



Date: 14<sup>th</sup> February 2023

To,  
IDBI Trusteeship Services Ltd,  
Asian Building, Ground Floor,  
17, R. Kamani Marg, Ballard Estate,  
Mumbai – 400 001

Dear Sir,

**Sub: Quarterly Compliance Report for the Quarter ended 31<sup>st</sup> December 2022**

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.

Sl. No.	Particulars of Information/Documents																
1.	<b><u>REGULATORY REQUIREMENT:</u></b>	<b>Furnished Yes/No</b>															
a.	<p><b><u>List Of Debenture Holders:-</u></b></p> <p>An updated list of debenture holders registered in the Register of Debenture Holders in the following format:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="5">ISSUE-WISE PARTICULARS</th> </tr> <tr> <th>Issue size (including ISIN No)</th> <th>Name(s) of Debenture Holder</th> <th>Address</th> <th>Contact No.</th> <th>Email Id</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	ISSUE-WISE PARTICULARS					Issue size (including ISIN No)	Name(s) of Debenture Holder	Address	Contact No.	Email Id						Yes. Kindly refer to <b>Annexure 1.</b>
ISSUE-WISE PARTICULARS																	
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b.	<p><b><u>Any Modification In Existing Outstanding ISINs:</u></b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="5">ISSUE DETAILS</th> </tr> <tr> <th>Existing ISIN No.</th> <th>Revised ISIN No.</th> <th>Date of change in ISIN No.</th> <th>Date of DP letter for change in ISIN</th> <th>Furnish copy of letter from DP</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	ISSUE DETAILS					Existing ISIN No.	Revised ISIN No.	Date of change in ISIN No.	Date of DP letter for change in ISIN	Furnish copy of letter from DP						No
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c.	<p><b><u>Investor Grievances Details:-</u></b></p> <p>Details of complaints/grievances in the following format. In case no complaints have been received, a confirmation thereof.</p> <table border="1" data-bbox="183 448 1173 907"> <thead> <tr> <th colspan="6">ISSUE-WISE PARTICULARS</th> </tr> <tr> <th>Issue size</th> <th>Nos. of Complaints/ Grievances pending for the previous quarter</th> <th>Nos. of Complaints/ Grievances Received during current quarter</th> <th>Resolved/ Unresolved</th> <th>Nos. of Complaints/ Grievances pending for the current quarter</th> <th>Reason (if pending beyond 30days of receipt of grievance)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	ISSUE-WISE PARTICULARS						Issue size	Nos. of Complaints/ Grievances pending for the previous quarter	Nos. of Complaints/ Grievances Received during current quarter	Resolved/ Unresolved	Nos. of Complaints/ Grievances pending for the current quarter	Reason (if pending beyond 30days of receipt of grievance)							No complaints received during the reporting period.
ISSUE-WISE PARTICULARS																				
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c.	<p><b><u>Payment Of Interest / Principal:</u></b></p> <p>A Certificate cum Confirmation duly signed by a key managerial personnel viz., Managing Director/ Whole Time Director/CEO/ CS/CFO of the Company to the effect that:-</p> <table border="1" data-bbox="183 1198 1204 1568"> <thead> <tr> <th colspan="6">INTEREST/PRINCIPAL (ISIN WISE)</th> </tr> <tr> <th>Issue size</th> <th>ISIN No</th> <th>Due date of redemption and/or interest (falling in the quarter)</th> <th>Paid/unpaid (actual date of payment, if paid, reasons if not paid)</th> <th>Next due date for the payment of Interest / principal</th> <th>Reasons for delay (if any)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	INTEREST/PRINCIPAL (ISIN WISE)						Issue size	ISIN No	Due date of redemption and/or interest (falling in the quarter)	Paid/unpaid (actual date of payment, if paid, reasons if not paid)	Next due date for the payment of Interest / principal	Reasons for delay (if any)							Yes. Enclosed as <b>Annexure 2.</b>
