

March 18, 2025

To,
Securities and Exchange Board of India,
Corporate Finance Department
Division of Issues and Listing
SEBI Bhavan Plot No. C4 A, G Block,
Bandra Kurla Complex, Bandra East
Mumbai 400 051

### **DUE DILIGENCE CERTIFICATE**

Dear Sir/Madam,

SUB: PROPOSED INITIAL PUBLIC OFFEROF EQUITY SHARES OF ATC ENERGIES SYSTEM LIMITED

WE, THE BOOK RUNNING LEAD MANAGER TO THE ABOVE-MENTIONED FORTHCOMING OFFER STATE AND CONFIRM AS FOLLOWS:

- 1. WE HAVE EXAMINED VARIOUS DOCUMENTS INCLUDING THOSE RELATING TO LITIGATION, INCLUDING COMMERCIAL DISPUTES, PATENT DISPUTES, DISPUTES WITH COLLABORATORS, ETC. AND OTHER MATERIAL WHILE FINALISING THE RED HERRING PROSPECTUS OF THE SUBJECT OFFER.
- 2. ON THE BASIS OF SUCH EXAMINATION AND THE DISCUSSIONS WITH THE ISSUER, ITS DIRECTORS AND OTHER OFFICERS, OTHER AGENCIES, AND INDEPENDENT VERIFICATION OF THE STATEMENTS CONCERNING THE OBJECTS OF THE OFFER, PRICE JUSTIFICATION AND THE CONTENTS OF THE DOCUMENTS AND OTHER PAPERS FURNISHED BY THE ISSUER, WE CONFIRM THAT:
  - (a) THE RED HERRING PROSPECTUS FILED WITH THE EMERGE PLATFORM OF NATIONAL STOCK EXCHANGE OF INDIA LIMITED ("EXCHANGE") IS IN CONFORMITY WITH THE DOCUMENTS, MATERIALS AND PAPERS RELEVANT TO THE OFFER;
  - (b) ALL MATERIAL LEGAL REQUIREMENTS RELATING TO THE OFFER AS SPECIFIED BY THE SECURITIES EXCHANGE BOARD OF INDIA ("BOARD"), THE CENTRAL GOVERNMENT AND ANY OTHER COMPETENT AUTHORITY IN THIS BEHALF HAVE BEEN DULY COMPLIED WITH; AND
  - (c) THE MATERIAL DISCLOSURES MADE IN THE RED HERRING PROSPECTUS ARE TRUE, FAIR AND ADEQUATE TO ENABLE THE INVESTORS TO MAKE A WELL-INFORMED DECISION AS TO THE INVESTMENT IN THE PROPOSED OFFER AND SUCH DISCLOSURES ARE IN ACCORDANCE WITH THE REQUIREMENTS OF THE COMPANIES ACT, 2013, THE SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018 AND OTHER APPLICABLE LEGAL REQUIREMENTS.



- 3. WE CONFIRM THAT BESIDES OURSELVES, ALL THE INTERMEDIARIES NAMED IN THE RED HERRING PROSPECTUS ARE REGISTERED WITH THE BOARD AND THAT TILL DATE SUCH REGISTRATION IS VALID COMPLIED WITH
- 4. WE HAVE SATISFIED OURSELVES ABOUT THE CAPABILITY OF THE UNDERWRITERS TO FULFILL THEIR UNDERWRITING COMMITMENTS NOTED FOR COMPLIANCE
- 5. WE CERTIFY THAT WRITTEN CONSENT FROM PROMOTERS HAS BEEN OBTAINED FOR INCLUSION OF THEIR SPECIFIED SECURITIES AS PART OF PROMOTERS' CONTRIBUTION SUBJECT TO LOCK- IN AND THE SPECIFIED SECURITIES PROPOSED TO FORM PART OF PROMOTERS' CONTRIBUTION SUBJECT TO LOCK IN SHALL NOT BE DISPOSED / SOLD / TRANSFERRED BY THE PROMOTERS DURING THE PERIOD STARTING FROM THE DATE OF FILING THE RED HERRING PROSPECTUS WITH THE BOARD TILL THE DATE OF COMMENCEMENT OF LOCK-IN PERIOD AS STATED IN THE RED HERRING PROSPECTUS COMPLIED WITH AND NOTED FOR COMPLIANCE
- 6. WE CERTIFY THAT REGULATION 237 OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018, WHICH RELATES TO SPECIFIED SECURITIES INELIGIBLE FOR COMPUTATION OF PROMOTERS CONTRIBUTION, HAS BEEN DULY COMPLIED WITH AND APPROPRIATE DISCLOSURES AS TO COMPLIANCE WITH THE SAID REGULATION HAVE BEEN MADE IN THE RED HERRING PROSPECTUS COMPLIED WITH AND NOTED FOR COMPLIANCE
- 7. WE UNDERTAKE THAT SUB-REGULATION (2) OF REGULATION 236 AND CLAUSE (C) AND (D) OF SUB-REGULATION (9) OF REGULATION 25 OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018 SHALL BE COMPLIED WITH. WE CONFIRM THAT ARRANGEMENTS HAVE BEEN MADE TO ENSURE THAT PROMOTERS' CONTRIBUTION SHALL BE RECEIVED AT LEAST ONE DAY BEFORE THE OPENING OF THE OFFER. WE UNDERTAKE THAT AUDITORS' CERTIFICATE TO THIS EFFECT SHALL BE DULY SUBMITTED TO THE SEBI. WE FURTHER CONFIRM THAT ARRANGEMENTS HAVE BEEN MADE TO ENSURE THAT PROMOTERS' CONTRIBUTION SHALL BE KEPT IN AN ESCROW ACCOUNT WITH A SCHEDULED COMMERCIAL BANK AND SHALL BE RELEASED TO THE ISSUER ALONG WITH THE PROCEEDS OF THE PUBLIC ISSUE NOT APPLICABLE
- 8. WE CONFIRM THAT NECESSARY ARRANGEMENTS HAVE BEEN MADE TO ENSURE THAT THE MONEYS RECEIVED PURSUANT TO THE OFFER ARE KEPT IN A SEPARATE BANK ACCOUNT AS PER THE PROVISIONS OF SUB-SECTION (3) OF SECTION 40 OF THE COMPANIES ACT, 2013 AND THAT SUCH MONEYS SHALL BE RELEASED BY THE SAID BANK ONLY AFTER PERMISSION IS OBTAINED FROM ALL THE STOCK EXCHANGE MENTIONED IN THE RED HERRING PROSPECTUS. WE FURTHER CONFIRM THAT THE AGREEMENT ENTERED INTO BETWEEN THE BANKERS TO THE OFFER AND THE ISSUER SPECIFICALLY CONTAINS THIS CONDITION NOTED FOR COMPLIANCE
- 9. WE CERTIFY THAT THE EXISTING BUSINESS AS WELL AS ANY NEW BUSINESS OF THE ISSUER FOR WHICH THE FUNDS ARE BEING RAISED FALL WITHIN THE "MAIN OBJECTS" IN THE OBJECT CLAUSE OF THE MEMORANDUM OF ASSOCIATION OR OTHER CHARTER OF THE ISSUER AND THAT THE ACTIVITIES WHICH HAVE BEEN CARRIED IN THE LAST



