

Ref No.1291/STCL/DT/2025-26

Date: June 09, 2025

The Securities & Exchange Board of India

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

<u>Sub: SBICAP Trustee Company Limited - Submission of Half Yearly Report for the half year</u> ended March 31, 2025

Respected Sir,

In accordance with SEBI (Debenture Trustee) Regulations, 1993 and SEBI Master Circular No. SEBI/HO/DDHS-PoD3/P/CIR/2024/46 dated May 16, 2024, 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 March 31, 2025 as per the reporting format prescribed by you.

Kindly acknowledge the receipt.

Yours faithfully,

For SBICAP Trustee Company Limited

Mr. Sandeep Poddar

uthorised Signatory

**Compliance Officer** 

**SBICAP Trustee Company Ltd.** 



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INDOCOCCOSS FOR REGISTRATION (in dd/mm/yry) (Renewal Certificate)  Activities other than Debenture Trusteeship as on March 31, 2025  Activity Trype Description of the activity Number of Mandates  Security Trustee Ion obtain and hold security on behalf of lenders till the respective loans are settled-frepaid. Facility Agent Pyrivate Ion obtain and hold security on behalf of lenders till the respective loans are settled-frepaid. Facility Agent Pyrivate Ion obtain and hold security on behalf of lenders till the respective loans are settled-frepaid.  Facility Agent Pyrivate Ion obtain and hold security on behalf of lenders till the respective loans are settled-frepaid.  Facility Agent Pyrivate Ion of Starres pledged to Trustee, Assignment given by 581 Share Pledge Trustee Invocation of Shares pledged against the loans/ransfer of shares against payment/fulfilment of certain agreed conditions.  To monitor the shares pledged against the loans/ransfer of shares against payment/fulfilment of certain agreed conditions.  To provide all sorts of ligistics for recribin of security, i.e. Get the possession of title deeds, carry out search, carry out Iss-gendens (Per Pending ligisland), carry out valuation of securities, payment for provide all sorts of ligistics for recribin of security payments against payment/fulfilment of certain agreed conditions.  Facurity Agent To hold propertry/shares in demat/physical model as security on behalf of the deposit holders.  Security Agent To act as an agent on behalf of the security holders.  Security Agent To hold the charge created under section 45 - 18 of RBI Act and as per the provision of the NHB act, on behalf of the deposit holders.  Will MyWI Services encompassing Online and Offline Customized Will to clients.  Virtual Data Room (VDR) WyWI Services encompassing Online and Offline Customized By them with us in various transaction.  To act as Trustee for AFF as per SEBI Regulations.  25 Employee Welfare Trust, Employee Welfare Trust To act as Trustee for Infarstucture Investment Tr	NAC:	<u>REI</u>	PURT OF DEBENTURE TRUSTEES FOR THE HALF YEAR ENDED MARCH	
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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.  Will  MyWill Services encompassing Online and Offline Customized Will to clients.  Providing virtual access to the clients for document deposited by them with us in various transaction.  Commercial Paper  To act as CP Trustee  AIF  To act as Trustee for AIF as per SEBI Regulations.  Employee Welfare Trust / ESOP  Infrastructure Investment Trust incorporated for their Employees benefits  To act as Trustee for Infrastructure Investment Trust incorporated under SEBI (Infrastructure Investment Trusts) Regulations, 2014  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 subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TIR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust  Formation of Trust Formation of Trust for group gratuity.  1 Total  Name of Compliance Officer  To Abold the charge created under Section 45 - IB of RBI Act and as per the provision of the deposit holders.  5  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.  Formation of Trust  Formation of Trust for group gratuity.  1  Total  Sandeep Poddar		Escrow Trustee	behalf of lenders, subject to terms and conditions between them.	58
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.  Will  MyWill Services encompassing Online and Offline Customized Will to clients.  Providing virtual access to the clients for document deposited by them with us in various transaction.  Commercial Paper  To act as CP Trustee  AIF  To act as Trustee for AIF as per SEBI Regulations.  Employee Welfare Trust / ESOP  Infrastructure Investment Trust (InvIT)  To act as Trustee of the ESOP Trust Established by the Corporate for their Employees benefits  To act as Trustee for Infrastructure Investment Trust incorporated under SEBI (Infrastructure Investment Trust) Regulations, 2014  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 subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TiR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust Formation of Trust for group gratuity.  Total  Name of Compliance Officer  Sandeep Poddar				
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Will MyWill Services encompassing Online and Offline Customized Will to clients.  Virtual Data Room (VDR) Providing virtual access to the clients for document deposited by them with us in various transaction.  Commercial Paper To act as CP Trustee 5  AIF To act as Trustee for AIF as per SEBI Regulations. 25  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 of Infrastructure Investment Trusts 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 subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TIR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust Formation of Trust for group gratuity. 1  Name of Compliance Officer Sandeep Poddar			To hold the charge created under Section 45 - IB of RBI Act and as	
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Virtual Data Ruom (VDR)  Providing virtual access to the clients for document deposited by them with us in various transaction.  Commercial Paper  To act as CP Trustee  AIF  To act as Trustee for AIF as per SEBI Regulations.  Employee Welfare Trust / ESOP  Infrastucture Investment Trust effor their Employees benefits  To act as Trustee for Infrastucture Investment Trust incorporated under SEBI (Infrastructure Investment Trusts) Regulations, 2014  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 subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TIR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust  Formation of Trust for group gratuity.  1  Name of Compliance Officer  Virtual Data Ruom (VDR)  Providing virtual access to the clients for document deposited by them with us in various transaction.  52  To act as Trustee of the ESOP Trust Established by the Corporate for their Employees benefits  1  To act as Trustee of the ESOP Trust Established by the Corporate for their Employees benefits  1  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 subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TIR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust for group gratuity.  1  Total  Name of Compliance Officer  Sandeep Poddar				
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Employee Welfare Trust / ESOP		Commercial Paper	To act as CP Trustee	5
Employee Welfare Trust / ESOP		AiF	To act as Trustee for AIF as per SEBI Regulations.	25
ESOP   for their Employees benefits   1		Employee Welfare Trust /		
Infrastucture Investment Trust (InvIT)  To act as Trustee for Infrastucture Investment Trust incorporated under SEBI (Infrastructure Investment Trusts) Regulations, 2014  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 subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TIR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust  Formation of Trust for group gratuity.  Total  Name of Compliance Officer  Sandeep Poddar				1
Trust (InvIT)  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 subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TiR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust  Formation of Trust for group gratuity.  1  Name of Compliance Officer  Value Poddar				
Fraction Shares Trustee  company has allotted shares but the fractional since can't be allotted is hold in trust and subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TiR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust  Formation of Trust for group gratuity.  1  Total  Sandeep Poddar			under SEBI (Infrastructure Investment Trusts) Regulations, 2014	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.  Formation of Trust  Formation of Trust  Total  Sandeep Poddar			To hold the shares on behalf of shareholders to whom the	
allotted is hold in trust and subequently sold at the instructions of Company and amount is paid to the shareholder by Company.  To Co-ordinate with TSR Advocate and Valuer for TIR Report and valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust  Formation of Trust for group gratuity.  1  Total  Sandeep Poddar  Sandeep Poddar		Fraction Shares Trustee		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.  Formation of Trust  Formation of Trust for group gratuity.  1  Total  Sandeep Poddar  To Co-ordinate with TSR Advocate and Valuer for TiR Report and valuation Report respectively and cross check the TSR with Title Deeds.  1  Name of Compliance Officer  Sandeep Poddar		Traction Shares Hustee		1
Ancillary Services valuation Report respectively and cross check the TSR with Title Deeds.  Formation of Trust Formation of Trust for group gratuity.  1  Total 5873*  Name of Compliance Officer Sandeep Poddar				
Deeds.  Formation of Trust Formation of Trust for group gratuity.  Total  Name of Compliance Officer Sandeep Poddar				
Formation of Trust Formation of Trust for group gratuity.  1 Total 5873*  Name of Compliance Officer Sandeep Poddar		Ancillary Services		66
Name of Compliance Officer Sandeep Poddar Sandeep Poddar		Farm-11		
Name of Compliance Officer Sandeep Poddar		Formation of Trust		
			lotal	5873*
Email ID sandeep.poddar@sbicaptrustee.com		Name of Compliance Officer	Sandeep Poddar	
		Email ID	sandeep.poddar@sbicaptrustee.com	
			lates issued have been considered including the cancelled/closed/red	





