



Ref. No: SHCL/CO/DJB/F.1104 (14)/21-22/258

Date: 29/06/2021

BSE Ltd.  
Phiroz Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400001

Scrip Code / Scrip ID: 511533

**Subject: Annual Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup> March 2021.**

Dear Sir,

In terms of the SEBI Circular No.: CIR/CFD/CMDI/27/2019 dated 8<sup>th</sup> February 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued to the Company viz. Sahara Housingfina Corporation Limited by P V Subramanian, Company Secretary in Whole-time Practice, for the financial year ended 31<sup>st</sup> March 2021.

This is for your information and records.

Yours faithfully,

for Sahara Housingfina Corporation Limited



D J Bagchi  
Company Secretary

Encl: as above

**SAHARA HOUSINGFINA CORPORATION LIMITED**

Registered & Corporate Office : 46, Dr. Sundari Mohan Avenue, Kolkata - 700 014, India, Tel.: +91 33 2289 0148 / 6708  
CIN No. : L18100WB1991PLC099782, E-mail : info.saharahousingfina@gmail.com, Web : www.saharahousingfina.com

**P. V. SUBRAMANIAN**  
B.Com., LL.B., ACS.  
Company Secretary in Whole-time Practice

81/8, Regent Estate,  
Kolkata-700 092, India.  
Mobile: 98300 26425  
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**ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF  
SAHARA HOUSINGFINA CORPORATION LIMITED  
FOR THE YEAR ENDED ON 31<sup>ST</sup> MARCH, 2021.  
[Pursuant to Circular No. CIR/CFD/CMD1/27/2019 dated 08/02/2019 issued by  
Securities and Exchange Board of India]**

I, P. V. Subramanian, Company Secretary in Whole-time Practice, have examined:

- (a) all the documents and records made available to me and explanation provided by Sahara Housingfina Corporation Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (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, 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;

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- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2015;
- (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 review period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not applicable to the company during the review period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not applicable to the company during the review period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not applicable to the company during the review period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and
- (k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **(Not applicable to the company during the review period);**

and based on the above examination, I hereby report that, during the Review Period:

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(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:-

1.	2	3	4
Sr. No.	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
1.	Regulation 20(2A) of SEBI (LODR) Regulations 2015	BSE Ltd. had observed, vide its email communication dated 10 <sup>th</sup> Aug 2020, that during the Qr. Ended June 2020, the Stakeholder Relationship Committee of the Company comprised of only 2 directors instead of the prescribed minimum number of 3 directors.	The Company replied to BSE Ltd., vide letter dated 11 <sup>th</sup> Aug 2020, regretting the inadvertent error and also informed the Exchange of having rectified the error on 28 <sup>th</sup> July 2020.

(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
1.	BSE Ltd.	Non-compliance with the requirements of Regulation 20(2A) of SEBI (LODR) Regulations 2015.	Fine of Rs.2,14,760/- (inclusive of GST Rs.32760/-) was levied by BSE Ltd. which was paid by the Company on 24 <sup>th</sup> Aug 2020.	The issue stands resolved.

(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 report	Observations made in the secretarial compliance report for the year ended 31/03/2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	None	None	None	Does not arise

I further certify that the listed entity has complied with the conditions as mentioned in serial nos. 6(A) and 6(B) of SEBI Circular vide no. CIR/CFD/CMD1/114/2019 dated 18.10.2019 relating to the terms and conditions of appointment of statutory auditors of the Company.

Place: Kolkata,

Date: 28/06/2021.



Signature: P.V. Subramanian

Name of the Practicing Company Secretary: P.V. SUBRAMANIAN

ACS No.: 4585

C P No.: 2077

UDIN: A004585C000532783