

HFFCIL/BSE/NSE/EQ/22/2022-23

Date: 16-05-2022

To, BSE Limited, Department of Corporate Services, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001. Scrip Code- 543259	To, The National Stock Exchange of India Limited, The Listing Department, Bandra Kurla Complex, Mumbai- 400 051. Scrip Symbol- HOMEFIRST
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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, 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, 2022. 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

SECRETARIAL COMPLIANCE REPORT OF
HOME FIRST FINANCE COMPANY INDIA LIMITED
FOR THE YEAR ENDED MARCH 31, 2022

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

To,
Home First Finance Company India Limited.

We 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,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification for the year ended March 31, 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 (the "Listing Regulations");
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 – Not Applicable;



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- 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 and Sweat Equity) Regulations, 2021 and erstwhile the SEBI (Share Based Employee Benefits) Regulations 2014 ;
- f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 and erstwhile the SEBI (issue and Listing of Debt Securities) Regulations 2008;
- g) 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.	As per Regulation 54 (2) of SEBI Listing Regulations, the listed entity shall disclose to the stock exchange in quarterly, half-yearly, year-to-date and annual financial statements, as applicable, the extent and nature of security created and maintained with respect to its secured listed non-convertible debt securities.		Delay in disclosure of extent and nature of security created and maintained with respect to secured listed NCDs in the Financial Statements for the half year ended 30.09.2021 as per Regulation 54 (2) of SEBI Listing Regulations.



- 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 Limited (BSE)	Non-disclosure of extent and nature of security created and maintained with respect to secured listed NCDs in the Financial Statements for the Quarter ended 30.09.2021 as per Regulation 54 (2) of SEBI Listing Regulations.	Pursuant to SEBI circular no. SEBI/HO/ DDHS/ DDHS/ CIR/P/2020/231 dated November 13, 2020, BSE imposed fine of Rs. 29,500/-.	Delay in disclosure of extent and nature of security created and maintained with respect to secured listed NCDs in the Financial Statements for the half year ended 30.09.2021 as per Regulation 54 (2) of SEBI Listing Regulations the Company has made representation to BSE Limited with regards to waiver of the same and the matter is still pending.

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



Bhatt & Associates Company Secretaries LLP

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

Further, as a precautionary measure against "COVID 2019", the audit process has been modified, wherein documents /records etc. were verified in electronic mode, and have relied on the representations received from the Company for its accuracy and authenticity.

For Bhatt & Associates Company Secretaries LLP



Aashish K. Bhatt

Designated Partner

Membership No.: 19639

UDIN: A019639D000258548

Place: Mumbai

Date: 03.05.2022