

Ref No.: SECY/S-16/2022

21<sup>st</sup> May, 2022

BSE Ltd. Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400001 Ph. No.: 022-22723121	National Stock Exchange of India Limited (NSE) “Exchange Plaza”, Bandra-Kurla Complex, Bandra (E), Mumbai – 400051 Ph. No.: 022-26598237
<b>COMPANY NO. 507828</b>	<b>SYMBOL : ANSALHSG</b> <b>SERIES : EQ</b>

Dear Sir/ Ma’am,

**Sub: Annual Secretarial Compliance Report for the Financial Year 2021-22.**

**Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019.**

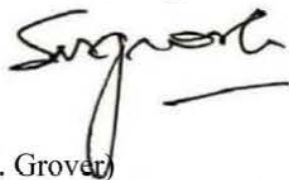
Dear Ma’am/ Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27 /2019 dated 8th February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of the Company issued by M/s. Parveen Rastogi & Co., Practicing Company Secretaries for the financial year ended 31st March, 2022.

We request you to kindly take the above on record.

Thanking you.

Yours faithfully,  
For Ansal Housing Limited



(S.N. Grover)  
Addl V.P. & Company Secretary  
M.No.: F4055



**Ansal Housing Limited**

— An ISO 9001:2015 Company —

(Formerly known as Ansal Housing & Construction Ltd.)

Regd. Office : 606, 6<sup>th</sup> Floor, Indra Prakash, 21, Barakhamba Road, New Delhi - 110001, Ph. : 91-11-23317466, 23315108  
Head Office : 2F-AHCL, 2<sup>nd</sup> Floor, Ansal Plaza, Sector-1, Vaishali, Ghaziabad, U.P. - 201010, Ph. : 91-120-3854000, 4195100  
E-mail : ahl@ansals.com Website : www.ansals.com  www.facebook.com/AnsalsHousing CIN : L45201DL1983PLC016821



# Parveen Rastogi & Co.

## Company Secretaries

### SECRETARIAL COMPLIANCE REPORT OF M/S ANSAL HOUSING LIMITED

FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022

I, Parveen Kumar Rastogi, Proprietor of M/s Parveen Rastogi & Co., Practicing Company Secretaries have examined:

- a) all the documents and records made available to me and explanation provided by M/s Ansal Housing 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 documents/ filings, as found relevant and 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;
- 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 to the Company during the Reporting Period}**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **{Not Applicable to the Company during the Reporting Period}**



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Branch Off. : CS-54 & 55, 1st Floor, Ansal Plaza, Vaishali, Ghaziabad-201010  
: Shop No. 5-6, Satyam Plaza, Plot No-4, Block-B & E, Dilshad Garden, North East Delhi-110093  
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Web. : csparveenrastogi.com

- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **{Not Applicable to the Company during the Reporting Period}**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- i) SEBI (Delisting of Equity Shares) Regulations, 2009 **{Not Applicable to the Company during the Reporting Period}**
- j) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- k) Other regulations as applicable and circulars/guidelines 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, except in the matter specified below :

Sr. No	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Non-Compliance of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) for submission of financial results	Delay of 27 days in submission of financial results of the Company for fourth quarter and financial year ended 31 <sup>st</sup> March, 2021.	Delay in submission of financial results for fourth quarter and financial year ended 31 <sup>st</sup> March, 2021 caused due to hardships faced by the Company during the second wave of COVID-19 pandemic at that time.

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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.
1.	NSE	Non-Compliance of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') for submission of financial results	NSE had proposed imposition of fine for delay of 27 days in submission of financial results for fourth quarter and financial year ended 31 <sup>st</sup> March, 2021 as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') against which the Company had moved Applications before the Fine Waiver Committee of NSE. Considering the application made by the Company, the NSE had waived of the fine vide its letter <i>Ref. No. NSE/LIST/SOP/ANSALHSG</i> dated <i>January 10, 2022</i> .	The Company submitted its response and requested NSE to waive off the fine on the grounds that such delay for submission of financial results of the Company for the fourth quarter and financial year ended March 31, 2021 caused due to hardships faced by the Company during the second wave of COVID-19 pandemic during that time.
2.	BSE	Non-Compliance of Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') for submission of financial results	BSE had proposed imposition of fine for delay of 27 days in submission of financial results for fourth quarter and financial year ended 31 <sup>st</sup> March, 2021 as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') against which the Company had moved Applications before the Fine Waiver Committee of BSE. Considering the application made by the Company for waiver of fine levied, <i>the</i>	The Company submitted its response and requested BSE to waive off the fine on the grounds that such delay for submission of financial results of the Company for the fourth quarter and financial year ended March 31, 2021 caused due to hardships faced by the Company during the second wave of COVID-19 pandemic during at that time.



			<b>BSE vide its email dated January 03, 2022</b> had waived of the fine.	
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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 March 31, 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Delay of 119 days in Appointment of Sixth Director on the Board of the Company with effect from 01 <sup>st</sup> April, 2020.	The Board of Directors of the Company was duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. However, NSE vide its email dated 20th August, 2020 and 17th November, 2020 had proposed to levy fine of Rs. 5,36,000 (inclusive of GST @ 18 % i.e. Rs. 81,900/- for the Quarter ended June 2021 and Rs. 1,65,200/- (inclusive of GST @ 18 % i.e. Rs 25,200/-) for Quarter ended September 2020 respectively due to delay of 119 days in appointment of required sixth director on the Board of Directors of the	The Company has complied with the requirement of Regulation 17(1) (c) of SEBI LODR Regulations, 2015 and has appointed the sixth director on its Board dated July 29, 2020.	It is complied with and the Company has appointed the sixth director on its Board on July 29, 2020. Consequentially, penalty so imposed by NSE vide its email dated 20 <sup>th</sup> August, 2020 to levy fine of Rs. 5,36,000 (inclusive of GST @ 18 % i.e. Rs. 81,900/- for the Quarter ended June 2021 has been waived off. However, fine imposed by NSE vide its email dated 17th November, 2020 for Rs. 1,65,200/- (inclusive of GST @ 18 % i.e. Rs 25,200/-) for Quarter ended September 2020 is still pending and the decision is yet to be communicated to the Company by NSE.



Company with effect from 01st April, 2020.

The Company submitted its response and requested NSE to waive off the fine on the grounds that the Company started its search for suitable candidate for being appointed as a director and approached a few incumbents with the proposal but it was declined by them due to their other prior commitments or personal reasons. Also the Company faced difficulties in appointing the desired sixth director due to lockdown announced by the Government in the month of March, 2020 and, hence, it was entirely beyond its control to appoint the sixth director on or before 1st April, 2020.

The Company also informed NSE that in order to comply with the requirement of Regulation 17(1) (c) of SEBI LODR Regulations, 2015, the Company has appointed one more director on the Board with effect from 29th July, 2020. NSE has waived off the fine proposed to be levied



		for the quarter ended 30th June, 2020 and the fine waiver request of the Company for the quarter ended 30th September, 2020 is still pending and the decision is yet to be communicated to the Company by NSE.		
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**For Parveen Rastogi & Co.  
(Company Secretaries)**



**Parveen Kumar Rastogi**

**M. No.: 4764**

**COP No.: 2883**

**Date: 17.05.2022**

**Place: New Delhi**

**UDIN: F004764D000336062**