



802, Natraj by Rustomjee, Western Express Highway,  
Sir MV Road Junction, Andheri East, Mumbai - 400069.  
Tel: 41689900 / 61213400 Fax : 4168 9934

Date: 9<sup>th</sup> May, 2023

To,  
The General Manager  
BSE Ltd.  
Listing Compliance  
P J Towers, Dalal Street,  
Mumbai – 400001

Kind Attn.: Listing Corporate Relationship Department

**Sub: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2023 as per Regulation 24A (2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations")**

Ref. No.: Company Code- 10844/ 11302

Dear Sir/ Madam,

Pursuant to Regulation 24A (2) of the SEBI LODR Regulations read with SEBI Operational Circular No. SEBI/HO/DDHS/DDHS\_Div1/P/CIR/2022/0000000103 dated 29<sup>th</sup> July, 2022 and BSE circulars dated 16<sup>th</sup> March, 2023 and 10<sup>th</sup> April, 2023 please find enclosed the Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2023 duly issued by M/s. Roy Jacob & Co, Company Secretaries.

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

Kindly note the same and take this on your record.

Thanking you,  
**For Aadhar Housing Finance Limited**



**Harshada Pathak**  
Assistant Company Secretary

**Aadhar Housing Finance Ltd.**

CIN: U66010KA1990PLC011409  
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



## Annual Secretarial Compliance Report

### AADHAR HOUSING FINANCE LIMITED For the financial year ended 31/03/2023

We, Roy Jacob & Co, Company Secretaries, having our office at 207, Anjani Complex, Periera Hill Road off Andheri-Kurla Road, Nr. WEH Metro Station, Andheri-East, Mumbai-400099 have examined:

- (a) all the documents and records made available to us and explanation provided by **Aadhar Housing Finance Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31/03/2023 ("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 thereunder, 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(Not applicable to the listed entity for the period under review);
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the listed entity for the period under review);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021(Not applicable to the listed entity for the period under review);
- (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.

Additional affirmations in Annual Secretarial Compliance Report (ASCR) in terms of the BSE circular reference No. 20230316-14 dated 16<sup>th</sup> March 2023 and the BSE circular reference no. 20230410-41 dated 10<sup>th</sup> April 2023.

S No.	Particulars	Compliance Status Yes/No/NA	Observations/ 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	
2	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li></ul>	Yes	
3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li></ul>	Yes	





	<ul style="list-style-type: none"><li>• Timely dissemination of the documents/ information under a separate section on the website</li><li>• 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</li></ul>		
4	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	
5	<u>To examine 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	Yes	
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	
7	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI regulations	Yes	
8	<u>Related Party Transactions:</u> (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions (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	No	Not applicable
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.	No	Regulation 30 is Not applicable to the listed





			entity. However, the Company complies with the requirements of Regulation 51.
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	
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions 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	Not Applicable
12	<u>Additional Non-compliances, if any:</u> No additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	No	Not Applicable

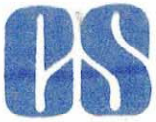
\*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

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

- (a) The listed entity where ever it is applicable, has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

S No	Compliance Requirement (Regulations / circulars/ guidelines including specific clause	Regulation/ Circular No.	Deviation	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the PCS	Management Response	Remarks
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA





- (b) The listed entity has taken the following actions to comply with the observations made in previous reports:

S N o	Compliance Requirements (Regulations / circulars/ guidelines including specific clause	Regula tion/ Circula r No.	De via tio ns	Actio n Take n by	Type of Actio n	Detail s of Violat ion	Fine Amou nt	Observa tions/ Remarks of the PCS	Manag ement Respo nse	Rema rks
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

For Roy Jacob & Co  
Company Secretaries



Place: Mumbai  
Date: 08<sup>th</sup> May, 2023

(Roy Jacob)  
Proprietor  
(C.P. No.8220), (FCS No.9017)  
UDIN: F009017E000260818  
P.R. Cer. No.686/2020