



## LADAM AFFORDABLE HOUSING LIMITED

(Formerly known as Ladam Finance Limited)

**Date: June 30, 2021**

To  
Bombay Stock Exchange Limited.  
P.J. Towers  
Dalal Street  
Mumbai - 400001

**Dear Sir,**

**Sub: Annual Secretarial Compliance Report for the Financial Year 31<sup>st</sup> March, 2021**

Pursuant to Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 and SEBI Circular No. CIR/ CFD/ CMD1/ 27/2019 dated 8<sup>th</sup> February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of Ladam Affordable Housing Ltd. issued by M/s. A G Ranade & Associates, Company Secretaries, for the Financial Year ended 31st March, 2021.

Kindly take the same on record.

Your Faithfully,

**For Ladam Affordable Housing Ltd.**

**Sumesh Aggarwal**

**Director**

**Din: 00325063**



Email: agranade@rediffmail.com  
info@agranadeandassociates.com

A. G. RANADE & Associates  
Company Secretaries

Office Contact # 8104386425

2, B Wing, Gr Fl, Om Sai Prasad Bldg, Shivaji Nagar, Nr.  
Railway Colony, B-Cabin, THANE (W) – 400 602

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101, Bldg #4, Shiv Amrut Dham, KALYAN – 421 301.  
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Secretarial Compliance Report of  
Ladam Affordable Housing Limited  
[CIN#L65990MH1979PLC021923]  
for the year ended 31st March, 2021

We have examined:

- a) all the documents and records made available to us and explanation provided by Ladam Affordable 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 document/ filing, as may be relevant, which has been relied upon to make this certification, [Part of assignment was conducted during Covid-19 pandemic and resultant lockdown restrictions. We have used appropriate Information Technology tools to access the relevant documents and records to complete the assignment.]

for the year ended 31st March, 2021 (“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;

- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars / guidelines issued thereunder;

and based on the above examination, we 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 respect of matters specified below: -

Sr. No.	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1	Regulation 31(2) of LODR, 2015: The listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board.	800,000 nos of shares held by Mr. Bharat Bhushan Aggarwal – Promoter of listed entity are not in dematerialized form	As explained by the listed entity, the said shares are pledged to secure a loan taken by an associate company and physical share certificates may have been handed over to Lender. Therefore this is a violation of Reg. 31(2) since part of promoter's shares are not in dematerialized form.

- 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 our examination of those records.

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A. G. RANADE & Associates  
Company Secretaries

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- c) There are no 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.
- d) The reporting of actions by the listed entity to comply with the observations made in previous reports does not arise during the Review Period.

Signature :  
Name of the Company Secretary : Ajay Ranade  
Address : A G Ranade & Associates  
Company Secretaries,  
2, Gr Fl, B Wing, Om Sai Prasad Bldg,  
Shivaji Nagar, Thane (W) – 400 602.  
Membership No. : FCS 6199  
C. P. No. : 6231  
ICSI UDIN : F006199C000510164

Place: Thane  
Date: 26<sup>th</sup> June, 2021