VARDHMAN
TRUSTEESHIP PRIVATE LIMITED
Nurturing & Protecting Your Trust

Date: 12th June, 2026

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 March 31st, 2026

In accordance with the Circular No. SEBI/HO/DDHS-PoD-1/P/CIR/2025/117 dated August 13, 2025, we submit herewith Half Yearly Compliance Report for the half year ended March 31st, 2026, as per the reporting format prescribed by you.

Kindly acknowledge receipt of the same.

Yours faithfully,

For VARDHMAN TRUSTEESHIP PRIVATE LIMITED

Yogesh

Vardhman Trusteeship Pvt. Ltd.

YOGESH LIMBACHIYA
COMPLIANCE OFFICER

VARDHMAN TRUSTEESHIP PRIVATE LIMITED

COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED 31ST MARCH, 2026

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	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

Yogesh K

Vardhman Trusteeship Private Limited

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 31/03/2026 (latest audited financials) is Rs. 19.77 Crores/-

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

OFFICE EQUIPMENTS	
Electrical Equipment	
Laptop	17
Desktop	1
Scanner/Printer	2
Biometric Machines	1
Software	
DA / PTC Software	1
HRMS Software	1
ERP System software designed by Virtual Splat	1

iii) Changes in Key personnel during the half year ended 31st March, 2026

Name(s) of the key personnel (Directors)	Appointment / Cessation	Date of appointment / cessation	Qualification	Experience	Functional areas of work
NA					

E Details of deficiencies and non compliances : SEBI letter dated January 29, 2026, communicating the discrepancies, deficiencies with respect to provisions required under Regulation 18 (2) of the NCS Regulation to mention minimum penal interest (2%) to be paid by the issuer on non-execution of the Debenture Trust Deed.

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

(i) **Date of Board Review :** May 11, 2026

Yogesh K

Vardhman Trusteeship Private Limited

(ii)	**Observation of the Board of Directors on the deficiencies and non-compliances and corrective measures initiated: In response to the SEBI letter dated January 29, 2026, the Board advised to ensure that the deficiencies do not occur in future. The necessary amendment agreement to Debenture Trust Deed was entered to include the mandatory provisions as per the SEBI ILNCS Regulation. VTPL has also made certain changes in the compliance processes and checklist so that such discrepancies do not occur in future.**

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: Yogesh Limbachiya

Email ID: yogesh@vardhmantrustee.com

Yogesh

Vardhman Trusteeship Private Limited