

Compliance Report for the quarter ended March 31, 2019

Name of Issuer Company : **Centrum Financial Services Limited**

Information submitted at the times of issuance/allotment:

1	Description of the Debenture Series /Issue (Secured / Unsecured PCD/FCD/NCD)	SECURED, REDEEMABLE, NON-CUMULATIVE, UNLISTED, UNRATED, NON-CONVERTIBLE, PRINCIPAL PROTECTED MARKET LINKED DEBENTURES BEARING A FACE VALUE OF INR 1,00,000 EACH
2	Type of Issue (Private / Public / Rights)	Private Placement
3	Issue Amount and Amounts Raised	Issue Amount- Rs.150,00,00,000/- Amount raised -Rs. 149,65,00,000/-
4	Listed/Unlisted (If Listed, the Exchange where listed)	Unlisted
5	ISIN (Listed and Unlisted)	Unlisted ISIN: <ol style="list-style-type: none"> 1. CFSL/MLD/9 – Type -1 - INE244R07090 Type -2 - INE244R07108 2. CFSL/MLD/10 – Type -1 - INE244R07116 Type -2 - INE244R07124 3. CFSL/MLD/11 – Type -1 - INE244R07132 Type -2 - INE244R07140 4. CFSL/MLD/12 – Type 2 – INE244R07165 5. CFSL/MLD/14 Type 3- INE244R07223 6. CFSL/MLD/15 Type 2- INE244R07249 7. CFSL/MLD/16 Type 1- INE244R07256 8. CFSL/MLD/17 Type 3- INE244R07272 9. CFSL/MLD/18- INE244R07298



		<p>10. CFSL/MLD/19 Type 3- INE244R07330 Type 4- INE244R07348</p> <p>11. CFSL/MLD/20- INE244R07322</p> <p>12. CFSL/MLD/21 Type 3-INE244R07371</p> <p>13. CFSL/MLD/22 Type 1- INE244R07397 Type 3- INE244R07413</p> <p>14. CFSL/MLD/25 Type 3- INE244R07496</p> <p>15. CFSL/MLD/27 Type 1- INE244R07512 Type 2- INE244R07520</p> <p>16. CFSL/MLD/29 Type 1- INE244R07546 Type 3- INE244R07561 Type 4- INE244R07579</p> <p>17. CFSL/MLD/30 Type 2- INE244R07603</p> <p>18. CFSL/MLD/31 Type 2- INE244R07637 Type 3- INE244R07611</p> <p>19. CFSL/MLD/33 Type 3- INE244R07652 Type 4- INE244R07660</p> <p>20. CFSL/MLD/34 Type 1- INE244R07678 Type 2- INE244R07686 Type 3- INE244R07694</p>
6	Date of Listing of NCDs (please provide confirmation and supporting from BSE/NSE)	NA
7	Original & Revised (if any) Coupon Rate	Original
8	Tenor of Issue	<p>1. CFSL/MLD/9 – Type -1 - 1225 days Type -2 - 1225 days</p>



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|--|---|
| | <p>2. CFSL/MLD/10 –
Type -1 - 1225 days
Type -2 - 1225 days</p> <p>3. CFSL/MLD/11 –
Type -1- 1228 days
Type -2 - 1228 days</p> <p>4. CFSL/MLD/12 –
Type 2 – 1225 days</p> <p>5. CFSL/MLD/14
Type 3- 1225 days</p> <p>6. CFSL/MLD/15
Type 2- 1225 days</p> <p>7. CFSL/MLD/16
Type 1- 770 days</p> <p>8. CFSL/MLD/18- 1225 days</p> <p>9. CFSL/MLD/19
Type 3- 1225 days
Type 4- 770 days</p> <p>10. CFSL/MLD/20- 1223 days</p> <p>11. CFSL/MLD/21
Type 3- 1225 days</p> <p>12. CFSL/MLD/22
Type 1- 1225 days
Type 3- 780 days</p> <p>13. CFSL/MLD/24
Type 1- 782 days</p> <p>14. CFSL/MLD/25
Type 3- 1232 days</p> <p>15. CFSL/MLD/27
Type 1- 1225 days
Type 2-1230 days</p> <p>16. CFSL/MLD/29
Type 1- 1225 days
Type 3- 1225 days</p> |
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		<p>Type 4- 1229 days</p> <p>17. CFSL/MLD/30 Type 2- 1230 days</p> <p>18. CFSL/MLD/31 Type 2- 733 days Type 3- 1225 days</p> <p>19. CFSL/MLD/33 Type 3- 1225 days Type 4- 1230 days</p> <p>20. CFSL/MLD/34 Type 1- 1225 days Type 2- 1225 days Type 3- 1230 days</p>
9	Date of Allotment of Debentures	<p>1. CFSL/MLD/9 – 06th June, 2016</p> <p>2. CFSL/MLD/10 – 15th June, 2016</p> <p>3. CFSL/MLD/11 – 24th June, 2016</p> <p>4. CFSL/MLD/12 – 04th July, 2016</p> <p>5. CFSL/MLD/16-03rd August, 2016</p> <p>6. CFSL/MLD/18- 26th August, 2016</p> <p>7. CFSL/MLD/19- 02nd September, 2016</p> <p>8. CFSL/MLD/20-16th September, 2016</p> <p>9. CFSL/MLD/21- 28th September, 2016</p> <p>10. CFSL/MLD/22-01.10.2016</p> <p>11. CFSL/MLD/24-20.10.2016</p>



