

Date: 29th May, 2025

To,
The General Manager,
BSE Ltd.
P. J. Towers, Dalal Street,
Mumbai- 400001
Scrip Code: 544176

To
Sr. General Manager
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G, Bandra Kurla Complex
Bandra (E), Mumbai – 400 051
Symbol: AADHARHFC

Kind Attn.: Listing Corporate Relationship Department

Sub: Annual Secretarial Compliance Report for the year ended 31st March, 2025 as per Regulation 24A (2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations")

Dear Sir/ Madam,

Pursuant to Regulation 24A (2) of the SEBI LODR Regulations read with applicable circulars, please find enclosed the Annual Secretarial Compliance Report for the year ended 31st March, 2025 duly issued by M/s. Aashish K. Bhatt & Associates, Practising Company Secretaries.

This will also be hosted on the Company's website at <https://aadharhousing.com/investor-relations/disclosures-under-regulation-62-of-the-sebi-lodr-regulation-2015/annual-secretarial-compliance-report>.

Kindly note the same and take this on your record.

Thanking you,
For Aadhar Housing Finance Limited



Harshada Pathak
Company Secretary & Compliance Officer

Aadhar Housing Finance Ltd.

CIN: L66010KA1990PLC011409

Regd. Office: 2nd Floor, No. 3, JVT Towers, 8th 'A' Main Road,
S.R Nagar, Bengaluru 560 027, Karnataka.

Toll Free No: 1800 3004 2020 www.aadharhousing.com
customercare@aadharhousing.com



AASHISH K. BHATT & ASSOCIATES

Practicing Company Secretaries

Aashish K. Bhatt

B.Com., A.C.S., PGDSL

SECRETARIAL COMPLIANCE REPORT OF FOR THE FINANCIAL YEAR ENDED MARCH 31, 2025

To,

Aadhar Housing Finance Limited

We have examined:

- all the documents and records made available to us and explanation provided by Aadhar Housing Finance Limited ("the listed entity"),
- the filings / submissions made by the listed entity to the Stock Exchanges i.e National Stock Exchange of India Limited (NSE) and BSE Limited (BSE),
- website (<https://aadharhousing.com/>) of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 2025 (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 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 thereunder, have been examined, include: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations");
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - To the extent applicable.



- 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;
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and circulars/ guidelines issued thereunder;
- h) other acts/regulations as 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 matters specified in Annexure A;
- b) The listed entity has taken the following actions to comply with the observations made in previous reports as stated in Annexure B:
- (c) I hereby report that, during the review period the compliance status of the listed entity with following requirements:

Sr No.	Particulars	Compliance Status (Yes / No / NA)	Observation / Remarks by PCS
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	There was a delay in circulation of signed minutes.



2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. 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	The Board of Directors of the listed entity has adopted applicable policies, which are in conformity of the SEBI Regulations.
3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"> The Listed entity 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	The listed entity has been maintaining website i.e https://aadharhousing.com/
4.	<u>Disqualification of Director:</u> None of the Director of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None of the Directors of the listed entity are disqualified under Section 164 of Companies Act, 2013.
5.	<u>Details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA Yes	The Company does not have material subsidiary. Other disclosures pertaining to the subsidiaries were complied.
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	Yes	The listed entity has been preserving and maintaining records as per the Policy of Preservation of

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	and Archival policy prescribed under the Listing Regulations.		Documents and Archival policy as prescribed under Regulation 9 of the Listing Regulations.
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees during the financial year as prescribed in SEBI Regulations.
8.	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) In case no prior approval has been obtained, the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.</p>	<p>Yes</p> <p>NA</p>	<p>The listed entity has obtained prior approval from the audit committee for its related party transactions.</p> <p>There were no instances wherein the prior approval for the related party transactions was not obtained.</p>
9.	<p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of the Listing Regulations within the time limits prescribed thereunder.</p>	Yes	The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of the Listing Regulations within the time limits prescribed thereunder.

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10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	The listed entity has complied with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No actions have been 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.	No	As stated above
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 Statutory Auditor resigned from the listed entity during the year under review.
13.	<u>Additional Non-compliances, if any:</u> No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	Yes	NA

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 as it has disclosed the entire scheme and no redaction has been pursued.

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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the Listing Regulations 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 Aashish K. Bhatt & Associates
Practicing Company Secretaries**



**Aashish K. Bhatt
Proprietor**



Place: Mumbai

Date: May 06, 2025

ACS No.: 19639, COP No. 7023

UDIN: A019639G000274960

ICSI Unique Code S2008MH100200

Peer Review Certificate No.: 2959/2023

Annexure A

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.	The constitution of Stakeholder Relationship Committee (SRC) with at least 3 directors of which at least 1 would be Independent Director (ID).	Regulation 20(2A)	The term of ID was completed hence the members of SRC were reduced.	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE)	Fine Imposed	There were 2 members in SRC from 14.09.24 till 24.10.24.	Rs. 32000/- plus GST by each Exchange e(s) for Sept 2024 quarter and Rs. 46000/- plus GST by BSE for Dec 2024 quarter	Fine imposed was paid to stock exchanges for Sept 2024 quarter. However, upon application for waiver by the Company, NSE, the designated stock exchange, waived the fine for Sept 2024 as well as Dec 2024 quarter. Further, BSE also noted the same and waived the fine.	NA	NA



2.	Record Intimation	date	Regulati on 60(2)	The Company was required to intimate the record date at least before 7 working dates for ISIN INE883F07215 for payment of Interest	BSE Limited	Fine Imposed	Delay in intimation by 1 day.	10,000	Fines as per SEBI circular no. SEBI/HO/DDHS/ DDHS_Div1/P/CI R/2022/00000001 03 dated July 29, 2022 was paid.	NA	NA
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Annexure B

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2024	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.	Board Meeting Intimation	Delay in Board Meeting Intimation	The Company was required to make at least 2 working days advance intimation for the Board Meeting excluding the date of intimation and date of meeting.	The Board meeting intimation was submitted with a delay of 1 day.	The Company has strengthened its internal compliance SOPs.	The revised SOPs has been working properly as there were no such instances during the year.

