

SHRI NIWAS LEASING AND FINANCE LIMITED

Regd. Office: 47/18, RAJENDRA PLACE METRO STATION NEW DELHI-110060

CIN: L65993DL1984PLC019141,

E-mail: shriniwas.limited@gmail.com ,

Website: www.shriniwasleasingfinance.in ,

Mob: +91-9891709895

May30, 2026

To,
The Head Listing & Compliance
The Department of Corporate Service
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai-400001

SCRIP CODE: 538897

ISIN: INE201F01015

Dear Sir/ Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2026 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

Pursuant to Regulation 24A of the Listing Regulations, please find enclosed the annual secretarial compliance report for the year ended March 31, 2026 issued by **Bhupendra Kaushik & Associates**, Practicing Company Secretaries.

This is for your information and records.

Thanking You

**For and on behalf of Board of Directors
Shri Niwas Leasing and Finance Limited**

**Rajni Tanwar
Managing Director
DIN: 08201251**

Place: New Delhi

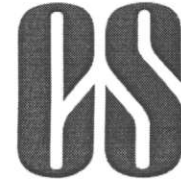
B. Kaushik & Associates.

Company Secretaries.

7/29 Basement West Patel Nagar, Delhi 110008

Email: pcsbhk@gmail.com Web site: <http://bkaacs.com>

Phone No: +91-11-43632828 Mobile No: +91- 9015450050.



To,

SHRI NIWAS LEASING AND FINANCE LIMITED

CIN: L65993DL1984PLC019141

Reg. Office Address: 47/18, RAJENDRA PLACE METRO STATION, Central Delhi, NEW DELHI, Delhi, India, 110060

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **SHRI NIWAS LEASING AND FINANCE LIMITED** (hereinafter referred as "the listed entity"), having its registered office at 47/18, RAJENDRA PLACE METRO STATION, Central Delhi, NEWDELHI, Delhi, India, 110060. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on March 31, 2026, complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I, **Bhupendra Kaushik**, Proprietor of **Bhupendra Kaushik & Associates**, a firm of Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **SHRI NIWAS LEASING AND FINANCE 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 Report.

for the financial year ended 31st March, 2026 ("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 SEBI;

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

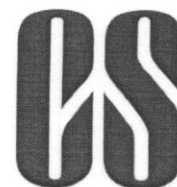
- (a) Securities and Exchange Board of India (LODR) Regulations, 2015; (**Applicable during review period**)
- (b) Securities and Exchange Board of India (Issue) of Capital and Disclosure Requirements) Regulations, 2018; (**Applicable during review period**)

Shri Niwas Leasing and Finance Limited (SCR for the financial year 2025-26



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- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Applicable during review period)**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable during review period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not applicable during review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not applicable during review period)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **(Applicable during review period)**
- (h) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; **(Applicable during review period)**
- (i) Other regulations as applicable.

and circulars/ guidelines issued thereunder and based on the above examination, I 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 (Regulation/ s/ circulars/ guidelines including specific clause)	Regulation/ Circular No	Action taken by	Type of Action	Details of violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
01	Website Update	Regulation 46 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	NA	NA	Website not Updated	NA	Website not Updated	Not received	NA
02	SDD	Regulation 3	NA	NA	SDD not	NA	No	Not	NA

Shri Niwas Leasing and Finance Limited AS CR for the financial year 2025-26

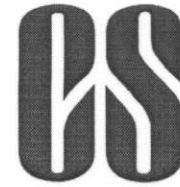
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	Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015		maintained		information is provided with respect to SDD maintenance	received	
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations / Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Details of violation / deviation s and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
NA						

I. I 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)	Observations/ Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	Management informed that the notice was served by hand delivery.
2.	Adoption and timely updation of the Policies:		There is non-compliance of all applicable policy as per

Shri Niwas Leasing and Finance Limited ASCR for the financial year 2025-26

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	<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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI.	No No	the SEBI regulation
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">The listed entity is maintaining 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 redirects to the relevant document(s)/section of the website.	No No No	The Company has not updated their website as per Regulation 46 of SEBI (LODR), 2015.
4.	Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	Yes	
5.	Details related to subsidiaries of listed entities have been examined w.r.t.:	NA	The Listed entity does not have any Material Subsidiary.

Shri Niwas Leasing and Finance Limited, ASCR for the financial year 2025-26

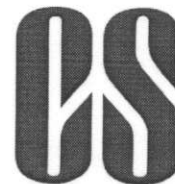
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	<p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>		
6.	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed 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	
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluation of the board, Independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	
8.	<p>Related Party Transactions:</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>	No	<p>There is non-compliance with Regulation 23 of the SEBI (LODR) Regulations as a material related party transaction was undertaken during the year without obtaining the requisite approval</p>

Shri Niwas Leasing and Finance Limited - ASCR for the financial year 2025-26



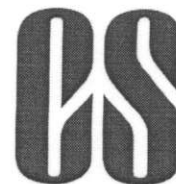
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9.	<p>Disclosure of events or information:</p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	No	No information is provided with respect to SDD maintenance.
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been 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 (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	Yes, No action has been taken by SEBI or Stock Exchange during the Financial Year 2025-2026.	
12.	<p>Resignation of statutory auditors from the listed entity or its material</p>	NA	The statutory auditor of the listed entity did not resign during the

Shri Niwas Leasing and Finance Limited _ ASGR for the financial year 2025-26

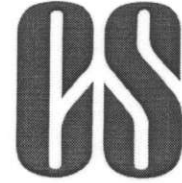
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	subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.		review period.
13.	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	No	During the Financial Year company had done borrowing without the shareholder approval as limits prescribe under section 180(1) of Companies Act 2013.



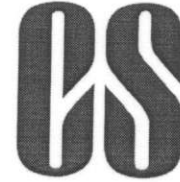
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Assumptions & limitation of scope and review:

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 report 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 account 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.

Thanking you

For Bhupendra & Associates

Peer Review Certificate No. 3397/2023



CS Bhupendra Kaushik

C.P. No.: 12453

Membership No.: F9884

UDIN: F009884H000546002

Place: New Delhi

Date: 29/05/2026