

A. K. Verma & Co.
Company Secretaries
(PEER REVIEWED- YEAR 2022-2027)

ANNUAL SECRETARIAL COMPLIANCE REPORT OF
ASHIANA HOUSING LIMITED

FOR THE YEAR ENDING 31ST MARCH, 2026

[Pursuant to Regulation 24A of Securities and Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018 duly amended as on Date)

We have examined the applicable statutory provisions and adherence to good corporate practices by Ashiana Housing Limited (hereinafter called the "Company"), having its registered office at 5F, Everest, 46/C, Chowringhee Road, Kolkata, West Bengal -700071 as under:

- (1) all the documents and records made available to us and explanation provided by the Company;
- (2) the filings/ submissions made by the Company to the Stock Exchanges;
- (3) website of the Company;
- (4) any other document/ filing, as may be relevant, which has been relied upon to make this report, for the year ended 31st March 2026 ("Review Period") in respect of compliance with the provisions of:
 - i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the regulations, circulars, guidelines issued there under; and
 - ii) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time;
- (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 (To the extent applicable to the Company during the Review Period);

13-B, IIND FLOOR, ABOVE, CENTRAL BANK OF INDIA, NETAJI SUBASH MARG,
DARYAGANJ, NEW DELHI-110002

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- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations 2018(Not Applicable as there was no reportable event during the review period) ;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (Not Applicable as there was no reportable event during the review period) ;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021, as amended from time to time;
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time;
- (h) The Depositories Act, 1996 and Bye laws framed there under to the extent of Regulations 76 of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (i) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009.
- (k) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; and
- (l) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (Not Applicable as there was no reportable event during the review period) ;

And based on the above examination, we hereby report that, during the Review Period:

A. The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued there under except in respect of matters for Financial Year 2025-2026 as specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the PCS	Management Response	Remarks
1.	Submission of the Prior Intimation of Board Meeting to the Stock under Regulation 29 of The SEBI (LODR) Regulations, 2015 regarding	Regulation 29 of SEBI (LODR) Regulations, 2015 SEBI Circular No. SEBI/HO/CF D/POD2/CIR/P/0155 Dated Nov 11, 2024.	Non-inclusion of matter related to fund raising while submitting intimation of Board Meeting	NSE and BSE	Fine levied for Non submission of advance notice of 2 days for fund raising	NSE Ltd and BSE Ltd, imposed a fine on the company alleging non-compliance with Regulation 29 of the SEBI (LODR)	Total Amount of fine is Rs. 11,800/- (Including GST 18%) by NSE and BSE.	Inadvertent miss on the part of the company to include the matter of fund raising while submitting the intimation of Board Meeting held on 12 th	In response to the alleged non-compliance under Regulation 29 of SEBI (LODR), 2015, the company submitted its reply on 19 th August 2025 to NSE against notice dated 15 th September 2025, wherein the company	The company admitted that the alleged non-compliance was an inadvertent miss to



<p>delay in furnishing prior intimation of Board Meeting held for fund raising.</p>		<p>g held on 12th August 2025 under Regulation 29 of the SEBI (LODR) Regulations, 2015.</p>	<p>in respect of the Board Meeting held on 12th August 2026 to stock exchange.</p>	<p>Regulations, 2015, due to non submission of prior intimation for fund raising to stock exchange while filing intimation of Board Meeting held on 12th August 2025 under Regulation 29 of the SEBI (LODR) Regulations, 2015.</p>	<p>August 2025 to the Stock Exchanges on 01st August 2025 under Regulation 29 of the SEBI (LODR) Regulations, 2015.</p>	<p>submitted that the prior intimation of Board Meeting to be held on 12th August 2025 was filed to the Stock Exchange on 01st August 2025 both in pdf and XBRL. However, the final agenda for the Board Meeting was circulated to the Board members post that intimation, in which the item of fund raising was proposed to be considered, and it was inadvertently omitted to be updated to the Exchange under Regulation 29 of the SEBI (LODR) Regulations, 2015. The omission was solely unintentional with no intention to conceal any material information.</p> <p>Further, the company admitted the inadvertent miss and paid fine of Rs. 11,800/- both on BSE and NSE, on 25th September 2025.</p>	<p>give prior intimation of fund raising in Board Meeting notice filed to the Stock Exchanges and paid fine of Rs. 11,800/- each on BSE and NSE on 25th September 2025.</p>
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Note:

1. During the year, BSE Ltd. has waived off the fines of INR 15,29,940/- against the imposed fine of INR 18,11,300/- BSE Ltd. had imposed these fines alleging non compliances relating to NCDs issued to IFC, for the period during the year 2021, 2022 and 2023. The reply submitted by the Company contested the rationale behind the fines imposed and persistently followed up for waiver of the fines levied. Currently the company has written to BSE Ltd. to refund the amount so waived.
2. The company has made all requisite compliances during the year. However, there was one instance of delayed filing with the stock exchange, (as mentioned in the above table) which occurred inadvertently and without any intention of willful non-compliance.



Note: Apart from the above, BSE and NSE Ltd. issued various emails to the company during FY 2025-26 seeking clarifications / observations on various quarterly compliances which were duly replied by the company to both the Stock Exchanges.

(b) The Listed Entity has taken the following actions to comply with the observations made in previous reports:

Sl. No.	Observations/Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31-03-2025	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of violation /Deviations and actions taken /penalty imposed, if any, on the listed entity	Remedial actions, If any taken by the listed entity	Comments of the PCS in the actions taken by the listed entity
1.	Based on the supporting documents and explanation provided by the management, it was noted that the company had submitted a detailed response on December 16, 2024, along with several follow-up emails. In its response, the company clarified that the disclosure under Regulation 23(9) had been duly submitted in both XBRL and PDF formats. The company further informed the stock exchange that the intimation under the said	Based on the supporting documents and explanation provided by the management, it was noted that the company had submitted a detailed response on December 16, 2024, along with several follow-up emails. In its response, the company clarified that the disclosure under Regulation 23(9) had been duly submitted in both XBRL and PDF formats. The company further informed the stock exchanges that the intimation under the said regulation had	NSE Circular Ref No. NSE/CML/2022 /18 dated 25th April 2022, disclosures under Regulation 23(9) are required to be made every six months following the publication of the standalone and consolidated financial results.	NSE Ltd, imposed a fine on the company vide notice dated 13 th December 2024 alleging non-compliance with Regulation 23(9) of the SEBI (LODR) Regulations, 2015, due to a delay in submitting the Related Party Disclosure for the half-year ended September 2024.	The company vide its reply to dated 16 th December 2024 informed the stock exchanges that the company had duly submitted the intimation under Regulation 23 of the SEBI (LODR) Regulations, 2015 to BSE on 14th November 2024 at 12:06 AM. which was given a slight delay of only 6 (six) minutes in the filing process due to technical issues faced resulting in the initial file	the company had duly submitted the intimation under Regulation 23 of the SEBI (LODR) Regulations, 2015 to BSE on 14th November 2024 at 12:06 AM. which was given a slight delay of only 6 (six)



	<p>regulation had been filed with NSE on November 14, 2024, at 12:06 AM — a delay of merely six minutes due to technical issues faced resulting in the initial file being corrupted. And the RPT was filed was re-prepared to ensure compliance and filed with a slight delay of 6 minutes. Accordingly, the company requested the exchanges to reconsider and withdraw the fine.</p>	<p>been filed with NSE on November 14, 2024, at 12:06 AM — a delay of merely six minutes. Accordingly, the company requested the exchanges to reconsider and withdraw the fine</p>			<p>being corrupted. And the RPT was filed was re-prepared to ensure compliance and filed with a slight delay of 6 minutes.</p> <p>Accordingly, the company requested the Exchange to withdraw the fine levied as there is no non-compliance of the provision questioned.</p> <p>After several follow-ups, the fine amount was waived by NSE vide it's letter dated 21st February 2025.</p>	<p>minutes in the filing process due to technical issues faced resulting in the initial file being corrupted. And the RPT was filed was re-prepared to ensure compliance and filed with a slight delay of 6 minutes. The fine amount was waived by NSE vide it's letter dated 21st February 2025</p>
2.	<p>Based on the reply submitted by the company, And upon review of the documentary evidence and management's explanation, it</p>	<p>Based on the reply submitted by the company, And Upon review of the documentary evidence and management's explanation, it was noted that</p>	<p>Submission of Notice of Record Date under Regulation 60 (2) of SEBI (LODR), 2015 before 3 working days of</p>	<p>BSE Ltd. vide it's mail dated 28.03.2025 levied fine on the company alleging non-Compliance under Reg. 60 (2) of the SEBI (LODR), 2015 for delay in submission of</p>	<p>The Intimation of record date for the month ended February 2025 i.r.o. ISIN: INE365D0708 5 was submitted</p>	<p>The Intimation of record date for the month ended February 2025 i.r.o.</p>



