OSBITrustee

Ref No.1625/STCL/DT/2024-25

Date: 12th June, 2024

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 ended 31st March, 2024</u>

Respected Sir,

In accordance with SEBI (Debenture Trustee) Regulations, 1993, Circular No. SEBI/HO/DDHS-PoD1/P/CIR/2023/109 dated March 31, 2023 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 31st March, 2024 as per the reporting format prescribed by you.

Kindly acknowledge the receipt.

Yours faithfully,

For SBICAP Trustee Company Limited

Authorised Signatory

Rajiv Ranjan 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

| ANTE | REPU | ORT OF DEBENTURE TRUSTEES FOR THE HALF YEAR ENDED MARCH, 2 | | | | | | | |
|--------------------|--|---|--------------------|--|--|--|--|--|--|
| AME: | SBICAP Trustee Company | | | | | | | | |
| | RATION NO | mm/yy) (Renewal Certificate) | IND000000536 | | | | | | |
| 12.01 | REGISTRATION (III dd) | (Refewal Certificate) | 6th October 2015 | | | | | | |
| | | SECTION I: ACTIVITIES | | | | | | | |
| | | | | | | | | | |
| | Activities other than Debenture Trusteeship as on 31st March, 2024 | | | | | | | | |
| | p to on our match, 2021 | | | | | | | | |
| | Authority Tyme | Description of the cost of | | | | | | | |
| | 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. | 3902 | | | | | | |
| | Facility Agent | Acting as Lender's Agent for SBI PFSBU and ICICI for loans availed by NHAI | 1 | | | | | | |
| | Joint Will | Customise Will preparation and handed over the client | 1 | | | | | | |
| | Securitisation | Pool Purchaase on Direct Assignment Basis and to be settled at the end of Term | 4 | | | | | | |
| | Enforcement Trustee | Invocation of Shares pledged to Trustee, Assignment given by SBI SAMB | 1 | | | | | | |
| | Share Pledge Trustee | To monitor the shares pledged against the loans/transfer of shares against payment/fulfilment of certain agreed conditions. | 323 | | | | | | |
| | 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. | 374 | | | | | | |
| | Escrow Trustee | To hold property/shares (in demat/physical mode) as security on behalf of lenders, subject to terms and conditions between them. | 54 | | | | | | |
| | Security Agent | To act as an agent on behalf of the security holders. | 29 | | | | | | |
| | 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. | 4 | | | | | | |
| | Will | MyWill Services encompassing Online and Offline Customized Will to clients. | 3 | | | | | | |
| | Virtual Data Room (VDR) | Providing virtual access to the clients for document deposited by them with us in various transaction. | 35 | | | | | | |
| | Commercial Paper | To hold the original documents viz title deeds, Security documents etc on behalf of lenders/investors for safe custody. We are having safekeeping arrangement at various centres throughout India. | 5 | | | | | | |
| | AIF | To act as Trustee of the funds and to monitor compliances as per SEBI Regulations. | 21 | | | | | | |
| | Employee Welfare Trust / ESOP | To act as Trustee of the ESOP Trust Established by the Corporate for their Employees benefits | 1 | | | | | | |
| | InvIT | To act as Trustee for Infrastucture 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 subequently 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 | 34 | | | | | | |
| Formation of Trust | | Formation of Trust for group gratuity. | 1 | | | | | | |
| | | Total | 4795 | | | | | | |
|): | *Note: Na - Cd | stee mandate include 3 Deed of Accession | | | | | | | |
| | note: No of Security Tru | | | | | | | | |
| | | | | | | | | | |
| | Name of Compliance | Rajiv Ranjan | | | | | | | |
| | Officer | .5 | | | | | | | |
| | Email ID | rajiv.ranjan@sbicaptrustee.com | | | | | | | |



| NA | ME: | | SBICAP Tru | istee Company Ltd | 1 | | | | |
|--|---|--|---------------------------------|--|--------------------|--|--|--|--|
| REGISTRATION NO | | | IND0000005. | | 1 | | | | |
| COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED 31st March 2024 | | | | | | | | | |
| A | No conflict of interests with other ac | | | | | | | | |
| | The activities other than debenture trus activities and appropriate systems and | we certify that there is no conflict of interest with other activities performed by Debenture Trustee | | | | | | | |
| В | Change in status or constitution | | | | 74 | | | | |
| | Reporting of changes in status or constitution' of Debenture Trustee including the following: | | | | | | | | |
| i | Amalgamation, demerger, consolidatio of the Companies Act, 1956 (1 of 1956 | NIL | | | | | | | |
| ii | Change in Director, including managin | YES | | | | | | | |
| iii | Change in shareholding not resulting in | YES | | | | | | | |
| | If there is no change during the relevan | | | | | | | | |
| C | Other Information | | | | | | | | |
| | (i) Details of arrest /conviction of key of | officials of Deben | ture Trustee | | NIL | | | | |
| | (ii) Details of prosecution cases or crim | | | a accinet the Dahentura Turnta | | | | | |
| | | | | | NIL | | | | |
| | Debenture Trustee | (iii) Details of any fraudulent activity by the employees associated with Debenture Trustee activities and action taken by the Debenture Trustee | | | | | | | |
| | (iv) Details of conviction of any offence Trustee | NIL | | | | | | | |
| | (v) Action taken by the Debenture Trus | NIL | | | | | | | |
| D | Compliance with registration require | ements | | | | | | | |
| | Certified that the requirements specified | d for SEBI registr | ation as DT are | fulfilled, the details are as under; | | | | | |
| | (i) Net worth (audited) as defined in the | ded 31st March, 2024 (as per the latest audited | | | | | | | |
| | financials) (In Rs.) | 1,75,09,85,654 | | | | | | | |
| | (ii) Any change in infrastructure since t | wal | NIL | | | | | | |
| | (iii) Changes in Key personnel during the | | | | | | | | |
| | Name(s) of the key personnel | Appointment / Cessation | Date of appointment / cessation | Qualification | Experience (years) | | | | |
| 1 | Rajay Kumar Sinha | Cessation | 23-01-2024 | Graduate and completed JAIIB , CAIIB Part II, Certification Programme For Compliance & Risk , Certification Program For Risk Management | 32 Years | | | | |
| 2 | Virendra Bansal | Appointment | 26-03-2024 | Bachelor's degree in engineering (Mechanical) certification of AML/ KYC from Indian Institute of Bankers. | 33 Years | | | | |
| 3 | Shaanya Srivastava | Cessation | 15-02-2024 | Masters in Law and Semi Qualified Company Secretary | 4 Years | | | | |
| 4 | Rajiv Ranjan | Appointment | 16-02-2024 | Masters in Science, CAIIB, NISM Certified | 35 Years | | | | |
| E | Details of deficiencies and non compl | iances | NIL | | | | | | |
| F | Details of the review of the report by the Board of Directors | | | | | | | | |
| | i. Date of Board Review (dd/mm/yyyy) 12-06-2024 | | | | | | | | |
| | 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 | Rajiv Ranjan | | | | | | | |
| _ | Email ID | rajiv.ranjan@s | bicaptrustee. | com | | | | | |
| | Signature | ymber | (\$10 × 88)C | | | | | | |
| | Date: | 12-06-2024 | 1/2 | | | | | | |