



सुधियां आपकी साथ हमारा....

NHB Registered  
CIN - U67120RJ1995PLC009580

To  
The Assistant General Manager  
Department of Supervision  
National Housing Bank, Core 5A, 5<sup>th</sup> Floor,  
India Habitat Centre, Lodhi Road  
New Delhi – 110003

Date – 22/03/2022

Subject – Scrutiny of Statutory Return (Schedule-I) for the year ended on 31-03-2021

Reference – Your letter dated NHB(ND)/DoS/HFC/01382/2022 dated March 15, 2022

Dear Sir,

In reference to your captioned letter received from your good office, we would like to provide explanations as under –

1. We would like to bring into your notice that the statutory auditors of the company had issued Additional Auditor report as per the HFC(NHB), Directions 2016 as a part of Independent Auditor's report of Financials of FY 2020-21.  
We have obtained the independent auditor's report as per chapter XII of Master Direction -Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, 2021, the same been annexed for your reference in Annexure I. The updated report has also been furnished to the Board of Directors.
2. The Annual Return for FY 2020-21 has been certified by the Managing Director, Mr. Pawan Kumar Goyal whose specimen signature has been shared with you on 30-06-2021 at the time of filling of Provisional Annual Return. Further, we are annexing the specimen signature of our Finance head (Mr. Ankit Agnihotri) for reference.
3. In Part 4 of Annual Return for FY 2020-21 the company has disclosed Mortgage loans under other housing Loans as the collateral of our mortgage loans are residential property. Moreover, we have explicitly mentioned it as mortgage loans in Annual Return FY 2021 for transparency and all the below particulars in regards to mortgage loans are done in manner directed by NHB-
  - The classification in balance sheet
  - Provisioning of Standard and Non-performing assets in
  - Reporting in Schedule II return
  - Any other reporting and disclosure as directed by NHB

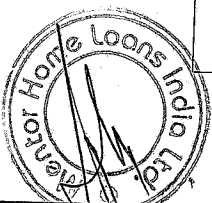


**MENTOR HOME LOANS INDIA LTD.**

Further, we will rectify this in the annual return filling of FY 2022 as directed.

4. We would like to bring to your notice that the information in regards to the resignation of the erstwhile auditors (M/S H.S. Badaya and Co.) and the appointment of the new auditors (M/S Agrawal Jain and Gupta) was informed by the company to National Housing Bank in writing via the letter dated 14<sup>th</sup> October, 2021, which was sent to your good office through Indian Post. The copy of the letter along is annexed for your reference.
5. Kindly find below replies for the observations of disclosures in the notes to balance sheet for FY 2020-21 in terms of Master Direction-NBFC-HFC (Reserve Bank) Directions, 2021

S.No.	Particulars	Serial Number	Reply
a)	Annex – III Schedule to the balance sheet of an HFC	2 (c) Other Public deposits	The company has omitted to include the row item <i>Other Public Deposits</i> under the head ' <i>Break-up of outstanding public deposits inclusive of interest accrued thereon but not paid</i> ' owing to the non-applicability of the clause as the company is not accepting public deposits. However, the same has been included in the format and the same is attached for your reference in Annexure II.
b)	Annex – IV Indicative list of Balance Sheet Disclosures for HFCs	3.6 – Asset Liability Management	Mentor Home Loans India Limited is a non-deposit taking company and the foreign exposure of the company is NIL. Also, the company has not taken any market borrowings and has appropriately disclosed the maturity pattern of the carrying instruments i.e., Bank Borrowings, Investments and Loans & Advances. We have revised the same and annexed it in annexure III.
		4.4 – Group Structure	As per AS-18 Mentor Finmart Pvt Ltd is our related party and the disclosure of the same has been



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			made in Note 29. Mentor Finmart Pvt Ltd is not a Subsidiary or Associate of Mentor Home Loans India Limited therefore the same has not been considered as a group company for the purpose of group structure.
		5.1 - Details for Provision for Standard Assets	We would like to bring your notice that the company has made an adequate provisioning in case of standard assets of CRE and CRE-RH loans. Further, we will separately disclose it upcoming financials in FY 22.
		5.6 - Off-Balance sheet sponsored SPVs	We have taken the note of the same and is attached in annexure IV for disclosure of Off-Balance sheet sponsored SPV's which is in line with the format as specified in the Directions.

We request you to consider the above response to your observations and we expect that we have implemented the suggestions in our process as directed by NHB.

We request you to kindly consider the same and oblige us.

Thanking You

For & On behalf of  
Mentor Home Loans India Limited

Mr. Pawan Kumar Goyal  
Managing Director

**MENTOR HOME LOANS INDIA LTD.**

# H. S. BADAYA & CO.

Chartered Accountants

26, Shree Hari Mansion, Hathroi Block,  
Gopalbari, Ajmer Road, Jaipur-302001 (Raj.)

