

**SCRIP NAME: SRGHFL; SCRIP CODE: 534680; ISIN: INE559N01010**

Date: 30-05-2022

To,  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai- 400001

Respected Sir,

**Sub: Annual Secretarial Compliance Report of the Company for the Financial Year ended March 31, 2022**

**Ref:- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

With reference to the above mentioned subject, please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended March 31, 2022 issued by Mr. Shiv Hari Jalan, Practicing Company Secretary.

Kindly take the above information on record.

Thanking You,

With Regards,

For SRG Housing Finance Limited

Sunaina Nagar  
Company Secretary  
M.No:- A40754

***Encl:- a/a***



**Secretarial compliance report**

**of**

**SRG Housing Finance Limited**

**for the year ended 31<sup>st</sup> March, 2022**

**(Pursuant to circular CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019)**

To,  
The Members of  
SRG Housing Finance Limited  
321, S.M. Lodha Complex,  
Near Shastri Circle,  
Udaipur – 313001.

I, Shiv Hari Jalan, Proprietor of Shiv Hari Jalan & Co., have examined:

- (a) all the documents and records made available to me and explanation provided by SRG 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<sup>st</sup> March, 2022 (“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; (Not applicable to the company during the review period)



- (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 during the period under review)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable during the period under review)
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- (g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013; and The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the company during the review period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and applicable Regulation and circulars / guidelines issued thereunder.

and based on the above examination, considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, I hereby report that, during the Review:

- (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:-

<b>Sr. No</b>	<b>Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)</b>	<b>Deviations</b>	<b>Observations/ Remarks of the Practicing Company Secretary</b>
1	Closure of Trading Window under SEBI (Prohibition of Insider Trading) Regulations 2015.	The company has made disclosure of closure of trading window to BSE Ltd with delay of 4 days i.e. on 04.10.2021 for dealing in the securities of the Company shall remain Closed from 1st October 2021 till 48 hours after the announcement of financial results of the	The company has made disclosure of closure of trading window to BSE Ltd with delay of 4 days. However the company has Closed trading window for all

		Company for the quarter and half year ended 30th September, 2021.	designated person from 1st October 2021.
2	Regulation 30 (6) and para 4 in Para A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The Company has submitted outcome of Board Meeting held on 28.05.2021 to BSE Ltd with delay of just 7 minutes (Due to technical glitches) in which board has approved and considered the audited financial result for the quarter and year ended 31.03.2021.	The Company admitted to comply this regulation henceforth.
3	Regulation 57 (4) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The Company has made delayed disclosure i.e. disclosure made on 08.10.2021 and 19.01.2022 for interest/principal obligations for non-convertible securities are payable during October'21 to December'21 and January'22 to March'22 respectively.	The Company admitted to comply this regulation henceforth. The Company has made compliance its vide letter dated 21.03.2022 under this regulation for interest/principal obligations payable for non-convertible securities during April'22 to June'22.
4	Regulation 57 (5) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The Company has made delayed disclosure i.e. disclosure made on 19.01.2022 for payment of interest /principal obligations for non-convertible securities during the quarter October'21 to December'21.	The Company admitted to comply this regulation henceforth. The Company has made compliance its vide letter dated 04.04.2022 under this regulation for payment of interest /principal obligations for non-convertible securities during the quarter January'22 to March'22.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.

- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
-----NIL-----				

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
No observations were made in previous report issued by us on June 28, 2021, June 30, 2020 and M/s Deepak Vijaywargey and Associates, Company Secretaries on May 24, 2019 and hence reporting on action taken by the listed entity and our comment thereto, does not arise.				

Place: Mumbai  
Date: 30.05.2022  
UDIN: F005703D000430501

For Shiv Hari Jalan & Co.  
Company Secretaries  
FRN: S2016MH382700

Shivhari Jalan  
Digitally signed by Shivhari Jalan  
Date: 2022.05.30 18:27:17 +05'30'

(Shiv Hari Jalan)  
Proprietor  
FCS No: 5703  
C.P.NO: 4226  
PR No. 1576/2021