

October 24, 2024

To,

Catalyst Trusteeship Limited  
 Unit No- 901, 9th Floor, Tower – B,  
 Peninsula Business Park, Senapati Bapat Marg,  
 Lower Parel (W), Mumbai - 400013

Dear Sir/Madam,

**Subject: Quarterly Compliance Report for the quarter ended September 30, 2024, for Series I Non-Convertible Debentures (ISIN: INE466P07010)**

In compliance with the Securities and Exchange Board of India (SEBI) (Debenture Trustee) Regulations, 1993 as amended from time to time, the SEBI (Listing Obligations and Disclosure Requirements) 2015, and the Companies Act 2013, we furnish the required information for your needful.

Sl. No.	Particulars of Information/Documents																
1.	<b><u>Regulatory Requirement:</u></b>	<b>Furnished Yes/No</b>															
a.	An updated list of Debenture holders registered in the Register of Debenture Holders in the following format: <table border="1" data-bbox="228 1056 1089 1220" style="margin-left: 20px;"> <thead> <tr> <th colspan="5" data-bbox="228 1056 1089 1087">ISSUE-WISE PARTICULARS</th> </tr> <tr> <th data-bbox="228 1087 363 1184">Issue size</th> <th data-bbox="363 1087 574 1184">Name(s) of Debenture Holder</th> <th data-bbox="574 1087 769 1184">Address</th> <th data-bbox="769 1087 911 1184">Contact No.</th> <th data-bbox="911 1087 1089 1184">Email Id</th> </tr> </thead> <tbody> <tr> <td data-bbox="228 1184 363 1220"></td> <td data-bbox="363 1184 574 1220"></td> <td data-bbox="574 1184 769 1220"></td> <td data-bbox="769 1184 911 1220"></td> <td data-bbox="911 1184 1089 1220"></td> </tr> </tbody> </table>	ISSUE-WISE PARTICULARS					Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id						<b>List of Debenture holders as on September 30, 2024, is attached as Annexure I.</b>
ISSUE-WISE PARTICULARS																	
Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id													

b.	<p>Details of complaints- quarter ended on 30.09.2024</p> <p>A) Status of Investor Grievance:</p> <table border="1" data-bbox="316 321 1011 485"> <thead> <tr> <th>Nos. of Complaints/ received during the quarter</th> <th>No. of complaints resolved during the quarter</th> <th>No. of Complaints pending at the end of reporting quarter</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>B) Details of complaints pending for more than 30 days:</p> <table border="1" data-bbox="228 678 1076 999"> <thead> <tr> <th rowspan="2">Nos. of Complaints pending for more than 30 days</th> <th colspan="3">Nature of complaints Steps taken for redressal</th> <th rowspan="2">Steps taken for Redressal</th> <th rowspan="2">Status of complaint (if redressed, date of redressal)</th> </tr> <tr> <th>Delay in payment of interest</th> <th>Delay in payment of redemption</th> <th>Any other</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Nos. of Complaints/ received during the quarter	No. of complaints resolved during the quarter	No. of Complaints pending at the end of reporting quarter				Nos. of Complaints pending for more than 30 days	Nature of complaints Steps taken for redressal			Steps taken for Redressal	Status of complaint (if redressed, date of redressal)	Delay in payment of interest	Delay in payment of redemption	Any other							<p>There were no Complaints recorded during the quarter ended September 30, 2024. (Investor Grievance Report for quarter ended September 30, 2024, attached as Annexure II)</p> <p style="text-align: center;">Nil</p>
Nos. of Complaints/ received during the quarter	No. of complaints resolved during the quarter	No. of Complaints pending at the end of reporting quarter																					
Nos. of Complaints pending for more than 30 days	Nature of complaints Steps taken for redressal			Steps taken for Redressal	Status of complaint (if redressed, date of redressal)																		
	Delay in payment of interest	Delay in payment of redemption	Any other																				

2.	<b><u>Management Confirmations:</u></b>	<b>Furnished Yes/No</b>
a.	The assets of Vikas Telecom Private Limited and of the guarantors, if any, which are available by way of security/cashflows/profits are sufficient to discharge the claims of the debenture holders as and when they become due and that such assets are free from any other encumbrances except those which are specifically agreed to by the debenture holders.	<b>Yes (Attached as Annexure III)</b>
b.	A Certificate cum Confirmation duly signed by key managerial personnel viz., <del>Managing Director/ Whole Time Director/CEO/ CS/CFO</del> of VTPL	<b>Attached as Annexure A</b>

<b>3. Debenture Redemption Reserve/Debenture Redemption/ maintenance of funds as per Companies (Share Capital and Debentures) Rules, 2014</b>								<b>Furnished Yes/No</b>
Sr. No.	Name of the Listed Entity	Issue Type (public/ Privately placed listed)	Type of entity (NBF C/ HFC/ FI/ other)	Issue Size (in ₹ crores)	ISIN (that is maturing in the current FY 2024-25)	Amount Outstanding (in ₹ crores)	Status of maintenance of DRR	Details of action taken if any
1.	Vikas Telecom Private Limited	Private Placement	Others	495	NA	495	DRR has been created for ₹ 49.5 crores.	NA

<b>3. Details of Recovery Expense Fund.</b>							
Sr. No.	Name of the Listed Entity (including ISINs)	Issue Type (public/ Privately placed)	Issue Size (in ₹ crores)	Size/Value of recovery fund maintained	Any addition in the recovery Expense fund during the quarter	Details of usage of the funds, if any, during the quarter	
1.	Vikas Telecom Private Limited INE466P07010 (Series I)	Privately Placed	495	4,95,000	NA	NA	

**For and on behalf of Vikas Telecom Private Limited**

**GAUTHAM NAMBIAR** Digitally signed by  
GAUTHAM NAMBIAR  
Date: 2024.10.24  
09:56:42 +05'30'

**Gautham Nambiar**  
**Company Secretary and Compliance Officer**  
**F12367**

## Annexure A

**Vikas Telecom Private Limited (“VTPL”) hereby declares the following as on September 30, 2024:**

- i. Interest and Principal due on debentures in respect of Series I, has been paid on September 26, 2024, which is within the due dates i.e September 30, 2024, to those debenture holders who have held the debentures as on record date i.e. September 15, 2024.
- ii. There is no change in credit rating of the issues since the date of issuance of captioned NCD’s.
- iii. The properties secured for the Debentures are adequately insured.
  - iii(a). The Insurance policies are in the joint names of the Trustees; (wherever applicable)- **The Insurance policy in respect of Series I (NCD’S) are in the name of IDBI Trusteeship Services Limited (acting as Trustee agent to Catalyst Trusteeship Limited).**
- iv. All requisite information / documents indicated as per conditions precedent/subsequent in debenture document/s in respect of NCD are submitted from time to time. (If not submitted details of the same).
- v. There are no events or information or happenings which may have a bearing on the performance/operation of VTPL, or there is no price sensitive information or any action as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 that may affect the payment of interest or redemption of the Debentures.
- vi. Vikas Telecom Private Limited has submitted the pre-authorization as per SEBI Circular dated 10.08.2021 bearing reference no SEBI/HO/DDHS/PoD1/P/CIR/2023/119 and ~~on Operational framework for transactions in defaulted debt securities dated 23.06.2020~~ and if there is any change in the provided bank details same will be shared within 1 day. – **Circular repealed by SEBI.**
- vii. Vikas Telecom Private Limited has complied with the applicable provisions of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, the listing agreement with stock exchange, trust deed and all other regulations issued by SEBI pertaining to debt issue from time to time as applicable.
- viii. Compliance of all covenants of the issue and status thereof;
- ix. Vikas Telecom Private Limited has complied with para 2.2 of the SEBI circular dated 12.11.2020, for all existing debt securities, listed entities and trustees are required to enter into supplemental/amended debenture trust deed incorporating the changes in the debenture trust deed. - **Not applicable for Series I.**
- x. There are no Fraud/defaults by promoter or key managerial personnel or by Issuer Company or arrest of Key managerial personnel or Promoter.
- xi. A functional website containing, amongst others, email address for grievance redressal and other relevant details and Name of the debenture trustees with full contact details is maintained by the company.

- xii. Compliance with provisions of Security and Covenant Monitoring System as per Chapter III of SEBI Operational circular dated May 16, 2024, wherever applicable.
- xiii. Company has complied with Regulation 18(6A) of SEBI (Issue and listing of non-convertible securities) Regulations, 2021 amended on February 02, 2023 w.r.t. Appointment of Nominee Director, for all existing debt securities by entering in to supplemental/amended debenture trust deed incorporating the changes in the debenture trust deed and amending Articles of Associations of the Company, wherever applicable.

**For and on behalf of Vikas Telecom Private Limited**

**GAUTHAM  
NAMBIAR**

Digitally signed by  
GAUTHAM NAMBIAR  
Date: 2024.10.24  
09:57:03 +05'30'

**Gautham Nambiar**

**Company Secretary and Compliance Officer**

**F12367**

## MANAGEMENT REPRESENTATION LETTER

To,  
Catalyst Trusteeship Limited  
Unit No- 901, 9th Floor, Tower – B,  
Peninsula Business Park, Senapati Bapat Marg,  
Lower Parel (W), Mumbai - 400013

I, Aravind Maiya, Nominee Director of Vikas Telecom Private Limited (“VTPL”) do hereby certify that the assets of VTPL are sufficient to discharge the interest and principal amounts in connection with the NCD’s issued by VTPL bearing ISIN INE466P07010 for Series I as on **September 30, 2024**.

Kindly take the same on record.

Yours Faithfully,

**For and on behalf of Vikas Telecom Private Limited**

**ARAVIND** Digitally signed by  
ARAVIND MAIYA  
**MAIYA** Date: 2024.10.24  
09:54:14 +05'30'

**Aravind Maiya**  
Nominee Director  
DIN: 08481898

**Place: Bengaluru**  
**Date: October 24, 2024**