

Compliance Report for the quarter ended June 30, 2020

Name of Issuer Company: Security and Intelligence Services (India) Limited

Information submitted at the times of issuance/allotment:

1	Description of the Debenture Series /Issue (Secured/Unsecured PCD/FCD/NCD)	Secured, Rated, Listed, Redeemable, Non-Convertible Debentures
2	Type of Issue (Private / Public / Rights)	Private
3	Issue Amount and Amounts Raised	INR 1500 Milion
4	Listed/Unlisted (If Listed, the Exchange where listed)	Listed at National Stock Exchange of India Limited
5	ISIN (Listed and Unlisted)	INE285J07033
6	Date of Listing of NCDs (please provide confirmation and supporting from BSE/NSE)	May 2, 2018
7	Original & Revised (if any) Coupon Rate	Original Coupon Rate: 9.50% p.a. Revised Coupon Rate: N.A.
8	Tenor of Issue	3 years from the date of Allotment
9	Date of Allotment of Debentures	April 13, 2018
10	PAS-3, PAS-4, PAS-5 filed with ROC within specified time limit (please provide confirmation and supporting)	Form PAS-3, PAS-4 and PAS-5 were filed with ROC within the specified time limit. Copies of the forms were already provided to Debenture Trustee.
11	Date of Issue of Debenture Certificate (Physical) or Credit to Demat A/c	April 25, 2018
12	Credit Rating at the time of issue/ last credit rating prior to change	A+ by ICRA
13	No. of debenture holders on the date of Allotment	1 (One)
14	Name of the Debenture holder representative/facility agent along with its contact details	Mr. Shadab Rizvi Ph.: 022-6647 0324
15	Details of Debenture holders holding more than 10% of debentures in value for the time being outstanding	ICICI Prudential Balanced Advantage Fund Sempire Plaza, Twr-1, 4 th Floor, Chandan Nagarlbs Marg, Vikhroli West, Mumbai- 400083 ICICI Prudential Equity & Debt Fund Sempire Plaza, Twr-1, 4 th Floor,

		Chandan Nagarlbs Marg, Vikhroli West, Mumbai- 400083
16	Whether the company has issued debentures to Foreign debenture holders	No
17	Certificate of inspection of trust property (security provided – immovable) is confirmed annually by the Auditors of the Company.	Not Applicable
18	Valuation Report (if applicable) has been obtained from Government approved valuer	Not Applicable
19	ROC Search Report has been obtained	Not Applicable
20	Details Regarding Registration of charges and reasons for delay (if any)	Charge has been created in favour of Debenture Trustee, VISTRA ITCL (INDIA) LIMITED to secure the issue of debentures and the same has been registered with the Registrar of Companies on April 12, 2018. The charge identification number is 100318967.

Information submitted on quarterly basis:

1	Confirmation of having complied with Foreign Account Tax Compliance Act (FATCA) as regards the investors, borrowers, and other intermediaries (If Applicable - along with supporting documents, registration number etc.)	Not Applicable
2	Outstanding amount as on June 30, 2020	INR 1500 Million
3	Previous Interest Payment Date and Amount paid	2 nd Coupon: April 13, 2020 Amount paid: INR 141.72 Million
4	Next Interest Payment Date and Amount	April 13, 2021 Amount: INR 142.50 Million
5	Previous Repayment Date and Amount paid	Not Applicable
6	Next Repayment Date and Amount	Date: April 13, 2021 Amount: INR 1500 Million
7	Whether there has been any delay / default in payment of interest and/or principal amount? If yes, the due dates thereof & date of payment	No
8	Present Credit Rating and date of change of credit rating. In case of revision, please	A+ by ICRA. There is no revision in rating.

	attach letter from Credit Rating Agency indicating revision in rating.	
9	No. of debenture holders as on last day of this quarter, <i>(Please provide details of NCD Holder viz. Names, Holding, Mailing Address, Email id, Contact Nos. (Benpos))</i>	Name: ICICI Prudential Balanced Advantage Fund Holding: 1,000 NCDs Mailing Address: Sempire Plaza, Twr-1, 4 th Floor, Chandan Nagarlbs Marg, Vikhroli West, Mumbai- 400083 Contact No. +91-22-30752800 Name: ICICI Prudential Equity & Debt Fund Holding: 500 NCDs Mailing Address: Sempire Plaza, Twr-1, 4 th Floor, Chandan Nagarlbs Marg, Vikhroli West, Mumbai- 400083 Contact No. +91-22-30752800
10	Brief details of the security created till date for the Debentures including third party securities	Pledge over 24,07,263 equity shares of Dusters Total Solutions Services Private Limited held by Security and Intelligence Services (India) Limited
11	Whether any security is pending to be created for the Debentures, if yes provide details of the same along with the date by which such security is to be/was to be created.	No
12	Whether the Secured Assets are insured? If yes, attach the latest renewed copies thereof	Not applicable
13	Confirmation with respect to submission of Half yearly communication (HYC) to BSE/NSE for the last applicable half year and reasons for non submission/ delay if any (Only for Listed) unaudited/audited financial results on half yearly basis should be submitted to exchanges within 45 days from the end of half year	Half-yearly communication was submitted to the stock exchanges including the audited financial results for the year ended March 31, 2020.
14	Half-yearly results statement should indicate material deviation, if any. This should cover deviation in use of proceeds of issue other	Not Applicable

