REPORT OF DEBENTURE TRUSTEES FOR THE HALF YEAR ENDED 315T MARCH,2017
NAME: IDBI Trusteeship Services Limited
REGISTRATION NUMBER: IND000000460
RATE OF REGISTRATION (IN DD/MN/YY): Renewal Certificate d

Renewal Certificate dated 14th February, 2017

SECTION I: ACTIVITIES

Details of Debenture Issues (Public (P)/Rights * Privately Placed (PPL)/ Privately Placed Unlisted(PPUL)

				2			25.	otal
18,13,135	1,12,322	5/,31/	1,15,005	3000	301	7.4	227	tvately Placed Unitstand
000,001	200,002	818'01	17,603	751	103	30	73	Watery Placed Listed
10,00,104	020,00,1	40,390	90,222	2202	195	44	151	ghts
45.00		,		0	0	0	0	ublic
00010	0,000		0,900	4/	3	0	3	
58043 *	8 900 8 900	CONT.	000		ŀ		October Co.	
	10131	Unsecured	Secured		d Total	Unsecured	DOMINGS	
Size (in Rs. Crore) of Debenture issues accepted during Crore) of Debenture issues the half year ended 31st March, 2017. Comulative Size (in Rs. Crore) of Debenture issues handled upto the year ended 31st March, 2017.	s accepted during ch,2017.	ts, Crore) of Debenture issues accept the half year ended 31st March,2017	Size (in Rs. Crore) the half y	Cumulative Number of Debentures Issues handled up to the year ended 31st March,2017.	epted during the ch,2017.	Number of Debenture issues accepted during the half year ended 31st March,2017.	Number of Del	

* Issue size in the case of Muthoot Finance Ltd. originally envisaged as Rs 300 crores subsequently enhanced to Rs.500 crores (CL/15-18/Deb/991)

Note: As on 31/03/2017; 1913 lesues having aggregate value of Rs. 5,56,317 crores have been redeemed. 8 cases were cancelled which was issued in last year having value of Rs. 3,491 crores 2 Cases which were inadvertently marked as redeemed are revalidated during this half year. Activities other than debenture trusteeship as on 31st March,2017.

2002	C. Hadingon	Venture Capital Fund
7	VOE Trustagship	Special Purpose venicie
2	SPV Trusteeship	OLY LUBRER
C)	SLR Trusteeship for holding SLR securities will the benefit depositions	
	LIOCHING OF STREET AND ASSESSMENT OF STREET	Share Pledge Trustee
88	Listance for the honefit lenders	Settlor
3	Creation of trust	Security Inustree
838	Holding of security for thebanefit lenders	Security Agent
71	Acting as an agent on behalf of security holder	Securitzation
67	Securitization trusteeship	Sare Neeping
2	Safe keeping of documents	PUDIC Depose Tuores
16	Public Deposit trusteeship	NAME TIME
19	Holding Private trustee	Ower or Audiney
	Holding POA	DO Agent
43	NDU Agentship	*CIECING
4	Monitoring the value of shares	Ilidsougue lirecours.
2	InviT Trutseeship	-acimy regera
60	Facility Agent Trusteeship	ESCION Agent
41	Escrow Agent Trusteeship	Offilletotal Fabor France
	Commercial Paper Trusteeship	(IBINative Inscounce: and
	Alternative Investment Fund Trusteeship	Attamative Investment Fund
AND SOME	Description of Activity	The state of the s

Name of Compilance Officer: Mr. S. Gunware Email ID: sgunware@ldbitrustee.com Date: 11th April, 2017



Name of the DT: ITSL

SECTION II : REDRESSAL OF INVESTOR GRIEVANCES

For the Half Year ended 31st March 2017.

