

Ref No. 5234/STCL/DT/2025-26

Date: November 11, 2025

The Securities & Exchange Board of India

Plot No. C 4 A, G block,
Bandra Kurla Complex, Bandra (East),
Mumbai- 400 051

Sub: SBICAP Trustee Company Limited - Submission of Half Yearly Report for the half year ended September 30, 2025

Respected Sir,

In accordance with SEBI (Debenture Trustee) Regulations, 1993 and SEBI Master Circular SEBI/HO/DDHS-PoD-1/P/CIR/2025/117 dated August 13, 2025, we submit herewith half yearly compliance report and information pertaining to other activities carried out by Debenture Trustee(s) including type of activity, description of activity etc. for the half-year ended September 30, 2025 as per the reporting format prescribed by you.

Kindly acknowledge the receipt.

Yours faithfully,

For **SBICAP Trustee Company Limited**


Authorised Signatory



Mr. Sandeep Poddar
Company Secretary and Compliance Officer

SBICAP Trustee Company Ltd.

Registered & Corporate Office : 4th Floor, Mistry Bhavan, 122, Dinshaw Vachha Road, Churchgate, Mumbai, Pin - 400 020.

+91 22 4302 5566 / +91 22 4302 5555 ✉ corporate@sbicaptrustee.com CIN : U65991MH2005PLC158386

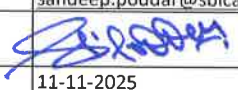
UDYAM REGISTRATION NUMBER (SMALL ENTERPRISE Under MSME Act, 2006) - UDYAM-MH-19-0111411

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A Group Company of SBI

Annexure I		
REPORT OF DEBENTURE TRUSTEES FOR THE HALF YEAR ENDED SEPTEMBER 30, 2025		
Name of Debenture Trustee	SBICAP Trustee Company Ltd	
Registration No.	IND000000536	
Date of Registration (In DD/MM/YY) (Renewal Certificate)	6th October 2015	
SECTION I: ACTIVITIES		
Activities other than Debenture Trusteeship as on September 30, 2025		
Activity Type	Description of the activity	Number of Mandates
Security Trustee	To obtain and hold security on behalf of lenders till the respective loans are settled/repaid.	5185*
Facility Agent	Acting as Lender's Agent for SBI PFSBU and ICICI for loans availed by NHA	1
Joint Will	Customise Will preparation and handed over the client	1
Securitisation	Pool Purchase on Direct Assignment Basis and to be settled at the end of Term	123
Enforcement Trustee	Invocation of Shares pledged to Trustee, Assignment given by SBI SAMB	2
Share Pledge Trustee	To monitor the shares pledged against the loans/transfer of shares against payment/fulfilment of certain agreed conditions.	426
Safe Keeper	To provide all sorts of logistics for creation of security i.e. Get the possession of title deeds, carry out search, carry out lis-pendens (i.e. Pending litigation), carry out valuation of securities, payment of appropriate stamp duty, vetting of documents and creation of securities in favour of lenders.	483
Escrow Trustee	To hold property/shares (in demat/physical mode) as security on behalf of lenders, subject to terms and conditions between them.	60
Security Agent	To act as an agent on behalf of the security holders.	53
SLR Trust	To hold the charge created under Section 45 - IB of RBI Act and as per the provision of the NHB act, on behalf of the deposit holders.	5
Will	MyWill Services encompassing Online and Offline Customized Will to clients.	5
Virtual Data Room (VDR)	Providing virtual access to the clients for document deposited by them with us in various transaction.	76
Commercial Paper	To act as CP Trustee	5
AIF	To act as Trustee for AIF as per SEBI Regulations.	26
Employee Welfare Trust / ESOP	To act as Trustee of the ESOP Trust Established by the Corporate for their Employees benefits	1
Infrastructure Investment Trust (InvIT)	To act as Trustee for Infrastructure Investment Trust incorporated under SEBI (Infrastructure Investment Trusts) Regulations, 2014	1
Fraction Shares Trustee	To hold the shares on behalf of shareholders to whom the company has allotted shares but the fractional since can't be allotted is hold in trust and subsequently sold at the instructions of Company and amount is paid to the shareholder by Company.	1
Ancillary Services	To Co-ordinate with TSR Advocate and Valuer for TIR Report and valuation Report respectively and cross check the TSR with Title Deeds.	86
Formation of Trust	Formation of Trust for group gratuity.	1
	Total	6541**
Name of Compliance Officer Sandeep Poddar		
Email ID sandeep.poddar@sbicaptrustee.com		
Note -		
* No. of Security Trustee mandates include 2 assigment of Deed of Accession from April 01, 2025 to September 30, 2025		
**Total number of mandates issued have been considered including the cancelled/closed/redeemed mandates till September 30, 2025		



NAME:		SBICAP Trustee Company Ltd			
REGISTRATION NO		IND000000536			
COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED SEPTEMBER 30, 2025					
A	No conflict of interests with other activities				
	The activities other than debenture trusteeship performed by Debenture Trustee are not in conflict with Debenture Trustee activities and appropriate systems and policies have been put in place to protect the interests of debenture holders.				we certify that there is no conflict of interest with other activities performed by Debenture Trustee
B	Change in status or constitution				
	Reporting of changes in status or constitution' of Debenture Trustee including the following:				
i	Amalgamation, demerger, consolidation or any other kind of corporate restructuring falling within the scope of section 391 of the Companies Act, 1956 (1 of 1956) or the corresponding provision of any other law for the time being in force				NIL
ii	Change in Director, including managing director/ whole-time director				NO
iii	Change in shareholding not resulting in change in control				YES
	If there is no change during the relevant quarter, it shall be indicated in the report.				
C	Other Information				
	(i) Details of arrest /conviction of key officials of Debenture Trustee				NIL
	(ii) Details of prosecution cases or criminal complaints filed by investors against the Debenture Trustee				NIL
	(iii) Details of any fraudulent activity by the employees associated with Debenture Trustee activities and action taken by the Debenture Trustee				NIL
	(iv) Details of conviction of any offence involving moral turpitude or any economic offence by employees of Debenture Trustee				NIL
	(v) Action taken by the Debenture Trustee 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 (Unaudited) as defined in the Regulations as on Half Year ended September 30, 2025 (as per the latest Unaudited financials) (In Rs.)				2,29,52,24,845.00
	(ii) Any change in infrastructure since the last report / registration/ renewal				NIL
	(iii) Changes in Key personnel during the half year ended September, 2025				NIL
Sl. No	Name(s) of the key personnel	Appointment / Cessation	Date of appointment / cessation	Qualification	Experience (years)
1	NIL	NIL	NIL	NIL	NIL
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 (dd/mm/yyyy)		10-11-2025		
	ii. Observation of the Board of Directors on the deficiencies and non-compliances and corrective measures initiated : NA				
	Certified that we have complied with SEBI (Debenture Trustee) Regulations, 1993, applicable provisions of SEBI (Issue and Listing of Non-convertible Securities) Regulations, 2021, Circulars issued by SEBI and any other laws applicable from time to time, other than the deficiencies and non-compliances reported by us at Section(e) above.				
	Name of Compliance Officer		Sandeep Poddar		
	Email ID		sandeep.poddar@sbicaptrustee.com		
	Signature		 		
	Date:		11-11-2025		