



October 30, 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 September 30, 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.	An updated list of Debenture holders registered in the Register of Debenture Holders in the following format: <table border="1"><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						List of Debenture Holders as on September 30, 2023, is attached as Annexure I.
ISSUE-WISE PARTICULARS																	
Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id													

b.	<p>Details of complaints- Quarter ended on 30.09.2023</p> <p>A) Status of Investor Grievance:</p> <table border="1" data-bbox="331 388 1027 552"> <thead> <tr> <th data-bbox="331 388 548 516">Nos. of Complaints/ received during the Quarter</th> <th data-bbox="548 388 761 516">No. of complaints resolved during the quarter</th> <th data-bbox="761 388 1027 516">No. of Complaints pending at the end of reporting Quarter</th> </tr> </thead> <tbody> <tr> <td data-bbox="331 516 548 552"></td> <td data-bbox="548 516 761 552"></td> <td data-bbox="761 516 1027 552"></td> </tr> </tbody> </table> <p>B) Details of complaints pending for more than 30 days:</p> <table border="1" data-bbox="245 747 1092 1068"> <thead> <tr> <th data-bbox="245 747 407 936" rowspan="2">Nos. of Complaints pending for more than 30 days</th> <th colspan="3" data-bbox="407 747 797 814">Nature of complaints Steps taken for redressal</th> <th data-bbox="797 747 943 936" rowspan="2">Steps taken for Redressal</th> <th data-bbox="943 747 1092 936" rowspan="2">Status of complaint (if redressed, date of redressal)</th> </tr> <tr> <th data-bbox="407 936 548 1068">Delay in payment of interest</th> <th data-bbox="548 936 708 1068">Delay in payment of redemption</th> <th data-bbox="708 936 797 1068">Any other</th> </tr> </thead> <tbody> <tr> <td data-bbox="245 936 407 1068"></td> <td data-bbox="407 936 548 1068"></td> <td data-bbox="548 936 708 1068"></td> <td data-bbox="708 936 797 1068"></td> <td data-bbox="797 936 943 1068"></td> <td data-bbox="943 936 1092 1068"></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 2023. (Investor Grievance Report for Quarter ended September 30, 2023, attached as Annexure II)</p> <p>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.	<u>Management Confirmations:</u>	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. Debenture Redemption Reserve/Debenture Redemption/ maintenance of funds as per Companies (Share Capital and Debentures) Rules, 2014								Furnished Yes/No
Sr. No.	Name of the Listed Entity	Issue Type (public/ Privately placed listed)	Type of entity (NBFC/ HFC/FI/ other)	Issue Size (in ₹ crores)	ISIN (that is maturing in the current FY 2023-24)	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 ₹ 495 Million.	The Company has issued Non-Convertible Debentures during the current year and as per the provisions of the Companies Act, 2013, company is required to create debenture redemption reserve out of the profits available for payment of dividend.

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

Digitally signed by GAUTHAM
NAMBIAR
Date: 2023.10.30 18:47:58 +05'30'

Gautham Nambiar

Company Secretary and Compliance Officer

F12367

Vikas Telecom Private Limited

Regd. Office: Embassy GolfLinks Business Park, Royal Oaks, Off Intermediate Ring Road, Bangalore - 560 071.

Tel: +91 80 4722 2222 I F: +91 80 4722 2223 I CIN: U64202KA1992PTC083998

E: compliance@embassyofficeparks.com | www.embassyofficeparks.com

Annexure A

Vikas Telecom Private Limited (“VTPL”) hereby declares the following as on September 30, 2023:

- i. Interest and Principal due on debentures in respect of Series I, has been paid on September 29, 2023 which is within due dates i.e September 30, 2023, to those debenture holders who have held the debentures as on record date i.e. September 23, 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 regularized as Nominee Directors at the Annual General Meeting of the Company held on July 7, 2023.
- iv. The properties secured for the Debentures are adequately insured.

iv(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).**
- 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 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.**
- 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. Compliance of all covenants of the issue and status thereof;
- x. 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

Vikas Telecom Private Limited

Regd. Office: Embassy GolfLinks Business Park, Royal Oaks, Off Intermediate Ring Road, Bangalore - 560 071.

Tel: +91 80 4722 2222 I F: +91 80 4722 2223 I CIN: U64202KA1992PTC083998

E: compliance@embassyofficeparks.com | www.embassyofficeparks.com



supplemental/amended debenture trust deed incorporating the changes in the debenture trust deed. - **Not applicable for Series I.**

- xi. There are no Fraud/defaults by promoter or key managerial personnel or by Issuer Company or arrest of Key managerial personnel or Promoter.
- xii. 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.
- xiii. Compliance with provisions of Security and Covenant Monitoring System as per Chapter III of SEBI Operational circular dated March 31, 2023, wherever applicable.
- xiv. 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 Digitally signed by
NAMBIAR GAUTHAM NAMBIAR
Date: 2023.10.30
18:45:57 +05'30'

Gautham Nambiar
Company Secretary and Compliance Officer
F12367



MANAGEMENT REPRESENTATION LETTER

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

I, Aravind Maiya, 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, 2023**.

Kindly take the same on record.

Yours Faithfully,

For and on behalf of Vikas Telecom Private Limited

**ARAVIND
MAIYA** Digitally signed
by ARAVIND
MAIYA
Date:
2023.10.30
19:23:22
+05'30'

Aravind Maiya
Nominee Director
DIN: 08481898

Place: Bengaluru
Date: October 30, 2023