To,  
The Board of Directors,  
Mentor Home Loans India Limited,  
Mentor House, Govind Marg,  
Sethi Colony, Jaipur – 302004

**Sub: - Master Direction - Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, 2021**

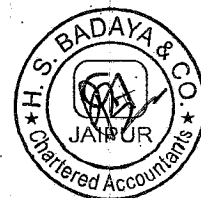
We, H.S. Badaya & Co, have audited the financial statements of Mentor Home Loans India Limited (the "Company") for the period ended 31 March 2021.

Based on the audited financial statements of the Company referred to above and information / explanations and representations received from the management, we confirm the following particulars: -

**A. Applicable to all Housing Finance Companies:**

1. The housing finance company has obtained the Certificate of Registration (CoR - not valid for acceptance of public deposit) granted by the NHB dated 05th August 2014. Further The housing finance company is complying with the principal Business Criteria as defined in para 4.1.17 of the Master Direction - Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, 2021.
2. The housing finance company is meeting the required Net Owned Fund (NOF) requirement as prescribed under Section 29A of the National Housing Bank Act, 1987 during the period under audit and as on 31 March 2021. The housing finance company has not issued paid-up preference shares which are compulsorily convertible into equity.
3. The housing finance company has complied with Section 29C of the National Housing Bank Act, 1987 by creating a reserve fund in which 20 percent of its net profit has been transferred during the financial year ended 31 March 2021.
4. The total borrowings of the housing finance company are within the limits prescribed under Paragraph 27.2 of Master Direction - Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, 2021.
5. The housing finance company has complied with the prudential norms on income recognition, accounting standards, asset classification, provisioning requirements, disclosure in balance sheet, investment in real estate, exposure to capital market and engagement of brokers, and concentration of credit/investments as specified in Master Direction - Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, 2021. With respect to the calculation of Loan to Value (LTV) Ratio, the housing finance company computes Loan to Value ratio, for all loans so sanctioned, on the basis of Market Value, considering it as realisable value, of the residential property as denominator.
6. The capital adequacy ratio as disclosed in the half-yearly statutory return, submitted to the NHB during the financial year ended 31 March 2021, as per the directions issued by NHB in this regard, has been determined based on LTV calculated on Market Value of residential property, as reported in para 5 above, as denominator for all its loan assets. As on 31 March 2021, such ratio is in compliance with the prescribed minimum capital to risk weighted asset ratio (CRAR).

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Phone : (Res.) 0141 - 2811796  
E-mail : hsbaraya@gmail.com



7. The housing finance company, during the financial year 31 March 2021 has furnished to the NHB within the stipulated period the half-yearly statutory return, as specified in the directions issued by NHB.
8. The housing finance company, during the financial year 31 March 2021 has furnished to the NHB within the stipulated period, the quarterly statutory return on Statutory Liquid Assets, as specified in the directions issued by NHB.
9. The housing finance company has complied with the requirements contained in the Master Direction - Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, issued by NHB, while opening and closure of branches for the financial year ending on March 2021.
10. The housing finance company has complied with the provisions contained in Paragraph 3.1.3 for Loans against securities of shares, Paragraph 3.1.4 for Loans against securities of single product - gold jewellery and Paragraph 18 for Loans against HFCs own shares of Master Direction - Non-Banking Financial Company Housing Finance Company (Reserve Bank) Directions, 2021.
11. The Board of Directors of the housing finance company has passed a resolution for non-acceptance of any public deposits dated February 6, 2014;
12. The housing finance company has not accepted any public deposits during the financial year ended 31 March 2021.

**B. Applicable to Housing Finance Companies accepting/holding public deposits**

The housing finance company has obtained the Certificate of Registration (CoR - not valid for acceptance of public deposit) granted by the NHB dated 14 November 2017. Accordingly, Paragraph 70.2.1 to 70.2.7 of Master Direction - Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, 2021 are not applicable to the Company for the financial year ended 31 March 2021.

This certificate has been issued solely at the request of the Company in terms of Master Direction - Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, 2021 and it is not to be used, circulated, quoted, or otherwise referred to for any other purposes without our prior written consent.

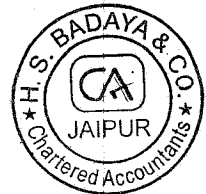
For H.S. Badaya & Co  
Chartered Accountants  
FRN 006567C



Rajat Badaya  
Partner

M.No. 422193

UDIN - 22422193AF IN 501409





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NHB Registered  
CIN - U67120RJ1995PLC009580

## SPECIMEN SIGNATURE FOR NHB

### SPECIMEN SIGNATURE

NAME	DESIGNATION	SIGNATURE
Mr. Ankit Agnihotri	Finance Head	

For on and behalf of Mentor Home Loans India Limited

  
Pawan Kumar Goyal  
Managing Director  
DIN: 00020153

**MENTOR HOME LOANS INDIA LTD.**



खुशियां आपकी साथ हमारा....

