

AKARA CAPITAL ADVISORS PRIVATE LIMITED

To,
MITCON Credentia Trusteeship Services Limited
 1402 & 1403, 14th Floor,
 B-Wing, Dalamal Tower,
 Free Press Journal Marg,
 211, Nariman Point, Mumbai - 400 021

Dear Sir,

Sub: Quarterly Compliance Report for the Quarter ending December 31, 2022

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 and other applicable laws, we furnish the required information for your needful.

Sl. No.	Particulars of Information/Documents					
1.	Issue Size		ISIN			
	30 Crore		INE08XP07050			
2.	<u>Regulatory Requirement:</u>					Furnished Yes/No (Pls attach)
a.	An updated list of Debenture holders registered in the Register of Debenture Holders in the following format:					BENPOS
	ISSUE-WISE PARTICULARS					
	Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id	
	30 Crore	BENPOS ATTACHED				
b.	Details of complaints/grievances in the following format. In case no complaints have been received, a confirmation thereof.					
	ISSUE-WISE PARTICULARS					
	Issue size	Complaints/ Grievances pending for the previous quarter	Complaints/ Grievances pending for the current quarter	Resolved/ Unresolved	Reason (if pending beyond 30days of receipt of grievance)	
	No Complaints have been received					
3.	<u>Management Confirmations:</u>					Furnished Yes/No (Pls attach)
a.	A Certificate cum Confirmation duly signed by a key managerial personnel viz., Managing Director/ Whole Time Director/CEO/ CS/CFO/Manager of the Company to the effect that:-					
	Interest/Principal (ISIN wise)					

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Issue size	ISIN No	Due date of redemption and/or interest (falling in the quarter)	Paid/unpaid (date of payment, if paid, reasons if not paid)	Next due date for the payment of Interest / principal	
30 Crore	INE08XP07050	NA			
Recovery Expense Fund					
Issue Size	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	Additional remarks	
30 Crore	30000	NO	NIL	NIL	
b.	<u>Security and insurance¹:</u>				
	i. Security Documents executed by the Company remain valid (including but not limited to the purpose of and as provided in Limitation Act 1963), subsisting and binding upon the Company				Yes
	ii. The assets of the Company 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
	iii. Delay or Failure to create security (if any), with detailed reasons for delay or default in security creation and the time lines within which the same shall be created				NO
	iv. The Secured Assets have been insured against all risks as prescribed in the Prospectus/Information Memorandum of the captioned Debentures and Security Documents thereof				NO
	v. All the Insurance policies obtained are valid, enforceable and cover the risks as required under the Information Memorandum/Debenture Trust Deed, and are endorsed in favour of Debenture Trustee as 'Loss Payee'. The premium in respect of the following insurance policies have been paid.				NO
	Issue Size	Policy No.	Coverage (Rs.)	Period & expiry date	Status of Endorsement
c.	Statutory:				Yes/No/R emarks

¹ applicable for secured debentures

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	i. The Company has complied with and is in compliance with the provisions of the Companies Act 2013, the extant SEBI Regulations and the terms and conditions of the captioned Debentures and there is no event of default which has occurred or continuing or subsisting as on date	Yes
	ii. Any additional covenants of the issue (including side letters, accelerated payment clause, etc.) and status thereof	NA
	iii. There is no major change in composition of its Board of Directors, which may amount to change in control as defined in SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Changes if any to be disclosed along with copies of intimation made to the stock exchanges)	NO
	iv. any amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Company	NO
	v. Change, if any, in the nature and conduct of the business by the Company	NO
	vi. Outstanding litigations, orders, directions, notices, of court/tribunal affecting, or likely to materially affect the interests of the Debenture Holders or the assets, mortgaged and charged under security creation documents, if any	NO
	vii. Proposals, if any placed before the board of directors for seeking alteration in the form or nature or rights or privileges of the Debentures or in the due dates on which interest or redemption are payable, if any	NO
	viii. Disclosures, if any made to the stock exchange in terms of Regulation 30 or Regulation 51(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which may have a bearing on the Debentures or on the payment of interest or redemption of the Debentures	NO
	ix. There are no events or information or happenings which may have a bearing on the performance/operation of the Company, 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.	NO
d.	Others:	Yes/No/R emarks
	i. Details of revisions in the credit rating (if any)(to be attached);	NO
	ii. Details of Corporate Debt Restructuring (if any);	NO
	iii. Details of lenders/creditors joining or entering into Inter Creditor Agreement as per RBI guidelines, including all such information/documents required to be submitted by the Company to the RBI on an annual basis in respect of such Financial Year, as applicable	NA
	iv. Details of Fraud/defaults by promoter or key managerial personnel or by Issuer Company or arrest of key managerial personnel or promoter;	NO
	v. Details of one time settlement with any bank (if any);	NO
	vi. Details of Reference to Insolvency or a petition (if any) filed by any creditor	NO

