

Date: 15th May 2022

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 31-03-2022

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.

We confirm the following:

1. Statutory/Compliance Confirmations

Sr. No.	Particulars
i.	The Issuer 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.
ii.	There are no additional covenants (including side letters, accelerated payment clause, etc.) other than those covered in transaction documents.
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.
iv.	There is no change in nature and conduct of business of the Issuer.
v.	There is no amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Issuer.
vi.	There are no 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
vii.	There were no proposals placed before the board of directors, for considering alterations to any ISIN for which ATSL is debenture trustee, seeking- - alteration in the form or nature of the ISIN; - alteration in rights or privileges of the holders thereof; - alteration in the due dates on which interest or redemption is payable - any matter affecting the rights or interests of holders.



viii.	There were disclosures made to the stock exchange in terms of Regulation 51(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which may have a bearing on the performance/operation of the Issuer, price sensitive information or on the payment of interest or redemption of the Debentures. – Necessary disclosures in this regard were made to the stock exchange, from time to time.
ix.	The Issuer is maintaining hundred percent asset cover or higher asset cover as per the terms of offer document/ Information Memorandum and/or Debenture Trust Deed, including compliance with all the covenants of the Debentures.
X.	The submissions to the stock exchange have been done in timely manner as per Applicable Law and requisite information has been provided to the Debenture Trustee and debenture holders, as applicable.

2. Secured Issuance Confirmations

Sr. No.	Particulars
a.	The Security Documents executed by the Issuer remain valid (including but not limited to the purpose of and as provided in Limitation Act 1963), subsisting and binding upon the Issuer.
	of and as provided in Linnahon (100 1) oc), successing and chinang apon the issuer.
Ь.	The assets of the Issuer and of the third party security providers, 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.
с.	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
d.	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.

ocuments Furnished
Yes/No
-



ISIN No.	l, a confirmat	V Name(s) of Debenture Holder	3	Contact No.	f the nt(s) (<i>if</i>)	Reason pending for pre than 30 days)	No complaints.	
b. Details received ISIN No. 2. Manage	tranche of complaints d, a confirmat No. pending Complaints at the end last quarter	e Debenture Holder	e following form WISE PARTICL No. of complaints pending at the end	No. at. In case r JLARS	f the nt(s)	Reason pending for pre than 30	No complaints	
ISIN No. 2. Manage	No. pending Complaints at the end last quarter	tion thereof. ISSUE- of No. of complaints received during the quarter	No. of complaints pending at the end	ILARS Nature of	f the nt(s) (<i>if</i>)	Reason pending for pre than 30	No complaints	
2. Manage	pending Complaints at the end last quarter	of No. of complaints received during the of quarter	No. of complaints pending at the end	Nature of	nt(s) (<i>if</i>)	pending for Dre than 30		
2. <u>Manage</u> a. A Certif	pending Complaints at the end last quarter	of complaints received during the quarter	complaints pending at the end		nt(s) (<i>if</i>)	pending for Dre than 30		
a. A Certif	ement Confir	rmations:						
Dirottor		onfirmation duly s Director/CEO/ (All the debentures issued have bullet payment	
	Interest/Principal (Issue wise)							
ISIN No	tranche	Due date of redemption and/or interest (falling in the quarter)	Paid/unpaid (date or payment, i paid, reasons i not paid)	f the pa f Interest /	ie date foi ayment of / principal		was no interest due payable in the given quarter.	



b.	Statu	utory:	Yes/No
	xi.	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
	xii.	Any additional covenants of the issue (including side letters, accelerated payment clause, etc.) and status thereof	Nil
	xiii.	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.
	xiv.	any amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Company	No
	XV.	Change, if any, in the nature and conduct of the business by the Company	No
	xvi.	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
	xvii.	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
	xviii.	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.
	xix.	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.	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.
C.	Othe	rs:	Yes/No
	i.	Details of revisions in the credit rating (if any) (rationale to be attached);	There was no revision in for existing debentures except for debentures rated by ICRA



		Limited wherein the rating issued in respect of debentures was revalidated to [ICRA] A- with 'Positive' outlook vide letter dated 24th March 2022.
	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:- 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] revision in rating assigned to the NCDs [if any] 	Yes. Applicable disclosures are being updated on website.
4.	<u>Copies of the following information/documents (to be attached):</u> (a) to (g) applicable in case of secured issuances.	Furnished Yes/No
a.	Asset cover Certificate ¹	Will be provided separately.
b.	A statement of value of pledged securities ²	Not applicable

¹ 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. ² 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.