TEN YEARS ARE VALID IN TERMS OF THE OBJECT CLAUSE OF THE MEMORANDUM OF ASSOCIATION. - COMPLIED WITH

- 10. WE CERTIFY THAT THE FOLLOWING DISCLOSURES HAVE BEEN MADE IN THE RED HERRING PROSPECTUS:
  - (a) AN UNDERTAKING FROM THE ISSUER THAT AT ANY GIVEN TIME, THERE SHALL BE ONLY ONE DENOMINATION FOR THE EQUITY SHARES OF THE ISSUER AND COMPLIED WITH
  - (b) AN UNDERTAKING FROM THE ISSUER THAT IT SHALL COMPLY WITH SUCH DISCLOSURE AND ACCOUNTING NORMS SPECIFIED BY THE BOARD FROM TIME TO TIME COMPLIED WITH AND NOTED FOR COMPLIANCE
- 11. WE UNDERTAKE TO COMPLY WITH THE REGULATIONS PERTAINING TO ADVERTISEMENT IN TERMS OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018 WHILE MAKING THE OFFER NOTED FOR COMPLIANCE

WE ENCLOSE A NOTE EXPLAINING THE PROCESS OF DUE DILIGENCE THAT HAS BEEN EXERCISED BY US INCLUDING IN RELATION TO THE BUSINESS OF THE ISSUER, THE RISKS IN RELATION TO THE BUSINESS, EXPERIENCE OF THE PROMOTERS AND THAT THE RELATED PARTY TRANSACTIONS ENTERED INTO FOR THE PERIOD DISCLOSED IN THE OFFER DOCUMENT HAVE BEEN ENTERED INTO BY THE ISSUER IN ACCORDANCE WITH APPLICABLE LAWS.

WE ENCLOSE A CHECKLIST CONFIRMING REGULATION-WISE COMPLIANCE WITH THE APPLICABLE PROVISIONS OF THE SECURITIES AND EXCHANGE ROARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018, CONTAINING DETAILS SUCH AS THE REGULATION NUMBER, ITS TEXT, THE STATUS OF COMPLIANCE, PAGE NUMBER OF THE RED HERRING PROSPECTUS WHERE THE REGULATION HAS BEEN COMPLIED WITH AND OUR COMMENTS, IF ANY.

ADDITIONAL CONFIRMATIONS/ CERTIFICATION TO BE GIVEN BY BOOK RUNNING LEAD MANAGER IN DUE DILIGENCE CERTIFICATE TO BE GIVEN ALONG WITH OFFER DOCUMENT REGARDING SME EXCHANGE.

## **WE CONFIRM THAT:**

- 1. NONE OF THE INTERMEDIARIES NAMED IN THE RED HERRING PROSPECTUS HAVE BEEN DEBARRED FROM FUNCTIONING BY ANY REGULATORY AUTHORITY -COMPLIED WITH
- 2. THE ABRIDGED PROSPECTUS CONTAINS ALL THE DISCLOSURES AS SPECIFIED IN THE SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018. NOTED FOR COMPLIANCE
- 3. ALL THE MATERIAL DISCLOSURES IN RESPECT OF THE ISSUER HAVE BEEN MADE IN RED HERRING PROSPECTUS AND CERTIFY THAT ANY MATERIAL DEVELOPMENT IN THE ISSUER OR RELATING TO THE OFFER UP TO THE COMMENCEMENT OF LISTING AND TRADING OF THE SPECIFIED SECURITIES OFFERED THROUGH THIS OFFER SHALL BE



INFORMED THROUGH PUBLIC NOTICES/ADVERTISEMENTS IN ALL THOSE NEWSPAPERS IN WHICH PRE-ISSUE ADVERTISEMENT AND ADVERTISEMENT FOR OPENING OR CLOSURE OF THE OFFER HAVE BEEN GIVEN. - COMPLIED WITH AND NOTED FOR COMPLIANCE

- 4. AGREEMENTS HAVE BEEN ENTERED INTO WITH THE DEPOSITORIES FOR DEMATERIALISATION OF THE SPECIFIED SECURITIES OF THE ISSUER COMPLIED WITH
- 5. THAT UNDERWRITING AND MARKET MAKING ARRANGEMENTS AS PER REQUIREMENTS OF REGULATION 260 AND 261 OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018, HAVE BEEN MADE COMPLIED WITH
- 6. THE ISSUER HAS REDRESSED AT LEAST NINETY-FIVE PER CENT OF THE COMPLAINTS RECEIVED FROM THE INVESTORS TILL THE END OF THE QUARTER IMMEDIATELY PRECEDING THE MONTH OF THE FILING OF THE OFFER DOCUMENT WITH THE REGISTRAR OF COMPANIES WITH THE SME EXCHANGE NOTED FOR COMPLIANCE

Thanking you,

**Indorient Financial Services Limited** 

Authorised Signatory Name: Ivor Anil Misquith

**Designation: Joint Managing Director and CEO** 

DIN: 07025270



### NOTE ON THE PROCESS OF DUE DILIGENCE

Following details summarize our process of Due Diligence with respect to the proposed Initial Public Offer of ATC ENERGIES SYSTEM LIMITED ("Issuer") on EMERGE PLATFORM OF NATIONAL STOCK EXCHANGE OF INDIA LIMITED:

Current business background about the operational structure and the Business Strategy:

I, Ivor Anil Misquith, Joint Managing Director and Chief Executive Officer of Indorient Financial Services Limited (Book Running Lead Manager to the offer) visited the offices of the Issuer.

- 1. Inspected the offices, infrastructure, staffing systems and procedures w.r.t, the Company's business. Also examined various documents including those relating to litigations, approvals, disputes with statutory authorities and other material documents in connection with the finalization of the Red Herring Prospectus pertaining to the said offer.
- 2. Had discussions with the Board of Directors, KMP's including the support staff regarding the business operations and related activities of the Company and gone through other documents / website in order to further understand the actual procedures of business.

We have disclosed the relevant details about the issuer in the Section titled "Our Business" in the Red Herring Prospectus.

### **Risks Factors:**

We have studied the factors related to Company operations. While risks are an inherent part of any business, we have put forth the risk associated with the Company, its business operations and compliance with laws and regulations. We believe this with reasonable certainty that almost all material risks (which we are aware of and have been made aware of and have discovered during our due diligence process) have been disclosed in the Red Herring Prospectus under the head "Risk Factors". We have further bifurcated the Risks into Risks pertaining to the Internal Risks of the Company, Risks related to Offer & Equity shares and External Risks.

## **Promoter's Background:**

The Promoters of the Issuer Company are: -

a. Mr. Sandeep Gangbishan Bajoria

We have disclosed the relevant details about the Promoters and their experience in the Section titled "Our Promoters and Promoter Group" in the Red Herring Prospectus.

M/s. Crawford Bayley & Co. were appointed as Legal Counsel to the Offer to perform the Due Diligence in all Legal aspects of the Company as well as its Promoters, Promoters' Group, Promoter Group Company.

## **Company History And Track Record Etc:**



- 1. We have interacted with the Statutory Auditor of the Company M/S. A Kasliwal & Company, Chartered Accountants, Mumbai, Maharashtra about the aspects of Finance and aspects relating to the Audited & Restated Financial Statements including related party transactions of the Company for six-month ended September 30, 2024 and financial year ended as on March 31, 2024, 2023 and 2022.
- 2. We have had elaborate discussions with the Legal Advisors to the Offer with respect to the legal matters pertaining to the Issuer, Promoter, Promoter Group, Directors and the Group Company.
- 3. We examined the MOA and AOA of the Company, relevant Board and Shareholder Resolutions of the Company and confirm that the Issuer Company is eligible to offer their shares to public through the SME IPO.
- 4. Since Company is going public, the Company will take necessary steps to comply with the Corporate Governance norms as per the requirement of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, listing agreement to be entered with NSE India Limited and other Statutory Provisions. Consequently, the Company has already broad based its Board with experienced and qualified Independent Directors and also formed the Audit and other required committees with the directors of the Company.

Further, we have cross checked all the material details as disclosed in Red Herring Prospectus and ensured that the same are in compliance with the SEBI (ICDR) Regulations, 2018 and any amendments made to the same thereof. Kindly take note.

For & on behalf of Indorient Financial Services Limited

Authorised Signatory

Name: Ivor Anil Misquith

**Designation: Joint Managing Director and CEO** 

DIN: 07025270



# CHECKLIST FOR COMPLIANCE WITH CHAPTER IX (SME) AND PART A OF SCHEDULE VI OF SEBI (ISSUE OF CAPITAL AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2018

Regula tion	CHAPTER –IX: INITIAL PUBLIC OFFER BY SMALL AND MEI Text	Complied with- Y/N/NA	Pg. No.	Comment
227	Unless otherwise provided in this Chapter, an issuer making an initial public offer of specified securities shall satisfy the conditions of this Chapter as on the date of filing of the draft offer document with the SME exchange and also as on the date of filing the offer document with the Registrar of Companies.	Complied with	-	
	ELIGIBILITY REQUIREMENTS			
	not eligible to make an initial public offer			
228	An issuer shall not be eligible to make an initial public offer:	Complied with	169, 184- 185, 215, 219	
	(a) if the issuer, any of its promoters, promoter group or directors or selling shareholders are debarred from accessing the capital market by the Board;			
	(b) if any of the promoters or directors of the issuer is a promoter or director of any other company which is debarred from accessing the capital market by the Board;			
	<ul><li>(c) if the issuer or any of its promoters or directors is a wilful defaulter or a fraudulent borrower.</li><li>(d) if any of its promoters or directors is a fugitive economic offender.</li></ul>	_		
	Explanation: The restrictions under clauses (a) and (b) shall not apply to the persons or entities mentioned therein, who were debarred in the past by the Board and the period of debarment is already over as on the date of filing of the draft offer document with the SME Exchange.			
Eligibili	ty requirements for an initial public offer			
229(1)	An issuer shall be eligible to make an initial public offer only if its post- issue face value paid-up capital is less than or equal to ten crore rupees.	Not Applicable	-	
229(2)	An issuer, whose post issue face value capital is more than ten crore rupees and up to twenty-five crore rupees, may also issue specified securities in accordance with provisions of this Chapter.	Complied with	Cover page, 216, 248	
229(3)	An issuer may make an initial public offer, if it satisfies track record and/or other eligibility conditions of the SME Exchange(s) on which the specified securities are proposed to be listed. Provided that In case of an issuer which had been a partnership firm or a limited liability partnership, the track record of operating profit of the partnership firm or the limited liability partnership shall be considered only if the	Not Applicable	-	
	or the limited liability partnership shall be considered only if the financial statements of the partnership business for the period during which the issuer was a partnership firm or a limited liability partnership, conform to and are revised in the format prescribed for companies under the Companies Act, 2013 and also comply with the following:	N		
	a) adequate disclosures are made in the financial statements as required to be made by the issuer as per <b>Schedule III</b> of the Companies Act, 2013;	Not Applicable	-	
	b) the financial statements are duly certified by auditors, who have subjected themselves to the peer review process of the Institute of Chartered Accountants of India (ICAI) and hold a valid certificate	Not Applicable	-	



	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME			
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
	issued by the Peer Review Board of the ICAI, stating that:  (i) the accounts and the disclosures made are in accordance with the provisions of Schedule III of the Companies Act, 2013;	Not Applicable	-	
	(ii) the accounting standards prescribed under the Companies Act, 2013 have been followed;	Not Applicable	-	
	(iii) the financial statements present a true and fair view of the firm's accounts;	Not Applicable	-	
1	Provided further that in case of an issuer formed out of merger or a division of an existing company, the track record of the resulting issuer shall be considered only if the requirements regarding financial statements as specified above in the first proviso are complied with.	Not Applicable	-	
General	conditions			
230(1)	An issuer making an initial public offer shall ensure that:			
	(a) it has made an application to one or more SME exchanges for listing of its specified securities on such SME exchange(s) and has chosen one of them as the designated stock exchange, in terms of Schedule XIX:	Noted for Complianc e	219	
	(b) it has entered into an agreement with a depository for dematerialisation of its specified securities already issued and proposed to be issued	Complied with	219	
	(c) all its existing partly paid-up equity shares have either been fully paid-up or forfeited;	Complied with	219	
	(d) all specified securities held by the promoters are in the dematerialised form;	Complied with	219	
	(e) it has made firm arrangements of finance through verifiable means towards seventy-five per cent. of the stated means of finance for the project proposed to be funded from the issue proceeds, excluding the amount to be raised through the proposed public offer or through existing identifiable internal accruals.  Explanation: "project" means the object for which monies are proposed to be raised to cover the objects of the issue.	Not Applicable	85	,
230(2)	The amount for general corporate purposes, as mentioned in objects of the issue in the draft offer document and the offer document shall not exceed twenty-five per cent. of the amount being raised by the issuer.	Complied with	85, 93, 219	
230(3)	The amount for:  (i) general corporate purposes, and  (ii) such objects where the issuer company has not identified acquisition or investment target, as mentioned in objects of the issue in the draft offer document and the offer document,	Complied with	93	,
	shall not exceed thirty-five percent of the amount being raised by the issuer:			
	Provided that the amount raised for objects where the issuer company has not identified acquisition or investment target, as mentioned in objects of the issue in the draft offer document and the offer document, shall not exceed twenty-five per cent. of the amount being raised by the issuer.			
	Provided further that such limits shall not apply if the proposed acquisition or strategic investment object has been identified and			1



