REPORT OF DEBENTURE TRUSTEES FOR THE HALF YEAR ENDED 30TH SEPTEMBER,2019.

NAME: IDBI Trusteeship Services Limited

REGISTRATION NUMBER: IND000000460

PATE OF REGISTRATION (IN DD/MM/YY): Renewal Certificate date

Renewal Certificate dated 14th February, 2017

SECTION I: ACTIVITIES

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

	The second secon				200	ŧ	164	Total
22,00,010	2,49,340	/8,243	1,71,097	2718	208	44	101	Privately Placed Unlisted
27 00 01 5	0,40,040	10000		113	00	10	73	D. C. Distriction
1,94,492	21,386	3,629	17.757	775	93		90	Privately Placed Listed
200,000	24.000	14,011	1,00,040	0681	124	34	00	
20,25,164	2.25.454	74 614	1 50 840	4000		c	0	Rights
20.05.40.4			-	0	0	0		Public
-			1,000	30	-	0	_	
802,00	2,500		2 500	63		,	000000000000000000000000000000000000000	
036.00		Olioccaica	Secured		Total	Unsecured	Secured	
	Total	linsecured	porting					
Crore) of Debenture Issues handled upto the year ended 30th September,2019.	during	in Rs. Crore) of Debenture issues accepted the half year ended 30th September,2019.	Size (in Rs. Crore) the half yea	Cumulative Number of Debentures Issues handled up to the year ended 30th September,2019.	d during the	ber of Debenture issues accepted durin half year ended 30th September,2019.	Number of Debenture issues accepted during the half year ended 30th September,2019.	
0								ערומווז טו טכטכוונמו כיינישני ויייים ייייים יייי

Note: The data in the Cumulative is in respect of outstanding issues as on 30th September,2019.

B Activities other than debenture trusteeship as on 30th September,2019.

	Description of Activity	No. of clients
Activity Type	Alternative Investment Fund Trusteeship	35
Alternative Investment Fund	Alleriative investicity and increasing	11
Commercial Paper Trustee	Commercial Paper Husteesing	54
Escrow Agent	Escrow Agent i rusteesnip	50 4
Facility Agent	Facility Agent Trusteeship	29
Infrastructure Investment Fund	InvIT Trutseeship	3
Monitorina	Monitoring the value of shares	14
ADII Appat	NDU Agentship	33
NOO Agent	Holding POA	1
Private Trust	Holding Private trustee	25
Dishic Denocit Trustee	Public Deposit trusteeship	15
Onto Coponico	Safe keeping of documents	105
Sale Needing	Securitization trusteeship	83
Seculitzation	Acting as an agent on behalf of security holder	109
Security Agent	Holding of security for th ebenefit lenders	1119
Security Hustee	Creation of trust	8
Settlor	Holding of shares for th henefit lenders	110
Share Pledge Trustee	noidilly of strates for the series revised of	
	SLR Trusteeship for holding SLR securities for the	7
SLK Huster	SPV Trusteeship	2
Special Purpose venicle	VOE Trusteeshin	25
Wenture Capital Fund	***************************************	

Name of Compliance Officer: Mr. Jatin Bhat Email ID: jatin.bhat@idbitrustee.com Date: 18-10-2019



Name of the DT: IDBI Trusteeship Services Ltd.

SECTION II: REDRESSAL OF INVESTOR GRIEVANCES

For the Half Year ended 30th September,2019.

#### Status of Investor Grievances

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0	20	19	18	17	i	ń	ō	15	14	13		12	1	10	9		8	7	6	5	4	ω	2	_	Sr.No.
	Reliance Home Finance Ltd.	Edelweiss Housing Finance Ltd.	NHPC Limited	NIPC Limited	NITTO LINES	ICICI Bonds	H L 18010 C	IIFI Home Finance Ltd.	Muthoot Finance Ltd.(NCD-XVIII)	Multipot Finance Etc. (INCO-XIII)		Muthoot Finance Ltd. (NCD-IX)	Muthoot Finance Ltd.(NCD -VII)	Muthoot Finance Ltd. (NCD-XIV)	Shriram Transport Finance Company Ltd.		Shriram Transport Finance Company Ltd.(NCD VI)	SBI	SBI	L & T Finance Ltd.	IDFC Ltd.(Tranche -I, II, III -FY 2011-2012)	IDFC Ltd.(Tranche -III -FY 2010-2011)	IDFC Ltd.(Tranche -II -FY 2010-2011)	IDFC Ltd.(Tranche -I -FY 2010-2011)	Name of the issuer (tranche wise)
7000	3500	500	1000	1000	700	CH_01,MARCH_02,FEB_03,FE B_03,JAN_05,FEB_05	PIB_FEB	200	3000		500	500	500	438.32	420 22	3000 (Under Shelf Prospectus)	500(NCD VI 2013)	5496.99	1000	1000	5000	250	800	4/2	Issue Size (Rs. Crores)
0	C			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
52		0 8	30	41	11	16		0	2 3		1	-			1	_	C	0	0	ى د	1,774	1 774	314	300	No. of complaints received during the half year
52	5	8	30	41	11	16		0	, _		_		_	_	_	1	c		n 0	ه در	0 1,7,7	1 774	314	805	No. of complaints resolved during the half year
	0 0	0	0	0	0	0		c	0		0		0	0	0	0		0	0	0	0	0	0	0	No of complaints pending at the end of half year



	Sr. No.	B.							
	Name of the Issuer				25	24	23	22	
	Issue Size (Rs. in Crores)				J.M.Financial Products Ltd.	Indiabulls Consumer Finance Ltd.	J.M.Financial Credit Solutions Ltd.	Edelweiss Retail Finance Ltd.	
	No. of complaints pending for more than 30 days				1500	3000	750	Rs.491.62Cr)	500(Actual collected
CALL HARMS AND THE RESERVE OF THE PARTY OF T					0	0	0	0	
,	Nature of the Complaint(s)				44	189	103	31	
	s)				44	189	103	31	
	Steps taken for redressal				0	0	0	0	
	Status of the complaint (if redressed, date of redressal)								

Name of Compliance Officer: Email ID: Date:

Mr. Jatin Bhat

N

Delay in payment of interest

Delay in payment of redemption

Delay in payment of redemption

jatin.bhat@idbitrustee.com 18-10-2019



Section III - DEFAULT DETAILS

### For the Half Year ended 30th September,2019.

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 30th September,2019.