C.	A statement of value of Debt Service Reserve Account or any other form of security ³	Company does not have any Debt Service Reserve Account.
d.	Net worth certificate of personal guarantors [if any] ⁴	Already submitted for half year ended 31 st March 2022.
e.	Financials/value of corporate guarantor [If any] prepared on basis of audited financial statement etc. of the guarantors ⁵	Not applicable.
f.	Valuation report and title search report for immovable and movable secured assets ⁶	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 ⁷	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.	Will be submitted separately with Financial Results for the period ending 31 st March 2022.

For Vivriti Capital Private Limited

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

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 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

⁵ 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

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



Annexure -1

S.No	ISIN	Issue Amount (Rs. In Crs)	Name of the Debenture Holder**	Address of the Debenture Holder	Category	No. of Debentures held
1	INE01HV07106	10.00	Ladderup <i>Multiple</i> holders**	_	-	200
2	INE01HV07130	50.00	Multiple holders**	_	_	500
3	INE01HV07155	50.00	Multiple holders**	_	-	500

Note 1: Details of Debenture holders as per BENPOS as on 31st March 2022

S.			No. of Debentures
No.	ISIN	Particulars of the holders	held
1	INE01HV07106	BRIJ MOHAN MAHENDRU	15
2		TANYA VAISH	10
3		RUUCHI GUPTA	10
4		RADHIKA AAKASH SHAH	10
5		VIVEK SINGHAL	10
		MACK STAR MARKETING PRIVATE	
6		LIMITED	10
7		SHAILENDRA KUMAR TRIPATHI	6
8		SARLA DAYAL SAMTANI	6
9		Ram Kanwar Garg	5
10		M KUMARAGURU	5
11		ANSHU HOTCHANDANI	4
12		AAKASH YOGENDRALAL SHAH	4
13		BIBHUTI MOHAN JHA	4
14		PUTHIYAPURAYIL MOHANDAS	4
15		SHEETAL DILIP KULKARNI	4



16		AMBUJ JAIN	4
17		HARSHA SAKSENA	4
18		MANISH SEHGAL	4
19		GIRISH ANANT PATKAR	4
20		THIRUMALAI GOPALAKRISHNA	3
21		AMIT DAS	3
22		ANURAG AJIT CHOUDHARY	2
23		ASHOK JAMES IGNATIUS LOBO	2
24		SHRIKRISHNA DATTATRAY NAIK	2
25		FARAH KHATRI	2
26		HIMANSHU SATYANARAYAN SEKSARIA	
27		ARVIND KATYAL	2
28		AJAY HARISH LAKHANI	2
29		VRUNDA KASHINATH BHAGAT	2
30		REKHA PRAFULL SATAM	2
31		SNEHA RAMESH POHANI	2
32		VINOD SARAN	2
33		RAJAN BABASAHEB BHONSLE	2
34		ASHOK KUMAR ASTHANA	2
35		VIPLAW KASHYAP	2
36		SARVESH GARG	2
37		POOJA MOHAN JAISAL	2
38		KAPIL ANANT DAS	2
39		GOVIND R KOREKAR	1
40		KUNDA KASHINATH BHAGAT	1
41		ANURAG MEHRA	1
42		SHILPA GOVIND KOREKAR	1
43		LALITA RANA	1
44		INDER KUMAR RANA	1
45		MAKARAND ASHOK KUNTE	1
46		TUSHAR MAHAJAN .	4
47		SUBRAMANIAM MAHADEVAN IYER	1
48		MINAL MADHAV JAYAKAR	1
49		NACHIKET VISHWANIYANT NAIK	6
50		PUSHKAR MOHAN LIMAYE	1
51		SUJAN SINHA	1
52		SIVAKUMAR THANGARATNAVELU	12
53		RAJENDRA DEO AGRAWAL	3
54		BAJEE KASHINATH DURVE	1
	Total		200
		1	200

