

GLUHEND INDIA PRIVATE LIMITED  
23, Floor-2, Plot-59/61, Arsiwala Mansion Nathalal Parikh Marg, Colaba Mumbai, Mumbai City,  
Maharashtra, India - 400005  
CIN: U74994MH2017FTC303216  
Website: www.gluhend.com

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To  
The Secretary,  
(Listing department)  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, 21<sup>st</sup> Floor, Fort,  
Mumbai – 400 001

Date: 15 May 2019

**Scrip Name: Gluhend India Private Limited**  
**Scrip Code: 957731**  
**Reference: - ISIN No (s): INE744Z07019**

Dear Sir / Ma'am

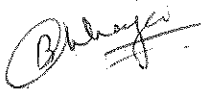
**Sub: Disclosure of reasons for delay in submission of financial results as per Regulation 52 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")**

This is to inform you that Gluhend India Private Limited ("Company") has on 15 May 2019, filed an application with the Securities and Exchange Board of India ("SEBI") seeking for an extension of time for submission of financial results for the half year ended 31 March 2019 in terms of Regulation 52 of the Listing Regulations, for the reasons detailed in the application made to SEBI, which is enclosed herewith for your reference.

We kindly request you to please take this on record.

Thank You

For Gluhend India Private Limited



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Bhupesh Chhajjer

Director

Enclosure:

1. Application for relaxation dated 15 May 2019 submitted to SEBI.

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D/15  
T/15/19

*By email and hand delivery*

To

Date: 15 May 2019

Department of Debt and Hybrid Securities  
Securities and Exchange Board of India  
SEBI Bhavan, Plot No C-4, G Block  
Bandra Kurla complex, Bandra (East)  
Mumbai - 400 051



Dear Sirs and Madams

**Sub : Non-convertible debentures listed on BSE Limited (BSE ISIN: INE744Z07019).**

**Request for extension of time for filing half yearly results for half year ended 31 March 2019 beyond the timelines prescribed in Regulation 52 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").**

**1. BACKGROUND**

- 1.1 We, Gluhend India Private Limited ("**Company**"), are a company incorporated under the Companies Act, 2013. The Company's registered office is located at #23, Floor-2, Plot-59/61, Arsiwala Mansion, Nathalal Parikh Marg, Colaba, Mumbai - 400 005. The Company's non-convertible debentures ("**NCDs**") are listed on BSE Limited ("**BSE**") (BSE ISIN: INE744Z07019).
- 1.2 In terms of Regulation 52 of the Listing Regulations, any company that has listed its non-convertible debt securities on a recognised stock exchange is required to prepare and submit to such recognised stock exchange its un-audited (with limited review report of the statutory auditors) or audited financial results on a half yearly basis within 45 days from the end of the half year.
- 1.3 Regulation 101 of the Listing Regulations empower the Securities and Exchange Board of India ("**SEBI**") to remove any difficulties in the application or interpretation of the Listing Regulations by issuing clarifications through guidance notes or circulars, recording the reasons in writing. Regulation 102 (1) of the Listing Regulations empowers the SEBI to relax the strict enforcement of the Listing Regulations in certain circumstances that are enumerated therein. Regulation 102 (2) of the Listing Regulations allows for an application to be made for relaxation under Regulation 102 (1). The application is required to be filed with SEBI along with a fee of INR 1,00,000.
- 1.4 This application is being made by the Company to seek extension for submitting its un-audited financial results (with limited review report of the statutory auditors) for the half year ended 31 March 2019 to BSE Limited, as required pursuant to Regulation 52 of the Listing Regulations.

**2. GROUNDS FOR SEEKING RELAXATION**

We are requesting for this extension / relaxation for the following reasons:

- 2.1 The NCDs of the Company have been issued, on a private placement basis, to two investors in March 2018 and a debenture trust deed was executed in relation to the NCDs, appointing Vistra ITCL (India) Limited as the debenture trustee.
- 2.2 In terms of the aforementioned debenture trust deed, the Company has appointed Deloitte Haskins & Sells LLP, Chartered Accountants, Mumbai (Firm Registration No. 117366W/W-100018) as the statutory auditor of the Company. The appointment of the new statutory auditors of the Company was completed only on 15 March 2019. The Company is still in the process of transitioning to its new statutory auditors.
- 2.3 The Company, in the course of its expansion, has also acquired (through its subsidiaries) additional businesses and assets during the previous financial year (2018-19). Acquisition of such additional businesses and assets during the previous financial year (2018-19) has resulted in a larger consolidated balance sheet of the Company.
- 2.4 Owing to the foregoing factors, the Company has not been able finalise its un-audited financial results and have them reviewed by its new statutory auditors.

**3. REQUEST FOR RELAXATION**

- 3.1 Regulations 101 and 102 of the Listing Regulations empower SEBI to take action to remove difficulties and relax strict enforcement of the Listing Regulations. We humbly submit that this may be considered as a fit case for SEBI to exercise its powers under the aforementioned Regulations, given the facts and circumstances surrounding the Company.
- 3.2 Based on the above facts and submissions, the Company humbly requests the SEBI for granting an extension for submitting its un-audited financial results (with limited review report of the statutory auditors) for the half year ended 31 March 2019 to BSE Limited pursuant to Regulation 52 of the Listing Regulations. The Company will endeavour to prepare and submit by 30 June 2019 its un-audited financial results (with limited review report of the statutory auditors) for the half year ended 31 March 2019 to BSE Limited.
- 3.3 In terms of Regulation 102(3), we've attached with this application a demand draft with the following details:

Amount (INR) : 1,00,000  
Date : 15 May 2019  
Number : 030803  
In favour of : Securities and Exchange Board of India  
Payable at : Mumbai  
Bank : HDFC Bank

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Website: www.gluhend.com

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We will be extremely grateful for the above relaxation / extension.

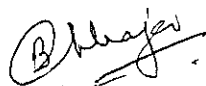
We are pleased to furnish any additional information as may be required by your kind self in support of this application. Any request for further information may be addressed to:

Name : Bhupesh Chhajer  
Title : Director  
Address : #23, Floor-2, Plot-59/61, Arsiwala Mansion, Nathalal Parikh Marg, Colaba, Mumbai –  
400 005  
Email : compliance.gluhend@gmail.com

We will also promptly intimate BSE Limited and the debenture trustee, Vistra ITCL (India) Limited, in relation to the foregoing.

Thank You

For Gluhend India Private Limited



Bhupesh Chhajer  
Director