



Date: December 12, 2023

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 30th, 2023

In accordance with the Circular No. SEBI/HO/DDHS/ P/CIR/2023/50 dated March 31, 2023, we submit herewith Half Yearly Compliance Report for the half year ended September 30, 2023, as per the reporting format prescribed by you.

Kindly acknowledge receipt of the same.

Yours faithfully,

For VARDHMAN TRUSTEESHIP PRIVATE LIMITED

Puresab
COMPLIANCE OFFICER



VARDHMAN TRUSTEESHIP PRIVATE LIMITED

COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED 30th September, 2023

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 | Mr. Nilesh Palav Cessation w.e.f. 15-05-2023 |
| (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 |



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 31/03/2023 (latest audited financials) is Rs. 12.67 Crores/-

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

| OFFICE EQUIPMENTS | |
|---|----|
| Electrical Equipment | |
| Laptop/Desktop | 18 |
| Scanner/Printer | 4 |
| Biometric Machines | 1 |
| Software | |
| ERP System software designed by Virtual Splat | 1 |

(iii) Changes in Key personnel during the half year ended 30th September, 2023

| Name(s) of the key personnel (Directors) | Appointment / Cessation | Date of appointment / cessation | Qualification | Experience | Functional areas of work |
|--|-------------------------|---------------------------------|---------------|------------|--------------------------|
| Nilesh Palav | Cessation | 15-05-2023 | | | |

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 : December 09, 2023

(ii) **Observation of the Board of Directors on the deficiencies and non-compliances and corrective measures initiated: The Board noted that there is 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