VIVRITI CAPITAL PRIVATE LIMITED CIN - U65929TN2017PTC117196 GST – 33AAFCV9757P12E 2nd FLOOR, PRESTIGE POLYGON No. 471, ANNA SALAI, NANDANAM CHENNAI 600035

www.vivriticapital.com 🎽



Note 2: Details of Debenture holders as per BENPOS as on 31st March 2022

S. No.	ISIN	Particulars of the holders	No. of Debentures held
1	INE01HV07130	RAGHUVANSHI INVESTMENT PVT LTD	30
2		OFB TECH PRIVATE LIMITED	20
3		SUPER AUTO FORGE PRIVATE LIMITED	20
4		DIPAK KUMAR SINGH	20
		VENKTESH INVESTMENT AND TRADING COMPANY	
5		PRIVATE LIMITED	20
6		AZIM F TAPIA	10
7		JAVED F TAPIA	10
8		RENU PURI	10
9		MOHIT MADHOK	10
10		VIBHORE SHARMA	10
11		ANUP TIWARI	10
12		NALIN JASWANTSINH NANAVATI	10
13		MEHRAAN SAIRUS INDOREWALLA	8
14		TUSHAR THAKKAR	6
15		V S V MANI	6
16		SUNIL SUDHAKARRAO DESHMUKH	6
17		HENRY ARTHUR SYDNEY LEDLIE	5
18		PARAG DIWAN	5
19		MANOJ ODUNGHAT	5
20		BALAKRISHNAN P VARIYAM	5
21		KULANGARA PAUL PHILIP	5
22		GIRISH PADMANABHA KAMALA	5
23		RAKHI PANDIT	5
24		MOHIT GUPTA	5
25		RAMA CHANDIRAMANI	5
26		PRABIR ROY	5
27		ZENIA ERMIN IRANI	5
28		RENUKA SRINIVASAN	5
29		RAJAT MONGA	5
30		JWALANT ANILCHANDRA RANA	5
31		HARISH GANGJI DEDHIYA	5
32		KOTA SHAKUNTALA KARANTH	4
33		KERSOO JAL INDOREWALLA	4
34		KERSOO JAL INDOREWALLA	4
35		KERSOO JAL INDOREWALLA	4
36		KALYANASUNDARAM SIVAKUMAR	4
37		MANOJ JOGLEKAR	4
38		PADMA UTTAMCHAND KUKREJA	3
39		RAJESH KUMAR SINHA	3
40		GURJOT SINGH BHATIA	3