		<p>12. CFSL/MLD/25-26.10.2016</p> <p>13. CFSL/MLD/27-10.11.2016</p> <p>14. CFSL/MLD/29-01.12.2016</p> <p>15. CFSL/MLD/30-02.12.2016</p> <p>16. CFSL/MLD/31-08.12.2016</p> <p>17. CFSL/MLD/33-20.12.2016</p> <p>18. CFSL/MLD/34-27.12.2016</p>
10	PAS-3, PAS-4, PAS-5 filed with ROC within specified time limit (please provide confirmation and supporting)	Yes
11	Date of Issue of Debenture Certificate (Physical) or Credit to Demat A/c	All issues of Debentures are in Demat mode
12	Credit Rating at the time of issue / last credit rating prior to change	Unrated
13	No. of debenture holders on the date of Allotment	As on March 31, 2019, no of debenture holders is as per annexure attached
14	Certificate of inspection of trust property (security provided – immovable) is confirmed annually by the Auditors of the Company.	N.A.
15	Valuation Report (if applicable) has been obtained from Government approved valuers	N.A.
16	ROC Search Report has been obtained	Yes, ROC search report is obtained from independent practicing Company Secretary
17	Details Regarding Registration of charges and reasons for delay (if any)	Form CHG-9 is filed for registration of charges without any delay.

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)	NA
2	Outstanding amount as on March 31, 2019	Rs. 73,21,00,000/- Redemption details are as per annexure
3	Whether there has been any delay / default in payment of interest and/or principal	No



	amount? If yes the due dates thereof & date of payment	
4	Present Credit Rating and date of change of credit rating. In case of revision, please attach letter from Credit Rating Agency indicating revision in rating.	-
5	No. of debenture holders as on last day of this quarter, (please provide details of NCD Holder viz. Names, Holding, Mailing Address, Contact Nos. (Benpos))	As per annexure attached
6	Brief details of the security created till date for the Debentures including third party securities	<p>The Debentures shall be secured by:</p> <ol style="list-style-type: none"> I. A first <i>pari passu</i> charge over the Issuer's immovable properties as set out in the Debenture Trust Deed; and II. First <i>pari passu</i> floating charge on present and future business receivables. For this purpose business receivables shall include investment in subsidiaries and current assets, as will be set out in the Debenture Trust Deed proposed to be signed for the issue. <p>For Both I and II the value shall be equivalent to 100% of the face value of Debentures.</p> <p>The Security provided in relation to this Issue shall be shared <i>pari passu</i> with other issuances of the Company at the discretion of the Company.</p>
7	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
8	Whether the Secured Assets are insured? If yes, attach the latest renewed copies thereof	Yes, immovable property situated at Surat more particularly mentioned in the Debenture Trust Deed is insured and the copy of the same is attached herewith as "Schedule V"
9	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	Yes



10	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	The issuer being an NBFC issuing debentures by way of private placement is not obligated to maintain a Debenture Redemption Reserve ("DRR").
11	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, 2019 as detailed in the clarification circular provided by MCA	The issuer being an NBFC issuing debentures by way of private placement, is not obligated maintain a Debenture Redemption Reserve ("DRR").
12	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
13	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
14	Whether any major change in the 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	No
15	Whether any Post dated Cheques (PDCs) are issued as Security, if yes then provide the favoring name of PDC	No
16	Whether any change in Authorized Signatory to bank accounts and Escrow Account who had signed Post dated Cheques (PDCs) as security as per transaction documents.	No
17	Security Cover as on March 31, 2019 (Please attach CA Certificate in the format as stated in Annexure)	Shall provide
18	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.	Demat Mode(Benpos)
19	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
20	Whether all the terms & conditions of the	




	transaction documents are complied with? If no, please give reasons.	Yes
21	<p>Whether the provisions of the following laws applicable to debentures have been complied with :</p> <p>a) Companies Act, 2013 and Rules made thereunder (For all Issuers)</p> <p>b) SEBI Model Listing Agreement (For Listed Issues)</p> <p>c) SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015 (For Listed Issues)</p> <p>d) SEBI (Issue of Capital and Disclosure Requirements), 2009 (For all issuers)</p> <p>e) SEBI (Issue and Listing of Debt Securities), 2008</p>	<p>(a) Yes</p> <p>(b) N.A.</p> <p>(c) N.A.</p> <p>(d) N.A.</p>
22	Whether any dividend has been declared during this quarter.	No
23	Nature of investor grievances received for quarter ended March 2019 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)	Annexure attached
24	Any Buy Back of NCDs during the quarter and details of the same	No
25	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	N.A
26	Pursuant to name change of the Trustee, whether the revised Form SH-4 (Securities Transfer Form) is submitted by the company on new name i.e Vistra ITCL (India) Limited	N.A

<p>Contact Details :</p> <p>a) Name of Authorised Signatory / Company Secretary</p> <p>b) Email Address</p> <p>c) Contact Numbers</p> <p>d) Name ,Address and Email id of R&T Agent</p>	<p>Mr. Jaymeen Shah</p> <p>Jaymeen.shah@centrum.co.in</p> <p>022 42159000</p> <p>Link Intime India Private Limited Sharad Amin Assistant Vice President- Bond Registry Link Intime India Private Limited C-101, 247 Park</p>
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e) Name , Address and Email id of the Credit Rating Agency	L.B.S. Marg, Vikhroli (W) Mumbai 400 083 N.A.
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For Centrum Financial Services Limited



Jaymeen Shah
Compliance Officer



Number of Investor grievances received for quarter ended March 31, 2019	Nil
Details of grievances received i.e. Complainant, nature of Complaint, etc	NA
Number of Investor grievances pending for quarter ended March 31, 2019	Nil
Whether any grievance is pending for more than 30 days? If yes, then please provide details and reasons thereof	NA

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