Status of Investor Grievances

		21		20		19	1 8		17	ъ	15	14	13	12	±	10	9		<u>م</u>	7	6	ტ	4	ယ	2			Sr.No.	
		Munou rilaica Lia	The state of the s	Muthoot Finance Ltd.		Muthoot Finance Ltd.	Muthoot Finance Ltd.	Times of the	Muthoot Finance Ltd.	Muthoot Finance Ltd.	Muthoot Finance Ltd.	Muthoot Finance Ltd.	Muthoot Finance Ltd.	Muthoot Finance Ltd.	Muthoot Finance Ltd.	Muthoat Finance Ltd.	Shriram Transport Finance Company Ltd.		Shriram Transport Finance Company Ltd. (NCD VI)	SBI	SBI	L & T Finance Ltd.	IDFC Ltd.(Tranche -1, II, III 1 2011-2012)	IDFC Ltd.(Tranche -III -FT ZUIU-ZUII)	IDFC Ltd.(Tranche -II + Y ZUIV-ZUII)	IDFC Ltd.(Tranche -1 -1 2010-2011)		Name of the issuer (tranche wise)	
crores)	(Actually collected Rs.438.52	250+250= Rs. 500 crores	250+250= Rs. 500 crores		150+150(300)	400.00 (Rs.417.44 crores)		crores)	500(Actual collected 400.19 cr)	ZOU(ACIDAL COMBCIDE 107:02 C)	poor at a collected 197 92 C	sonyactual Collected 500.00)	200/Actual collected 300)	anniactual collected 300)	sonractus collected 274.94)	500 (Activation Collected 259.75)	son (Artis) colleted 459.32)	1974 8471 (NCDVII-2014	/bullion zona)	0490.99	5408.00	1000	1000	5000	250	800	472	Issue Size (Rs. Crores)	
0	-	-	0		0	0		0				0	0	0	0	0	0	0			0	0	0	0	0	0	0	complaints at the end of the previous half year	Pending
0	•		4	•		C	D	0		2	2	12	ယ	11	2	2	4	-		-	8	0	2	2,802	332	1088	509	received during the half year	No. of complaints
-	<u> </u>	-		<u>.</u>				0		2	2	12	3	11	2	2	4				8	0	_	2,802	332	1088	800	resolved during the half year	No. of complaints
	<u> </u>			_ o	 u	,	0	c	,	0	0	0	0	0			0	0		0	0	-	,	.	0		,		



		Sr. No.		00				- 7	- 1		-т	_		_			7
		Name of the Issuer		Details of the	33	32		אַנ	30	29	28	27	26	25	24	23	
		Issue Size (Rs. In Crores)		Details of the complaints pending for more man so details	Indiabulis Housing Finance Lw.	Reliable Holle Change In	Dalingo Home Finance Itd	Edelweiss Housing Finance Ltd.	NHPC Limited	NTPC Limited	ICICI Bonds - September-2007(709)KIB(B1)	India Inforline Housing Finance Ltd.	India Infoline Housing Finance Ltd.	India Infoline Finance Ltd.	India Infoline Finance Ltd.	Muthoot Finance Ltd.	
		pending for more than 30 days	No. of			7000	3500	900	500	1000	700	3.71	300	500	1050	500	250+250 (500)
O. W. Mariotop	Delay in payment		Nat			0			0	0	0	0	0	-	23		0
redempton	payment of		Nature of the Complaint(s)			55	100	22	146	43	37	2	0	9	60	10	4
reaembaon	payment of	Delay in				199	4 7 7	23	146	43	37	2	0	10	62	1-1	4
		redressal	Steps taken for				0	0	0	0	0	0	0	0	c	0	-
		redressal)	complaint (if	Status of the													

Name of Compliance Officer: Email ID: Date: 11th April,2017

Mr. S. Gunware

sgunware@idbitrustee.com



Name of the DT: ITSL

Section III - DEFAULT DETAILS

For the Half Year ended 31st March, 2017

Information regarding default by the Issuer Companies in Public (P) / Rights (R) / Privately Placed Listed (PPL) Issues of Debentures up to the half year ended 31st March, 2017.