Regula	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME	Complied	Pg.	Comment
tion	Text	with- Y/N/NA	No.	S
	suitable specific disclosures about such acquisitions or investments are made in the draft offer document and the offer document at the time of filing of offer documents."			
PART II	I: ISSUE OF CONVERTIBLE DEBT INSTRUMENTS AND WARRA	NTS		l.
231	An issuer shall be eligible to make an initial public offer of convertible	Not	-	
	debt instruments even without making a prior public issue of its equity shares and listing thereof.	Applicable		
	Provided that an issuer shall not be eligible if it is in default of payment			
	of interest or repayment of principal amount in respect of debt			
	instruments issued by it to the public, if any, for a period of more than			
1	six months.			
	nal requirements for issue of convertible debt instruments			1
232(1)	In addition to other requirements laid down in these regulations, an	Not	-	
N.	issuer making an initial public offer of convertible debt instruments	Applicable		
1.0	shall also comply with the following conditions:			
1 N	a) it has obtained credit rating from at least one credit rating agency;	NI-4		
	b) it has appointed at least one debenture trustees in accordance with the provisions of the Companies Act, 2013 and the Securities and Exchange	Not Applicable	-	
	Board of India (Debenture Trustees) Regulations, 1993;	Applicable		
	c) it shall create a debenture redemption reserve in accordance with the	Not	_	
	provisions of the Companies Act, 2013 and the rules made thereunder;	Applicable		
	d) if the issuer proposes to create a charge or security on its assets in	Not	-	
	respect of secured convertible debt instruments, it shall ensure that:	Applicable		
	i) such assets are sufficient to discharge the principal amount at all	Not	-	
	times;	Applicable		
	ii) such assets are free from any encumbrance;	Not	-	
		Applicable		
	iii) where security is already created on such assets in favour of any		-	
/	existing lender or security trustee or the issue of convertible debt	Not		
	instruments is proposed to be secured by creation of security on a	Applicable		
	leasehold land, the consent of such lender or security trustee or lessor			
	for a second or pari passu charge has been obtained and submitted to the debenture trustee before the opening of the issue;			
	iv) the security or asset cover shall be arrived at after reduction of the	Not	_	
	liabilities having a first or prior charge, in case the convertible debt	Applicable		
	instruments are secured by a second or subsequent charge.	- FF		
232(2)	The issuer shall redeem the convertible debt instruments as stipulated in	Not	-	
	the offer document.	Applicable		
	ion of optionally convertible debt instruments into equity share capital			1
233(1)	The issuer shall not convert its optionally convertible debt instruments	Not	-	
	into equity shares unless the holders of such convertible debt	Applicable		
	instruments have sent their positive consent to the issuer and non-			
	receipt of reply to any notice sent by the issuer for this purpose shall not			
	be construed as consent for conversion of any convertible debt instruments			
233(2)	Where the value of the convertible portion of any listed convertible debt	Not	_	
_55(2)	instruments issued by a issuer exceeds fifty lakh rupees and the issuer	Applicable		
	has not determined the conversion price of such convertible debt	-F F		
	instruments at the time of making the issue, the holders of such			
	convertible debt instruments shall be given the option of not converting			
	the convertible portion into equity shares:			1



CHAPTER IV. INITIAL PUBLIC OFFER BY SMALL AND MEDIUM ENTERPRISES					
D 1 .	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME				
Regula	Text	Complied	Pg.	Comment	
tion		with- Y/N/NA	No.	S	
- 7		1/1\/1\A			
	Provided that where the upper limit on the price of such convertible				
	debt instruments and justification thereon is determined and disclosed to				
	the investors at the time of making the issue, it shall not be necessary to				
	give such option to the holders of the convertible debt instruments for				
	converting the convertible portion into equity share capital within the				
233(3)	said upper limit.  Where an option is to be given to the holders of the convertible debt	Not			
233(3)			_		
	instruments in terms of sub-regulation (2) and if one or more of such	Applicable			
	holders do not exercise the option to convert the instruments into equity				
	share capital at a price determined in the general meeting of the				
	shareholders, the issuer shall redeem that part of the instruments within	1			
	one month from the last date by which option is to be exercised, at a				
	price which shall not be less than its face value.				
233(4)	The provision of sub-regulation (3) shall not apply if such redemption is	Not	-		
ì	in terms of the disclosures made in the offer document.	Applicable			
Issue of	convertible debt instruments for financing	I II ·····	I		
234	An issuer shall not issue convertible debt instruments for financing or	Not	_		
	for providing loans to or for acquiring shares of any person who is part	Applicable			
	of the promoter group or group companies;	пррисцеге			
	Provided that an issuer shall be eligible to issue fully convertible debt				
	instruments for these purposes if the period of conversion of such debt				
	instruments is less than eighteen months from the date of issue of such				
T 0	debt instruments.				
	warrants	37.		1	
235	An issuer shall be eligible to issue warrants in an initial public offer	Not	-		
	subject to the following:	Applicable			
	a) the tenure of such warrants shall not exceed eighteen months from	Not	-		
	their date of allotment in the initial public offer;	Applicable			
	b) A specified security may have one or more warrants attached to it;	Not	-	10	
		Applicable			
	c) the price or formula for determination of exercise price of the	Not	-		
	warrants shall be determined upfront and disclosed in the offer	Applicable			
	document and at least twenty-five per cent. of the consideration amount				
	based on the exercise price shall also be received upfront;				
	Provided that in case the exercise price of warrants is based on a	Not	_		
	formula, twenty-five per cent. consideration amount based on the cap	Applicable			
		Applicable			
	price of the price band determined for the linked equity shares or				
	convertible securities shall be received upfront.;			10	
	d) in case the warrant holder does not exercise the option to take equity	Not	-		
	shares against any of the warrants held by the warrant holder, within	Applicable			
	three months from the date of payment of consideration, such				
	consideration made in respect of such warrants shall be forfeited by the				
	issuer.				
	II: PROMOTERS' CONTRIBUTION				
	m promoters' contribution		r	_	
236(1)	The promoters of the issuer shall hold at least twenty per cent. of the	Complied	78		
	post-issue capital:	with			
	•				
	Provided that in case the post-issue shareholding of the promoters is less				
	than twenty per cent., alternative investment funds or foreign venture			12.0	
	capital investors or scheduled commercial banks or public financial			8	
	capital investors of selectured commercial banks of public illiancial	L	L		



9	CHAPTER –IX: INITIAL PUBLIC OFFER BY SMALL AND MEDIUM ENTERPRISES			
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
	institutions or insurance companies registered with Insurance Regulatory and Development Authority of India [or any non-individual public shareholder holding at least five per cent. of the post-issue capital or any entity (individual or non-individual) forming part of promoter group other than the promoter(s)] may contribute to meet the shortfall in minimum contribution as specified for the promoters, subject to a maximum of ten per cent. of the post-issue capital without being identified as promoter(s);	272.02.02		
1	Provided further that the requirement of minimum promoters' contribution shall not apply in case an issuer does not have any identifiable promoter			
236(2)	The minimum promoters' contribution shall be as follows:  a) the promoters shall contribute twenty per cent. as stipulated subregulation (1), as the case may be, either by way of equity shares or by way of subscription to the convertible securities:  Provided that if the price of the equity shares allotted pursuant to conversion is not pre-determined and not disclosed in the offer document, the promoters shall contribute only by way of subscription to the convertible securities being issued in the public offer and shall undertake in writing to subscribe to the equity shares pursuant to conversion of such securities.	Complied with	78 - 80	
	b) in case of any issue of convertible securities which are convertible or exchangeable on different dates and if the promoters' contribution is by way of equity shares (conversion price being pre-determined), such contribution shall not be at a price lower than the weighted average price of the equity share capital arising out of conversion of such securities.	Not Applicable	-	
	c) subject to the provisions of clause (a) and (b) above, in case of an initial public offer of convertible debt instruments without a prior public issue of equity shares, the promoters shall bring in a contribution of at least twenty per cent. of the project cost in the form of equity shares, subject to contributing at least twenty per cent. of the issue size from its own funds in the form of equity shares:	Not Applicable	-	
	Provided that if the project is to be implemented in stages, the promoters' contribution shall be with respect to total equity participation till the respective stage vis-à-vis the debt raised or proposed to be raised through the public offer.			
	d) The promoters shall satisfy the requirements of this regulation at least one day prior to the date of opening of the issue.	Noted for complianc e	-	
	e) In case the promoters have to subscribe to equity shares or convertible securities towards minimum promoters' contribution, the amount of promoters' contribution shall be kept in an escrow account with a scheduled commercial bank, which shall be released to the issuer along with the release of the issue proceeds:	Noted for complianc e	-	
	Provided that where the promoters' contribution has already been brought in and utilised, the issuer shall give the cash flow statement disclosing the use of such funds in the offer document;	Noted for Complianc e	-	



	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME			
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
- //	<b>Explanation:</b> For the purpose of this regulation:			
	(I) Promoters' contribution shall be computed on the basis of post-issue expanded capital:			
	(a) assuming full proposed conversion of convertible securities into equity shares.			
	(b) assuming exercise of all vested options, where any employee stock options are outstanding at the time of initial public offer.			
	(II) For computation of "weighted average price":			
	(a) "weights" means the number of equity shares arising out of conversion of such specified securities into equity shares at various stages.			
	(b) "price" means the price of equity shares on conversion arrived at			
	after taking into account predetermined conversion price at various stages.			
Securiti	es ineligible for minimum promoters' contribution			•
237(1)	For the computation of minimum promoters' contribution, the following specified securities shall not be eligible:	Complied with	79-80	
	(a) specified securities acquired during the preceding three years, if they	With		
	are:  (i) acquired for consideration other than cash and revaluation of assets			
	or capitalisation of intangible assets is involved in such transaction; or			
	(ii) resulting from a bonus issue by utilisation of revaluation reserves or unrealised profits of the issuer or from bonus issue against equity shares which are ineligible for minimum promoters' contribution;			
	(b) specified securities acquired by the promoters and alternative			
	investment funds or foreign venture capital investors or scheduled commercial banks or public financial institutions or insurance			
	companies registered with Insurance Regulatory and Development			
	Authority of India, [or any non-individual public shareholder holding at least five percent of the post-issue capital or any entity (individual or			
	non-individual) forming part of the promoter group other than the			
	promoter(s)], during the preceding one year at a price lower than the price at which specified securities are being offered to the public in the			
	initial public offer:			
	Provided that nothing contained in this clause shall apply:	Not		
	(i) if the promoters and alternative investment funds foreign venture capital investors or scheduled commercial banks or public financial	Not Applicable	-	
	institutions or insurance companies with Insurance Regulatory and			
	Development Authority of India [or any non-individual public shareholder holding at least five percent of the post-issue capital or any			
	entity (individual or non-individual) forming part of the promoter group			
	other than the promoter(s)], as applicable, pay to the issuer the difference between the price at which the specified securities are offered			
	in the initial public offer and the price at which the specified securities had been acquired;			
	(ii) if such specified securities are acquired in terms of the scheme under	Not	-	
	sections 230 to 234 of the Companies Act, 2013, as approved by a High Court or a tribunal, as applicable, by the promoters in lieu of business	Applicable		
	and invested capital that had been in existence for a period of more than			
	one year prior to such approval;			



	CHAPPED IV. INPULL DUDI IC OFFED BY SMALL AND ME			rvices Lim
Regula tion	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND MEI Text	Complied with-	Pg. No.	Comment
	(iii) to an initial public offer by a government company, statutory authority or corporation or any special purpose vehicle set up by any of them, which is engaged in the infrastructure sector;	Y/N/NA Not Applicable		
	(iv) to equity shares arising from the conversion or exchange of fully paid-up compulsorily convertible securities, including depository receipts, that have been held by the promoters and alternative investment funds or foreign venture capital investors or scheduled commercial banks or public financial institutions or insurance companies registered with Insurance Regulatory and Development Authority of India or [any non-individual public shareholder holding at least five per cent. of the post-issue capital or any entity (individual or non-individual) forming part of promoter group other than the	Not Applicable	-	
	promoter(s)], as applicable, for a period of at least one year prior to the filing of the draft offer document and such fully-paid up compulsorily convertible securities are converted or exchanged into equity shares prior to the filing of the offer document (i.e. red herring prospectus in case of a book built issue and prospectus in case of a fixed price issue), provided that full disclosures of the terms of conversion or exchange are made in such draft offer document.			
	(c) specified securities allotted to the promoters and alternative investment funds during the preceding one year at a price less than the issue price, against funds brought in by them during that period, in case of an issuer formed by conversion of one or more partnership firms or limited liability partnerships, where the partners of the erstwhile partnership firms or limited liability partnerships are the promoters of the issuer and there is no change in the management:	Not Applicable	-	
	Provided that specified securities, allotted to the promoters against the capital existing in such firms for a period of more than one year on a continuous basis, shall be eligible;			
	(d) specified securities pledged with any creditor.	Not Applicable	80	We hav inserted negative statement to thi effect
237(2)	Specified securities referred to in clauses (a) and (c) of sub-regulation (1) shall be eligible for the computation of promoters' contribution, if such securities are acquired pursuant to a scheme which has been approved under the Companies Act, 2013 or any previous company law.	Not Applicable	-	
	V: LOCK-IN AND RESTRICTIONS ON TRANSFERRABILITY of specified securities held by the promoters			
238	The specified securities held by the promoters shall not be transferable (hereinafter referred to as 'lock-in') for the periods as stipulated hereunder:  a) minimum promoters' contribution including contribution made by	Complied	78	
	alternative investment funds or foreign venture capital investors or scheduled commercial banks or public financial institutions or insurance companies registered with Insurance Regulatory and Development Authority of India, [or any non-individual public shareholder holding at least five percent of the post-issue capital or any entity (individual or	with		

0//	CHA DEED WY TAYOU A STORY OF COMMENT			rvices Lim
D 1	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND MEI			
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
	non-individual) forming part of the promoter group other than the promoter(s)] as applicable, shall be locked-in for a period of three years from the date of commencement of commercial production or date of allotment in the initial public offer, whichever is later; b) promoters' holding in excess of minimum promoters' contribution	Complied	78 - 80	
	shall be locked-in for a period of one year from the date of allotment in the initial public offer	with		
	<b>Explanation:</b> For the purposes of this clause, the expression "date of commencement of commercial production" means the last date of the			
7	month in which commercial production of the project in respect of which the funds raised are proposed to be utilised as stated in the offer			
V	document, is expected to commence.			
239	The entire pre-issue capital held by persons other than the promoters shall be locked-in for a period of one year from the date of allotment in the initial public offer:	Complied with	80- 81	
- A	Provided that nothing contained in this regulation shall apply to:			
\ \	a) equity shares allotted to employees, whether currently an employee		-	
	or not, under an employee stock option or employee stock purchase	Not		
	scheme of the issuer prior to the initial public offer, if the issuer has	Applicable		
	made full disclosures with respect to such options or scheme in			
	accordance with Part A of Schedule VI;	-		
	b) equity shares held by an employee stock option trust or transferred to the employees by an employee stock option trust pursuant to exercise of	Not	-	
1	options by the employees, whether currently employees or not, in	Applicable		
	accordance with the employee stock option plan or employee stock	Applicable		
0.	purchase scheme.			
	Provided that the equity shares allotted to the employees shall be subject		-	
	to the provisions of lock-in as specified under the Securities and	Not		
	Exchange Board of India (Share Based Employee Benefits and Sweat	Applicable		
	Equity) Regulations, 2021.			
	c) equity shares held by a venture capital fund or alternative investment	Not	-	
	fund of category I or Category II or a foreign venture capital investor:	Applicable		
	Provided that such equity shares shall be locked in for a period of at			
	least one year from the date of purchase by the venture capital fund or			
	alternative investment fund or foreign venture capital investor.			
	<b>Explanation:</b> For the purpose of clause (c), in case such equity shares			
	have resulted pursuant to conversion of fully paid-up compulsorily			
	convertible securities, the holding period of such convertible securities			
	as well as that of resultant equity shares together shall be considered for			
	the purpose of calculation of one year period and convertible securities			
	shall be deemed to be fully paid-up, if the entire consideration payable			
	thereon has been paid and no further consideration is payable at the time of their conversion.			
I ook in		ion		
240	of specified securities lent to stabilising agent under the green shoe optor.  The lock-in provisions shall not apply with respect to the specified	Not		
∠ <del>+</del> U	securities lent to stabilising agent for the purpose of green shoe option,	Applicable	-	
	during the period starting from the date of lending of such specified	ripplicable		
	securities and ending on the date on which they are returned to the			
	lender in terms of sub-regulation (5) or (6) of regulation279:			
	Provided that the specified securities shall be locked-in for the	Not	_	
	remaining period from the date on which they are returned to the lender.	Applicable		
Inscripti	on or recording of non-transferability			



- 5				rvices Lim
D 1	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME			
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
241	The certificates of specified securities which are subject to lock-in shall	Noted for	-	
	contain the inscription "non- transferable" and specify the lock-in	complianc		
	period and in case such specified securities are dematerialised, the	e		
	issuer shall ensure that the lock-in is recorded by the depository.			
Pledge o	f locked-in specified securities			
242	Specified securities held by the promoters and locked-in may be	Noted for	80 - 81	
	pledged as a collateral security for a loan granted by a scheduled	complianc		
	commercial bank or a public financial institution or a systemically	e		
	important non-banking finance company or a housing finance company,			
	subject to the following:			
	a) if the specified securities are locked-in in terms of clause (a) of	Noted for		
	regulation 238, the loan has been granted to the issuer company or its	complianc		
	subsidiary(ies) for the purpose of financing one or more of the objects	e		
	of the issue and pledge of specified securities is one of the terms of			
	sanction of the loan;			
	b) if the specified securities are locked-in in terms of clause (b) of	Noted for		
	regulation 238 and the pledge of specified securities is one of the terms	complianc		
	of sanction of the loan.	e		
	<b>Provided that</b> such lock-in shall continue pursuant to the invocation of	Noted for	-	
	the pledge and such transferee shall not be eligible to transfer the	complianc		
	specified securities till the lock-in period stipulated in these regulations	e		
	has expired.			
Transfe	rability of locked-in specified securities	•	•	•
243	Subject to the provisions of Securities and Exchange Board of India	Noted for	80	
	(Substantial Acquisition of shares and Takeovers) Regulations, 2011,	complianc		
	the specified securities held by the promoters and locked-in as per	e		
	regulation 238 may be transferred to another promoter or any person of			
	the promoter group or a new promoter or a person in control of the			
	issuer and the specified securities held by persons other than the			
	promoters and locked-in as per regulation 239 may be transferred to any			
	other person (including promoter or promoter group) holding the			
	specified securities which are locked-in along with the securities			
	proposed to be transferred:			
	Provided that the lock-in on such specified securities shall continue for			
	the remaining period with the transferee and such transferee shall not be			
	eligible to transfer them till the lock-in period stipulated in these			
	regulations has expired.			
	V: APPOINTMENT OF LEAD MANAGERS, OTHER INTERME	EDIARIES A	ND CON	MPLIANCE
OFFICE		1	1	1
244(1)	The issuer shall appoint one or more merchant bankers, which are	Complied	60	
	registered with the Board, as lead manager(s) to the issue.	with		
244(2)	Where the issue is managed by more than one lead manager, the rights,	Not	60	We have
	obligations and responsibilities, relating inter alia to disclosures,	Applicable		inserted a
	allotment, refund and underwriting obligations, if any, of each lead			negative
	manager shall be predetermined and disclosed in the draft offer			statement
	document and the offer document as specified in <b>Schedule I.</b>			to this
	.39)			effect
244(3)	At least one lead manager to the issue shall not be an associate (as	Complied	82	
		with		
	Bankers) Regulations, 1992) of the issuer and if any of the lead manager			
	is an associate of the issuer, it shall disclose itself as an associate of the			
	issuer and its role shall be limited to marketing of the issue.			
14(3)	At least one lead manager to the issue shall not be an associate (as defined under the Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992) of the issuer and if any of the lead manager is an associate of the issuer, it shall disclose itself as an associate of the		82	to th