INTEREST/PRINCIPAL (ISIN WISE)																				
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d.	<p><b><u>Credit Rating:-</u></b></p> <p>Details of revisions in the credit rating (if any);</p> <table border="1" data-bbox="183 1758 1212 1870"> <thead> <tr> <th>Name(s) of Rating Agency</th> <th>Immediate Previous Credit Rating</th> <th>Revised Credit Rating &amp; date of revision</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Name(s) of Rating Agency	Immediate Previous Credit Rating	Revised Credit Rating & date of revision				The outlook of existing credit ratings by ICRA, i.e., [ICRA]A (Stable); upgraded from [ICRA]A- and outlook changed to Stable from Positive vide credit rating												
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		letter dated July 05, 2022.																							
e.	<p><b>DRR And REF Details:-</b></p> <table border="1"> <thead> <tr> <th>Issue size</th> <th>Maintenance of Debenture Redemption Reserve</th> <th>DRR required to be Created [In Crs.]</th> <th>DRR Created upto March 31, 2022 Rs. (In Cr.)</th> <th>Funds invested for debentures maturing during the year</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Please mention issue size along with ISIN no. for DRR &amp; REF</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="4"><b>Creation of Recovery Expense Fund (REF) in terms of SEBI Circular dated 22.10.2020</b></td> </tr> <tr> <th>Maintenance of REF, REF required to be created [in Rs.]</th> <th>REF created upto December 31, 2022</th> <th>REF maintained In the form of</th> <th>Any addition in the REF during the last quarter <u>December , 2022</u></th> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Issue size	Maintenance of Debenture Redemption Reserve	DRR required to be Created [In Crs.]	DRR Created upto March 31, 2022 Rs. (In Cr.)	Funds invested for debentures maturing during the year	Please mention issue size along with ISIN no. for DRR & REF					<b>Creation of Recovery Expense Fund (REF) in terms of SEBI Circular dated 22.10.2020</b>				Maintenance of REF, REF required to be created [in Rs.]	REF created upto December 31, 2022	REF maintained In the form of	Any addition in the REF during the last quarter <u>December , 2022</u>						<p>DRR – Not applicable</p> <p>REF details – enclosed as <b>Annexure 3</b></p>
Issue size	Maintenance of Debenture Redemption Reserve	DRR required to be Created [In Crs.]	DRR Created upto March 31, 2022 Rs. (In Cr.)	Funds invested for debentures maturing during the year																					
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	Maintenance of REF, REF required to be created [in Rs.]	REF created upto December 31, 2022	REF maintained In the form of	Any addition in the REF during the last quarter <u>December , 2022</u>																					
2.	<b><u>Copies of the following information/documents (to be attached) (all fields mandatory):-</u></b>	<b>Whether copy enclosed</b>																							
a.	i. Security cover Certificate <sup>1</sup> as per guidelines and the format of <b>Annexure I</b> of the SEBI Circular dated 19.05.2022. (attached below)	Security Cover certificate in line with the SEBI Circular dated May 19, 2022, as																							