Redemption / Interest 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. The Operating Agency has submitted a Revised Rehabilitation Scheme Redemption / Interest 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 to ITSL on 12.10.2017, and the same has been kept in sparate Escrow Account maintained with IDBI, ITSL is in the process of distributing the amount to Hon'ble BIFR and case was posted for hearing on 20th October 2016. The DRS is approved by BIFR vide their mintues dt 20.10.16, accordingly IDBI Bank - OA had a MA from integrated Finance heard on June 3, 2015. The main hearing was 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, 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, towards 40% of principal for the debentureholders. SCIL draft scheme provides for detailed note on below aspects and placed before BIFR. Meanwhile, Company 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 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 to the Hon'ble BIFR. The 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 distributed to 404 debenture holders so far Debenture Holders. Payment of Rs. 241- per Debenture is being made as per the BIFR Order dated the 20th October, 2016. An amount of Rs. 190800/ has been s supposed to release 50 % of amount from NLA. From which 40 % amount shall be paid to DHs. IDBI Bank has since released the amount of Rs.86.25 lakhs

Ch

Spartek Ceramics

Secured

PPL

2.75

Limited

Spartek Ceramics

Secured

PPL

5.03

Limited



The Company has defualted 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 22nd February, 2015 to the Company. The Company vide letter dated 17/2015 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 current status is that the issuer company is under discussion stage with the debenture holder with respect to the revival status. Further, ITSL has issued notice dated 18.02.2019 to company for revocation of Article 6 of the above referred Settlement Agreement persuant to default made in payment of amounts as per Settlement Agreement. Further, the Company giving reasons for non payment of amount as per Settlement Agreement and requested for re-extension of validity of the agreement to which we have replied on March 20, 2019 upon instructions of Debenturholder, by rejecting request	Delay in redemption of debentures	ప	PPL		WS Industries (India) Ltd.	ω
The Company has defualted in payment of interest. We had Four meetings of Debenture Holders on the Issue. The Company had made reference to CDR. Except SBI Pension Fund and LIC Pension Fund other debenture hoders had joined CDR. Last meeting of the Debenture holders was convened on 26/09/2016 to discuss various modes of actions to 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 issued on 18/05/2017. We had convened the meeting of the Debenture Holders on 11/08/2017 wherein it was reported that ING Vysaya Bank now Kotak Mahindra Bank has filed the Application before NCLT and as such there is Moratorium and SARFAESI Action is stalled. The Debenture Holders have filed their claim with NCLT as Financial Creditor. We have been initmated by RP that the outcome of proceedings under IBC shall be infimated to us once order is issued.	Delay in payment of interest/redemption of principal	247	PPL	Secured	Parekh Aluminiunex Ltd.	7
Constant & vigorous follow-up is being made with the Company for clerance of defualt. Debenture holder are seized of the matter and in constant touch with the Company. The company has 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 on 14th June, 2013, 25th September, 2013, 8th July, 2015 at our Office under Section 13(2) the SARRAESI Act, 2002 issued to the Company on 08/07/2015. The Company had assured to clear the defualt at the earliest replied the same vide our letter dated the 18th September, 2015. Again Meeting of the Debenture Holders and the Company was held on 13/10/2015 at our 17/03/2016. However, at the request of the Company and with the approval of the Company, Possession was scheduled to taken on on payment. Next Meeting of the Debenture Holders was held on 04/10/2016 as required by the issuer Company, Valuation Report of the Properties received on 08/03/2017. We convened the meeting of the debenture holders was held on on 28/12/2016 as required by the issuer Company, Valuation Report of the Properties received on 08/03/2017. We application before NCLT, Mumbai 02/08/2017. Union Bank of India, filed CP 1271/2017before NCLT, Mumbai . The Company settled the matter with UBI & approved the OTS with HDIL. UCO Bank has reached one time settlement. Bank of India have filed insolvency proceedings against the company and the matter sis now before the NCLT. The Company has appealed to NCLAT against the order of NCLT, Mumbai. NCLAT has stayed the order of NCLT.	Delay in payment of interest/redemption of principal	1150	Pdd	Secured	HDIL Ltd.	o o



