



**INDIA HOME
LOAN LTD.**

CIN: L65910MH1990PLC059499
GSTIN : 27AAACM5101F1ZO

Date: May 29, 2024

To,
The Department of Corporate Affairs,
The Bombay Stock Exchange,
Phiroze Jeejeebhoy Towers
Dalal Street,
Mumbai- 400 001.

Scrip Code: 530979

Sub.: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024

Dear Sir/Madam,

With reference to the above mentioned subject and in compliance with the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Amendment Regulations, 2018, read with SEBI Circular dated February 08, 2019 and April 10, 2023, please find enclosed Annual Secretarial Compliance Report of the Company for the Financial year ended March 31, 2024.

The above said report dated May 27, 2024 has been signed by Ms. Rachana Shanbhag, Partner in D.A. Kamat & Co., Practicing Company Secretaries.

Kindly take the above information on record.

Yours Faithfully,
For India Home Loan Limited



Shilpa Katare
Company Secretary and Compliance Officer
A65863



D.A. KAMAT & CO
Partners in Compliance

D A Kamat & Co

Company Secretaries

Website: csdakamat.com

To,

The Board of Directors

INDIA HOME LOAN LIMITED

504/504A, 5th Floor, Nirmal Ecstasy,

Jatashankar Dosa Road, Mulund (W),

Mumbai MH 400080 IN

Subject: Annual Secretarial Compliance Report for Financial Year 2023-24.

Dear Sirs,

We have been engaged by **INDIA HOME LOAN LIMITED** (hereinafter referred to as the 'Company') bearing **CIN: L65910MH1990PLC059499** whose Equity Shares are listed on the Bombay Stock Exchange Ltd ("BSE Ltd") to conduct an audit in terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.



RMShaubhag

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Mumbai 400 053

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Sr.No. 23-24/528



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Our audit was conducted in accordance with guidance note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner, which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For the purpose of this Certificate, the submissions, records and documents maintained were checked electronically for the period up to 31st March, 2024, based on the submissions received from the management of the Company.

For, D. A. Kamat & Co

Company Secretaries

P.R. No:1714/2022



R. Shanbhag

Rachana Shanbhag

Partner

FCS 8227

CP 9297

UDIN: F008227F000462340

Date: 27/05/2024

Place: Mumbai

**Secretarial Compliance report of India Home Loan Limited for the Financial Year ended
31st March, 2024**

To,

INDIA HOME LOAN LIMITED

504/504A, 5th Floor, Nirmal Ecstasy,

Jatashankar Dosa Road, Mulund (W)

Mumbai MH 400080 IN

We, M/s D. A. Kamat & Co, Company Secretaries, have examined:

- a) All the documents and records made available to us and explanation provided by **INDIA HOME LOAN 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 31st March 2024 ("Review Period") in respect of compliance with the provisions of:
 - i. The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - ii. 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 –

1. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
2. Securities and Exchange Board of India (Issue of Capital & Disclosure Requirements) Regulations, 2018
3. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011





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4. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2021 **(Not applicable)**
5. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable) **(Not applicable)**
6. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993.
7. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **(Not applicable)**
8. The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not Applicable for the Review period)**
9. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Based on the above examination, we hereby report that, during the Financial Year ending on 31st March 2024 ("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)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practising Company Secretary (PCS)	Management Response	Remarks
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1	Prior intimation of Board Meeting pursuant to sub-regulation (1)(a) of Regulation 29 of the SEBI (LODR) Regulations, 2015	Regulation 29(1)(a) of the SEBI (LODR) Regulations, 2015	Prior intimation for Board Meeting scheduled to be held on 29.05.2023 for Quarterly Financial Results was filed on 26.05.2023,	BSE Limited	Fine levied by BSE	Delay of 2 days in filing of the intimation of Board Meeting for Quarterly Results.	Rs. 10,000/-	The Company should file intimations on time as per the SEBI regulations so as to avoid penalties from BSE.	It got missed inadvertently. The Company has further complied with all other regulations.	The Company paid the Penalty to BSE.
2	Submission of Security Cover Certificate pursuant to sub-regulation (3) of Regulation 54 of the SEBI (LODR) Regulations, 2015	Regulation 54(3) of the SEBI (LODR) Regulations, 2015	Delay in submission of Security Cover Certificate	BSE Limited	Fine levied by BSE	Delay of 19 days in submission of Security Cover Certificate	Rs. 19,000/-	The Company should file the necessary certificates/details as per the SEBI regulations so as to avoid penalties from BSE.	This was due to delay in receiving the security cover certificate from the Auditor.	The Company paid the Penalty to BSE.

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



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Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports (PCS)	Observations made in the secretarial compliance report for the year ended (the years 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 is observed that in few Board Meetings, Agenda is not circulated atleast 7 days before the Board Meeting.	FY 2022- 2023	Secretarial Standard- 1 (SS-1)- Meetings of the Board of Directors	NIL	There was no scope of rectification for the mentioned remark	The Company is advised to comply with the provisions of SS-1 for circulation of Agenda of the Board Meeting.

We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations / Remarks by PCS*
1	<u>Secretarial Standard</u> The compliances of the listed entity are in accordance with the applicable secretarial standards Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI), as notified by the Central Government under Section 118(10) of the Companies Act, 2013 and mandatorily applicable.	YES	<ul style="list-style-type: none"> The Agenda for the Board and Committee Meetings held on 09.08.2023 and 06.11.2023 were sent less than 7 days before the meetings.



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2	<p><u>Adoption and timely updation of the Policies:</u></p> <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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI. 	YES	-
3	<p><u>Maintenance and disclosures on Website:</u></p> <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 redirects to the relevant document(s)/ section of the website. 	YES	-
4	<p><u>Disqualification of Director:</u></p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	YES	-
5	<p><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></p> <p>(a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries.</p>	NA	-
6	<p><u>Preservation of Documents:</u></p> <p>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.</p>	YES	-





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7	Performance Evaluation: 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	Related Party Transactions: (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.	YES	-
9	Disclosure of events or information: 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	-
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	-
11	Actions taken by SEBI or Stock Exchange(s), if any: 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 action(s) has 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	NA	-



	through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.		
12	<p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>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.</p>	NA	
13	<p><u>Additional Non-compliances, if any:</u></p> <p>No additional non-compliance observed for all SEBI regulation/circular/guidance note etc. except as reported above.</p>	NA	<p>It was observed that the Company had defaulted in repayment of 200 Rated, Listed, Secured, Redeemable, Taxable Non-Convertible Debentures (NCDs) each having the face value of Rs. 10,00,000/-, aggregating up to Rs. 20 Crores which was issued by the Company and was due on 30th June, 2023.</p>

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.





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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 SEBI (LODR) 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, D. A. Kamat & Co
Company Secretaries
P.R. No:1714/2022



Rachana Shanbhag

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Partner
FCS 8227
CP 9297

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