	than the object stated in offer document	
15	Publication of financial results and statements within 2 calendar days of the conclusion of the Board Meeting. (atleast in one English national daily newspaper)	Complied for the quarter ended June 30, 2020
16	HYC submitted to stock exchange contains certificate signed by Debenture Trustee	Yes
17	Whether unaudited financial results are accompanied by Limited Review Report (LRR)* *LRR is not required if the company has intimated exchanges in advance that it shall submit annual audited results within 60 days from the end of Financial Year	Yes
18	Whether all taxes, cesses, insurance premia, any other government charges with respect to Secured Assets for the issue have been paid. If No, please give details and reasons for the same	Not Applicable
19	Whether Debenture Redemption Reserve (DRR) as per SEBI Guidelines and Companies Act has been maintained. If No, please give reasons for the same. Please provide details / issue wise of DRR amount and date of transfer till date.	Yes Debenture Redemption Reserve as on March 31, 2020 – INR 250.00 Mn
20	Confirmation & Supporting of creation / maintaining DRR before April 30 th by way of deposit / invest not less than 15% of the amount of debentures maturing during the year ending March 31, 2020 as detailed in the clarification circular provided by MCA	Not Applicable
21	Whether any material change has taken place in the nature and the conduct of the business of the Issuer since the date of Issue, which is detrimental to the interest of debenture holders. If yes, please give details	No
22	Whether any orders, directions, notice of court/ tribunal/ authority affecting or likely to affect the Secured Assets has been passed. If yes, please give details	No
23	Whether any major change in the	No

	composition of the Board of directors or shareholders as defined in SEBI (Substantial Acquisition and Take Over) Regulations, 2011 which amounts to change in control of Issuer Company has occurred. If yes, please give details	
24	Whether any Postdated Cheques (PDCs) are issued, if yes then provide the favoring name of PDC	No
25	Whether any change in Authorized Signatory to bank accounts and Escrow Account who had signed Postdated Cheques (PDCs) as security as per transaction documents.	No
26	Security Cover as on June 30, 2020 (Please attach CA Certificate in the format as stated in Annexure)	Complied
27	Whether Register of Debenture Holders has been maintained with their addresses and whether the transfers and changes in ownership have been recorded. If no, please give reasons.	Yes
28	In case of Partially/ Fully Convertible Debentures, whether the debentures have been converted into equity in accordance with the terms of issue? If no, please give reasons.	Not Applicable
29	Whether all the terms & conditions of the transaction documents are complied with? If no, please give reasons.	Complied
30	Whether the provisions of the following laws applicable to debentures have been complied with: a) Companies Act, 2013 and Rules made thereunder (For all Issuers) b) SEBI Model Listing Agreement (For Listed Issues) c) SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015 (For Listed Issues) d) SEBI (Issue of Capital and Disclosure Requirements), 2009 (For all issuers) e) SEBI (Issue and Listing of Debt	Complied

	Securities), 2008	
31	Whether any dividend has been declared during this quarter.	No
32	Nature of investor grievances received for quarter ended June 2020 its status as on date of the submission of QCR and reason for the non- resolution/ delay if any (Details to be separately provided in annexure as enclosed)	Nil
33	Any Buy Back of NCDs during the quarter and details of the same	No
34	Whether the company has given prior intimation to exchanges of at least 11 working days before the date on and from which the interest on Debenture and redemption amount of Debentures is payable	Yes
35	Whether the company has maintained functional website containing requisite information (Reg 62)	Yes
36	Whether the company has intimated exchange(s) about its intention to raise funds through issue of new NCD and such intimation was given prior to holding Board meeting	Not applicable
37	Compliance with Accounting Standard and Financial disclosures	Complied
38	Compliance with Corporate Governance provisions as specified in Chapter IV viz Related Party framework, Independent Directors, submission of quarterly compliance report on corporate governance to Exchange(s), prior intimation to exchanges, disclosure of material information/event, shareholding pattern	Complied
39	Whether Directors and KMPs have disclosed to Board of Directors whether they are directly or indirectly have material interest in any transaction	Not Applicable
40	Whether the company has appointed qualified Company Secretary as the Compliance Officer	Yes
41	Whether the Company has appointed Share transfer agent or manage the same in house	The Company has appointed Link Intime India Private Limited as the

