



Date: 13th August 2021

To,
The Head Operations
Axis Trustee Services Ltd,
The Ruby, 2nd Floor (SW)
29, Senapati Bapat Marg,
Dadar West, Mumbai – 400 028

Dear Sir,

Sub: Quarterly Compliance Report for the Quarter ending 30-06-2021

In compliance with the Securities and Exchange Board of India (SEBI) (Debenture Trustee) Regulations, 1993 as amended from time to time, the SEBI (Listing Obligations and Disclosure Requirements) 2015, and the Companies Act 2013, we furnish the required information for your needful.

Sr.	Particulars Of Information/Documents	Furnished Yes/No																		
1.	<u>Regulatory Requirement:</u>																			
a.	An updated list of Debenture holders registered in the Register of Debenture Holders/BENPOS in the following format: <table><tr><th colspan="6">ISSUE-WISE PARTICULARS</th></tr><tr><th>ISIN no.</th><th>Series/ tranche</th><th>Name(s) of Debenture Holder</th><th>Address</th><th>Contact No.</th><th>Email Id</th></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>	ISSUE-WISE PARTICULARS						ISIN no.	Series/ tranche	Name(s) of Debenture Holder	Address	Contact No.	Email Id							Yes. Attached as Annexure 1.
ISSUE-WISE PARTICULARS																				
ISIN no.	Series/ tranche	Name(s) of Debenture Holder	Address	Contact No.	Email Id															
b.	Details of complaints/grievances in the following format. In case no complaints have been received, a confirmation thereof. <table><tr><th colspan="6">ISSUE-WISE PARTICULARS</th></tr><tr><th>ISIN No.</th><th>No. of pending Complaints at the end of last quarter</th><th>No. of complaints received during the quarter</th><th>No. of complaints pending at the end of quarter</th><th>Nature of the Complaint(s)</th><th>Reason (if pending for more than 30 days)</th></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td></tr></table>	ISSUE-WISE PARTICULARS						ISIN No.	No. of pending Complaints at the end of last quarter	No. of complaints received during the quarter	No. of complaints pending at the end of quarter	Nature of the Complaint(s)	Reason (if pending for more than 30 days)							No complaints.
ISSUE-WISE PARTICULARS																				
ISIN No.	No. of pending Complaints at the end of last quarter	No. of complaints received during the quarter	No. of complaints pending at the end of quarter	Nature of the Complaint(s)	Reason (if pending for more than 30 days)															
2.	<u>Management Confirmations:</u>	Furnished Yes/No																		



a.	<div>A Certificate cum Confirmation duly signed by key managerial personnel viz., Managing Director/ Whole Time Director/CEO/ CS/CFO/Manager of the Company to the effect that:-</div> <table><tr><th colspan="5">Interest/Principal (Issue wise)</th></tr><tr><th>ISIN No</th><th>Series/ tranche</th><th>Due date of redemption and/or interest (falling in the quarter)</th><th>Paid/unpaid (date of payment, if paid, reasons if not paid)</th><th>Next due date for the payment of Interest / principal</th></tr><tr><td></td><td></td><td></td><td></td><td></td></tr></table>	Interest/Principal (Issue wise)					ISIN No	Series/ tranche	Due date of redemption and/or interest (falling in the quarter)	Paid/unpaid (date of payment, if paid, reasons if not paid)	Next due date for the payment of Interest / principal						All the debentures issued have bullet payment structures. Hence, there was no interest due/ payable in this quarter.
Interest/Principal (Issue wise)																	
ISIN No	Series/ tranche	Due date of redemption and/or interest (falling in the quarter)	Paid/unpaid (date of payment, if paid, reasons if not paid)	Next due date for the payment of Interest / principal													
b.	<u>Security and insurance¹:</u>																
	i. Security Documents executed by the Company remain valid (including but not limited to the purpose of and as provided in Limitation Act 1963), subsisting and binding upon the Company.	Yes															
	ii. The assets of the Company and of the guarantors, if any, which are available by way of security/cashflows/profits are sufficient to discharge the claims of the debenture holders as and when they become due and that such assets are free from any other encumbrances except those which are specifically agreed to by the debenture holders.	Yes															
	iii. Delay or Failure to create security (if any), with detailed reasons for delay or default in security creation and the timelines within which the same shall be created	Not applicable.															
	iv. The Secured Assets have been insured against all risks as prescribed in the Prospectus/Information Memorandum of the captioned Debentures and Security Documents thereof	Not applicable.															

