

December 01, 2022

To,  
Securities and Exchange Board of India (SEBI),  
SEBI Bhavan, Plot No. C4-A,  
G-Block, Bandra Kurla Complex,  
Bandra (East), Mumbai 400 051  
Email: [dt@sebi.gov.in](mailto:dt@sebi.gov.in)

**Sub: Submission of SEBI half yearly compliance report for the half year ended September 30, 2022**

Dear Sir/Madam,

Vistra ITCL (India) Limited (“**Vistra**”) is a registered intermediary with SEBI for Debenture Trusteeship services having registration no. as **IND000000578**.

As per SEBI circular no. SEBI/HO/MIRSD/CIR/P/2020/230 dated November 12, 2020 and SEBI circular no. SEBI/HO/MIRSD/MIRSD\_CRADT/CIR/P/2022/67\_dated May 19, 2022 please find enclosed herewith the details of activities other than Debenture Trusteeship as **Annexure I** and SEBI Compliance Certificate for the half year ended September 30, 2022 enclosed as **Annexure II**.

Request you to take the same on record.

**For Vistra ITCL (India) Limited**



**Jatin Chonani**  
**Compliance Officer**

Encl.: As Above

**Activities other than debenture trusteeship as on September 30, 2022**

<b>Sr. No.</b>	<b>Type of activity</b>	<b>Description of the activity</b>	<b>Number of clients#</b>
1	Security Trustee	Acting as Security and Facilities Agent in holding the charge and mortgage, monitoring the performance of the facilities and transparently servicing all the lenders including Documentation and Advisory Services.	533
2	Trustee to Venture Capital Funds	To act as Trustee of the funds and to monitor compliances as per SEBI Regulations.	46
3	Trustee to Alternative Investment Funds *	To act as Trustee of the funds and to monitor compliances as per SEBI Regulations.	406
4	Securitisation	(a) Trusteeship for the SPV Trust established for the purpose of securitization of receivables (b) In case of a direct assignment from the originator to the investor, Trustee acting as a Investor representative to ensure that investors interest are taken care of including payouts.	7
5	Other Trusteeship activities/ Services	(a) Trusteeship for Multi Family Office Trusts, Not for Profit Trusts (NFPT) and Other Special Purpose Vehicles (SPVs) (b) Consultancy Services (c) Monitoring and custodial services (d) Due Diligence and transaction support services (e) Employee Benefit Structures	390
6	Trustee to Infrastructure Investment Trust (InVIT) *	Trusteeship for Infrastructure Investment Trusts (INVIT)	1

# These numbers are cumulative & live as on September 30, 2022

\* These numbers cover only matters wherein SEBI registration is received.

**COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED SEPTEMBER 2022**

**NAME:** VISTRA ITCL (INDIA) LIMITED  
**REGISTRATION NO:** IND000000578  
**DATE OF REGISTRATION:(in dd/mm/yy)** 16-10-2000

**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.

**b Change in status or constitution**

Reporting of 'changes in status or constitution' of DT (In terms of SEBI Circular No. CIR/MIRSD/10/2011 dated June 20, 2011)  
 No change in shareholding pattern of Vistra ITCL (India) Limited, since last reporting

**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;

**i Net worth (unaudited) as defined in the Regulations as on HY ended September 30, 2022**

INR 673,158,130/-

**ii. Any change in infrastructure since the last report / registration/ renewal**

NIL

**(iii) Changes in Key personnel during the half year ended September 30, 2022**

Name(s) of the key personnel	Appointment / Cessation	Date of appointment / cessation	of / Qualification	Experience
NIL				

**e Details of deficiencies and non compliances**

Nil during the quarter

**f Details of the review of the report by the Board of Directors**

i) Date of Board Review (DD/MM/YYYY)

ii) Observation of the Board of Directors on the deficiencies and non-compliances and corrective measures initiated

**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.**



**Name of Compliance Officer**  
**Email ID**

JATIN CHONANI  
[itclcomplianceofficer@vistra.com](mailto:itclcomplianceofficer@vistra.com)