



Ref No.370/VTPL/OPR/2022-23

Date: October 30,2022

The Securities and Exchange Board of India,
Plot No. C 4 A, G Block,
Bandra Kurla Complex,
Bandra (East), Mumbai : 4000 51.

Respected Sir,

Subject: Submission of Half Yearly Compliance Report for the Half Year ended September 30,2022

In accordance with the Circular No. SEBI / HO / MIRSD / CRADT / CIR / P / 2020 / 230 dated November 12, 2020, we submit herewith Half Yearly Compliance Report for the half year ended 30th September, 2022 as per the reporting format prescribed by you.

Kindly acknowledge receipt of the same.

Yours faithfully,

For VARDHMAN TRUSTEESHIP PRIVATE LIMITED

P. Manoj

COMPLIANCE OFFICER

VARDHMAN TRUSTEESHIP PRIVATE LIMITED

COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED 30th SEPTEMBER, 2022

A No conflict of interests with other activities

The activities other than debenture trusteeship performed by DT are not in conflict with DT activities and appropriate systems and policies have been put in place to protect the interests of debenture holders - Nil

B Change in status or constitution

Reporting of 'changes in status or constitution' of DT (In terms of SEBI Circular No. CIR/MIRSD/10/2011 dated June 20, 2011) - Nil

Sr. No.	Particulars	Remarks
(i)	Amalgamation, Demerger, consolidation or any other kind of corporate restructuring falling within the scope of section 391 of the Companies Act, 1956 or the corresponding provision of any other Law for the time being in force	NIL
(ii)	Change in the Director, including managing/ whole time director	NIL
(iii)	Change in the Shareholding not resulting in change in control	NIL

C Other Information

Sr. No.	Particulars	Remarks
(i)	Details of arrest / conviction of key officials of DT	NIL
(ii)	Details of prosecution cases or criminal complaints filed by investors against the DT	NIL
(iii)	Details of any fraudulent activity by the employees associated with DT activities and action taken by the DT	NIL
(iv)	Details of conviction of any offence involving moral turpitude or any economic offence by employees of DT	NIL
(v)	Action taken by the DT on the above issues	NIL

Praveen

D Compliance with registration requirements

Certified that the requirements specified for SEBI registration as DT are fulfilled, the details are as under;

(i) Net worth (audited) as defined in the Regulations as on FY ended 31/03/2022 (latest audited financials) is Rs. 11.72 Crores/-

(ii) Any change in infrastructure since the last report / registration/ renewal - No

OFFICE EQUIPMENTS	
Electrical Equipment	
Laptop	12
Scanner	1
Biometric Machines	1
Software	
ERP System software designed by Virtual Splat	1

(iii) Changes in Key personnel during the half year ended 30th September , 2022

Name(s) of the key personnel (Directors)	Appointment / Cessation	Date of appointment / cessation	Qualification	Experience	Functional areas of work
Neha Godha	Cessation	16th August, 2022	B.Com Company Secretary	2.5 years	Compliance
Rushabh Desai	Appointment	16th August, 2022	B.Com, LLB & ACS	15 Years	Legal, Compliance and Operations

E Details of deficiencies and non compliances : NIL

F Details of the review of the report by the Board of Directors

(i) Date of Board Review : October 14, 2022

(ii) **Observation of the Board of Directors on the deficiencies and non-compliances and corrective measures initiated: The Board noted that there is perse no non compliance however the Board has advised to meticulously monitoring and tracking of payment of Interest and Principal along with monitoring of Covenant and its reporting more effectively.**

Certified that we have complied with SEBI (Debenture Trustee) Regulations, 1993, applicable provisions of SEBI (Issue and Listing of Debt Securities) Regulations, 2008, Circulars issued by SEBI and any other laws applicable from time to time except the deficiencies and non-compliances those specifically reported at Section IV (E) above.

Name of Compliance Officer: Rushabh Desai

Email ID: rushabh@vardhmantrustee.com