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	<p>vii. Confirmation that a functional website containing, amongst others, the following information is maintained by the Company:-</p> <ul style="list-style-type: none"> • email address for grievance redressal and other relevant details; • name of the debenture trustees with full contact details; • the information, report, notices, call letters, circulars, proceedings, etc., concerning non-convertible redeemable preference shares or non-convertible debt securities; • all information and reports including compliance reports filed by the Company; • Debenture redemption reserve • Default by issuer to pay interest or redemption amount [if any] • failure to create a charge on the assets [if any] • revision in rating assigned to the NCDs [if any] • Other disclosures as per SEBI LODR Regulations 	<p>YES WIP WIP WIP NA NA NIL WIP</p>
4.	<u>Copies of the following information/documents (to be attached):-</u>	Furnished Yes/No (Pls attach)
a.	<p>Certificates from the Issuer –</p> <ol style="list-style-type: none"> i. Security Cover Certificate (As per Ann-1 of SEBI Circular SEBI/HO/MIRSD/MIRSD_CRADT/CIR/P/2022/67 dated May 19, 2022)* ii. Declaration for compliance with all covenants under transaction documents iii. All documents/intimations filed with Stock Exchange and to be furnished to Debenture Trustee as per SEBI LODR Regulations <p><i>*Please provide justification, in case market value is not ascertainable</i></p>	YES
b.	<p>Certificate from third Party Security Provider (applicable if third party assets being provided as security)–</p> <ol style="list-style-type: none"> i. Security Cover Certificate (As per Ann-1 of SEBI Circular SEBI/HO/MIRSD/MIRSD_CRADT/CIR/P/2022/67 dated May 19, 2022) 	NO
c.	<p>Certificates from Statutory Auditor-</p> <ol style="list-style-type: none"> i. Book value of the security cover certificate of the Issuer should be certified by their Statutory Auditor ii. Book value of the security cover certificate Third Party Security Provider should be certified by their Statutory Auditor (if applicable) iii. Compliance with the financial covenants iv. Any other certificates, if applicable under transaction documents 	YES
d.	A statement of value of pledged securities ²	NA
e.	A statement of value of Debt Service Reserve Account or any other form of security ³	NA
f.	Certified True Copy of quarterly and year-to-date standalone financial results ⁴ 33 3 a	NA

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		Regulation 52 is Applicable
g.	Copy of the un-audited or audited financial results ^{5 2 1}	YES
h.	Copy of the Insurance Policies duly endorsed in favour of the Debenture Trusteesas 'Loss Payee'	NA
i.	Details of initiation of forensic audit (by whatever name called) in respect of the Company, and copies of the disclosures made by the Company to the Stock Exchange in this regard.	NA

For Akara Capital Advisors Private Limited


Shruati Aggarwal
Director



DIN No. 06867269

Place: New Delhi

Date: 14th February, 2023

². To be submitted as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/P/ 2020/230 dated 12.11.2020.

³. To be submitted as per the SEBI Circular, bearing reference number SEBI/ HO/ MIRSD/ CRADT/ CIR/P/ 2020/230 dated 12.11.2020.

⁴. To be submitted pursuant to Regulation 33(3) (a) of SEBI LODR Regulations

⁵. To be submitted pursuant to Regulation 52 (1) of SEBI LODR Regulations