

# PHOTON CAPITAL ADVISORS LIMITED

(CIN: L65910TG1983PLC004368)

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

Website: <http://www.pcalindia.com/>, Email Id - [info@pcalindia.com](mailto:info@pcalindia.com)

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Date: 11.05.2022

To,  
The Assistant Manager,  
**Listing Compliance, 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 31.03.2022.

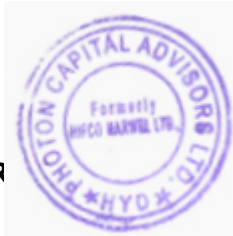
Kindly take the same on record.

Thanking you,

**For PHOTON CAPITAL ADVISORS LIMITED**

*N. Sobharani*

**SOBHARANI NANDURY**  
**WHOLE TIME DIRECTOR**  
**DIN: 00567002**



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

(To be submitted to the Stock Exchange(s) within 30 days from the beginning of the FY)

Sl. No.	Particulars	Details
1	Name of the company	PHOTON CAPITAL ADVISORS LIMITED
2	CIN	L65910TG1983PLC004368
3	Outstanding borrowing of company as on 31 <sup>st</sup> March 2022 (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.

Sd/-

Sd/-

NEHA AGARWAL  
COMPANY SECRETARY  
[info@pcalindia.com](mailto:info@pcalindia.com)

SREEDHAR BABU KANURI  
CHIEF FINANCIAL OFFICER  
[info@pcalindia.com](mailto:info@pcalindia.com)

Date: 11.05.2022

# - 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.