_ 		- 	
		<u></u>	<u> </u>
HDIL Lid.	Spartek Ceramics Limited	Spartek Ceramics Limited	Spanco Ltd.
Secured	Secured	Secured	Secured
PP	ים	P	. PPL
1150	2.75	5.03	92
Delay in payment of interest/redemption of principal	Redemption / Interest	Redemption / Interest	Delay in payment of interest/redemption of principal
Constant & vigorous follow-up is being made with the Company for clerance of defuelt. Debenture holder are seized of the matter and in constant touch with the Company. The companyhas defualted in payment of Interest to the debenture holders. The Company has also defualted in submission of Periodical Reports. We in our capacity as Debenture Trustees convened Six. Meetings of the Debenture Holders and the Company on 14th June, 2013, 25th September, 2013, 8th July, 2014, 3rd March, 2015, 10th March, 2015, and on 11th May, 2015 at our Office in Mumbai. The Company had assured to clear the defualt at the earliest. Notice under Section 13(2) the SARFAESI Act, 2002 issued to the Company on 08/07/2015. The Company has raised some objections to the Notice. We have replied the same vide our letter dated the 18th September, 2015. Again. Meeting of the Debenture Holders and the Secured Assets was sent to the Company. Possession was scheduled to taken on on 17/03/2016. However, at the request of the Company and with the approval of the Debenture Holders it was deferred as the Company had assured to make the payment. Next Meeting of the Debenture Holders was held on 04/10/2016. Possession of the Mortgaged Properties taken on 05/12/2016. Further Meeting of the Debenture Holders was held on 04/10/2016. Possession of the as required by the Issuer Company. Valuation Report of the Properties received on 08/03/2017. We are in the process of calling the Debenture Holder's Meeting for taking further steps in the matter for sale of properties.	Hon'ble BIFR has ordered circulation of the scheme on 12/12/2013 and had fixed the date of hearing on 12/3/2014 to invite objections from the parties concerned and pass orders for approving the Draft Rehabilitation Scheme. The meeting of BIFR was held on 12/3/2014 to consider approval of the DRS. The meeting was attended by all the concerned and the Hon'ble BIFR has reserved its orders. The DRS provides for repayment of Rs. 86 lakhs towards of principal for the debentureholders. SCIL draft scheme provides for detailed note on below aspects and placed before BIFR. Meanwhille, Company had a MA from integrated Finance heard on June 3, 2015. The main hearing scheduled for Feb 26, 2015 was postponed indefinitely by BIFR. The main hearing postponed from Feb 26,2015 was never posted for hearing at BIFR. Meanwhile Company had a MA from Integrated Finance heard on June 3 2015. OA, IDBI has submitted the Draft Rehabilitation Scheme of the company to the Hon'ble BIFR on 16/3/2016. Rehabilitation Scheme was circulated in July 2016 by the Hon'ble BIFR and case was posted for hearing on 20th October, 2016. The records are now under transfer from BIFR to NCLT.	Registered under BIFR 2006. IDBI Bank (OA) submitted BRS proposing to repay 40% of pricipal amount to all debentureholders. Accordingly, company has repaid all Institutional Debentureholders. While small debentureholders are yet to be repaid. Pending BIFR Clearance. IDBI Bank (OA) is holding amount due to small debentureholders Rs. 86 lacs in a seperate account. We are following up with OA. BIFR next hearing due on	Constant & vigorous follow-up is being made. LIC the debenture holder is seized of the matter and granted rescheduling of interest to the company vide its letter dated the 28th March, 2011. Company has paid an amount of Rs. 2 crores to LIC the Debentureholder. We as Trustee had convened the meeting of the Debenture Holders viz. LIC, BOI & Karnataka Bank on 09/03/2015 to deide upon the further course of action for recovery of dues. It was informed by LIC that LIC is in the process of filing Recovery Application before DRT, MUmbai. The representive of Karnataka Bank informed that their Bank is also in the process of filing Recovery Application before DRT and Complaint u/s 138 of NI Act, 1881 for dihonour of Cheques. It was informed by the Representative of BOI that they would take further action in consultation with their Legal Deptt. Notice undere SARFAESI Act, 2002 issued on 11/02/2016 on the Offical Liquidator, High Court, Bombay as the Company has gone in liquidation. OL has taken possession of the properties of the company. We have written to OL, HC Bombay to handover the assets charged to us us. We have filed the Company Petition bearing number 40/2016 in the Hon ble High Court of Bombay for taking possession of properties from the OL. We are pursuing the matter.



