

**Mumbai Office :**

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211, Nariman Point, Mumbai - 400 021  
Tel : 022-22828200 / 240 Fax : 022-22024553  
Email : mitcontrustee@mitconindia.com



**MITCON**  
Trusteeship Services Limited  
A wholly owned subsidiary promoted by  
MITCON Consultancy & Engineering Services Limited

MTSL/OPR/2020-21/DT/07

Date: 22/06/2020

To,

**THE SECURITIES AND EXCHANGE BOARD OF INDIA**

SEBI Bhavan, 3rd Floor A Wing,  
Plot No. C 4-A, G Block,  
Bandra-Kurla Complex,  
Bandra (East),  
Mumbai – 400 051.

**Kind Attn:- Surabhi Gupta, Deputy General Manager - MIRSD**

**Sub: - SUBMISSION OF REPORT OF DEBENTURE TRUSTEE FOR THE HALF YEAR ENDED 31<sup>st</sup> MARCH 2020.**

Madam,

This has reference to the captioned subject, we, **M/s. MITCON Trusteeship Services Limited** hereby submit to your good office Report of Debenture Trustee for the half year ended as on 31<sup>st</sup> March 2020 for your perusal and record.

The aforesaid report has also been uploaded on SEBI Intermediary Portal and also sent on mail, vide mail from our side sent on [dt@sebi.gov.in](mailto:dt@sebi.gov.in) on 22<sup>nd</sup> June, 2020. You may kindly acknowledge the receipt of submission.

The said report will also be uploaded on the company's website.

Please further note, regarding mentioning Net worth figures as on 31st March 2020, we had sought your permission to mention Net Worth figures as on 25<sup>th</sup> July 2019, the same Net worth as we had mentioned in our earlier Half Year Report ending 30<sup>th</sup> September 2019.

We received your reply through email on 10<sup>th</sup> June 2020 permitting us to mention 25<sup>th</sup> July 2019 Net worth figures in Debenture Trustee Half yearly Report for the half year ended 31st March 2020, with direction to furnish an Assurance letter stating our Net worth is in compliance with the regulatory requirements.



In view of the above, we are attaching herewith Assurance Letter signed by our Director and CFO of the company assuring your good office that the company has maintained minimum net worth of Rs. 10 Crore as on 31<sup>st</sup> March 2020. and further gives assurance that company will furnish Net Worth figures from Audited Financials for the financial year ended March 31, 2020 , once company's financial audit for the financial year ended 31<sup>st</sup> March 2020 gets completed.

Thanking you.

Yours faithfully,

**For MITCON Trusteeship Services Limited**

*K. A. Sawant*

**Kiran Sawant**

Compliance Officer



- Encl:- 1) Report of Debenture Trustee for the half year ended as on 31<sup>st</sup> March 2020  
2) Assurance Letter signed by Our Director and CFO of the company.



**MITCON**  
Trusteeship Services Ltd.

*ay*

No. MTSL/OPR/20-21/DT/05  
Date: 17/06/2020

To,  
The Division Chief  
Market Intermediaries Regulation and Supervision Department-5,  
Division of Registration  
**The Securities and Exchange Board of India**  
SEBI Bhavan, 3rd Floor A Wing,  
Plot No. C 4-A, G Block, Bandra-Kurla Complex,  
Bandra (East), Mumbai – 400 051

Madam,

**Kind Attention: - Anupama Chadha- Deputy General Manager  
Surabhi Gupta-Deputy General Manager**

**Sub: Assurance letter on maintaining our company net worth above Rs. 10 Crore.**

**Ref: SEBI Registration No. IND000000596**

In furtherance to our email communications on forwarding Half Yearly Report for 31<sup>st</sup> March, 2020, we hereby confirm that our company has maintained minimum net worth of Rs. 10 Crore as required on 31.03.2020. We further assure your good office that once our company's financial audit for 31.03.2020 is completed, we shall furnish the net worth figure from the audited financials.

Thanking you,

Yours faithfully,  
**MITCON Trusteeship Services Limited**

*ay*  
**Ram Mapari**  
Chief Financial Officer





Annexure

**REPORT OF DEBENTURE TRUSTEES FOR THE HALF YEAR ENDED MARCH 31, 2020**

MITCON TrusteeShip Services Limited

IND0000000596

25/07/2019

NAME:  
REGISTRATION NO  
DATE OF REGISTRATION (in dd/mm/yy)

**SECTION I: ACTIVITIES**

**A Details of Debenture Issues (Public (P) / Rights (R)/ Privately Placed Listed (PPL) / Privately Placed Unlisted (PPUL)**

