



Date: 15th May 2022

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 31st March 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.	<u>Regulatory Requirement:</u>	Furnished Yes/No															
a.	<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" style="text-align: center;">ISSUE-WISE PARTICULARS</th> </tr> <tr> <th style="text-align: center;">Issue size</th> <th style="text-align: center;">Name(s) of Debenture Holder</th> <th style="text-align: center;">Address</th> <th style="text-align: center;">Contact No.</th> <th style="text-align: center;">Email Id</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	ISSUE-WISE PARTICULARS					Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id						Yes. Kindly refer to Annexure 1.
ISSUE-WISE PARTICULARS																	
Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id													
b.	<p><u>Any Modification In Existing Outstanding ISINs:</u></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="5" style="text-align: center;">ISSUE DETAILS</th> </tr> <tr> <th style="text-align: center;">Existing ISIN No.</th> <th style="text-align: center;">Revised ISIN No.</th> <th style="text-align: center;">Date of change in ISIN No.</th> <th style="text-align: center;">Date of DP letter for change in ISIN</th> <th style="text-align: center;">Furnish copy of letter from DP</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"></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.
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													



c.	<p><u>Investor Grievances Details:-</u></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="196 517 1190 920"> <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.
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)															
2.	<p><u>Management Confirmations:</u></p>	Furnished Yes/No																		
a.	<p><u>Payment Of Interest / Principal:</u></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="196 1323 1222 1615"> <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 Annexure 2.
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)															
b.	<p><u>Credit Rating:-</u></p> <p>Details of revisions in the credit rating (if any);</p> <table border="1" data-bbox="196 1895 1227 1991"> <thead> <tr> <th>Name(s) of Rating Agency</th> <th>Immediate Previous Credit Rating</th> <th>Revised Credit Rating & date of revision</th> </tr> </thead> <tbody> <tr> <td>ICRA Limited</td> <td>ICRA A-; Stable</td> <td>ICRA A-; Positive</td> </tr> </tbody> </table>	Name(s) of Rating Agency	Immediate Previous Credit Rating	Revised Credit Rating & date of revision	ICRA Limited	ICRA A-; Stable	ICRA A-; Positive													
Name(s) of Rating Agency	Immediate Previous Credit Rating	Revised Credit Rating & date of revision																		
ICRA Limited	ICRA A-; Stable	ICRA A-; Positive																		



c.	<u>DRR And REF Details:-</u>					DRR – Not applicable REF details – enclosed separately	
	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						
		Creation of Recovery Expense Fund (REF) in terms of SEBI Circular dated 22.10.2020					
		Maintenance of REF, REF required to be created [in Rs.]	REF created upto March 31, 2022	REF maintained In the form of	Any addition in the REF during the last quarter		

3.	CONFIRMATIONS/CERTIFICATES FROM STATUTORY AUDITORS	Whether copy enclosed										
a.	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):-	Will be submitted separately along with financial results.										
	<table border="1" style="width: 100%;"> <tr> <td style="width: 15%;">Issue size with ISINs</td> <td style="width: 15%;">Security Value/Cover</td> <td style="width: 15%;">Asset Cover</td> <td style="width: 15%;">Debt Equity Ratio</td> <td style="width: 15%;">Value of book debts / receivables certified by the</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table>	Issue size with ISINs	Security Value/Cover	Asset Cover	Debt Equity Ratio	Value of book debts / receivables certified by the						
Issue size with ISINs	Security Value/Cover	Asset Cover	Debt Equity Ratio	Value of book debts / receivables certified by the								



				statutory auditor. ¹	
Purpose of utilization of Proceeds (deviations, if any)	Status of compliance with the covenants of the Offer Document/Information Memorandum In case of breaches, please provide details of breach and steps taken by the Company.	Debt Service Coverage Ratio [Not applicable to Banks]	Interest Service Coverage Ratio [Not applicable to Banks]		
	Net worth of the company	Net profit after tax	Earnings per share		
4.	<u>MANAGEMENT CONFIRMATIONS:</u>				Furnished Yes/No
a.	<u>Management Confirmation for Security and insurance²:</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/cash flows/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 and adequate asset cover is maintained.				Yes
	iii. Delay or Failure to create security (if any), with detailed reasons for delay or default in security creation and the time lines within which the same shall be created				Not applicable

