

Dated 18.09.2018

To,
Netra Sahani
Deputy General Manger
Listing Compliance
BSE Limited
PJ Towers , Dalal Street,
Mumbai -400001

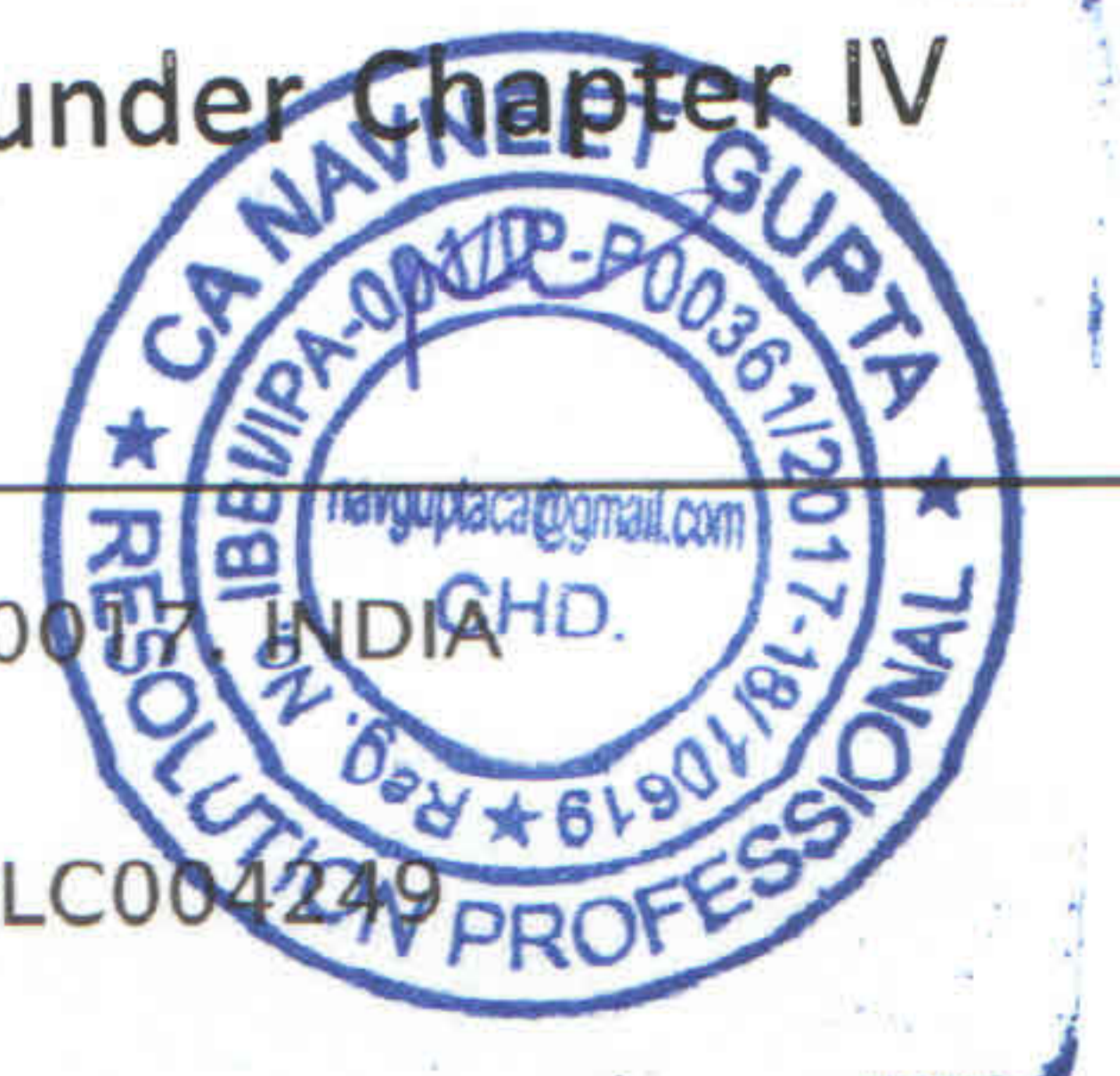
**Subject: - Non applicability of provisions of Regulation 27 of SEBI,
LODR 2015 on James Hotels Ltd.**

Dear Sir/Madam

This is with reference to your letter no 526558/812/2018-19 for Non- Submission of Corporate Governance Report under Regulation 27(2) of the SEBI (LODR) Regulations, 2015 for two consecutive quarters i.e. March 2018 and June 2018.

In this regard we would like to again submit that the company is undergoing Corporate Insolvency Resolution Process under Insolvency and Bankruptcy Code, 2016. The matter is subjudice and pending before various forums including Hon'ble Supreme Court and Hon'ble Punjab & Haryana High Court. As IBC proceedings are initiated and the Board of directors of the company as well as all committees thereof is suspended.

Furthermore I would also like to clarify here that from the records of the company which is available with me I hereby submit that the provisions of Regulation 27 regarding applicability of Corporate Governance report as per LODR-2015 are not applicable to the company pursuant to the exemption granted under Chapter IV



of SEBI (LODR) Regulation 15(2) as the paid up capital of the company is neither greater than nor equal to Rs. 10 Crore. Net worth of the company is neither greater than nor equal to Rs. 25 Crore anytime during the current financial year. Copy of certificate in this regard is attached.

In light of the above facts as Regulation 27 is not applicable hence the company is not liable to pay any penalty and same may be withdrawn.

Furthermore the company was transferred to Z group due to nonpayment of penalty for non filing of corporate governance report under regulation 27(2) of SEBI (LODR) Regulation 2015, you are requested to restore the company from Z group to the group as earlier. Accordingly promoters holding shall not be freezed for the same reason as company has not made any default.

This is for your information and record.

For James Hotels Ltd.

Navneet Gupta
CA Navneet Gupta
Resolution Professional




CERTIFICATE

I, CA Navneet Gupta, Resolution Professional of the company, James Hotels Ltd. hereby certify that the net worth of the company is neither greater than or equal to Rs. 25 Crore anytime during the current financial year and paid up capital of the company is neither greater than nor equal to Rs. 10 Crore anytime during the current financial year. Therefore as per the exemption given in Chapter IV of SEBI (LODR) Regulation 15(2) the company is exempted from Regulation 27 of SEBI (LODR), 2015. The provisions of regulation 27 of SEBI, (LODR) 2015 are not applicable on the company and the company is not liable to submit corporate governance report with BSE.

At present there is no CFO/CS and any other KMP in the company, therefore I am the compliance officer of the company

FOR JAMES HOTELS LIMITED


CA Navneet Gupta
Resolution Professional
Dated 18.09.2018