CHAPTER –IX: INITIAL PUBLIC OFFER BY SMALL AND MEDIUM ENTERPRISES					
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment	
244(4)	The issuer shall, in consultation with the lead manager(s), appoint other intermediaries which are registered with the Board after the lead manager(s) have independently assessed the capability of other intermediaries to carry out their obligations.	Complied with	61		
244(5)	The issuer shall enter into an agreement with the lead manager(s) in the format specified in <b>Schedule II</b> and enter into agreements with other intermediaries as required under the respective regulations applicable to the intermediary concerned:	Complied with	221		
	Provided that such agreements may include such other clauses as the issuer and the intermediary may deem fit without diminishing or limiting in any way the liabilities and obligations of the lead manager(s), other intermediaries and the issuer under the Act, the Companies Act, 2013 the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and the rules and regulations made thereunder or any statutory modification or statutory enactment thereof:				
	Provided further that in case of ASBA process, the issuer shall take cognisance of the deemed agreement of the issuer with self-certified syndicate banks.				
244(6)	The issuer shall, in case of an issue made through the book building process, appoint syndicate member(s) and in the case of any other issue, appoint bankers to issue, at centres specified in <b>Schedule XII</b> .	Noted for complianc e	61		
244(7)	The issuer shall appoint a registrar to the issue, registered with the Board, which has connectivity with all the depositories:	Complied with	61,63		
	Provided that if issuer itself is a registrar, it shall not appoint itself as registrar to the issue;				
	Provided further that the lead manager shall not act as a registrar to the issue in which it is also handling the post-issue responsibilities.			1	
244(8)	The issuer shall appoint a compliance officer who shall be responsible for monitoring the compliance of the securities laws and for redressal of investors' grievances.	Complied with	60		
	I: DISCLOSURES IN AND FILING OF OFFER DOCUMENTS				
245(1)	The offer document shall contain all material disclosures which are true and adequate so as to enable the applicants to take an informed investment decision.	Complied with and Noted for Complianc e	20, 220	1	
245(2)	Without prejudice to the generality of sub-regulation (1), the offer document shall contain:	Complied with and Noted for Complianc e	-		
	<ul><li>a) disclosures specified in the Companies Act, 2013; and</li><li>b) disclosures specified in <b>Part A</b> of <b>Schedule VI</b>.</li></ul>				
245(3)	The lead manager(s) shall exercise due diligence and satisfy themselves	Complied	61,		
<u> </u>	about all aspects of the issue including the veracity and adequacy of disclosure in the draft offer document and the offer document.	with and Noted for Complianc	220, 303		