¹ Where the debentures are secured by receivables/book debts

² applicable for secured debentures



	<p>iv. All the Insurance policies of the Secured Assets of the captioned debentures 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.</p> <table border="1" data-bbox="193 591 1265 779"> <thead> <tr> <th data-bbox="193 591 408 712">Issue Size</th> <th data-bbox="408 591 620 712">Policy No.</th> <th data-bbox="620 591 836 712">Coverage (Rs.)</th> <th data-bbox="836 591 1050 712">Period & expiry date</th> <th data-bbox="1050 591 1265 712">Status of Endorsement</th> </tr> </thead> <tbody> <tr> <td data-bbox="193 712 408 779"></td> <td data-bbox="408 712 620 779"></td> <td data-bbox="620 712 836 779"></td> <td data-bbox="836 712 1050 779"></td> <td data-bbox="1050 712 1265 779"></td> </tr> </tbody> </table>	Issue Size	Policy No.	Coverage (Rs.)	Period & expiry date	Status of Endorsement						Not applicable
Issue Size	Policy No.	Coverage (Rs.)	Period & expiry date	Status of Endorsement								
b.	<u>Management Confirmation for statutory items:</u>	Yes/No										
	<p>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.</p>	Yes										
	<p>ii. Whether there is any breach of covenant / terms of the debenture issues in terms of the Information Memorandum and DTD.</p> <p>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.</p> <p>Any additional covenants of the issue (including side letters, accelerated payment clause, etc.) and status thereof</p> <p><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></p>	No										
	<p>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)</p>	No change.										
	<p>iv. Any amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Company</p>	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	Yes
	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.	Management Confirmation for other items:	Yes/No
	i. Details of any default committed by the Issuer with respect to borrowings obtained from banks / financial institutions pertaining to:- a. payment obligations; and / or b. covenant compliance	No
	ii. Details of Reference to Insolvency or a petition (if any) filed by any creditor or details of Corporate Debt Restructuring (if any);	Not applicable
	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	Not applicable
	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);	Not applicable



	vi. Confirmation that a functional website containing, amongst others as per Regulation 62 of SEBI (LODR) Regulations is maintained by the Company.	Yes
	vii. Confirmation that the information/documents has been submitted to the debenture holders as per Regulation 58 of SEBI LODR Regulations.	Yes
	viii. 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
	ix. 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 ³	Yes

For **Vivriti Capital Private Limited**

P S Amritha Digitally signed by P S Amritha
Date: 2022.05.15 16:22:34 +05'30'

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

³ Clause 3.2 of SEBI circular SEBI/HO/DDHS/CIR/P/103/2020 dated 23.06.2020.



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	INE01HV07114	40.00	Bank of Baroda	DGM, Bank of Baroda, Specialized Integrated Treasury Br., Bst,4th And 5th Floor, C-34 G-Block, Bandra Kurla Complex, Mumbai - 400051	Bank-Nationalised	400
2	INE01HV07122	20.00	Punjab National Bank	Treasury Division, Pnb Pragati Tower, 6th Floor, C-9, G-Block, Bandra Kurla Complex, Mumbai - 400051	Bank-Nationalised	200
3	INE01HV07148	10.00	CSB Bank Ltd	NO 44, JOLLY MAKER CHAMBER 2 4TH FLR, VINAYAK K SHAH MARG, NARIMAN POINT, Mumbai - 400021	Corporate Body - Domestic	100
4	INE01HV07163	40.00	Axis Mutual Fund	Deutsche Bank AG, DB House,	Mutual Funds - MF	400



