No. SEBI/HO/MIRSD/ MIRSD- PoD/P/CIR/2025/ 97 dated July 2,	Newspaper advertisements were not published for the	NA	NA	Non-publication of bi-monthly newspaper	NA	It was observed that the Company had not published the	The Company commenced publication of the requisite advertisements	NIL

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	media on a bi-monthly basis.	2025	prescribed period.			advertisements regarding the special window for re-lodgment of shares.		requisite newspaper advertisements for the period from July 2025 to December 2025 as required under the aforesaid SEBI Circular.	from February 2026 onwards pursuant to the subsequent circular/clarification issued in this regard on January 30, 2026, and has since ensured compliance with the applicable requirements.	
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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	Observations made in the Secretarial Compliance report for the year ended ... (The year are to be mentioned)	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.	It was observed that the Company filed the trading application for 6,25,601 equity shares issued under preferential allotment beyond the stipulated timeline of seven working days from the date of receipt of listing approval.	F.Y. - 2024-25	SEBI circular SEBI/HO/CFD/PoD-2/P/CIR/2023/00094 dated June 21, 2023.	Delay in filing the trading application for 6,25,601 equity shares issued under preferential allotment, beyond the prescribed timeline of seven working days from the date of receipt of listing approval. Consequently, a fine of Rs. 60,000/- plus GST was levied by BSE Limited and National Stock Exchange of India Limited.	The Company subsequently strengthened its internal processes, and no such instances have occurred thereafter.	The deviation was addressed by paying the prescribed fine.
2.	It was observed that there was a minor delay in submission of audio recording.	F.Y. - 2024-25	Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with applicable disclosure requirements relating to dissemination of audio recordings.	Delay in disseminating audio recordings to the exchange(s) on May 8, 2024. As per requirement company need to disseminate the call recordings before the next trading day or within twenty-four hours from the conclusion of such call, whichever is earlier.	The Management informed that the delay occurred due to delay on the part of the moderator/service provider in sharing the audio recording with the Company. The Company has thereafter sensitised the concerned parties and strengthened its internal processes to avoid recurrence of such instances.	No fines or enforcement actions have been initiated by the Stock Exchanges in this regard till date. The Company has also taken process-level corrective measures to avoid recurrence.
3.	It was observed that the disclosure under Regulation 29(1) was not received from the shareholder (Alpha Group) within the stipulated timeframe. Consequently, the Company could not intimate the stock exchanges within the prescribed period.	F.Y. - 2024-25	SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - Regulation 29(1).	The intimation was required to be submitted by Alpha Group within 2 working days of the allotment dated August 14, 2024. However, the intimation was received by the Company on September 13, 2024, beyond the stipulated timeline.	The Company informed that the delay was attributable to the shareholder and was beyond the control of the Company. The Company has reminded the concerned shareholder regarding timely compliance with disclosure requirements under the SEBI (SAST) Regulations, 2011.	No action has been initiated and no fines have been levied by the Stock Exchanges in this regard till date.

We hereby report that, during the Review Period, the compliance status of the Company with the following requirement is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
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1.	<u>Secretarial Standards:</u> 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	None
2.	<u>Adoption and timely Updation of the Policies:</u> - All applicable policies under SEBI Regulations are adopted with the approval of board of directors; - All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	Yes	None
3.	<u>Maintenance and disclosures on Website:</u> - The Company is maintaining a functional website. - Timely dissemination of the documents/ information under a separate section on the website. - 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.	Yes	None
4.	<u>Disqualification of Director:</u> None of the Director(s) of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Company.	Yes	None
5.	<u>Details related to Subsidiaries of listed entity have been examined w.r.t.:</u> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	None
6.	<u>Preservation of Documents:</u> 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	None
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees during the financial year as prescribed in SEBI Regulations.	Yes	None
8.	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (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	None
9.	<u>Disclosure of events or information:</u> 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	None
10.	<u>Prohibition of Insider Trading:</u>		

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	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No action(s) has been taken against 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. The actions taken against the listed entity by SEBI / Stock Exchange(s) are specified - As stated under table (a) above (pertaining to fines).	Yes	None
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> 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.	NA	No such instances
13.	<u>Additional Non-compliances, if any:</u>	NA	No such instances

We further, report that the listed entity is 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 DM & Associates Company Secretaries LLP
Company Secretaries
ICSI Unique Code L2017MH003500

Tribhuvneshwar
Bhuvneshwar Kaushik

Digitally signed by Tribhuvneshwar
Bhuvneshwar Kaushik
Date: 2026.05.21 14:47:46 +05'30'

Tribhuvneshwar B. Kaushik
Partner

FCS No. 10607
C P No. 16207
UDIN: F010607H000430455
Place: Mumbai
Date: May 21, 2026