Int of We along with the LIC have filed the Suit with Admirality and Vice Admirality Jurisdiction of the Bombay High Court The matter is pending for hearing and the next date in the matter will be allotted as per the CMIS.	Delay in payment of interest/redemption of principal	Rs. 500 Crores & Rs. 200 Crores by	PPL	Secured	Essar Shipping Ltd.	2
The company has informed us vide their letter dated 04th July,2016 that they have made the payment of Interest to LIC of India ( Debentureholder) on 25/04/2016 for one of the Series of the NCDs  Subsequently company's proposal of Debt Realignment Plan (DRP) which is effective from 1st October 2016 has been approved by Joint Lender Forum (JLF) including LIC of India. As per Debt Resolution Plan (DRP) approved, no interest/principal is due for payment to LIC of India as on date in respect of the debentures subscribed/held by them.  LIC vide email dated 18th July, 2018 has confirmed that the Company's DRP has been approved and currently it is under cooling period. The account of the company is NPA in thier books as per mail confirmation dated 09.012019 from LIC.LIC vide email dated 01.10.2019 mentioned that LIC has not given consent for conversion of NCDs into RTL, but they have specifically mentioned in thier LOI that our NCDs would converted into OCDs as per Restructuring plan.  But till date, the restructuring plan is not fully implemented by the company, so the account of the company is NPA in thier books.	Cr. Non Creation of DRR & Cr. Delay in payment of Cr interest/redemption of IC	Rs. 300 Cr. Rs. 150 Cr. Rs. 400 Cr & Rs. 500 Cr by LiC	PPL	Secured	Jaiprakash Associates Ltd.	3
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. ICICI Bank has also initiated Insolvency Proceedings against the Company under the provisions of IBC, 2016. RP has been appointed by the Order of NCLT, Delhi. LIC has filed it's claim with RP. LIC has also filed OA bearing No.322 of 2017 before DRT-I, Mumbai.	CI Delay in payment of 50 interest/redemption of principal	300 (ICICI Bank), 150 (LIC)	Pad	Secured	Punj Lloyd Ltd.	10
Debenture Holders agreed to give time upto 20th March, 2014. The Company of not make the payment as assured. The Company well start they have provided for expond bits for discounting with the banks and the discounting of the all is in process. Lenders were considering the restricturing 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 debenture issued notice on 0/90/2012 to under SARFAESI Act, 2002. "Best on the series of the debenture issued by the company, we as Debenture Trusbee has issued notice on 0/90/2012 to under SARFAESI Act, 2002." Best on the series of the debenture is subject to the same. On the Instructions of LIC who is the Board or Industrial Reconstruction (BIFR) on April 28, 2015 and to Valuet study by the reasons of Sicchaes and determination of measures to be adopted or revival and rehabilitation.  One Mr. Surendra kinari José has no Operational Credition has initiated Corporate Insolvency and Bankfurpticy Code, 2016 NCLT vide their folder their Critical Payment of the Insolvency and Bankfurpticy Code, 2016 NCLT vide their Coder dated 27/02/2017 has admitted the petition, declared morativity in the captioned matter, Hon'tible Kolkara Bench ander Section 3 of tible Insolvency and Bankfurpticy Code, 2016 NCLT vide their folder dated the 27/02/2017 to the Debenture holders.  In the captioned matter, Hon'tible Kolkara Bench on NCLT done find matrix in the application as some of the assets of the corporate debtor were attached by Enforcement Directorate and investigation of Central Bureau of Investigation was also confining. It was also recorded by the Hon'tible Bench that there is no read to the company and processes of the company the Hon'tible Bench that there is no Resolution Process of REI Ago is underway? The part of the Ago is an order at a 2117 August 2017 for liquidation of the company which was a diented the processes of the Committee of caretitos and other stakeholders that injudiation order	Delay in payment of interest/redemption of principal	267.5	PPL	Secured	REI Agro Ltd.	ω

Delay in Payment of has vide their email dated 19.06.2018 informed us that it is under SDR and in wake of the same payment has not been made. LIC has vide their email dated Interest and redemption 21.09.2018 confirmed that they received a proposal for one time restructuring of NCDs from the company. Further action in the matter will be taken in consultation with LIC. The Company has made part payment of Rs.4.25 crores on 16/03/2017. On the instructions of the LIC the sole debenture holder we have issued Notice under SARFAESI, Act, 2002. Further proceedings will be taken up in consultation with the debenture holder.	Delay in Payment of Interest and redemptior of Principal	Rs.150 crore	PPL	Secured	Patel Engineering Ltd.	20
	Delay in Payment of interest.	Rs. 460 crores	Jdd	Secured	SGGD Projects Development Pvt. Ltd.	19
The Company has not paid interest to debenture holder from quarter ended. Jan 12, 2017 and the succeeding quarters till date. The lenders of the company had formed JLF and opted for SDR. The Debenture holder (LIC) has also approved invocation of the SDR and has agreed to wait till SDR process is completed and outcome is given. LIC has filed OA before DRT, Delhi. Copy of OA is received by us.	Delay in interest payment	Rs 150 Cr	PPL	Secured	Ballarpur Industries Limited	18
	Delay in Payment interest	Rs. 50 crores	PР	Secured	Usher Agro Ltd.	17
TThe Company has delayed payment of interest and Principal due on 28th September, 2016. The default w.r.t. interest payment and principal repayment as reported on 30th September 2016 is still continuing as no overdue interest payment or principal repayment obligations have been honoured by the company so fair. In addition, the company has defaulted in making interest payments and principal repayments due on 15th March 2017, 28th March 2017 and 28th March 2017 under the ISIN INE087J07031, INE087J07025 respectively. Post defaults; we as Debenture Trustee had called Debenture Holders meeting on 9th December 2016, 6th January 2017 and 26th May 2017 to decide upon the further course of action for recovery of dues from the company. In the meeting held on 11th August, 2017, the Debenture Holders decided to approach the DRT and we had filed the original Application alongwith couple of interim applications in front of the DRT and observations were raised by the DRT Presiding Officer which are being satisfied by us. BOB has filed Application before NCLT. Debenture Holders have filed their Claims before NCLT. Resolution Professional is finalising the Resolution Plan. L & T Finance Ltd. one of the Debenture Holder has also filed the Application under Section 71(10) of the Companies Act, 2013. NCLT had given additional time to the Resolution Professional for finalising the Resolution Plan. L & T Finance Ltd. one of the Debenture Holder has also filed their Claims before NCLT approach by the NCLT. Updates on implementation are being acertained.	Delay in payment of interest/redemption of principal	Rs.100 crs	PPL	Secured	Mandhana Industries Ltd.	6
The Company has failed to repay the installernnts on the due dates since July, 2015 and the same has been limited to be publication. So public to repay the installernnts on the due dates since July, 2015 and the sale debenture holder is seized of the matter. Original Application is lodged in Mumbai DRT (No L 662/2017) and the case is still at scrutiny level. It may be noted that operational creditor. Cytech Coatings Private Limited has filed an application with NCLT, Kolkata.  The application was admitted by NCLT Kolkata Bench and order has been issued on 18.06.2018. Mr. Rajendra K Bhutta has been appointed as an insolvency Resolution Professional(IRP) for further process. Public Announcement is displayed on IBBI website.  Presently NCLT has ordered Stay to CIRP. LIC has been advised to file its claim as Financial Creditor in NCLT.	Delay in pyment of principal.	100 (LIC has subscribed to two 40 Crs tranches)	PPL	Secured	Ess Dee Aluminium Limited	15
	Delay in payment of interest/redemption of principal	50	PPL	Secured	Jyoti Structures Limited	4
Based on the instructions of the Debentureholders, Vaspar Patel has been appointed in place of Shri Nilesh Dave on the board of the Company	Non Creation of Additional Security as desired by the Debenture holder	100	Jdd	Secured	Jai Maharashtra Nagar Development Pvt. Ltd.	3



				1
25	24	23	22	21
Three C Green Developers Private Limited	Mod Age Consultants and Advisory Services Pvt. Ltd. (formerly Mod Age Investment Pvt. Ltd.)	Panyam Cement & Minerals Industries Ltd.	RHC Holdings Ltd.	Appu Hotels Ltd.
Secured	Secured	Secured	Secured	Secured
ЬЫ	PPL	PPL	ЬЫ	PPL
225	17	Rs.97.80 crores	Rs. 300cr	Rs. 67 crores
Delay in Payment of interest.	Delay in payment of interest	Delay in Payment of interst and redemption of Principal	Delay in payment of interest	Delay in Payment of interst and redemption of Principal
We have received no information on payment of interest by due date i.e. September 30, 2017, March 31,2018, July 8,2018. We have intimated to CRA and SEBI both. We have intimated the Debenture Holders. Debenture Holder's Instructions are awaited. On Dated 23rd January 2018 upon instruction of Piramal (Sole Debenture Holder) Security deposit cheque was deposited in bank to liquidate the same, but as on 25th January 2018 upon instruction of Piramal (Sole dishonoured being reason as Drawers signature not as per mandate.  On 26th February 2018 upon instruction of Piramal we have issued Notice for the replacement of the cheque in lieu of the dishonoured cheque. As we are yet to receive reply and confirmation from company.  Piramal, the Debenture Holders have informed us that they will revert with further course of action. The last principal payment which was due on July 8, 2018 was not made by the issuer and accordingly we have informed the credit rating agency along with the Press release on ITSL website for the same. Reminder for the further course of action has been sent to the Debenture Holder (Piramal) as we are yet to receive further instructions from them. On 17th September, 2019 there was a meeting held in between IIFL (Debenture Holder), LLC (Shardul Amarchand Mangaldas) and ITSL as the Issuer Company has committed default in terms of IIFL's payment. Therefore Debenture Holder is planning to send notices and also initiate proceedings against the Issuer Company.	The Company has failed to repay interest installment on due date i.e. 30th September, 2017 and the same has been duly intimated to the credit rating agency (CARE) vide email dated 4th October, 2017 and as per paragraph 5 of the SEBI circular ref. SEBI/HO/MIRSD3/CIR/P/2017/72 dated June 30, 2017 intimation vide letter under no. 5291/ITSL/OPR/2017-18 dated 4th October, 2017 has been given to SEBI. We have intimated the Debenture Holders. The Debenture Holder is in touch with the Issuer and discussing for clearance of default. The Debenture Holder has advised us to wait till further instructions. No further instructions have been received by us from the debenture holders.	The outstanding dues as on 30-9-2017 are Rs.2.1 crores. Out of which PCMIL has paid approx Rs. 80 lakhs to the Debenture holders. PCMIL has informed that they shall pay the outstanding dues at the earliest. We have issued Notice of Defualt to the Company as advised by the Debenture Holder. Further action will be taken in consultation with DH. Under instructions of the Debenture Holders, we have issued Notice of acceleration and recall dated 31.01.2019 to the Issuer Company.On 17/09/2019, we have filed the application w/s 7 of IBC, 2016 before NCLT, Hyderabad.	Issuer has delayed payment of interest which was due on June 30, 2017. The Debenture Holders have vide their letter dated July 13, 2017 informed that the interest payment date was reshedule on July 18, 2017. Subsequently the company paid interest on July 17, 2017 and Debenture Holders enfirmed the receipt of payment. Issuer has defaulted in payment of inetrest and principal in Dec 2017. As per the instructions of Debenture Holders, we have initiated enforcement action against the Issuer company and the Pledgors.	AHL was due to pay Rs 17.9 crores (Rs 12 crores towards principal and Rs 5.9 crores as interest) towards o/s debentures on 20 Jun 2017. AHL has communicated to the Debenture holder that the interest will be paid to them in full in this week, with a part payment being made on July 10, 2017 and the remaining being made on or before Thursday (13th July 2017). AHL has already written to the Debenture holder requesting time until 30-Sep-2017 for repayment of the principal due. The proposal is under active consideration of the debenture holders and they expect to revert shortly on the same. Debenture holder vide their email dated July 12, 2017 has confirmed receipt of part interest from AHL—Rs 2.07 crores on 10 July 2017; and informed the remaining amount is expected by tomorrow i.e. July 13, 2017. Debenture holder shall provide update on rescheduling of principal amount shortly to the Debenture Trustee. Debenture holder vide their consent letter dated July 21 & 22, 2017 consented to the reschedulement of the principal amount in two installments i.e. September 30, 2017 & December 31, 2017. AHL has paid part first installment of principal amount on 28-9-2017 and balance principal amount was paid by AHL on 10-10-2017. AHL has not paid the part of the principal amount due on 20.06.2018. AHL has requested the debenture holder for extension of time to clear outstanding. Further, Edelweiss Commodities Services Limited and EW India Special Assets Fund PTE. Ltd. (Debentureholders) have proposed to initiate corporate insolvency resolution process against company for default made in payment of principal/ interest. Meanwhile, on the instructions of debentureholders, we have issued in-principal NoC to Dharani Developers Pvt. Ltd (Third pArty Mortgagor) for sell of its assets situated at Coimbator. The Properties of Dharani Developers has been modified to that effect.



SREI one of the debenture holder has issued recall notice to the Company. JM Financial MF, other debenture holders informed about non payment principal	Delay in payment of interest/redemption of	Rs. 150cr + Rs. 150cr	PPL	Secured	Fortis Healthcare	31
The Company vide it's letter dated the 3rd April, 2018 has informed CRA with a copy to us that Redemption alongwith interest due on 31.03.2018 has not been deposited/transferred by TSTRANSCO/Govt. of Telangana. We have informed SEBI vide letter dt 02.04.2018 and the CRA was intimated regarding non intimation of the payment of interest & principal amount vide mail dt 02.04.2018. Further a press release of the same was made on ITSL website on 03.04.2018. We are following-up with the Company. However when the same is expected to be cleared is not known by the Company. Follow ups with the Debenture Holders for further action in the matter is also being done. The Issue has been secured by the Soverign Guarantee of the State Government of Telangana. Vide the email communication dated 09.04.2019, the company has intimated that for the ISIN INE947F09057 of Rs.125 crores were allocated to TSTRANSCO at the time of State Bifurcation and final redemption is due on 31.03.2018, but TSTRANSCO amount was not transferred to APTRANSCO till to date, interest amount of Rs.5.38 crores during the period of 01.10.2017 to 31.03.2018 was paid by TSTRANSCO on 11.10.2018 only.	Delay in payment of interest/redemption of principal	125	PPL	Secured	AP TRANSCO Limited	30
Debenture holders have informed us vide their email dated 1-3-2018 that Interest due for Feb 28, 2018, Principal due for Nov 30, 2017 & Feb 28, 18 has not been paid by the company. Debenture holder is in dicussions with the company and we are awaiting instructions from the Debenture Holder. Notice of Default has been issued. Further action will be taken in consultation with DH. Further, the Promoters of company have paid Rs. 20 crores to the debentureholders in the month of March 2019, due to which activity of invoaction and sell of pledged shares were at hold. Since April, the activity related to sell of shares have again started. As on today, ITSL have sold 9,65,000 equity shares and realised and transfered to the accounts of debenture holders a sum of Rs. 86,10,815.81 out of the sell proceeds. The Company has executed documents for morgage of additional plot of land. Further, 25000 additional shares of Shakti Sugar Ltd. were sold during the said quarter and realised a sum of Rs. 1,94, 308.35 which has been further distributed to the debenture holders.	Defualt in Payment of Interest and Principal	100	PbL	Secured	ABT Investments Ltd.	29
The Company has informed us that installments and interest including arrears as on 31-12-2017 for the NCDs which is payable by the company. It is informed that the Joint Lenders Forum had decided to invoke the RBI regulated Scheme for Sustainable Structuring of Stressed Assets (S4A Scheme) for the company, whereby the lenders were mandated to interalia convert their debt exposure into Equity shares and Optionally Convertible Debentures as per the said Scheme. The said Scheme was approved by the Overseeing Committee of RBI and the same is binding on all the lenders. Accordingly all lenders have complied with the formalities for participation in the Scheme. However, the case of LIC (Debenture holder) the same is awaited. Presently discussions are still ongoing between the Company and the said Debenture holder for participation in Scheme. In view of the above, the installments due for 15-1-2017, 15-4-2017, 15-7-2017, 15-10-2017 aggregating to Rs.8.28 crores and the interest thereon which were due on monthly basis since 31-10-2017 & 31-12-2017 aggregating to Rs.5.92 crores are payable by the company and the company is making concerted efforts to conclude the discussions in this regard. The quarterly instalment due in October, 2018, January 2019, April, 2019 and July, 2019 and the monthly interest due thereon fromSeptemebr 2018 to August, 2019 are payable by the company as per their letter dated 12th September, 2019.	Non- Payment of Interest & Principal.	100	PPL	Secured	HCC LM	28
IIFCL the Investor is seized of the matter and in the process of initiating action for recovery of dues. Notice under Section 13(2)OF the SARFAESI Act, 2002 has been issued to the Company. Further steps u/s 13(4) will be taken in consulation with the IIFCL, the Debenture Holder. The Symbolic Posession of the properties taken on 16/10/2018. Claim filed with NCLT.	Defualt in Payment of Interest	60	PPL	Secured	GVR Infra Projects Ltd.	27
Debenture holder (FMO) vide email dated September 1, 2017 instructed us for issuance of default notice to KSDPL. As reported by the Debenture holder vide their email dated September 1, 2017, the Issuer has defaulted in the payment of interest & default interest on the Debentures. As per the details provided by the Debenture holders, outstanding amounts in respect of the Debentures as of September 1, 2017 is INR 31,09,59,462.83 (Indian Rupees thirty one crores nine lakhs fifty nine thousand eight hundred and forty three and fifty paise only) as Interest and INR 78,79,843.50 (Indian Rupees seventy eight lakhs seventy nine thousand eight hundred and forty three and fifty paise only) as Default Interest are still not paid by the Issuer to the Debenture holder. Hence under the instructions of the Debenture holders(s), default notices have been issued to the Issuer by us on September 4, 2017. The said information has been shared with Brickworks Ratings, the Credit Rating Agency in this case vide our email dated September 4, 2017 & also a press release has being hosted on the ITSL website dated 5-9-2017 & informed SEBI vide our letter ref. 4466/ITSL/OPR/2017-18 dated 5-9-2017 in compliance with SEBI Circular dated 30.06.2017.  WE have received reply from KSDPL vide their letter dated 8-9-2017 stating that they are in discussions with the debenture holders for taking various remedial and restructuring options. As per further instructions from Debenture holders, we have issued payment default notice ref. 496/ITSL/OPR/2017-18 dated 22-9-2017 to KSDPL. We are awaiting further instructions from the Debenture holders in the matter. FMO the Debenture Holder is considering Change of Management of the Company.	Delay in Payment of interest	179.4	PPL	Secured	Kumar Sinew Developers Ltd.	26



The Company has defaulted in Payment of interest and redemption of Principal. The Debenture Holders had approached NCLT under IBC and thereafter withdrawn their application. The Company vide it's email dated the 16th October, 2018 has informed us that due to delay in recovering the receipts, the company is planning to pay the interest in the first week of November, 2018. The Company has cleared the defualt and servicing it's debt on due dates. The Company has made advance interest payment for the quarter ended September 30, 2019 on September 26,2019 itslef and there are no overdues/defualt against the Company.	Delay in Payment of Interest	120	Pdd	Secured	SVL ltd.	39
The Company has defualted in payment of interest and redemption of Principal. Edelweiss Commodities Ltd. is the sole debenture holders is seized of the defualt position and efforts are being made to clear the defualt by liquidating FDs. ITSL (Debenture Trustee) has issued Default Notice to company alongwith its guarantors and security providers for paymen of outstanding interest and principal, upon instructions of Debenturehoder on February 18, 2019. Further to same, the Comapny has regularised outstanding payments towards principal and interest due to debentureholders till 08.04.2019. the Debentureholders have confirmed the same thruogh email dated 08.04.2019. Further, we have isseud NoC for release of charge on property of company situated at Bhanpur and property of Bhargavi Enerprises Pvt. ltd. (third party mortgagor) situated at Sahidnagar and ceding pari passu charge on Guarantees issued by Guarantors. The company has failed to honor its obligation to make payment of interest/ principal due till September 15, 2019. Notice of default issued on 04-10-2019.	Delay in payment of interest	110	ЬЬГ	secured	Orrisa Stevedors Ltd.	38
The Company is under CIRP as per IBC, 2016. Rioch Asia Pacific pte ltd. is sole debenture holder has been advised to file claim before RP. The claim is already filed before RP and in the Company's webite the details of the claim for secured creditors i.e. Ricoh Asia Pacific Pte. Ltd (Sole Debenture Holder) is also mentioned.	Delay in payment of interest	200	PbL	Secured	Ricoh India Ltd.	37
The Company has committed default in payment of interest since April, 2018. The Edelweiss, the sole debenture holder, is siezed of the matter and in discussions with the debenture holder for clearance of the default. Further to the default notice dated 13.12.2018, we have also issued a reminder notice interest/redemption of we have also issued notice u/s 13(2) of SARFAESI Act, 2002 to the Company We have filed the applications u/s 14 in the Hon'ble Chief Metropolitan Magistrate Court, Mumbai on 24.09.2019. The Application no. is 908 of 2019 and the next hearing date of 13.11.2019 for verification. Also, we are in process to file application u/s 14 of SARFAESI before DISTRICT MAGISTRATE'S COURT AHMEDABAD.	Delay in payment of interest/redemption of principal	43	₽₽L	Secured	Blue Blends (India) Ltd	36
The Company has defaulted in payment of interest due in October 2018 and February 2019. Subsquently, we have issued the Notice of Default on February Delay in payment of 4th & 5th, 2019. Further, we have invoked the Reliance Power Ltd Shares which were pledged as the security for the debentrue issue. The said shares were interest/redemption of invoked on various occassions to recover the due amount (inicuding interest / principal), based on the instructions of the debenture holder. As a result of invocation, debenture holders have received the due amount in full and Series E has been redeemed. Rs. 385crs - Company has paid interests due as on 31st August 2019 to Debenture Holder/s.	Delay in payment of interest/redemption of principal	500 & 385	PPL	Secured	Reliance Infrastructure Ltd	35
The Company defaulted in the payment of dues on 30.06.2018. the Company has made part payment of Rs.50 Lakhs on due date and has sought extension for payment of balance amount by 10.08.2018. The Company further made payment of Rs.1.50 crores and sought an extension till 30.09.2018 for payment of balance amount. It has been further agreed between the borrower and debenture holders on September 24, 2018 to clear the remaining dues by October 31, 2018. A payment of Rs. 1.35cr (post TDS) has been paid from 10.08.2018 to 30.09. 2018. Thereafter, the Company has paid an amount of Rs. 75 lacs from November 1, 2018 to November 30, 2018. The Company also defaulted in the payment of dues on 30.09.2018 and sought an extension for payment of balance amount till 31.12.2018. The Company has failed to pay the outstanding as on 31.12.18 and we have intimated the same to CRA & SEBI.We have written to the Debenture Holders seeking their further instructions. Thereafter, the Company defaulted in payment of interest on 31.01.2019, 28.02.2019, 31.03.2019, 31.05.2019, 31.06.2019, 31.07.2019, 31.08.2019, 30.09.2019. Edelweiss the sole debenture holder is seized of the matter.	Delay in payment of interest/redemption of principal	60	РРР	Secured	Luxora Infrastructure Pvt. Ltd	34
Delay in payment of interest/redemption of NCLT and posted the matter for hearing.	Delay in payment of interest/redemption of principal	105	PbL	Secured	SAI Regency Power Corporation Ltd.	33
The Company has defaulted in payment of insterest and is in negotiation with the Edlweiss (the sole debenture holder) for extension of time. The Company has again committed default in payment of dues on 30/09/2018. Notice of Default has been issued. The company is currently undergoing CIRP proceedings under the provisions of the Insolvency & Bankruptcy Code. The Debenture Holders have provided details of their claim to the Resolution professional at meeting of the Committee of Creditors. The Company is currently under CIRP under the provisions of IBC. Debenture Holders have provided their claim to RP at the meeting of the COC. EDL has to submit the revival plan under section 12(A) of IBC. Meanwhile, EDL has preferred Civil Appeal No.7591/2019 before SC against NCLT order dated 06.09.2019. Last CoC meeting was on 09.10.2019	Delay in payment of interest/redemption of principal		PPL	Secured	Empee Distilleries Pvt. Ltd.	32



The Company is awaiting NOC from one of the existing Lender to cede the charge on pari-passu basis in favour of Debenture Trustee. The Debenture holder is seized of the matter, who has provided the extension of time to create the security. However, security is held up for the want of NOC from existing lenders. We are following up with the Company to expedite further. The said security is proposed to be created in the month of November 2019.	Non creation of Security	1176	ЬЬГ	Secured	Indiagnd Trust	
appeal 340/2018 bifurcating various group companies of IL& FS Out of The Group Entities have been marked as (a). Siter Entities (b) Airbeit Entities (c) Airbeit Entities (c) Fred Entities. Jorabat Shillong Expressway Limited has been marked as Amber Entity. Moratorium continues. The company has appointed a claim managment advistory and has requested all the debenture holders via publishing in the newspaper to file their claims. We as a trustee have filed the claims on behalf of the debenture holders.					Expressway Ltd.	49
	Non payment of Interest	883 36	PPI	Secured	Jorbat Shillong	48
The Company has defaulted in making the payment of interest to the debenture holdets. The board of IL&FS has been reconstituted pursuant to the order dated October 01, 2018 of NCLT, Mumbai. NCLT has also issued an order dated October 9, 2018 empowering the newly constituted board of IL&FS to replace the directors of subsidiary companies of IL&FS. Further NCALT passed an order dated October 15, 2018 in the company appeal 346/2018 which inter alia restricts actions or proceedings by creditors against IL&FS and its group companies until further orders. NCALT passed another order dated February 11, 2019 in the company appeal 346/2018 bifurcating various group companies of IL&FS Out of '169 Group Entities' have been marked as (a) 'Green Entities' (b) 'Amber Entities' (c) 'Red Entities''. IL &FS Transportation Networks Ltd has been marked as Red Entity Moratorium continues. The company has appointed a claim management advisory and has requested all the debenture holders via publishing in the newspaper to file their claims. We as a trustee have filed the claims on behalf of the debenture holders.	Nonpayment of interest	3030	PPL	Secured/Uns ecured	IL& FS Transportation Networks Ltd.	47
As per approval from debetuerholdeers dated 30.08.2016, the interst payment after 31.03.2017 is payble on quartertly basis based on sufficiency of funds of company.	Restructuing	480 Cr	PPL	Secured	Sugam Vanijya Holdings Private Limited	46
The Company has not made the payment of interest for the qtr ended 30th june, 2019, we have infirmed the same to CRA and SEBI. We have written to the debenture holders seeking their confirmation and/or instruction for any further action. Debenture Holder's instructions are awaited.	Non-payment of interest	35cr	PPL	Secured	Shree Wardhman Buildprop Pvt Ltd	45
The Company has not made the payment of interest/prinicipal for the qtr ended 30th june, 2019, we have infirmed the same to CRA and SEBI. We have written to the debenture holder's nestructions are awaited.	Non-payment of interest	140cr	PPL	Secured	Shree Wardhman Infra heights Pvt Ltd	44
he Company has committed default in payment of interest in March, 2019 and notice for clear the default has been sent to company on 02.04.2019 on the request of ECL Finance Limited, single debentureholder. The debenture holders have confirmed that they have received the payment.	Delay in Payment of Interest	110	PPL	Secured	Saha Infratech Pvt. Limited	43
The Company has defaulted in payment of interest due in January 2019. Subsquently, we have issued the Recall Notice on January 25th, 2019. Further, we have invoked the shares of Dish TV India Ltd. on various occasion to recover the due amount. The debenture holders have received the due interest for Januray 2019. The debenture holders have received the due interest for July 2019.	Default in Payment of Interest	300	PPL	Secured	New Media Broadcasting Pvt Ltd	42
The interest/principal payment pertaining to various ISIN was due on 21.01.2019. Accordingly, based on the instruction received by us from the debenture holders, we had instructed the escrow bank (Allahabad Bank) to process the payment on the due date to the debenture holders. However the escrow bank did not process our request. Hence the interest/principal payment was not made to the debenture holders. We have informed the same to the rating agaency & SEBI vide letter dated January 22,2019.  The board of IL&FS has been reconstituted pursuant to the order dated October 01, 2018 of NCLT, Mumbai. NCLT has also issued an order dated October 9, 2018 empowering the newly constituted board of IL&FS go replace the directors of subsidary companies of IL&FS (which includes ILF&FS Energy Development Company Ltd.), Further NCALT passed an order dated Febraury 11, 2019 in the company appeal 346/2018 bifurcating various group companies of IL&FS Group Entities' have been marked as (a) "Green Entities" (b) "Amber Entities", (c) "Red Entities", harkhand Road Project Implementation Company Limited has been marked as Amber Entity. Now few terms of NCDs have been modified by the execution of amendment documents on 22.08.2019 & after that this entity shall become as green entity. Further the company has made the due amount upto 20.07.2019 except penal amount to the debentureholders.	Interest/principal	Crs Crs	7	Secured	Project Implementation Company Limited	4-
informed the same to the rating agency & SEBI vide letter detect of interest one of INAVERDED Agency in INCL That should deprive the vide agency informed the same to the rating agency & SEBI vide letter detect of November 30, 2018. The board of IL&FS has been reconstituted pursuant to the order dated October 01, 2018 of NCLT, Mumbai. NCLT has also issued an order dated October 9, 2018 empowering the newly constituted board of IL&FS to replace the directors of subsidary companies of IL&FS (which includes ILF&FS Energy Development Company Ltd.). Further NCALT passed an order dated October 15, 2018 in the company appeal 346/2018 which inter alia restricts actions or proceedings by creditors against IL&FS and its group companies until further orders. NCALT passed another order dated February 11, 2019 in the company appeal 346/2018 bifurcating various group companies until further Group Entities' have been marked as (a) "Green Entities" (b) "Amber Entities" (c) "Red Entities". IL & FS Energy Development Company Ltd has been marked as Red Entity. Moratorium continues.		305(205 +105 GSO) and 195.00 crores	PPL	Unsecured	IL & FS Energy Development Company Ltd.	
The Company has defaulted in Payment of interest which was due on 28-11-2018. The company has informed us vide their letter dated November 29, 2018						40