				Hazarimal Somani Marg, P.O.Box No. 1142, Fort, Mumbai - 400025		
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****Note 1: Details of Funds as per BENPOS as on 31st Mar 2022**

S.No	ISIN	Particulars of the fund	No. of Debentures held
1	INE01HV07163	AXIS MUTUAL FUND TRUSTEE LIMITED A/C AXIS MUTUAL FUND A/C AXIS STRATEGIC BOND FUND	250
2		AXIS MUTUAL FUND TRUSTEE LIMITED A/C AXIS MUTUAL FUND A/C AXIS CREDIT RISK FUND	110
3		AXIS MUTUAL FUND TRUSTEE LIMITED A/C AXIS MUTUAL FUND A/C AXIS REGULAR SAVER FUND	40
	Total		400



Annexure-2

15th May 2022
The Debenture Trustees

Dear Sir/Madam,

**Sub: Statutory Compliance Report of the NCDs for the Quarter ending 31st March 2022
Ref: Non-convertible Debentures issued by the Company**

Details of Interest/Principal Payment for the Quarter ended on 31.03.2022 (01.01.2022-31.03.2022):

S. No.	ISIN	Coupon Rate	Amount paid (INR)	Interest/ principal due on	Actual payment date	Remarks
1	INE01HV07163	10.71%	36,37,946	18-01-2022	18-01-2022	Interest payment
2	INE01HV07189	10.50%	26,75,342	25-01-2022	25-01-2022	Interest payment
3	INE01HV07171	9.90%	31,41,523	25-01-2022	25-01-2022	Interest payment
4	INE01HV07171	9.90%	4,50,51,750	25-01-2022	25-01-2022	Principal payment
5	INE01HV07247	10.39%	35,29,957	30-01-2022	29-01-2022	Interest payment
6	INE01HV07247	10.39%	13,23,734	30-01-2022	29-01-2022	Interest payment
7	INE01HV07148	10.57%	19,98,807	10-02-2022	10-02-2022	Interest payment
8	INE01HV07148	10.57%	83,33,333	10-02-2022	10-02-2022	Principal payment
9	INE01HV07163	10.71%	36,37,946	18-02-2022	18-02-2022	Interest payment
10	INE01HV07171	9.90%	27,62,718	25-02-2022	25-02-2022	Interest payment
11	INE01HV07171	9.90%	4,15,35,000	25-02-2022	25-02-2022	Principal payment
12	INE01HV07189	10.50%	26,75,342	25-02-2022	25-02-2022	Interest payment
13	INE01HV07049	13.80%	1,41,66,575	28-02-2022	28-02-2022	Interest payment



14	INE01HV07247	10.39%	33,02,218	28-02-2022	28-02-2022	Interest payment
15	INE01HV07247	10.39%	12,38,332	28-02-2022	28-02-2022	Interest payment
16	INE01HV07114	10.00%	49,31,507	16-03-2022	16-03-2022	Interest payment
17	INE01HV07114	10.00%	10,00,00,000	16-03-2022	16-03-2022	Principal payment
18	INE01HV07163	10.71%	32,85,887	18-03-2022	18-03-2022	Interest payment
19	INE01HV07171	9.90%	21,79,920	25-03-2022	25-03-2022	Interest payment
20	INE01HV07171	9.90%	3,94,53,000	25-03-2022	25-03-2022	Principal payment
21	INE01HV07189	10.50%	24,16,438	25-03-2022	25-03-2022	Interest payment
22	INE01HV07247	10.39%	34,16,088	30-03-2022	30-03-2022	Interest payment
23	INE01HV07247	10.39%	12,81,033	30-03-2022	30-03-2022	Interest payment
24	INE01HV07122	10.25%	50,54,794.52	31-03-2022	30-03-2022	Interest payment

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

**P S
Amritha**

Digitally signed by P
S Amritha
Date: 2022.05.15
16:20:26 +05'30'

**P S Amritha
Company Secretary
Mem No. A49121**

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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