NAME: SBICAP Trustee Company Ltd REGISTRATION NO IND000000536 COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED MARCH 31, 2025 No conflict of interests with other activities we certify that there is no conflict The activities other than debenture trusteeship performed by Debenture Trustee are not in conflict with Debenture Trustee of interest with other activities activities and appropriate systems and policies have been put in place to protect the interests of debenture holders. performed by Debenture Trustee R Change in status or constitution Reporting of changes in status or constitution' of Debenture Trustee including the following: Amalgamation, demerger, consolidation or any other kind of corporate restructuring falling within the scope of section 391 of the NIL Companies Act, 1956 (1 of 1956) or the corresponding provision of any other law for the time being in force Change in Director, including managing director/ whole-time director YES 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. Other Information (i) Details of arrest /conviction of key officials of Debenture Trustee NII (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 NIL Debenture Trustee (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 NII 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 Half Year ended 31st March, 2025 (as per the latest audited financials) 2,11,90,40,054.00 (ii) Any change in infrastructure since the last report / registration/ renewal (iii) Changes in Key personnel during the half year ended March, 2025 SI. No Name(s) of the key personnel Appointment / Date of Qualification Experience (years) Cessation appointment / cessation Shivam Appointment 13-12-2024 Bachelor's degree in Science (Math. Hons.) 26 Years After Completed Executive MBA with specialization in Finance from Faculty of Management Studies (FMS), Delhi. Certified Associate of Indian Institute of Bankers (CAIIB) Prabhat Mohan Prasad 13-12-2024 Appointment Bachelor's degree in Science Physics. CAIIB 34 Years Part I, CAIIB Part II, CERTIFICATION PROGRAM FOR SME CREDIT Sandeep Poddar Appointment 21-03-2025 Bachelor's degree in Commerce (B.Com.) and 8.5 Years Completed CS degree from ICSI. Currently pursuing LLB. Details of deficiencies and non compliances NIL Details of the review of the report by the Board of Directors i. Date of Board Review (dd/mm/yyyy) 06-06-2025 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@sbicaetrustep.com Signature 09-06-2019 Date: