

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

Date: 14.04.2025

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 Operational Circular No. SEBI/HO/DDHS/P/CIR/ 2021/613 dated August 10, 2021 (updated as on April 13, 2022)

With reference to the above cited subject and with regards to Operational Circular No. SEBI/HO/DDHS/P/CIR/2021/613 dated August 10, 2021 (updated as on April 13, 2022), we hereby submit that pursuant to Chapter XII of the said circular, the Company does not fall under the definition of "Large Corporate".

In view of the above and as per Para 3 of Chapter XII 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 31.03.2025.

Kindly take the same on record.

Thanking you,
For PHOTON CAPITAL ADVISORS LIMITED

N. Sobharani

SOBHARANI NANDURY
WHOLE-TIME DIRECTOR
DIN: 00567002



Encl: Annexure-XII-A & XII-B2

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,

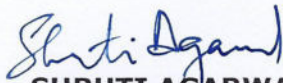
Website: <http://www.pcalindia.com/>, Email Id - info@pcalindia.com

Annexure-XII-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 2025 (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 Chapter XII of SEBI Operational circular dated August 10, 2021.



SHRUTI AGARWAL
COMPANY SECRETARY
info@pcalindia.com



SREEDHAR BABU KANURI
CHIEF FINANCIAL OFFICER
info@pcalindia.com

Date: 10.04.2025

**In terms para graph of 2.2 (d) of the circular, beginning FY 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.*

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

Annexure - XII-B2

Format of the Annual Disclosure to be made by an entity identified as a LC^{\$}

1. Name of the Company : PHOTON CAPITAL ADVISORS LIMITED
2. CIN : L65910TG1983PLC004368
3. Report filed for FY : 2024-25
4. Details of the Current block (all figures in Rs crore):

Sl. No.	Particulars	Details	
		2024-2025	2025-2026
1	2-year block period (Specify financial years)	2024-2025	2025-2026
2	Incremental borrowing done in FY (T) (a)	0	0
3	Mandatory borrowing to be done through debt securities in FY (T) (b) = (25% of a)	0	0
4	Actual borrowing done through debt securities in FY (T) (c)	0	0
5	Shortfall in the borrowing through debt securities, if any, for FY (T-1) carried forward to FY (T). (d)	0	0
6	Quantum of (d), which has been met from (c) (e)	0	0
7	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

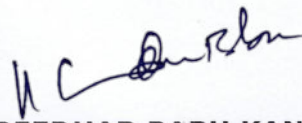
5. Details of penalty to be paid, if any, in respect to previous block (all figures in Rs crore):

Sl. No.	Particulars	Details	
		2023-2024	2024-2025
1	2-year block period (Specify financial years)	2023-2024	2024-2025
2	Amount of fine to be paid for the block, if applicable Fine = 0.2% of {(d)-(e)}#	0	0

* - 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 sl. Nos. 5 & 6 in table given at point no. 4 of this annexure.


SHRUTI AGARWAL
COMPANY SECRETARY
info@pcalindia.com


SREEDHAR BABU KANURI
CHIEF FINANCIAL OFFICER
info@pcalindia.com

Date: 10.04.2025