12 Punj Lloyd Ltd.		REI Ágro Ltd.	10 WS Industries (India) Ltd.	9 Parekh Aluminiunex Ltd.
Secured		Secured	¥	Secured
PPL		PPL	P _P P	
300 (ICICI Bank), 150 (LIC)		267.5	30	247
Delay in payment of interest/redemption of principal		Delay in payment of interest/redemption of principal	Delay in redemption of debentures	Delay in payment of interest/redemption of principal
The Company has not paid interest to the ICICI Bank. ICICI Bank is in touch with the company for early payment. LIC vide various letters/emails has advised the company to pay their dues.LIC has categorised the account of the Company as NPA in their books. After continous follow-up, the Company has made payment towards interest due on 2.10.2014 together with penal interest. As regards balance Payment the Company has sought support as discussed during their meeting with LIC.ICICI Bank has filed Original Application (OA) bearing No. 372/2016 in the DRT-I at Delhi on 26/07/2016 as also filed winding-up petition in the Delhi High Court. LIC is in the process of filing OA before DRT, Mumbai.	Accordingly, the Hon'ble BIFR vide its letter dated July 03, 2015 informed the Company that the aforesaid reference has been registered a case no. 85/2015 under the provisions of SICA for adopting measures for the revival and rehabilitation. One Mr. Surendra Kumar Joshi an Operational Creditor has initiated Corporate Insolvency Resolution Process by filing Company Petition bearing No. 73/2017 before NCLT, Kolkata Bench under Section 9 of the Insolvency and Bankruptcy Code, 2016. NCLT vide their Order dated 27/02/2017 has admitted the petition, declared moratorium and public announcement as stated in section 13 of IBC 2016. We have forwarded a copy of the NCLT Order dated the 27/02/2017 to the Debenture holders.	The Company has defualted in payment of interest. We had convened meeting of Debenture Holders on the Issue. The Company has assured to make the payment. Debenture Holders agreed to give time upto 20th March, 2014. The Company did not make the payment as assured. The Company vide it's letter has informed that they have provided for export bills for discounting with the banks and the discounting of the bill is in process. Lenders were considering the restructuring of the loans. Debenture Holders are to react to the same. On the Instructions of LIC who is the sole debenture holder for one of the series of the debentures issued by the company, we as Debenture Trustee has issued notice on 09/03/2015 under SARFAESI Act, 2002. Based on the erosion of the entire net worth of the Company a reference was filed by the Company in terms of the provisions of section 15(1) of SICA with the Board for Industrial and Financial Reconstruction (BIFR) on April 28, 2015 and to Further study the reasons of Sickness and determination of measures to be adopted for revival of the Company through its letter dated July 03, 2015.	The Company has detualted in payment redemption of 1st Instalment of Principal due on 30th September, 2013. We in our capacity as Debenture Trustees as also Debenture Holder are following up with the company for payment. On the instructions of the Debenture Holders ITSL as Trustees has issued "Notice of Acceleratrion" on payment. On the instructions of the Debenture Holders ITSL as Trustees has informed us regarding their case 22nd February, 2015 to the Company. The Company vide letter dated 1/7/2015 has informed us regarding their case having registered with the BIFR under Reference No.75/2015. We have communicated the said information to the Debenture Holders on 9/07/2015. Further instructions in the case are awaited from the Debenture Holder.	The Company has defualted in payment of interest. We had Four meetings of Debenture Holders on the Issue. The Company has made reference to CDR. Except SBI Pension Fund and LIC Pension Fund other debenture hoders company has made reference to CDR. Except SBI Pension Fund and LIC Pension Fund other debenture hoders called the provision of the Debenture holders was convened on 26/09/2016 to discuss various modes of actions for recovery of dues of debenture holders. It has been decided to issue notice under SARFAESI Act, 2002 as amended by Enforcement of Security Interest and Recovery of Debt. Laws and Misclianeous Provisions (Amendment) Act, 2016 as notified on 16/08/2016. Defualt Notice duly approved by the Debenture Holders have been issued on the 9th February, 2017. Notice u/s 13(2) of SARFAESI Act, 2002 will be issued on expiry of 90 days from the date of defualt notice.



