

**Secretarial compliance report of
India Home Loan Limited for the year ended 31st March, 2026**

To,
The Board of Directors
India Home Loan Limited

I have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by *India Home Loan Ltd* (hereinafter called "**the Company**"). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/ statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on 31st March, 2026 ("**Audit Period/period under review**") complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined:

- (a) all the documents and records made available to us and explanation provided by India Home Loan Ltd ("**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, 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 thereunder have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI LODR);
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 **(Not applicable to the listed entity during the Review Period)**;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not applicable to the listed entity during the Review Period)**
- (d) Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 **(Not applicable to the listed entity during the Review Period)**;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable to the listed entity during the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable during the year under review)**;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013- **(Not Applicable during the year under review)**;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) SEBI (Depositories and Participants) Regulations, 1996;

and circulars/ guidelines/Master direction issued thereunder.

and based on the above examination, I 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.

Sr No	Compliance Requirement	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



								(PCS)		
1	Conduct periodic review of risk categorisation of customers at least once in six months and Carry out periodic updation of KYC	RBI Master Direction on Know Your Customer (KYC) Directions, 2016	Failure to conduct periodic review of risk categorisation of customer and Failure to carry out periodic updation of KYC	Reserve Bank of India (RBI)	Monetary penalty	Failed to conduct periodic review of risk categorisation of customer at least once in six months and Failed to carry out periodic updation of KYC	Rs. 32000	During the year under review, it was observed that the Reserve Bank of India (RBI), vide its speaking order, imposed a monetary penalty of ₹32,000 on the Company under Section 52A of the National Housing Bank Act, 1987 for non-compliance with the RBI Master Direction on Know Your Customer (KYC) Directions, 2016. The non-compliances, inter alia, included failure to conduct periodic	The Company has since undertaken corrective actions, including completion of periodic review of risk categorisation and updation of KYC for all customers, which were duly noted by the Board. The Management further confirms that necessary systems and controls have been strengthened to ensure timely compliance with	The Company has paid the monetary penalty imposed by RBI.



								review of risk categorisation of customers and periodic updation of KYC within the prescribed timelines.	applicable regulatory requirements going forward and to avoid recurrence of such instances	
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(b) The listed entity has taken the following actions to comply with the observations made in the previous reports:

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 2025	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	Company should follow RBI Directions with respect to maintenance of Loan to Value Ratio ('LTV') and adhere to the NHB Directions issued in this regard	Company should follow RBI Directions with respect to maintenance of Loan to Value Ratio ('LTV') and adhere to the NHB Directions issued in this regard	Paragraph 27A of NHB Circular and Paragraph 19 of the NHB Directions.	Breach of prescribed Loan to Value on sanctioned Affordable Housing scheme of the State Govt. and a penalty of Rs. 1,00,000 was imposed	This got missed inadvertently . The Company has further complied with all other regulations.	The deviation appears to be inadvertent; however, the Company has since taken corrective measures and ensured compliance with the applicable RBI/NHB Directions. The imposition of penalty indicates regulatory

						action, and the Company is advised to strengthen its internal controls and monitoring mechanisms to prevent recurrence of such instances.
2	The Company Should submit its financial Results for Quarter and year ended 31st March within 60days from the end of the financial year so as to avoid penalties from BSE.	The Company Should submit its financial Results for Quarter and year ended 31st March within 60days from the end of the financial year so as to avoid penalties from BSE.	Regulation 33 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015,	Delayed submission of Statement on impact of audit qualification	This got missed inadvertently. The Company has further complied with all other regulations	The Company has since submitted the required Statement on Impact of Audit Qualification and has strengthened its internal compliance calendar and review mechanism to ensure such delays do not recur.

(c) I report below the compliance status by the listed entity of the items stated in the table:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1	Secretarial Standards:	Yes	None
	The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.		



2	Adoption and timely Updation of the Policies:	Yes	None
	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		
3	Maintenance and disclosures on Website:	Yes	None
	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		
4	Disqualification of Director:	Yes	None
	None of the Director(s) of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Company.		
5	To examine details related to Subsidiaries of listed entity:	NA	None
	(a) identification of material subsidiary companies		
	(b) Disclosure requirement of material as well as other subsidiaries		
6	Preservation of Documents:	Yes	None
	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.		
7	Performance Evaluation:	Yes	None
	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	Related Party Transactions:	Yes	None
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or		
	(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		
9	Disclosure of events or information:	Yes	None
	The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule 111 of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.		
10	Prohibition of Insider Trading:	Yes	None
	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.		
11	Actions taken by SEBI or Stock Exchange(s), if any:	Yes	None
	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		

	through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.		
12	Additional Non-compliances, if any: 1. Companies Act 2013.	No	<p>The Company had sought approval of the Members by way of Special Resolution for continuation of Mr. Mahesh Narshibhai Pujara as Managing Director upon attaining the age of 70 years pursuant to the provisions of Section 196(3)(a) of the Companies Act, 2013. However, the process for obtaining shareholders' approval was initiated after Mr. Mahesh Narshibhai Pujara had already attained the age of 70 years. Further, the Special Resolution proposed for such continuation did not receive the requisite majority and therefore could not be approved by the Members. the Company re-designated Mr. Mahesh Narshibhai Pujara from Managing</p>



			<p>Director to Director. The said change was carried out to align the position with the applicable provisions of Section 196(3)(a) of the Companies Act, 2013, though there was an interim period prior to such re-designation during which the requisite approval remained pending.</p>
	Redemption of debentures		<p>During the year under review, 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 for redemption on 30th June, 2023. During the FY 2025-26 The current outstanding liability stands at</p>

HIMANSHU GAJRA & Co.

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			Rs. 24.03 crore (16.95 Crore - principal)
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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 certify 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 SEBI (LODR) 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.

Place: Thane
Date: 29-05-2026

For Himanshu Gajra & Company

CS Himanshu Gajra
FCS No.: F11691
C P No.: 25306
Peer Review No: 6768/2025
UDIN No: F011691H000543508