



14th February 2023

The Catalyst Trusteeship Service Ltd
Windsor, 6th Floor, Office No-604,
C.S.T Road, Kalina, Santacruz (East),
Mumbai – 400 098

Dear Sir/Madam,

Sub: Listed NCD - Statutory Compliance Report of the NCD's for the Quarter ending 31st December 2022
Ref: Non-convertible Debentures issued by the Company

With reference to the captioned subject, please find below the followings:

1. Updated list of the names and addresses of the Debenture holders: Enclosed in **Annexure -1**
2. A Certificate cum Confirmation about the payment of interest and principal on timely basis and if the same is unpaid, reasons thereof, duly signed by key managerial personnel viz., Managing Director/ Whole Time Director / CEO / CS / CFO of the Company: Enclosed in **Annexure -2**
3. Grievances:
 - a) Number of Grievances received: Nil
 - b) Nature of Grievances received: Nil
 - c) Number of Grievances resolved by the Company: Nil
 - d) Grievances unresolved by the Company and the reason for the same: Nil
4. Statement that assets are sufficient to discharge the claims and free from encumbrances: Security Cover certificate in line with the SEBI Circular dated May 19, 2022, as certified by the Statutory Auditor of the Company has already been shared along with the financials.
5. A copy of financial results submitted to stock exchanges shall also be provided as per Regulation 52 and such results shall disclose items as per Regulation 52(4) of SEBI (LODR) Regulations: Shared already.
6. Details of Debenture Redemption Reserve/ Debenture Redemption/Maintenance of funds as per Companies Act: Maintenance of Debenture Redemption Fund / Debenture Redemption Reserve is not applicable to an NBFC registered with Reserve Bank of India.
7. Details of Recovery Expense Fund: Enclosed in **Annexure-3.**
8. Details of Accounts/Funds to be maintained in case of Municipal Debt Securities: Not Applicable
9. Utilization of Issue Proceeds of Non Convertible Securities: Statement furnished under Regulation 52(7) & 52(7A) are shared already along with Financials.
10. Details of any significant change in composition of Board of Directors as defined by SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011:



During the quarter, there is no change in composition of Board of Directors as defined by SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. Updated list of Directors of the Company is enclosed as **Annexure 4**.

11. Statement on ISIN, payment on due dates & Credit rating as on 31-Dec-2022: Enclosed as **Annexure 5**.
12. Details of any amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Company

We confirm that, there is no amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Company.

13. Details of change, if any, in the nature and conduct of the business by the Company

We confirm that the nature and conduct of the business remains the same.

14. 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: Nil
15. 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: Nil
16. Compliance of all covenants of the issue (including side letters, accelerated payment clause, etc.) and status thereof: We confirm the compliance of all covenants of the issue to the extent applicable.
17. 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: We confirm, all information as required to be disclosed under regulation 51 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, have been duly submitted, from time to time.
18. Details of Fraud/defaults by promotor or key managerial personnel or by Issuer Company or arrest of key managerial personnel or promoter: Nil
19. Details of requisite/ pending (if any) information/ documents indicated as conditions precedent/subsequent in debenture document/s in respect of your NCD: Nil
20. Any revision in rating of the debentures: The outlook of existing credit ratings by CARE has been upgraded from 'Stable' to 'Positive' for all the ISINs vide credit rating letter and Press release dated November 24, 2022.
21. Updated Information on default in payment of principal and interest on due dates: Nil
22. Company has complied with the provisions of Companies Act, Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, the listing agreement with stock



exchange, trust deed and all other regulations issued by SEBI pertaining to debt issue from time to time:
We confirm

23. Company has complied with para 2.2 of the SEBI circular dated 12.11.2020, for all existing debt securities, listed entities and trustees are required to enter into supplemental/amended debenture trust deed incorporating the changes in the debenture trust deed: We confirm.
24. The 'High Value Debt Listed Entities' which has listed its non-convertible debt securities and has an outstanding value of listed non-convertible debt securities of Rupees Five Hundred Crore and above (provided that in case an entity that has listed its non-convertible debt securities triggers the specified threshold of Rupees Five Hundred Crore during the course of the year), shall ensure compliance with the provisions outlined under Regulations 16 to 27: We confirm that the same is in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

For and on behalf of **Vivriti Capital Private Limited**

P S Amritha
Company Secretary & Compliance Officer
Mem No. A49121