VIVRITI CAPITAL PRIVATE LIMITED CIN - U65929TN2017PTC117196 GST – 33AAFCV9757P12E



1 London Link Jinkow 3 42 SAMEER GUPTA 3 43 RADHA SHELAT 3 44 PRAVERI CHANDRA SOOD 3 45 SOWMYAN RAMAKRISHNAN 3 46 BHARTI DINESH ISHARANI 3 47 KORATIKERE TIRUMALACHAR NALINI 3 48 V JAGDISH 3 50 ARADHANA LALL 3 51 SWATANTRA KUMAR K 3 52 TARUN KUMAR 3 53 SUATANTRA KUMAR K 3 54 SUPERNA BEDI 3 55 SIVAKUMARAN R 3 56 FARIDA KERSOO INDOREWALLA 3 57 DINESH KUMAR JAIN 3 58 PRITI GOYAL 3 59 PADMA 3 61 ARVIND SAMPATH 3 62 Abhishek Khandelwai 3 63 RUMA CHAKRAVARTY 3 64 RUMA CHAKRAVARTY 3 70<	41		TEJINDER PAL SINGH	3
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52TARUN KUMAR353PUNEET KAUSHIK354SUPERNA BEDI355SIVAKUMARAN R356FARIDA KERSOO INDOREWALLA357DINESH KUMAR JAIN358PRITI GOYAL360VIVEK PAL361ARVIND SAMPATH362KRISHNA SCHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367ANIL KUMAR ANARTHAN R368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOT JAYAKARAN372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN280SUKESH LAL181OM PARKASH MALHOTRA184SHAZIA ANJUM KACHWALLA1		-		
53PUNEET KAUSHIK354SUPERNA BEDI355SIVAKUMARAN R356FARIDA KERSOO INDOREWALLA357DINESH KUMAR JAIN358PRITI GOVAL360VIVER PAL361ARVIND SAMPATH362Abhishek Khandelwal363RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372UCTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN280SUKESH LAL181OM PARKASH MALHOTRA184SHAZIA ANJUM KACHWALLA1		-		
54SUPERNA BEDI355SIVAKUMARAN R356FARIDA KERSOO INDOREWALLA357DINESH KUMAR JAIN358PRITI GOYAL3359PADMA3360VIVEK PAL3361ARVIND SAMPATH362Abhishek Khandelwal363RIMANATHAN364RAMANATHAN R365RAMANATHAN R366ANIL KUMAR BHASIN367AMIL SUMAR BHASIN368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIK KARACHIWALA278B M KRISHNAN280SUKESH LAL1181OM PARKASH MALHOTRA1182SHADEP ADUKIA1184SHAZIA ANJUM KACHWALLA11		-		
55SIVAKUMARAN R356FARIDA KERSOO INDOREWALLA357DINESH KUMAR JAIN358PRITI GOYAL360VIVEK PAL361AMVIND SAMPATH362Abhishek Khandelwal363KRISHNA S CHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367SVARADRAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371CVINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINI NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN280SUKESH LAL181OM PARKASH MALHOTRA182SHATAR ANJUM KACHWALLA183SHAZIA ANJUM KACHWALLA1	-			
56FARIDA KERSOO INDOREWALLA357DINESH KUMAR JAIN358PRITI GOYAL359PADMA360VIVEK PAL361ARVIND SAMPATH362Abhishek. Khandelwal363RUMA CHAKRAVARTY364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367SVARADARJAN368S VARADARJAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN374SAURARJAN275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOGFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA181OM PARKASH MALHOTRA182HALLA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
57DINESH KUMAR JAIN358PRITI GOYAL359PADMA360VIVEK PAL361ARVIND SAMPATH362Abhishek Khandelwal363KRISHNA S CHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367AMIL KUMAR BHASIN368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAZIA ANJUM KACHWALLA1		-		
58PRITI GOYAL359PADMA360VIVEK PAL361ARVIND SAMPATH362Abbishek Khandelwal363KRISHNA S CHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN280SUKESH LAL181OM PARKASH MALHOTRA183SHAZIA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
59PADMA360VIVEK PAL361ARVIND SAMPATH362Abhishek Khandelwal363KRISHNA S CHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
60VIVEK PAL361ARVIND SAMPATH362Abhishek Khandelwal363KRISHNA S CHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAZIA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
61ARVIND SAMPATH362Abhishek Khandelwal363KRISHNA S CHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN280SUKESH LAL181OM PARKASH MALHOTRA183SHAYA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
62Abhishek Khandelwal363KRISHNA S CHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367ANIL KUMAR BHASIN368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN280SUKESH LAL181OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI184SHAZIA ANJUM KACHWALLA1		-		
63KRISHNA S CHANDRA364RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN280SURESH LAL181OM PARKASH MALHOTRA181SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
64RUMA CHAKRAVARTY365RAMANATHAN R366ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
65RAMANATHAN R366ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN280SUKESH LAL181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
66ANIL KUMAR BHASIN367AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAZIA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
67AMIT BIPIN NANAVATI368S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
68S VARADARAJAN369MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
69MOKILMARATHUR B MADHUSUDAN370SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		-		
70SANJAY KRISHAN DAWAR371C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	68	_	S VARADARAJAN	
71C VINOTH CHANDAR372VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1		_	MOKILMARATHUR B MADHUSUDAN	
72VICTOR JAYAKARAN373E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1			SANJAY KRISHAN DAWAR	
73E S NATARAJAN274SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA182SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1			C VINOTH CHANDAR	
74SAURABH MEHTA275UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI183SHAZIA ANJUM KACHWALLA1			VICTOR JAYAKARAN	
75UDAY JASWANTSINH NANAVATI276FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	73			
76FAKHRUDDIN ESOOFALI KARACHIWALA277ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1				
77ZAFAR SHABBIR KARACHIWALA278B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	75		UDAY JASWANTSINH NANAVATI	
78B M KRISHNAN279SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	76	_	FAKHRUDDIN ESOOFALI KARACHIWALA	2
79SANDEEP ADUKIA180SUKESH LAL181OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	77	_	ZAFAR SHABBIR KARACHIWALA	2
80SUKESH LAL181OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	78		B M KRISHNAN	2
81OM PARKASH MALHOTRA182MEHUL UDAY NANAVATI183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	79		SANDEEP ADUKIA	1
82MEHUL UDAY NANAVATI183SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	80		SUKESH LAL	1
83SHAYNA ANJUM KACHWALLA184SHAZIA ANJUM KACHWALLA1	81		OM PARKASH MALHOTRA	1
84 SHAZIA ANJUM KACHWALLA 1	82		MEHUL UDAY NANAVATI	1
	83		SHAYNA ANJUM KACHWALLA	1
85 DAANISH ANJUM KACHWALLA 1	84		SHAZIA ANJUM KACHWALLA	1
	85]	DAANISH ANJUM KACHWALLA	1