		Registrar and Share transfer agent
42	Whether the Company has preserved the transactions records at least for 8 years	Yes
43	Whether the Company is registered on the SEBI SCORES	Yes
44	Whether statement of investor grievances has been filed to Exchanges within 21 days from the end of quarter	Yes
45	Whether the Company has constituted following committees and held meetings in compliance with the provisions <ul style="list-style-type: none"> • Audit Committee • Nomination and Remuneration Committee • Stakeholders Relationship Committee • Risk Management Committee 	Yes
46	Whether the Company has made disclosure of material events/information to Exchanges and Debenture Trustee, if any	Yes
47	Whether the company has submitted Annual Report within 21 working days to stock exchange(s)	Yes
48	In case the Company has provided Post Dated Cheques (PDCs) in favour of Trustee towards security, whether the same are reissued in the new name of Trustee i.e. Vistra ITCL (India) Limited	Not Applicable
49	Whether the Company has submitted a compliance certificate to the Exchange(s), duly signed by both Compliance Officer of the listed entity and the authorised representative of the transfer agent (RTA)	Yes
50	In case of default in payment of Interest/principal whether the company has made disclosures to the Credit Rating Agencies in timely manner	Not Applicable

ANNEXURES

1	Updated list of names and addresses of debenture holders. – Please refer point no. 15 on page 1
2	Number and nature of grievances received from debenture holders and time frame within which the same were resolved by the Issuer Company. NIL statement to be submitted in case of no grievances. – NIL
3	<p>Companies Auditors Certificate certifying the following (If already provided, please ignore): Not Applicable</p> <ol style="list-style-type: none"> End utilization certificate of the Debenture Subscription receipts from issuer's statutory auditor: Security Cover ** Amount transferred to DRR Debt Equity Ratio Asset cover Ratio (100%) Debt Service coverage Ratio Interest Service Coverage Ratio Half yearly certificate from Practicing CS/CA regarding maintenance of 100% asset cover ratio. <p>**</p> <ol style="list-style-type: none"> Total assets charged Rs. A Total debts secured by way of charges created over the assets Rs. B with details thereof Security Cover = A/B <p>Note:</p> <ol style="list-style-type: none"> If third party security is created, please include the same and give supporting Requirement of disclosures of Debt Service Coverage Ratio, asset cover and interest service coverage ratio shall not be applicable for Banks or NBFC registered with RBI and unsecured debt issued by regulated financial sector entities.
4	Duly audited annual accounts of the issuer company – Annual Report for FY20 is enclosed as Annexure-1.
5	Quarterly audited / unaudited financials of the Issuer – Un-audited financial results for the quarter ended June 30, 2020 are enclosed as Annexure-2.
6	Insurance Policy of the security charged in our favour. In case Insurance Policy has expired, please provide Renewed Insurance Policies – Not applicable
7	CA Certificate giving value of book debts / receivables (Applicable for Listed NCDs) as on March 31, 2020 – Not applicable
8	Certificate from Director / Managing Director of the issuer company, certifying the value of book debts / receivables (Applicable for Listed NCDs) as on June 30, 2020 along with details of the said book debts and/or receivable – Not applicable
9	Report of the Lead Bank regarding – Not applicable <ol style="list-style-type: none"> progress of the Project report on monitoring of utilization of funds raised for the issue

10	Paper cutting of publication of financial results (at least in one English national daily newspaper) – Enclosed as Annexure-3.
11	Copy of all notices, resolutions and circulars relating to new issue of non-convertible debt securities, proceedings of meetings of debenture holders, advertisement issued in the media – Not applicable
12	Letter issued by Credit Rating agency for revised credit rating – Not applicable

	<p>Contact Details :</p> <p>a) Name of Authorised Signatory: Pushpalatha K</p> <p>b) Email Address: pushpalatha.k@sisindia.com</p> <p>c) Contact Numbers: 080 – 2559 0801</p> <p>d) Name, Address and Email id of R&T Agent: Link Intime India Private Limited C 101, 247 Park, L.B.S. Marg, Vikhroli West, Mumbai 400 083 Telephone: +91 22 4918 6000</p> <p>e) Name, Address and Email id of the Credit Rating Agency: ICRA Limited, Building No. 8, 2nd Floor, Tower A, DLF Cyber City, Phase II, Gurugram – 122002, Haryana, E-mail: info@icraindia.com.</p>
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For **Security and Intelligence Services (India) Limited**



Pushpalatha K
Company Secretary
Date: August 5, 2020