<sup>1</sup> To be submitted within 60 days from the end of each quarter except last quarter of the financial year where the issuer to submit the report within 75 days from the end of said quarter. To be submitted in the format as provided under SEBI/HO/MIRSD/MIRSD\_CRADT/CIR/P/2022/67 dated 19.05.2022.

	ii. Certificate of Confirmation of compliances of all the financial covenants from the statutory auditor of the company. (Applicable to Secured as well as Unsecured NCDs)	certified by the Statutory Auditor of the Company has already been shared along with the financials on 10-Feb-2023.
b.	A statement of value of pledged securities <sup>2</sup> as per the format of Annexure II , if any / applicable ( <b>Applicable Quarterly</b> )	Not applicable
c.	A statement of value of Debt Service Reserve Account or any other form of security <sup>3</sup> as per the format of Annexure III if any / applicable ( <b>Applicable Quarterly</b> )	Not applicable
d.	Net worth certificate of personal guarantors [if any] <sup>4</sup> ( <b>Applicable on half yearly basis</b> )	Not applicable
e.	Copy of Title Search Reports for movable/immovable assets, as applicable <sup>5</sup> ( <b>Applicable Annually</b> )	Not applicable
f.	Copy of Valuation Report for movable/immovable assets, as applicable <sup>6</sup> ( <b>Applicable Annually</b> )	Not applicable
g.	Financials/Value of guarantor prepared on the basis of audited financial statements, etc. of the guarantor (secured by way of corporate guarantee) ( <b>Applicable Annually</b> )	Not applicable
h.	a one-time certificate from the statutory auditor of the Company with respect to the use of the proceeds raised through the issue of Debentures as and when such proceeds have been completely deployed toward the proposed end-uses as per the format of <b>Annexure IV</b> .  In case of deviation/variation, please provide as per ' <b>Appendix A</b> '.	Not applicable for the reporting quarter.  No deviation, the statement under Regulation 52(7) & (7A)

<sup>2</sup> To be submitted within 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.

<sup>3</sup> To be submitted within 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.

<sup>4</sup> To be submitted within 45 days from the 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

<sup>5</sup> To be submitted once in three years (from the date of last submitted report) within 60 days from the end of the financial year as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated 12.11.2020 & SEBI/HO/MIRSD/MIRSD\_CRADT/CIR/P/2022/67 dated 19.05.2022.

<sup>6</sup> To be submitted once in three years (from the date of last submitted report) within 60 days from the end of the financial year as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated 12.11.2020 & SEBI/HO/MIRSD/MIRSD\_CRADT/CIR/P/2022/67 dated 19.05.2022

		has been shared along with the financials on 10-Feb-2023										
i.	Certified True Copy of quarterly and year-to-date standalone financial results containing line items as required under Regulation 52 (4) of SEBI LODR Regulations.	Shared already on 10-Feb-2023										
j.	Copy of the un-audited [with limited review report] or audited financial results submitted to stock exchange <sup>7</sup>	Shared already on 10-Feb-2023										
k.	Periodical reports from lead bank regarding progress of the Project, if applicable	Not applicable										
l.	Copy of the Insurance Policies duly endorsed in favour of the Debenture Trustee as 'Loss Payee'	Not applicable										
m.	Details of initiation of forensic audit (by whatever name called) in respect of the Company and copies of the disclosures made by the Company to the Stock Exchange in this regard	Not applicable										
<b>3.</b>	<b>CONFIRMATIONS/CERTIFICATES FROM STATUTORY AUDITORS</b>	<b>Whether copy enclosed</b>										
a.	<p>Certificate of confirmation from Statutory Auditor of the Company along with quarterly/annual financial results on following issues (please also enclose certificate of statutory auditor):-</p> <table border="1" data-bbox="180 1400 1002 1635"> <thead> <tr> <th>Issue size with ISINs</th> <th>Security Value/Cover</th> <th>Debt Ratio</th> <th>Equity</th> <th>Value of book debts / receivables certified by the statutory auditor.<sup>8</sup></th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Issue size with ISINs	Security Value/Cover	Debt Ratio	Equity	Value of book debts / receivables certified by the statutory auditor. <sup>8</sup>						<p>Quarterly Certificate by empaneled Chartered Accountant will be submitted separately within the prescribed timeline in compliance with the provisions of the SEBI Circular dated 19<sup>th</sup> May 2022.</p>
Issue size with ISINs	Security Value/Cover	Debt Ratio	Equity	Value of book debts / receivables certified by the statutory auditor. <sup>8</sup>								

<sup>7</sup> Regulation 52(1) of SEBI LODR Regulations – To be submitted within forty five days from the end the second and fourth quarter and on the same day the information is submitted to stock exchanges.

