

December 12, 2023

To,
Mr. Pradeep Ramakrishnan
Department of Debt and Hybrid Securities
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
pradeepr@sebi.gov.in

Sub: Submission of SEBI half yearly compliance report for the half year ended September 30, 2023

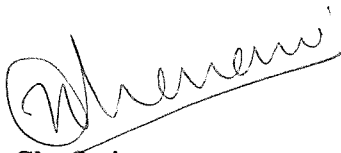
Dear Sir/Madam,

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

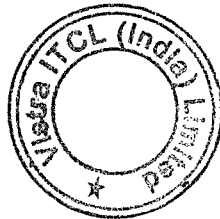
As per SEBI circular bearing reference no. SEBI/HO/DDHS/P/CIR/2023/50 dated March 31, 2023 please find enclosed herewith the details of activities other than Debenture Trusteeship as **Annexure I** and SEBI Compliance Certificate for the half year ended September 30, 2023 enclosed as **Annexure II**.

Request you to take the same on record.

For Vistra ITCL (India) Limited



Jatin Chohanani
Compliance Officer



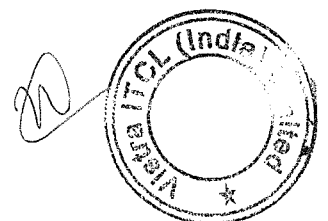
Encl.: As Above

Activities other than debenture trusteeship as on September 30, 2023

Sr. No.	Type of activity	Description of the activity	Number of clients#
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.	517
2	Trustee to Venture Capital Funds	To act as Trustee of the funds and to monitor compliances as per SEBI Regulations.	41
3	Trustee to Alternative Investment Funds *	To act as Trustee of the funds and to monitor compliances as per SEBI Regulations.	405
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	535
6	Trustee to Infrastructure Investment Trust (InVIT) *	Trusteeship for Infrastructure Investment Trusts (INVIT)	1

These numbers are cumulative & live as on September 30, 2023

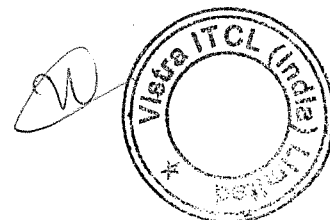
* These numbers cover only matters wherein SEBI registration is received.



COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED SEPTEMBER 2023

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 system 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, 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 (audited) as defined in the Regulations as on FY ended March 2023 (as per latest audited financials)			
	Rs. 561640562/-			
	ii. Any change in infrastructure since the last report / registration/ renewal			
	NIL			
	(iii) Changes in Key personnel during the half year ended September 2023			
	Name(s) of the key personnel	Appointment / Cessation	Date of appointment / cessation	Qualification
	NIL			Experience

Certificate



e	Details of deficiencies and non compliances			
	NIL			
f	Details of the review of the report by the Board of Directors			
	i) Date of Board Review (DD/MM/YYYY)	The report was approved by the Board of Directors in its meeting held on December 11, 2023		
	ii) Observation of the Board of Directors on the deficiencies and non-compliances and corrective measures initiated	NIL		
	Certified that we have complied with SEBI (Debenture Trustee) Regulations, 1993, applicable provisions of SEBI (Issue and Listing of Non-convertible Securities) Regulations, 2021, 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	JATIN CHONANI		
	Email ID	itclcomplianceofficer@vistra.com		