was noted that the delay in submission was by a single day. The record date for the relevant security was February 3, 2025, and the company communicated the same to the exchange on January 30, 2025, instead of the prescribed date of January 29, 2025.	the delay in submission was by a single day. The record date for the relevant security was February 3, 2025, and the company communicated the same to the exchange on January 30, 2025, instead of the prescribed date of January 29, 2025.	the proposed record date	record date for the month ended February 2025 i.r.o. ISIN: INE365D07085. The Intimation of record date for the month ended February 2025 i.r.o. ISIN: INE365D07085 was submitted with a delay of one day. The fine was duly paid on April 5, 2025. The delay was entirely inadvertent, with no intention of willful non-compliance	with a delay of one day. The fine was duly paid on April 5, 2025. The delay was entirely inadvertent, with no intention of willful non-compliance.	ISIN: INE365D07085 was submitted with a delay of one day. The fine was duly paid on April 5, 2025. The delay was entirely inadvertent, with no intention of willful non-compliance
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B. The Company 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.

C. Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR) in terms of the BSE circular reference no. 20230316-14 and NSE Circular Ref No: NSE/CM1/ 2023/21 both dated March 16, 2023 and Master Circular dated April 29, 2024 from NSE and April 30, 2024 from BSE.:

I/We hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observation/remarks by PCS
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	NIL



2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of Board of directors of the listed entities. All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI. 	Yes	NIL
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> The Listed entity maintains a functional website. Timely dissemination of the documents/ information under a separate section on the website. Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website. 	Yes	Complied
4.	<p><u>Disqualification of Director:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013.</p>	Yes	None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013.
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries.</p>	Yes	<p>The company has Four Subsidiary Companies, one Subsidiary LLP and on Subsidiary partnership firm.</p> <ol style="list-style-type: none"> 1. Topwell Projects Consultants Limited. 2. Latest Developers Advisory Limited. 3. Nitya Care Homes Private Limited 4. Ashiana Maintenance Services LLP 5. Ashiana Amar Developers <p>However, the company does not have any material subsidiary.</p>



6.	<p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	Complied
7.	<p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors, and the Committees at the start of every financial year as prescribed in SEBI Regulations.</p>	Yes	<p>1. Performance evaluation of Chairman/ MD/ Executive Directors /Board as whole were carried out by Independent Directors of the company in their meeting on 12th March 2026.</p> <p>2. Performance evaluation of Non-Executive Directors/Board Committees/Evaluation of performance of the Independent Directors were carried out by the Entire Board in their meeting held on 27th May 2026 .</p> <p>The company has a Performance Evaluation Policy in conformity with SEBI Regulations and the same is available on the company's website.</p>
8.	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.</p>	<p>(a)Yes</p> <p>(b) NA</p>	<p>The members of the Audit Committee have considered, discussed, reviewed, and approved all the related party transactions which require prior approval.</p> <p>The company makes disclosures pertaining to the related party transactions on the Stock Exchanges on a half-yearly basis as required under Regulation 23 (9) of SEBI (LODR) Regulations, 2015.</p>
9.	<p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	Complied



10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	The Company is duly maintaining the SDD Software and has a policy for code of fair disclosure and conduct.
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	No	Other than the actions mentioned above in the 01 st Table of the report, there were no other actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.
12.	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	
13	<u>Additional non-compliances, if any:</u> Any additional non-compliance observed for all SEBI regulation/circular/guidance note etc. *Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'	NA	Apart from the above, BSE and NSE Ltd. issued various emails /notices to the company during FY 2025-26 seeking clarifications / observations on various quarterly compliances which were duly replied by the company to both the Stock Exchanges.

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.



3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For A. K. VERMA & CO
(Practicing Company Secretaries)

ERN: P1997DE091500



ASHOK KUMAR VERMA

Partner

FCS: 3945

CP No: 2568

PR No: 2099/2022

UDIN: F003945H000522188

Place: New Delhi

Date 28.05 2026