Type	No. of debenture issues accepted during the half year ended 31st March 2020.			Cumulative No. of debenture issues handled up to the half year ended 31st March 2020	Size (in ` crores ) of debenture issues accepted during the half year ended 31st March 2020			Cumulative Size ( in ` crores ) of debenture issues handled up to the half year ended 31st March 2020
	Secured	Unsecured	Total		Secured	Unsecured	Total	
Public								
Rights								
Privately Placed Listed								
Privately Placed Unlisted								
<b>Total</b>								

**B Activities other than debenture trusteeship**

Activity Type	Description of the activity	Number of clients
ADANI BRAHMA SYNERGY PRIVATE LIMITED	Safe Keeping Service	1

Name of Compliance Officer  
Email ID  
Date:-

Mr. Kiran Sawant  
trusteeinvestors@mitconindia.com  
22/6/2020



Name of the DT  
Section II - REDRESSAL OF INVESTOR GRIEVANCES

MITCON Trusteeship Services Limited

For the Half Year ended 31st March 2020

**A** Status of Investor Grievances

Name of the issuer (tranche wise)	Issue size (Rs. Crores)	Pending complaints at the end of the previous half year	No. of complaints received during the half year	No. of complaints resolved during the half year	No. of complaints pending at the end of half year
NIL					

**B** Details of the complaints pending for more than 30 days

Name of the Issuer	Issue size (Rs. Crores)	No. of complaints pending for more than 30 days	Nature of the Complaint(s)			Steps taken for redressal	Status of the complaint (if redressed, date of redressal)
			Delay in payment of interest	Delay in payment of redemption	Any other		
NIL							

Name of Compliance Officer  
Email ID  
Date:-

Mr. Kiran Sawant  
trusteeinvestors@mitconindia.com  
22/6/2020



Name of the DT  
Section III - DEFAULT DETAILS

MITCON Trusteeship Services Limited

For the Half Year ended 31st March 2020

Information regarding default by the Issuer Companies in Public (P) / Rights (R) / Privately Placed Listed (PPL) Issues of Debentures up to the half year ended 31st March 2020.

Sr. No.	Name of the Issuer	Secured / Unsecured	Type (P/R/PPL)	Issue Size (in crores)	Type of Default*	Details of action taken
			NIL			

\*Type of Default

1. Non-payment of interest;
2. Non-payment of redemption;
3. Delay in payment of interest/redemption;
4. Any other (like non-creation of security)

Name of Compliance Officer  
Email ID  
Date:-

Mr. Kiran Sawant  
trusteeinvestors@mitconindia.com  
22/6/2020



**MITCON Trusteeship Services Limited**

Name of the DT :-

SECTION - IV - COMPLIANCE

**COMPLIANCE CERTIFICATE FOR THE HALF YEAR ENDED MARCH 31, 2020.**

**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.

YES

**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)

NIL

**C Other Information**

- (i) Details of arrest / conviction of key officials of DT
- (ii) Details of prosecution cases or criminal complaints filed by investors against the DT
- (iii) Details of any fraudulent activity by the employees associated with DT activities and action taken by the DT
- (iv) Details of conviction of any offence involving moral turpitude or any economic offence by employees of DT
- (v) Action taken by the DT on the above issues

NIL  
NIL  
NIL  
NIL  
N.A.

**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 31/03/2020 (as per the latest audited financials). We have mentioned here the Networth as on the date of grant of Certificate of Registration i.e. 25.07.2019, since the audit of our company's accounts for financial year ending on 31/03/2020 is still not over, so we are not able to mention Audited Net Worth figures as on 31/03/2020. However we attach Assurance Letter in this regard dated June 17, 2020 signed by our director and CFO, as directed through mail dated June 10, 2020 received from Ms. Surabhi Gupta, Deputy General Manager - MIRSD.

Rs. 10,28,75,691/-

(ii) Any change in infrastructure since the last report/registration/renewal

NIL

(iii) Changes in Key personnel during the half year ended 31st March 2020

Name(s) of the key personnel	Appointment / Cessation	Date of appointment / cessation	Qualification	Experience	Functional areas of work
RAM DHONDIBA MAPARI	Appointment	23/01/2020	BCOM, DBM	34 years	Chief Financial Officer

NIL

**E Details of deficiencies and non compliances**

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

Date of Board Review (dd/mm/yyyy)  
Observation of the BoD on :-  
i) the deficiencies and non compliances  
ii) corrective measures initiated

22/06/2020

NIL  
NIL

1 Certified that we have complied with SEBI (Debenture Trustees) 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:

2 We have complied with the provisions of the SEBI Circular No. SEBI/HO/MIRSD/MIRSD3/CIR/P/2017/72 dated 30<sup>th</sup> June 2017.

Name of Compliance Officer :- **Kiran Sawant**  
Email ID :- **trusteeinvestors@mitconindia.com**  
Date :- **22/6/2020**

*Kiran Sawant*

