

April 27, 2023

To,

Catalyst Trusteeship Limited
Windsor, 6th Floor, Office No-604,
C.S.T. Road, Kalina, Santacruz (East),
Mumbai-400 098

Dear Sir/Madam,

Subject: Quarterly Compliance Report for the Quarter ended March 31, 2023, 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.	<u>Regulatory Requirement:</u>	Furnished Yes/No															
a.	<p>An updated list of Debenture holders registered in the Register of Debenture Holders in the following format:</p> <table border="1" data-bbox="118 1395 1042 1576"> <thead> <tr> <th colspan="5">ISSUE-WISE PARTICULARS</th> </tr> <tr> <th>Issue size</th> <th>Name(s) of Debenture Holder</th> <th>Address</th> <th>Contact No.</th> <th>Email Id</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	ISSUE-WISE PARTICULARS					Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id						<p>List of Debenture Holders as on March 31, 2023, is attached as Annexure I.</p>
ISSUE-WISE PARTICULARS																	
Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id													

b. Details of complaints- Quarter ended on 31.03.2023.

A) Status of Investor Grievance:

Nos. of Complaints/ received during the Quarter	No. of complaints resolved during the quarter	No. of Complaints pending at the end of reporting Quarter

B) Details of complaints pending for more than 30 days:

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		

There were no Complaints recorded during the quarter ended December 31, 2022. (Investor Grievance Report for Quarter ended March 31, 2023, attached as Annexure II)

Nil

2. Management Confirmations:

Furnished Yes/No

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.

Yes (Attached as Annexure III)

b. A Certificate cum Confirmation duly signed by key managerial personnel viz., ~~Managing Director/ Whole Time Director/CEO/ CS/CFO~~ of VTPL

Attached as Annexure A

3. Details of Recovery Expense Fund.						
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
Company Secretary and Compliance Officer
F12376

Annexure A

Vikas Telecom Private Limited (“VTPL”) hereby declares the following as on March 31, 2023:

- i. Interest and Principal due on debentures in respect of Series I, has been paid on March 29, 2023 which is within due dates i.e March 31, 2023 to those debenture holders who have held the debentures as on record date i.e. March 24, 2023.
- ii. There is no change in credit rating of the issues since the date of issuance of captioned NCD’s.
- iii. Mr. Jitendra Mohandas Virwani and Mr. Donnie Dominic George were appointed as Additional Directors of the company as on 30.08.2022 and 11.10.2022 respectively.
- iv. The properties secured for the Debentures are adequately insured.

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).
- v. 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~~)
- vi. 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.
- vii. Vikas Telecom Private Limited has submitted the pre-authorization as per SEBI Circular 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.**
- viii. 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.
- 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.

For and on behalf of Vikas Telecom Private Limited

Gautham Nambiar
Company Secretary and Compliance Officer
F12376