¹ NA for unsecured debentures



	v. All the Insurance policies obtained are valid, enforceable and cover the risks as required under the Information Memorandum/Debenture Trust Deed and are endorsed in favour of Debenture Trustee as 'Loss Payee'. The premium in respect of the following insurance policies have been paid.				Not applicable
	Issue Size	Policy No.	Coverage (Rs.)	Period & expiry date	
c.	Statutory:				Yes/No
	i. The Company has complied with and is in compliance with the provisions of the Companies Act 2013, the extant SEBI Regulations and the terms and conditions of the captioned Debentures and there is no event of default which has occurred or continuing or subsisting as on date				Yes
	ii. Any additional covenants of the issue (including side letters, accelerated payment clause, etc.) and status thereof				Nil
	iii. There is no major change in composition of its Board of Directors, which may amount to change in control as defined in SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Changes if any to be disclosed along with copies of intimation made to the stock exchanges)				No major change. Ms. Anita Belani was inducted as the Independent Director of the Company with effect from 7 th May 2021. List of Directors as available on MCA attached Annexure 2.
	iv. any amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Company				No
	v. Change, if any, in the nature and conduct of the business by the Company				No
	vi. Outstanding litigations, orders, directions, notices, of court/tribunal affecting, or likely to materially affect the interests of the Debenture Holders or the assets, mortgaged and charged under security creation documents, if any				No
	vii. Proposals, if any placed before the board of directors for seeking alteration in the form or nature or rights or privileges of the Debentures or in the due dates on which interest or redemption are payable, if any				No
	viii. Disclosures, if any made to the stock exchange in terms of Regulation 30 or Regulation 51(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which may have a bearing on the Debentures or on the payment of interest or redemption of the Debentures				No.



	ix. There are no events or information or happenings which may have a bearing on the performance/operation of the Company, or there is no price sensitive information or any action as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 that may affect the payment of interest or redemption of the Debentures.	No.
d.	Others:	Yes/No
	i. Details of revisions in the credit rating (if any) (rationale to be attached);	No.
	ii. Details of Corporate Debt Restructuring (if any);	No
	iii. Details of lenders/creditors joining or entering into Inter Creditor Agreement as per RBI guidelines, including all such information/ documents required to be submitted by the Company to the RBI on an annual basis in respect of such Financial Year, as applicable	No
	iv. Details of Fraud/defaults by promoter or key managerial personnel or by Issuer Company or arrest of key managerial personnel or promoter;	No
	v. Details of one time settlement with any bank (if any);	No
	vi. Details of Reference to Insolvency or a petition (if any) filed by any creditor	No
	vii. Confirmation that a functional website containing, amongst others, the following information is maintained by the Company:- <ul style="list-style-type: none"> • email address for grievance redressal and other relevant details; • name of the debenture trustees with full contact details; • the information, report, notices, call letters, circulars, proceedings, etc., concerning non-convertible redeemable preference shares or non-convertible debt securities; • all information and reports including compliance reports filed by the Company; • Default by issuer to pay interest or redemption amount [if any] • failure to create a charge on the assets [if any] • revision in rating assigned to the NCDs [if any] 	Yes. Applicable disclosures are updated on website.
4.	Copies of the following information/documents (to be attached): (a) to (g) applicable in case of secured issuances.	Furnished Yes/No
a.	Asset cover Certificate ²	Will be provided separately.
b.	A statement of value of pledged securities ³	Not applicable
c.	A statement of value of Debt Service Reserve Account or any other form of security ⁴	To be confirmed separately.

² To be submitted within 30/45 days from the end of each quarter. To be submitted in the format as provided under Annexure A of the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated 12.11.2020.

³ To be submitted within 30/45 days from the end of each quarter as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated 12.11.2020.

⁴ To be submitted within 30/45 days from the end of each quarter as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated 12.11.2020.



d.	Net worth certificate of personal guarantors [if any] ⁵	Not applicable for this quarter.
e.	Financials/value of corporate guarantor [If any] prepared on basis of audited financial statement etc. of the guarantors ⁶	Not applicable.
f.	Valuation report and title search report for immovable and movable secured assets ⁷	Not applicable.
g.	Copy of the Insurance Policies duly endorsed in favour of the Debenture Trustee as 'Loss Payee'	Not applicable.
i.	Periodical reports from lead bank regarding progress of the Project	Not applicable.
j.	Certified True Copy of quarterly and year-to-date standalone financial results ⁸	Not applicable.
k.	A certificate from the statutory auditor of the Company with respect to the use of proceeds raised through the issue of Debentures at end of each year from Deemed Date of Allotment, until the funds are fully utilized.	Not applicable for this quarter.

For Vivriti Capital Private Limited

Authorized Signatory
(Name : P S Amritha)
(Designation : Company Secretary and Compliance Officer)

⁵ To be submitted within 30/45 days from end of the second and fourth quarter as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated 12.11.2020

⁶ To be submitted within 45/60 days from end of each financial year as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated 12.11.2020

⁷ To be submitted within 45/60 days from end of each financial year as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated 12.11.2020

⁸ Regulation 33(3) (a) of SEBI LODR Regulations –applicable only if the Company has its equity shares listed of Stock Exchange