T		Ī	_				Ţ		50		
19		18	2H	17	_		1			15	<u> </u>
Jyoti Structures	Limited	Nimal Lifestyle	Development Pvt. Ltd.	Jai Maharashtra Nagar		Ltd.	Decar Shinning		Associates Ltd.	Jaiprakash	Monnet Ispat Ltd.
Secured		Secured		Secured		Coccion	Secured		26 20	Secured	Secured
PP		Jed		1 1	2	1	Jdd			PPG	· PP
5 0		297	-	ē	100, 200	Crores &	Rs. 500	& Rs. 500	Rs. 400 Cr	Rs. 300 Cr.	Rs. 100 crores by LIC. Rs. 180 crores by J & K Bank & Ors.
Delay in payment of interest/redemption of	Interest payment, delay in commencement of development of project non creation and maintenance of interes reserve, failure to furnish proof to the Investors that subscription amounts have been used as peagreed terms.	Default in making	Debenture holder	Additional Security as	Non Creation of	interest/redemption of	Delay in payment of	principal	interest/redemption of	Non Creation of DRR & Delay in payment of	
The Company has failed to pay the interest and prinicipal amount. We had called Debenture Holders Meeting on 25.07.2016 and on 18.11.2016. The Company has asked sometime for restructing of its Debt. Next meeting of the Debenture Holders is scheduled on 21/04/2017 for discussing further course of action.	Interest payment, delay to the company instructing their immediate action for curing the defaults. The Company in response requested in commencement of project, non creation and maintenance of interest section 141 of the Negotiable Instruments Act, 1881 with the 23rd Court of Metropolitan Magistrate at Esplanade, investors that subscription amounts have been used as per conducted by Court and date for hearing is scheduled in June, 2017. Interest payment, delay to the Company instructions of time for curing the defaults. The Company in response requested in the Company in response of the Section 13 (2) and the Company in response of the Section 13 (2) of the Section 14 of Section 13 (2) of the Sarriage and the Court of Metropolitan Magistrate at Esplanade, and the Court of Metropolitan Magistrate at Esplanade, the Court of Metropolitan Magistrate at Esplanade, and the Court	We had called for the Debenture holders meeting wherein the debenture holders resolved to issue the detault notice		the Company's Board on November, 17,2015	Based on the Instructions of the Debentureholders, we have appointed a Shri Nilesh Dave as Nominee Director on	We along with the LIC are in process of filing the Suit with the Bombay High Court.		the paymnet to the Debnetureholder as and when Funds are available with them.	LIC of India (Debentureholder) on 25/04/2016 for one of the Series of the NCDs and they are in process of making	The company has informed us vide their letter dated 04th July,2016 that they have made the paymnet of interest to	LIC has written to the Company for clerance of defualt vide their letter dated 17th March, 2015. Central Bank of India as also J & K Bank have written to the Company vide letter dated the 20th Februrary, 2015 and 10th March, 2015 respectively. The Company is trying for Strategic Debt Restructuring (SDR) with the Debenture Holder. "Lenders of the Company have invoked SDR and converted part of their Debt in to equity to the extent of 51% of the paid up capital of the company. Currently process for change in management is underway. During the 18 month period from Reference Date of SDR invocation (Aug 22, 2015), the Lenders have resorted to standstill clause. Further the company has incurred EBIDTA losses during the FY ended March 31, 2016 and hence Is not in a position to pay the dues/interest of any of its lenders. NCD lenders have also participated in the SDR.



The Company has not paid interest to debenture noticer for quarter ended Jan 12, 2017. The formed company have formed JLF and opted for SDR. Further the Company informed the debenture holder that the JLF has called for stand still and hence it will not be able to pay further interest payments till the finalisation of Strategic Debt Restructuring Scheme.	Delay in interest payment	Rs 150 Cr	PPL	Secured	Ballarpur Industries Limited	
The landers of the		Rs. 50 crores	PPL	l. Secured	Usher Agro Ltd.	
Acceleration Notice issued to the Issuer Company on 22/02/2017. Debenture Holder is seized of the matter. We shall initiate the further action in consulation with the debenture holder.	Delay in Payment interest				23	N
	interest/redemption of principal	Rs.100 crs	PP	Secured	Mandhana Industries Ltd.	22
	Seculity.	Rs 650 crs	PPL	Secured	Crompton Greaves Consumer Electricals Ltd.	21
The Company has failed to repay the installemnts on the due dates since July, 2015 and the same has been intimated to us by LIC in September, 2016 and had called for security details which have been duly provided to LIC. The LIC, the sole debenture holder is seized of the matter and further colurse of action shall be taken as intimated by LIC.	Delay in pyment of principal.	100 (LIC has subscribed to two 40 Crs tranches)	РР	Secured	Ess Dee Aluminium Limited	. 20



