

ERAML/ANZEN/2025-26/16

May 27, 2025

BSE Limited P J Towers, Dalal Street, Fort, Mumbai – 400 001. Scrip Code: 543655, 974399, 974400, 976475	National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051. Symbol : ANZEN
--	---

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report of Anzen India Energy Yield Plus Trust ("Anzen") for the financial year ended March 31, 2025

Pursuant to Regulation 26J of the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014, and the circulars issued thereon from time to time, please find attached the Annual Secretarial Compliance Report of Anzen for the financial year ended March 31, 2025, issued by M/S. Ashita Kaul & Associates, Practicing Company Secretaries.

Kindly take the same on record.

Thanking you,

For ANZEN INDIA ENERGY YIELD PLUS TRUST
(acting through its Investment Manager EAAA Real Assets Managers Limited)


JALPA PAREKH
COMPANY SECRETARY & COMPLIANCE OFFICER
ACS 44507



CC:

Axis Trustee Services Limited Axis House, P B Marg, Worli, Mumbai, Maharashtra, India, 400025	Catalyst Trusteeship Limited Windsor, 6th Floor, Office No - 604, C.S.T. Road, Kalina, Santacruz (East), Mumbai – 400 098
--	---



Ashita Kaul & Associates

Ashita Kaul | Proprietor
Practicing Company Secretary

+91 9892332128 | ashkauls@gmail.com

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF
ANZEN INDIA ENERGY YIELD PLUS TRUST**
(An Infrastructure investment trust registered with SEBI vide Registration No. IN/InvIT/21-22/0020)
FOR THE YEAR ENDED MARCH 31, 2025
(Pursuant to the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014 and the Master Circular No. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024)

To,
Anzen India Energy Yield Plus Trust
Plot No. 294/3, Edelweiss House, off CST Road,
Kalina, Santacruz – East,
Mumbai 400098

We have examined:

- a) all the documents and records made available to us and explanation provided by **EAAA Real Assets Managers Limited (formerly known as Edelweiss Real Assets Managers Limited)** (“the Investment Manager”) acting as the Investment Manager of Anzen India Energy Yield Plus Trust (“Anzen”);
- b) the filings/ submissions made by the Investment Manager to the stock exchanges;
- c) website of Anzen;
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the financial year ended March 31, 2025 (“Review Period”) in respect of compliance with the provisions of:
 - i. The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
 - ii. The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include (“SEBI Regulations”):

- a) Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014;
- b) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (to the extent applicable);



Address: F-76-A, 1st Floor, Eternity Commercial Complex, Teen Haath Naka, LBS Marg, Thane West 400604



Ashita Kaul & Associates

Ashita Kaul | Proprietor
Practicing Company Secretary

+91 9892332128 | ashkaulcs@gmail.com

- c) Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

Based on the above examination, we hereby report that, during the Review Period:

- a) The Investment Manager of Anzen has complied with the provisions of the above Regulations and circulars /guidelines issued thereunder, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of The Practicing Company Secretary
Nil			

- b) The Investment Manager of Anzen has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder insofar as it appears from our examination of those records.
- c) The following are the details of actions taken against the InvIT, parties to the InvIT, its promoters, directors either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ Remarks of The Practicing Company Secretary
1	Securities and Exchange	Pursuant to the thematic inspection of Anzen by SEBI for the period	Administrative warning	The Investment Manager of Anzen has informed the





Ashita Kaul & Associates

Ashita Kaul | Proprietor
Practicing Company Secretary

+91 9892332128 | ashkaulcs@gmail.com

	Board of India	<p>November 16, 2022-April 30, 2024, SEBI had communicated following:</p> <ul style="list-style-type: none">• Observation pertaining to submission of Report on Activity and Performance on InvIT to the Board of Directors;• Observation pertaining to review of compliance report of every quarter by BoD of IM• Observation pertaining to non-preparation of Half Yearly Financial Statements• Observation pertaining to erosion of networth of IM of Anzen InvIT and related disclosures		exchanges on the receipt of the administrative warning on April 1, 2025. Further, the Investment Manager has taken necessary steps to avoid recurrence of the same in future.
2	Securities and Exchange Board of India	Securities and Exchange Board of India vide letter dated July 12, 2024 has issued a show cause notice to EAAA India Alternatives Limited (the holding company of the Investment Manager) for violation of certain provisions of SEBI (AIF)	Show Notice Cause	In relation to the alleged violation of certain provisions of SEBI (AIF) Regulations, SEBI circular dated October 1, 2015, SEBI circular dated June 19, 2014 read with SEBI