<sup>8</sup> Where the debentures are secured by receivables/book debts



b.	<b>Management Confirmation for statutory items:</b>					<b>Yes/No</b>
	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. If no, please specify details.					<u>Yes</u>
	ii. Whether there is any breach of covenant / terms of the debenture issues in terms of the Information Memorandum and DTD.  If yes, please specify date of such breach occurred, the details of breach of covenant and remedial action taken by the Company along with requisite documents.  Any additional covenants of the issue (including side letters, accelerated payment clause, etc.) and status thereof  <i>Note: As per SEBI circular no. SEBI/ HO/ MIRSD/ CRADT/ CIR/ P/ 2020/230 dated November 12, 2020, Debenture Trustee is required to intimate the covenant breach to Debenture Holders, Stock Exchange, SEBI, etc.</i>					<u>No</u>
	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)					<u>No changes during the reporting period.</u>
	iv. Any amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Company					<u>No</u>
	v. Change, if any, in the nature and conduct of the business by the Company					<u>No</u>
	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					<u>No</u>
	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					<u>No</u>

	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	<u>Yes</u>																
	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 (LODR) Regulations, 2015 that may affect the payment of interest or redemption of the Debentures	Same as viii above.																
	x. Confirmation that the unclaimed/ unpaid amounts of monies due on debentures and redemption of debentures are transferred to Investor Education and Protection Fund (IEPF)	Not applicable.																
c.	<b>Management Confirmation for other items:</b>	<b>Yes/No</b>																
	<p>i. ISIN Wise details :-</p> <table border="1"> <thead> <tr> <th>S. No.</th> <th>ISIN</th> <th>Facility</th> <th>Type of charge</th> <th>Sanctioned Amount</th> <th>Outstanding Amount As on 31-12-2022</th> <th>Cover Required</th> <th>Security Required</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	S. No.	ISIN	Facility	Type of charge	Sanctioned Amount	Outstanding Amount As on 31-12-2022	Cover Required	Security Required									Kindly refer to <b>Annexure I</b> . Security cover details are provided in the Security cover certificate as certified by the Statutory Auditors of the Company in line with SEBI Circular dated May 19, 2022 which was shared already on 10-Feb-2023.
S. No.	ISIN	Facility	Type of charge	Sanctioned Amount	Outstanding Amount As on 31-12-2022	Cover Required	Security Required											
	ii. Confirmation on uploading of details for all the existing outstanding Secured non – convertible securities by the issuer company on DLT platform on or before January 31, 2023, as per SEBI circular dated March 29, 2022 on Operational guidelines for “Security and Covenant Monitoring” using Distributed Ledger Technology (DLT) read with SEBI circular dated 05.01.2023.	<u>Yes</u>																
	<p>iii. Details of any default committed by the Issuer with respect to borrowings obtained from banks / financial institutions pertaining to:-</p> <p>a. payment obligations; and / or</p> <p>b. covenant compliance</p>	No																





	iv. Details of Reference to Insolvency or a petition (if any) filed by any creditor or details of Corporate Debt Restructuring (if any);	Not applicable
	v. 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	Not applicable
	vi. Details of fraud/defaults by promoter or key managerial personnel or by Issuer Company or arrest of key managerial personnel or promoter;	No
	vii. Details of one time settlement with any bank (if any);	Not applicable
	viii. Confirmation that a functional website containing, amongst others as per Regulation 62 of SEBI (LODR) Regulations is maintained by the Company.	Yes
	ix. Confirmation that the information/documents has been submitted to the debenture holders as per Regulation 58 of SEBI LODR Regulations.	Yes
	x. Confirmation that the capital adequacy norms are maintained as per RBI Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016	Yes
	xi. Confirmation that there has been no change in the bank details of the Company for preauthorizing Debenture Trustee(s) to seek debt redemption payment related information from the Bank <sup>10</sup>	Yes

**For Vivriti Capital Private Limited**

**Authorized Signatory**

**(Name: P S Amritha)**

**(Designation: Company Secretary & Compliance Officer)**

**Mem No. A49121**

<sup>10</sup> Clause 3.2 of SEBI circular SEBI/HO/DDHS/CIR/P/103/2020 dated 23.06.2020.