113 114		MOHIT B KHURANA BASKARAN S	3
112		ANJU MALIK	3
111		PERUVEMBA KRISHNAN SANGAMESHWARAN	1
110		ANURADHA RAMESH	
100		KULANDAIKANI AJITHTOGO	2
107	1	SURENDHREN MANAYATH	3
100		NAVINVIJAY JAGANNATHAN	1
105		B MAHIDHAR KRISHNA	1
104		MADHUSUDAN KEJRIWAL	5
103		SANDESH SHANKAR PRABHU	3
102	4	PREMA SUNDER .	8
101	4	AGARWAL SANJAY OMPRAKASH (HUF) .	3
100 101		MANISH JAISWAL HUF . MILLENNIUM FINANCE LIMITED	3
99	4	ANITA P. KOTHARI	5
98		LALITA S. KOTHARI	5
97	4	KANTA G KOTHARI	5
96		SANJULA S KOTHARI	5
95	-	SUMATHI	1
94	4	MRINALINI VIVEK MANOHAR	1
93	4	RAMESHBHAI GORDHANBHAI PATEL	1
92	4	RAMESH SRINIVASA MURTHY	1
91	4	SATISH MENON	1
90	-	NATHMAL NEVATIA	1
89		DHARA A PAWANI	1
88	-	ARTI AWASTHI	1
87		AJAY HARISH LAKHANI	1
86		ELIZA MOIZ KACHWALA	1

Note 3: Details of Debenture holders as per BENPOS as on 31st March 2022

S.			No. of Debentures	
No.	ISIN	Particulars of the holders	held	
1	INE01HV07155	POOJA UNICHEM LLP		70
		ACG ASSOCIATED CAPSULES PRIVATE		
2		LIMITED		50
3		ANURADHA SHARMA		10
4		NEELA ATUL ANJARIA		10
5		AJAY JAYSINGH ANJARIA		10
6		SAMARESH PARIDA		10
7		KIRAN BHASKAR KHOBARE		10
8		EMCO GOA PRIVATE LIMITED		10



9	VIVEK HINDUJA	10
10	SARITA DAS	8
11	ANNADURAI ELANGO	7
12	SEETHALAKSHMI VENKATARAMAN	6
13	SUNISH SHARMA	5
14	VISHWA DEVANG GADA	5
15	ATUL SINGH	5
16	GEETA KAPIL BEDI	5
17	GIAN P KUMAR HUF	5
18	ABHINAV SHARMA	5
19	SHASTRI RAMACHANDARAN	5
20	SUDHA SRIKANT	5
21	SHAURYA GUPTA	5
22	ARUN NATH	5
23	DELUX BEARINGS PRIVATE LIMITED	5
24	LAKSHMI ARULKANNAN	5
25	ROHIT CHANANA	5
26	KETAN A SHAH HUF	5
	AJIT SHELAT TECHNOLOGIES PRIVATE	
27	LIMITED	5
28	ANJALI GOPALAN	4
29	SANJEEV KUMAR JAIN	4
	OMEGA SECURITIES AND TRADING CO PVT	
30		3
31	TEJINDER PAL SINGH	3
32	MINA BADHWAR	3
33	SATISH KUMAR GUPTA	3
34	GOPAL DHUNDIRAJ CHIPLUNKAR	3
35	SIVASUBRAMANIAM KRISHNAMURTHY	3
36	S N BABUGOVINDARAJ	3
37	A SENTHIL KUMARAN	3
38	NIMISH SHASHIKANT AJMERA	3
39	PREETA RAJAN	3
40	ULRICH BLASS	3
41	HEMANGINI SANJIV SHETH	3
42	RAVINDRA NONAYA SHETTY	3
43		3
44	ALIASGAR J PLUMBER	3
45	Bharat Vansh Bahadur	3
46	KIRAN KRISHNAKUMAR KAPADIA	3
47	PUNIT KAUR	3



