IDBI Trusteeship Services Ltd.

CIN : U65991MH2001GOI131154

Name of the DT: IDBI Trusteeship Services Limited

SECTION - IV - COMPLIANCE

COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED 30TH SEPTEMBER 2023

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. — Yes

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 230 of the Companies Act, 2013 or the corresponding provision of any other law for the time being in force. — No

ii. Change in Director, including managing director/ whole-time director — Yes, the same is provided in detail in D (iii)

iii. Change in shareholding not resulting in change in control — No

C **Other Information**

(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

D **Compliance with registration requirements**

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

Networth (unadited) as defined in the Regulations as on HY ended 30/09/2023 (Rs. in crores) — INR 489.64 Crores (As per IND AS)

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

(iii) Changes in Key personnel during the half year ended 30th September 2023

Name(s) of the key personnel	Appointment/ Cessation	Date of Appointment/ Cessation	Qualification	Experience
Mr. J. Samuel Joseph (Director/Chairman)	Cessation	April 18, 2023	B.E. (Hons) and MBA	Over 27 years
Mr. Jayakumar S. Pillai (Director/Chairman)	Appointment as Additional Director	July 18, 2023	BFSc, CAIIB, MBA in Finance, Post Graduate Diploma in Foreign Trade, Diploma in Governance, Risk & Compliance (GRC) from ICA, London	Over 40 years
Ms. Sneha Jadhav (Compliance Officer)	Cessation	August 31, 2023	BLS LLB, ACS	Over 11 years
Mr. Sumit Panjabi (Compliance Officer)	Appointment as Compliance Officer	September 01, 2023	1. Company Secretary(CS) 2. LLM 3. LLB 4. Diploma In Corporate Law	Over 6 years

E **Details of deficiencies and non compliances** — NIL

F **Date of the review of the report by the Board of Directors**

Date of Board Review (ddlmmlyyyy) — 18-10-2023

Observation of the BoD on

i) the deficiencies and non compliances — NIL

ii) corrective measures initiated — NIL

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 except the deficiencies and non compliances those specifically reported at Section IV (E) above:

Name of Compliance Officer: Mr. Sumit Panjabi
Email ID: sumit@idbitrustee.com
Date:18-10-2023

IDBI Trusteeship Services Ltd. ITSL

Details of other activities carried out by Debenture Trustee(s) including type of activity, description of activity etc as on 30th September, 2023.

Activity Type	Description of Activity	No. of clients
Alternative Investment Fund	Alternative Investment Fund Trusteeship	85
Commercial Paper Trustee	Commercial Paper Trusteeship	5
Escrow Agent	Escrow Agent Trusteeship	86
Facility Agent	Facility Agent Trusteeship	57
Infrastructure Investment Fund	InvIT Trutseeship	11
Monitoring	Monitoring the value of shares	10
NDU Agent	NDU Agentship	14
Power of Attorney	Holding POA	1
Private Trust	Holding Private Trustee	25
Public Deposit Trustee	Public Deposit Trusteeship	13
Safe Keeping	Safe keeping of documents	186
Securitization	Securitization Trusteeship	107
Security Agent	Acting as an agent on behalf of security holder	119
Security Trustee	Holding of security for the benefit lenders	1220
Settlor	Creation of Trust	13
Share Pledge Trustee	Holding of shares for the benefit of lenders	92
SLR Trustee	SLR Trusteeship for holding SLR securities for the benefit depositors	7
Special Purpose Vehicle	SPV Trusteeship	4
Venture Capital Fund	VCF Trusteeship	28
Peer to Peer lending	P2P Trusteeship	25
Masala Bond	Acting as Security holder for Note Trustee	18

Name of Compliance Officer: Mr. Sumit Panjabi
Email ID: sumit@idbitrustee.com
Date: 18-10-2023