

PHOTON CAPITAL ADVISORS LIMITED

(CIN: L65910TG1983PLC004368)

Regd. Office: Plot. No.90-A, Road No.9, Jubilee Hills, Hyderabad-500 033,
Telangana, Tel No: 091-9951339995,

Website: <http://www.pcalindia.com//>, Email Id - info@pcalindia.com

Date: 11.04.2024

To,
The Manager,
Compliance Department,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

Dear Sir/Madam,

Sub: Non-Applicability of disclosure relating to Fund raising by issuance of Debt Securities by Large Corporates.

Ref: Stock Code: 509084 & SEBI Circular No. SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018

With reference to the above cited subject and with regard to SEBI Circular No. SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018, we hereby submit that pursuant to Para 2.2 and 3.1 of the said circular, the Company does not fall under the definition of "Large Corporate".

In view of the above and as per Para 4 of the said circular, disclosure requirements for large entities are not applicable to the Company and accordingly we are not required to submit disclosure relating to Fund raising by issuance of Debt Securities by Large Corporates for the financial year ending on 31.03.2024.

Kindly take the same on record.

Thanking you,

For PHOTON CAPITAL ADVISORS LIMITED

N. Sobharani

SOBHARANI NANDURY
WHOLE TIME DIRECTOR
DIN: 00567002



Encl: Annexure-A

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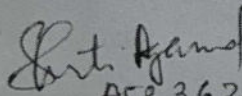
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Annexure-A

Format of the Initial Disclosure to be made by an entity identified as a Large Corporate

Sl. No.	Particulars	Details
1	Name of the company	PHOTON CAPITAL ADVISORS LIMITED
2	CIN	L65910TG1983PLC004368
3	Outstanding borrowing of company as on 31 st March 2024 (in Rs)	NIL
4	Highest Credit Rating During the previous FY along with name of the Credit Rating Agency	Not Applicable
5	Name of Stock Exchange# in which the fine shall be paid, in case of shortfall in the required borrowing under the framework	Not Applicable

We confirm that we are not a Large Corporate as per the applicability criteria given under the SEBI circular SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018.


AS8362
SHRUTI AGARWAL
COMPANY SECRETARY
info@pcalindia.com


SREEDHAR BABU KANURI
CHIEF FINANCIAL OFFICER
info@pcalindia.com

Date: 11.04.2024

- In terms para of 3.2(ii) of the circular, beginning F.Y 2022, in the event of shortfall in the mandatory borrowing through debt securities, a fine of 0.2% of the shortfall shall be levied by Stock Exchanges at the end of the two-year block period. Therefore, an entity identified as LC shall provide, in its initial disclosure for a financial year, the name of Stock Exchange to which it would pay the fine in case of shortfall in the mandatory borrowing through debt markets.

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Annexure B2

Format of the Annual Disclosure to be made by an entity identified as a LC^s

1. Name of the Company : PHOTON CAPITAL ADVISORS LIMITED
2. CIN : L65910TG1983PLC004368
3. Report filed for FY : 2023-2024
4. Details of the Current block (all figures in Rs crore):

Sl. No.	Particulars	Details	
		2023-2024	2024-2025
i	2-year block period (Specify financial years)	2023-2024	2024-2025
ii	Incremental borrowing done in FY (T) (a)	0	0
iii	Mandatory borrowing to be done through debt securities in FY (T) (b) = (25% of a)	0	0
iv	Actual borrowing done through debt securities in FY (T) (c)	0	0
v	Shortfall in the borrowing through debt securities, if any, for FY (T-1) carried forward to FY (T). (d)	0	0
vi	Quantum of (d), which has been met from (c) (e)	0	0
vii	Shortfall, if any, in the mandatory borrowing through debt securities for FY (T) {after adjusting for any shortfall in borrowing for FY (T-1) which was carried forward to FY (T)} (f) = (b)-[(c)-(e)] {If the calculated value is zero or negative, write "nil"}	Nil	Nil

5. Details of penalty to be paid, if any, in respect to previous block (all figures in Rs crore):

Sl. No.	Particulars	Details	
		2022-2023	2023-2024
I	2-year block period (Specify financial years)		
II	Amount of fine to be paid for the block, if applicable Fine = 0.2% of {(d)-(e)}#	0	0

Shruti Agarwal
AS8362
SHRUTI AGARWAL
COMPANY SECRETARY
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Sreedhar Babu Kanuri
SREEDHAR BABU KANURI
CHIEF FINANCIAL OFFICER
info@pcalindia.com

Date: 11.04.2024

\$ - In cases, where an entity is not categorised as LC for FY (T), however was LC for FY (T-1), and there was a shortfall in the mandatory bond borrowing for FY (T-1), which was carried forward to FY (T), the disclosures as prescribed in this annexure shall be made by the entity for FY (T).

#- (d) and (e) are same as mentioned at 4(v) and 4(vi) of this annexure.