48		KAMINI BHARDVAJ	3
49		AAKASH YOGENDRALAL SHAH	3
50		SUNDARI KRISHNAMURTHY	3
51	-	AMIT DAS	3
52		DINESH NARASIMHA KUNDAPUR	3
53	-	PRAMILA DINESH	3
54	-	ANUP TIWARI	3
55		SHILPA GOEL	2
56		KAILASH NATH AGARWAL	2
57		SEEMA JAIN	2
58		MOHAN MADHUKAR LIMAYE	2
59		SHWETA VIREN NANAVATI	2
60		ANIL MEHTA	2
61		ASHRITA ERROL MORAES	2
62		ALOK KANAGAT	1
63		ARCHANA DWIVEDI	1
64		ATUL VASUDEO KULKARNI	1
65		SHRIKRISHNA DATTATRAY NAIK	1
66		TAJUDDIN AHMED	1
67		RAVINDRANATH RAMANATH GADIYAR	1
68		SHEETAL DILIP KULKARNI	1
69		ASHOK KUMAR ASTHANA	1
70		SAROJINI ASHOK KUNTE	1
71		ASHOK DAMODAR KUNTE	1
72		MANISH SEHGAL	1
73		RAHUL SWARUP	1
74		AMIT KUMAR GUPTA	1
75		MAKARAND ASHOK KUNTE	1
76		SUNITA K MURTHI	1
77		SHEHNAZ ANJUM KACHWALLA	1
78		ANJUM MOIZ KACHWALLA	1
79		VIVEK CHINTAMAN MANOHAR	1
80		PRADIP KUMAR MENON	1
81		GOPALAKRISHNAN SRIKANTH	1
82		NITIN JAIN	3
		TRANSWEIGH INTERNATIONAL PRIVATE	
83	4	LIMITED	5
84	4	SANYA KHURANA .	3
85	4	TARUN PURI	7
86		SHAMITA PURI	9

VIVRITI CAPITAL PRIVATE LIMITED CIN - U65929TN2017PTC117196 GST – 33AAFCV9757P12E 2nd FLOOR, PRESTIGE POLYGON No. 471, ANNA SALAI, NANDANAM CHENNAI 600035

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87		BHUPENDRA RASIKLAL SHAH HUF .	5
88		DSS ENTERPRISES PRIVATE LIMITED	5
89		MOUSUMI NANDY	1
90		NACHIKET VISHWANIYANT NAIK	2
91		KAMALA BAHETI	1
92		MADHUSUDAN KEJRIWAL HUF .	5
93		BHUVAN KUMAR GUPTA	2
94		TAMARISH SINHA	2
95		JUHI KULKARNI	1
96		MAHADEVAN SOWMYA	1
97		SUBBIRAMANIAN PADMAVATHI	3
98		JAYALAKSHMI RANGARAJAN	3
99		MANJULABEN J SHAH	2
100		PAUSHAK LIMITED	37
	Total		500

List of Directors as per MCA

Directors/Signatory Details

DIN/PAN	Name	Begin date	End date	Surrendered DIN
00994532	NAMRATA KAUL	12/01/2019	-	
01532511	ANITA BELANI	07/05/2021	-	
02545813	KENNETH DAN VANDER WEELE	18/01/2019	-	
03559152	KARTIK SRIVATSA	30/05/2020	-	
06848801	VINEET SUKUMAR	30/08/2017	-	
07298703	JOHN TYLER DAY	18/01/2019	-	
07767248	GAURAV KUMAR	22/06/2017	-	
AWGPA9942F	PAITENKER SURESH AMRITHA	19/06/2018	-	
AVCPB6091R	SRINIVASARAGHAVAN	01/05/2021	-	

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