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55	54	53	52	51	50
Kohinoor CTNL Infrastructure Pvt Ltd	Reliance Power Limited	Reliance Home Finance Ltd.	Schoolnet India Limited (IL&FS Education & Technology Services Limited)	Ashiana Landcraft Realty Private Limited	Dewan Housing Finance Corporation Ltd.
Secured	Secured	Secured	Secured	Secured	Secured
PPL	Pbl	PPL	PbL	PPL	PPL
650 Crs	750 crs (Current o/s Rs. 545 crs	Rs.1000Cr, Rs.650 Cr. Rs.350 Cr.	Rs. 400 Crores	Rs. 180 Crs	
Default in payment of interest	Non payment of Interest	Non Payment of Principal & Interest.	Non payment of Interest/principal	Non payment of Interest/principal	Delay in Payment of Interest
The Company has delayed in payment of Interest due on 30th September, 2019 for ISIN INE409V07018. However, on request from the Company, Debenture Holders has granted extension for making such payment till 31st December, 2019	The Company has not made the payment of interest due on 30th September, 2019, we have informed the same to CRA and SEBI. As per letter from company dated October 01, 2019 to BSE / NSE has informed that they have not made the interest payment due on 30th Sept 2019 to the Debenture holders and Further cited about (a) ICA entered into by lenders and (b) commencement of stand still period of 180 days. We have asked for executed version of ICA and copies of apporval issued by Debentureholders. Further, we have issued a letter dated 01.10.2019 to the Company instructing them to make the payment due to debenture holders.	The Company has not made payment of Principal for INE217K07653 which was due on 09/09/2019. Further to the ICA entered into between RHFL and Lenders in accordance with the RBI Circular dated 7th June, 2019, the Company has stopped paying any principal due since August 2019. We have informed the same to CRA and SEBI. We issued a letter to the Company instructing them for payment of Principal for the said ISIN. The Company has delayed in payment of Interest due on 28th September, 2019 for ISIN INE217K07240. The interest for the said ISIN was paid on 1st October, 2019. We have informed the same to CRA and SEBI.	The issuer has failed to make payment of interest and principal against ISIN INE896F07068 which was due on July 10, 2019. The issuer had informed us vide their letter dated July 10, 2019 that they are unable to service its obligations in respect of interest and principal due on July 10, 2019 against ISIN INE896F07068. The issuer had also intimated the above information vide their letter dated July 10, 2019 to the concerned stock exchange. We had intimated the above information to the credit rating agency and SEBI on July 10, 2019 and have hosted the press release on ITSL website. The company has placed under the Amber category.	The Company has failed to make the payment of amount due on the outstanding NCDs on 31 March 2018 and 31 March 2019. Further on the instruction of the debenture holders we have sent the notice on 19.09.2019 to the company to make the said due amount at the earliest.	Company Defaulted in the payment of Two ISIN's viz INE202B07AU7 & INE202B07AV5, the payment was due on 4-Jun-2019, and subsequently paid on 7-Jun-2019. The same was informed to CRA's and SEBI.  Company has defaulted on all the payments subsequent to 1-Aug-2019 onwards, Lenders to DHFL have signed ICA in this respect while DHFL has charted out a probable Resolution Plan and presented to all Lenders and Debenture Holders on 27-Sep-2019. While we are/have followed/following up with Debenture Holder for consent to join ICA. Out of total 10 ISINs we have received consent for 5 Isins to join ICA, for which we have acceded to ICA on 24-Sep-2019.

\*Type of Default

Name of Compliance Officer: Officer Email ID: Date



Name of the DT: ITSL

#### SECTION - IV - COMPLIANCE

# COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED 30th September,2019.

## No conflict of interests with other activities

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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

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

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#### Other Information

- (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 offence involving moral turpitude or any economic offence by employees of DT

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(v) Action taken by the DT on the above issues

### Compliance with registration requirements

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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 FY ended 31/03/2019 (as per the latest audited financials (Rs. in crores))
- (ii) Any change in infrastructure since the last report / registration! Renewal
- (iii) Changes in Key personnel during the half year ended 31st March, 2019.

	Name(s) of the Appo
	Appointment Cessation
	Name(s) of the Appointment Date of Appointment key personnel Cessation cessation
	Qualification
	Experience
	Functional areas of work



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207.37

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### Details of deficiencies and non compliances

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Date of Board Review (ddlmmlyyyy)

Observation of the BoD on

i) the deficiencies and non compliances

ii) corrective measures initiated

26/11/2019

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1 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:

2 We are complying with the provisions of the SEBI Circular No. SEBI/MIRSD/MIRSD3/CIR/P/2017/72 dated the 30th June, 2017

Name of Compliance Officer: Jatin Bhat

Email ID: Date

jatin.bhat@idbitrustee.com