14<sup>th</sup> October, 2021

The Department of Regulation & Supervision  
National Housing Bank  
4<sup>th</sup> Floor, Core 5-A  
India Habitat Centre, Lodhi Road  
New Delhi – 110003

Sub.: Annual Report for the Financial Year (FY) 2020-21 of Mentor Home Loans India Limited & other relevant information

Dear Sir/ Ma'am,

We write to inform you that our Annual General Meeting (AGM) for FY 2020-21 was held on 30-09-2021. At the said AGM, the Members of the Company has adopted Audited Financials along with Auditor's Report thereon and approved the appointment of M/s Agrawal Jain & Gupta, Chartered Accountants as a Statutory Auditors of the Company for the period of three years as the term of previous Statutory Auditors, M/s H.S. Badaya & Co. Chartered Accountants has been completed.

Further, this is to bring to your kind notice that the Company has also appointed Mr. Sanjay Agarwal, Independent Director (Non-Executive) as the Chairman of the Company in place of Mr. Girdhari Lal Goyal, Non-Executive Director of the Company w.e.f. 27<sup>th</sup> September, 2021.

Please find enclosed herewith Annual Report for the FY 2020-21 of Mentor Home Loans India Limited for your kind reference and information.

You are requested to kindly take the above on your records and oblige.

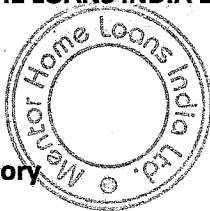
Thanking You,

Yours truly

For MENTOR HOME LOANS INDIA LIMITED

Ankit Agnihotri  
Authorized Signatory

Encl.A/a



ER290427719IN IVR:6982290427719  
SP JAIPUR CITY S.O <302004>  
Counter No:2, 14/10/2021, 16:20  
To: THE DEPT OF NATIONAL HOUSING  
PIN: 110003, Lodi Road HO  
From: MENTOR HOME, INDIA LTD SETHI  
Wt: 335gms  
Amt: 70.80 (Cash) Tax: 10.80  
<Track on www.indiapost.gov.in>

**MENTOR HOME LOANS INDIA LTD.**

Mentor House, Govind Marg, Sethi Colony, Jaipur, Rajasthan -302004 | Tel : 0141-2611999, 8946800900

Email : info@mentorloans.co.in | Website : www.mentorloans.co.in

**11. Schedule to the Balance**

Particulars	Amount outstanding	Amount overdue
<b>LIABILITIES SIDE</b>		
<b>(2) Break-up of (1)(f) above (Outstanding public deposits inclusive of interest</b>		
(a) In the form of Unsecured debentures	NA	NA
(b) In the form of partly secured debentures i.e. debentures where there is a shortfall in the value of security	NA	NA
(c) Other Public Deposits	NA	NA





## 3.6

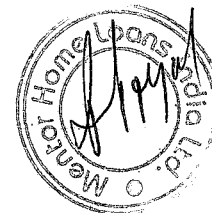
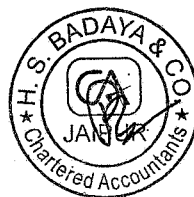
## Assets Liability Management

Annexure III

Maturity pattern of certain types of items of Assets &amp; Liabilities as on 31st March 2021.

(Rs. in Crore)

	1 day to 7 days	8 days to 14 days	15 days to 31 days	Over 1 Months to 2 Months	Over 2 Months to 3 Months	Over 3 Months to 6Months	Over 6 Months to 1 Year	Over 1 Years to 3 Years	Over 3 Years to 5 Years	Over 5 Years to 7 Years	Over 7 Years to 10 Years	Over 10 Years	TOTAL
<b>Liabilities</b>													
Deposits	0	0	0	0	0	0	0	0	0	0	0	0	0
Borrowings from banks	2.9	0.36	4.81	22.91	7.21	18.99	41.59	131.5	53.17	28.38	19.49	3.63	334.94
Market Borrowings	0	0	0	0	0	0	0	0	0	0	0	0	0
Foreign Currency Liabilities	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Assets</b>													
Advances	0.08	3.81	4.55	5.17	5.11597	15.61	32.37	132.28	100.08	54.4	36.08	7.92	397.47
Investments	5.1	0.48	3.06	22.77	7.14	6.86	9.9	1.45	1.69	0.54	0.03	0.37	59.39
Foreign Currency Assets	0	0	0	0	0	0	0	0	0	0	0	0	0



Note 38 Off-balance Sheet SPVs sponsored	Annexure IV
(which are required to be consolidated as per accounting norms)	

Name of the SPV sponsored	
Domestic	Overseas
NIL	NIL