PPL Rs. 500 Delay in executing the closure of Normation documents confirmation of Recurrity extension of Creation documents the assets. Rs. 460 Delay in Payment of Issuer Computer Structures interest.							-	
Limited Torrent Pharmaceuticals Secured PPL Rs. Limited	nent of Issuer Company has failed to make the Payment of Interest that fell due on 31st March, 2017. The Payment i expected to be made by 15th April, 2017.	Delay in Paym		PPP	Secured	Projects ment		
creation documents	Issuer company, in anticipation of not feasible to meet the time line of security creation within 3 months after the closure of NCD issue i.e. 29th December 2016, had written to the sole NCD holder under the issuance to seek security extension of time of another 60 days for security creation vide their letter dated 4 th March 2017. We are awaiting confirmation from the Investor with respect to extension of time for execution of DTD and for creating charge or the assets.	Delay in execution DTD and se creation documen		JAd	Secured	Torrent Pharmaceuticals Limited		
Delay in executing the closure of N DTD and security extension of	Issuer company, in anticipation of not feasible to meet the time line of security creation within 3 months after ing the closure of NCD issue i.e. 13 December 2016, had written to the sole NCD holder under the issuance to seek unity extension of time of another 60 days for security creation vide their letter dated 4 th March 2017. We are awaiting confirmation from the Investor with respect to extension of time for execution of DTD and for creating charge on the assets.	Delay in executing th DTD and security creation documents	Rs. 500 crores	JAd	Secured	Torrent Pharmaceuticals Limited		

*Type of Default 1. Non-payment of interest;
2. Non-payment of Principal;
3. Delay in payment of interest/redemption;
4. Any other (like non-creation of security)

Name of Compli:Mr. S. Gunware
Officer
Email ID: sgunware@idbitru:
Date 11th April,2017

sgunwa<u>re@idbitrustee.com</u> 11th April,2017



Name of the DT: ITSL

SECTION - IV - COMPLIANCE

COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED 31st March.2017.

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. Yes.

Change in status or constitution

Ø

Reporting of 'changes in status or constitution' of DT (In terms of SEBI Circular No. CIR/MIRSD/10/2011 dated June 20, 2011)

Z

- 1 IDBI Bank withdrew the nomination of Mr. Kishor Kharat and nominated Mr. G.M.Yadwadkar in his place.
 At the Board Meeting held on 28/11/2016 Mr. G.M.Yadwadkar has been inducted as additional director & Chairman.
- 2 Mr. Dilip Tickoo, director nominated by LIC resigned from the Board of ITSL and his resignation was accepted by the Board at their meeting held on 23/03/2017.
- 3 Mr. K.S. Nagnyal, Director representing LIC has resigned with effect from 31.03.2017 from the Board of ITSL

Other Information

n

- (i) Details of arrest / conviction of key officials of DT
- (ii) Details of prosecution cases or criminal complaints filed by investors against the DT
- (iii) Details of any fraudulent activity by the employees associated with DT activities and action taken by the DT

₹

- (iv) Details of conviction of any affence involving moral turpitude or any economic offence by employees of DT
- (v) Action taken by the DT on the above issues

Compliance with registration requirements

O

Certified that the requirements specified for SEBI registration as DT are fulfilled, the details are as under:



m

T

(i) Net worth (audited) as defined in the Regulations as on FY ended 31/03/2016 (as per the latest audited financials (Rs. in crores)) (iii) Changes in Key personnel during the half year ended 31st March, 2017. (ii) Any change in infrastructure since the last report / registration! Renewal

131.85

Z Z

			Name(s) of the key personnel
			Appointment Cessation
			Appointment Date of Appointment Cessation cessation
		NIL	Qualification
AND AND A			Experience
	The state of the s	-35.00	Functional areas of work

Details of deficiencies and non compliances

Z

Details of deficiencies and non compliances

Date of Board Review (ddlm:mlyyyy)

Observation of the BoD on

i) the deficiencies and non compliances

ii) corrective measures initiated

25-04-2017

Z.

Z

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 S.Gunware

Email ID: Date

sgunware@idbitruste e.com 11th April,2017

THE COLUMN AS TH