



December 12, 2025

To,
Deputy General Manager
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

Sub: Submission of SEBI half yearly compliance report for the half year ended September 30, 2025

Dear Sir/Madam,

Vistra ITCL (India) Limited ("**Vistra**") is a registered intermediary with SEBI for Debenture Trusteeship services having registration no. as **IND0000000578**.

As per SEBI circular bearing reference no. SEBI/HO/DDHS/P/CIR/2023/50 dated March 31, 2023 (updated as May 16, 2024) 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, 2025 enclosed as **Annexure II**.

Request you to take the same on record.

For Vistra ITCL (India) Limited

Name: Jatin Chonani
Designation: Compliance Officer

Encl.: As Above

Activities other than debenture trusteeship as on September 30, 2025

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.	458
2	Trustee to Venture Capital Funds	To act as Trustee of the funds and to monitor compliances as per SEBI Regulations.	35
3	Trustee to Alternative Investment Funds(AIF) *	To act as Trustee of the funds and to monitor compliances as per SEBI Regulations.	459
4	Trustee to AIF GIFT City Funds	To act as Trustee of the funds and to monitor compliances as per IFSCA Regulations.	73
5	Securitization	(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.	14
6	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	313
7.	Fund Administration Services	Fund Accounting and Administration of AIF Funds	105
8.	Corporate services	Company/LLP incorporation, Corporate secretarial and support services	152

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

**These data is client wise data.

Annexure II				
COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED SEPTEMBER 2025				
NAME:		VISTRA ITCL (INDIA) LIMITED		
REGISTRATION NO:		IND000000578		
DATE OF REGISTRATION:(in dd/mm/yy)		15-04-2024 (Initial Registration date : October 16, 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)			
	There was change in the shareholding pattern of Vistra ITCL (India) Limited as one equity share of face value of Rs. 100 was transferred from Mr. Neeraj Aggarwal to Mr. Ashish Mane on September 12, 2025.			
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 Debenture Trustee are fulfilled, the details are as under;			
	i Net worth (unaudited) as defined in the Regulations as on Half year ended September 2025			
	INR 70.32 Crores			
	ii.Any change in infrastructure since the last report / registration/ renewal			
	In August 2025, the company has changed its registered office address to The Qube, 2nd floor, A wing, 202, Hasan Pada Road Mittal Industrial Estate, Marol, Andheri, (East), Mumbai, Maharashtra, India, 400059			
	(iii) Changes in Key personnel during the half year ended September 2025			
	Please find below details :			
	Name(s) of the key personnel	Appointment / Cessation	Date of appointment / cessation	Qualification / Experience
	There is no change in the key personnel of Vistra ITCL (India) Limited during the half year ended September 30, 2025.			
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)			December 11, 2025
	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		