Ashita Kaul & Associates

Ashita Kaul | Proprietor
Practicing Company Secretary

+91 9892332128 | ashkaulcs@gmail.com

		Regulations, SEBI circular dated October 1, 2015, SEBI circular dated June 19, 2014 read with SEBI master circular for AIFs dated May 7, 2024.		master circular for AIFs dated May 7, 2024. EAAA India Alternatives Limited has submitted a reply dated August 28, 2024 to the SEBI SCN, denying the allegations made in the SEBI SCN. Further, a settlement application dated September 12, 2024, has been filed with SEBI which is currently pending.
3	Securities and Exchange Board of India	Edelweiss Financial Services Limited (EFSL) has received notices dated February 9, 2024 bearing reference numbers SEBI/HO/DDHS-SEC/P/OW/2024/5802/1 and SEBI/HO/DDHS-SEC-1/P/OW/2024/5821/1 from SEBI ("SEBI Letter"), under Section 15 HB for summary settlement in relation to alleged payments of additional interest for	-	EFSL has filed the settlement applications and an aggregate amount of ₹ 1.95 million has been remitted.





Ashita Kaul & Associates

Ashita Kaul | Proprietor
Practicing Company Secretary

+91 9892332128 | ashkaulcs@gmail.com

		<p>publicly issued NCDs and in its capacity as an Issuer and the merchant banker. The SEBI pursuant to its notice dated June 14, 2024 addressed to EFSL, issued a notice for summary settlement of the probable proceedings under the SEBI (Settlement Proceedings) Regulations, 2018 as provided in the SEBI Letter.</p> <p>Subsequently, EFSL has filed the settlement applications and an aggregate amount of ₹ 1.95 million has been remitted.</p>		
--	--	--	--	--

- d) The investment manager of the InvIT has taken following actions to comply with the observations made in previous reports:



Address: F-76-A, 1st Floor, Eternity Commercial Complex, Teen Haath Naka, LBS Marg, Thane West 400604



Ashita Kaul & Associates

Ashita Kaul | Proprietor
Practicing Company Secretary

+91 9892332128 | ashkaulcs@gmail.com

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the Investment Manager, if any	Comments of the Practicing Company Secretary on the actions taken by the InvIT
Nil				

For Ashita Kaul & Associates
Practicing Company Secretaries



Proprietor
FCS 6988/CP 6529
Peer Review: 1718/2022

Place: Thane
Date: 20/05/2025
UDIN: F006988G000382407

Note: This report is to be read with our letter of even date which is annexed as 'Annexure A' and forms an integral part of this report.



Ashita Kaul & Associates

Ashita Kaul | Proprietor
Practicing Company Secretary
+91 9892332128 | ashkaulcs@gmail.com

Annexure A

To,

Anzen India Energy Yield Plus Trust

Plot No. 294/3, Edelweiss House, off CST Road,
Kalina, Santacruz – East,
Mumbai 400098

Our report of even date is to be read along with this letter.

1. Maintenance of compliance record is the responsibility of the Investment Manager of the Listed Entity. Our responsibility is to express an opinion on these records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the records. Some part of Audit was conducted offline. We have also conducted online verification and examination of the relevant documents and records as facilitated by the listed entity for the purpose of issuing this Annual Secretarial Compliance Report. The verification was done on test basis to ensure that correct facts are reflected in records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the listed entity.
4. Wherever required, we have obtained the Investment Manager representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of SEBI laws, rules, regulation and other applicable laws, rules, regulations, standards is the responsibility of the Investment Manager. Our examination was limited to the verification of compliance done by the listed entity.
6. The Annual Secretarial Compliance Report is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the Investment Manager has conducted the affairs of the listed entity.

Place: Thane
Date: 20/05/2025
UDIN: F006988G000382407



For Ashita Kaul & Associates
Practicing Company Secretaries

Proprietor
FCS 6988/CP 6529
Peer Review: 1718/2022