

HFFCIL/BSE/NSE/EQ/26/2021-22

Date: 31-05-2021

To, <b>BSE Limited,</b> Department of Corporate Services, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001. Scrip Code- <b>543259</b>	To, <b>The National Stock Exchange of India Limited,</b> The Listing Department, Bandra Kurla Complex, Mumbai- 400 051.  Scrip Symbol- <b>HOMEFIRST</b>
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**Sub: Submission of Annual Secretarial Compliance Report pursuant to Regulation 24A of the SEBI  
(Listing Obligations and Disclosure Requirements) Regulations, 2015**

Dear Sir/Madam,

In compliance with captioned regulation read with SEBI Circular bearing Ref. No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021, we are submitting herewith the Annual Secretarial Compliance Report issued by M/s. Bhatt & Associates Company Secretaries LLP, for the Financial Year ended March 31, 2021. This is for your information and records.

Request you to kindly take the same on record.

For **Home First Finance Company India Limited**

**Shreyans Bachhawat**  
**Company Secretary and Compliance Officer**  
**ACS NO: 26700**



# BHATT & ASSOCIATES

## COMPANY SECRETARIES LLP

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**SECRETARIAL COMPLIANCE REPORT OF  
HOME FIRST FINANCE COMPANY INDIA LIMITED  
FOR THE YEAR ENDED MARCH 31, 2021**

*[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019]*

To,  
**Home First Finance Company India Limited.**

I have examined:

- a) all the documents and records made available to us and explanation provided by **Home First Finance Company India Limited ("the listed entity")**,
- a) the filings / submissions made by the listed entity to the stock exchanges,
- b) website of the listed entity,
- c) any other document/ filing, as may be relevant, which has been relied upon to make this certification for the year ended March 31, 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 (the "Listing Regulations");
- 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;
- 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 – Not Applicable;
- 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
	Nil	Nil	Nil

- 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



**Bhatt & Associates Company Secretaries LLP**

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.
	NA	NA	NA	NA

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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NA	NA	NA	NA

On account of pandemic "COVID 2019" and nationwide lockdown imposed by governments, the audit process has been modified, wherein documents / records etc. were verified in electronic mode and have relied on the representations received from Company for its accuracy and authenticity.

**For Bhatt & Associates Company Secretaries LLP**



**Aashish K. Bhatt**

**Designated Partner**

**Membership No.: 19639**

**UDIN: A019639C000226835**

**Place: Mumbai**

**Date: 03.05.2021**