tion  245(4) The lead manager(s) shall call upon the issuer, its promoters and its directors or in case of an offer for sale, also the selling shareholders, to fulfil their obligations as disclosed by them in the draft offer document or offer document, as the case may be, and as required in terms of these regulations.  245(5) The lead manager(s) shall ensure that the information contained in the offer document and the particulars as per audited financial statements in the offer document are not more than six months old from the issue opening date.  Filing of the offer document  246(1) The issuer shall file a copy of the offer document with the Stock Exchange through the lead manager(s), immediately upon filing of the offer document with the Registrar of Companies.  246(2) The Board shall not issue any observation on the offer document.  The lead manager(s) shall submit a due-diligence certificate as per Form A of Schedule V including additional confirmations as provided in Form G of Schedule V along with the offer document to the Board.  246(4) The offer document shall be displayed from the date of filing in terms of sub-regulation (1) on the websites of the issuer, the Board, the lead manager(s) and the SME exchange(s).	D 1	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND MEI			
directors or in case of an offer for sale, also the selling shareholders, to fulfil their obligations as disclosed by them in the draft offer document or offer document, as the case may be, and as required in terms of these regulations.  245(5) The lead manager(s) shall ensure that the information contained in the offer document and the particulars as per audited financial statements in the offer document are not more than six months old from the issue opening date.  Piling of the offer document  The issuer shall file a copy of the offer document with the Stock Exchange through the lead manager(s), immediately upon filing of the offer document with the Registrar of Companies.  The Board shall not issue any observation on the offer document.  The offer document shall be displayed from the date of filing in terms of sub-regulation (1) on the websites of the issuer, the Board, the lead manager(s) and the SME exchange(s).  The offer document shall also be furnished to the Board in a soft copy.  Offer document to be made available to public  247(1) The issuer and the lead manager(s) shall ensure that the offer documents are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Companies, Board and the SME exchange(s).  The lead manager(s) and the SME exchange(s).  PART VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  PART VII – PRICING  The issuer about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Complianc  248 The Size of the offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  The file of the offe	Regula tion	Text		Pg. No.	Comment
offer document and the particulars as per audited financial statements in the offer document are not more than six months old from the issue opening date.  Filing of the offer document  246(1) The issuer shall file a copy of the offer document with the Stock Exchange through the lead manager(s), immediately upon filing of the offer document with the Registrar of Companies.  246(2) The Board shall not issue any observation on the offer document.  The lead manager(s) shall submit a due-diligence certificate as per Form A of Schedule V including additional confirmations as provided in Form G of Schedule V along with the offer document to the Board.  246(4) The offer document shall be displayed from the date of filing in terms of sub-regulation (1) on the websites of the issuer, the Board, the lead manager(s) and the SME exchange(s).  246(5) The offer document to be made available to public  247(1) The issuer and the lead manager(s) shall ensure that the offer documents are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Complianc e Companies, Board and the SME exchange(s).  247(2) The lead manager(s) and the SME exchange(s) shall provide copies of the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  The disclosure about the face value of equity shares shall be made in the draft offer document, offer document in the public and with and shall as the provide copies of the offer document of equity shares shall be made in the draft offer document, offer document in the provide copies of the offer document of equity shares shall be made in the draft offer document of the offer document of equity sh	245(4)	directors or in case of an offer for sale, also the selling shareholders, to fulfil their obligations as disclosed by them in the draft offer document or offer document, as the case may be, and as required in terms of these regulations.	with and Noted for Complianc e	-	
246(1) The issuer shall file a copy of the offer document with the Stock Exchange through the lead manager(s), immediately upon filing of the offer document with the Registrar of Companies.  246(2) The Board shall not issue any observation on the offer document.  The lead manager(s) shall submit a due-diligence certificate as per Form A of Schedule V including additional confirmations as provided in Form G of Schedule V along with the offer document to the Board.  246(4) The offer document shall be displayed from the date of filing in terms of sub-regulation (1) on the websites of the issuer, the Board, the lead manager(s) and the SME exchange(s).  246(5) The offer documents shall also be furnished to the Board in a soft copy.  Offer document to be made available to public  247(1) The issuer and the lead manager(s) shall ensure that the offer documents are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Companies, Board and the SME exchange(s).  247(2) The lead manager(s) and the SME exchange(s).  247(2) The lead manager(s) and the SME exchange(s) shall provide copies of the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  The disclosure about the face value of equity shares shall be made in the draft offer document of the	245(5)	offer document and the particulars as per audited financial statements in the offer document are not more than six months old from the issue	with and Noted for Complianc	-	
Exchange through the lead manager(s), immediately upon filing of the offer document with the Registrar of Companies.  246(2) The Board shall not issue any observation on the offer document.  246(3) The lead manager(s) shall submit a due-diligence certificate as per Form A of Schedule V including additional confirmations as provided in Form G of Schedule V along with the offer document to the Board.  246(4) The offer document shall be displayed from the date of filing in terms of sub-regulation (1) on the websites of the issuer, the Board, the lead manager(s) and the SME exchange(s).  246(5) The offer document to be made available to public  247(1) The issuer and the lead manager(s) shall ensure that the offer documents are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Companies, Board and the SME exchange(s).  247(2) The lead manager(s) and the SME exchange(s) shall provide copies of the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application of the disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application of the disclosure and the lead manager shall be made in the draft offer document.  250	Filing of	the offer document			
246(2) The Board shall not issue any observation on the offer document.  The lead manager(s) shall submit a due-diligence certificate as per Form A of Schedule V including additional confirmations as provided in Form G of Schedule V along with the offer document to the Board.  The offer document shall be displayed from the date of filing in terms of sub-regulation (1) on the websites of the issuer, the Board, the lead manager(s) and the SME exchange(s).  246(5) The offer documents shall also be furnished to the Board in a soft copy.  Offer document to be made available to public  247(1) The issuer and the lead manager(s) shall ensure that the offer documents are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Companies, Board and the SME exchange(s).  The lead manager(s) and the SME exchange(s) shall provide copies of the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Occupilanc e 2, 7 – complianc e 2, 3, 42, 51, 71 – 72 = 78, 79, 8, 83, 97, 103, 104, 215, 217, 230, 230, 240,	246(1)	Exchange through the lead manager(s), immediately upon filing of the	Complianc	-	
246(4) The offer document shall be displayed from the date of filing in terms of sub-regulation (1) on the websites of the issuer, the Board, the lead manager(s) and the SME exchange(s).  246(5) The offer documents shall also be furnished to the Board in a soft copy.  Offer document to be made available to public  247(1) The issuer and the lead manager(s) shall ensure that the offer documents are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Complianc e a reasonable sum for providing a copy of the same.  PART VII - PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Part VII - PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Cover with and Noted for complianc e  23, 42, 51, 71  - 72 = , 78, 79  , 83, 97, 103, 104, 215, 217, 230, 240,	246(2) 246(3)	The lead manager(s) shall submit a due-diligence certificate as per <b>Form A</b> of <b>Schedule V</b> including additional confirmations as provided		66	
Offer document to be made available to public  247(1) The issuer and the lead manager(s) shall ensure that the offer documents are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Companies, Board and the SME exchange(s).  247(2) The lead manager(s) and the SME exchange(s) shall provide copies of the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Complianc e Cover with and Noted for complianc e Part VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Complianc e Cover with and Noted for complianc e Part VII – PRICING  2, 7 – complianc	246(4)	The offer document shall be displayed from the date of filing in terms of sub-regulation (1) on the websites of the issuer, the Board, the lead manager(s) and the SME exchange(s).			
The issuer and the lead manager(s) shall ensure that the offer documents are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Complianc e Part of the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  The dead manager(s) and the SME exchange(s) shall provide copies of the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  Face value of equity shares  The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Complied with and page, Noted for complianc e  2, 7 – complianc  e  23, 42, 51, 71 – 72 = , 78, 79 , 83, 97, 103, 104, 215, 217, 230, 240,	246(5)			-	
are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Companies, Board and the SME exchange(s).  247(2) The lead manager(s) and the SME exchange(s) shall provide copies of the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Complied with and Noted for 2, 7 - complianc e  23, 42, 51, 71 - 72 =, 78, 79, 83, 97, 103, 104, 215, 217, 230, 240,			NT - 16	I	
the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.  PART VII – PRICING  Face value of equity shares  248 The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  Cover with and page, Noted for complianc e 2, 7 – complianc e 23, 42, 51, 71 – 72 =, 78, 79 , 83, 97, 103, 104 , 215, 217, 230, 240,	247(1)	are hosted on the websites as required under these regulations and its contents are the same as the versions as filed with the Registrar of Companies, Board and the SME exchange(s).	Complianc	-	
The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application with and page, Noted for 2, 7 - complianc 8, 21 - e 23, 42, 51, 71 - 72 =, 78, 79 , 83, 97, 103, 104 , 215, 217, 230, 240,		the offer document to the public as and when requested and may charge a reasonable sum for providing a copy of the same.	complianc	-	,
The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application forms, along with the price band or the issue price in identical font size.  The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application with and Noted for complianc e 2, 7 - complianc e 23, 42, 51, 71 - 72 =, 78, 79 , 83, 97, 103, 104, 215, 217, 230, 240,					
		The disclosure about the face value of equity shares shall be made in the draft offer document, offer document, advertisements and application	with and Noted for complianc	page, 2,7- 8,21- 23,42, 51,71-72=, 78,79, 83, 97, 103, 104, 215, 217, 230,	
249(1) The issuer may determine the price of equity shares, and in case of Complied Cover					



				rvices Limi
	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME	DIUM ENTE	RPRISES	3
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
	convertible securities, the coupon rate and the conversion price, in consultation with the lead manager(s) or through the book building process, as the case maybe	with and Noted for complianc e	Page, 8, 44, 66, 97	
249(2)	The issuer shall undertake the book building process in the manner specified in <b>Schedule XIII</b> .	Complied with and Noted for Complianc e	5, 66, 247- 248	
Price an	d price band			
250(1)	The issuer may mention a price or a price band in the offer document (in case of a fixed price issue) and a floor price or a price band in the red herring prospectus (in case of a book-built issue) and determine the price at a later date before filing the prospectus with the Registrar of Companies:  Provided that the prospectus filed with the Registrar of Companies shall contain only one price or the specific coupon rate, as the case may be.	Complied with and Noted for complianc e	Cover page, 6 – 9, 44, 69–70, 97-98, 236, 263, 269	
250(2)	The cap on the price band, and the coupon rate in case of convertible debt instruments shall be less than or equal to one hundred and twenty percent of the floor price.	Noted for complianc e	6, 269	
250(3)	The floor price or the final price shall not be less than the face value of the specified securities.	Noted for complianc e		
250(4)	Where the issuer opts not to make the disclosure of the floor price or price band in the red herring prospectus, the issuer shall announce the floor price or the price band at least two working days before the opening of the issue in the newspapers in which the pre-issue advertisement was released or together with the pre-issue advertisement in the format prescribed under <b>Part A</b> of <b>Schedule X</b> .	Not applicable	230	)
250(5)	The announcement referred to in sub-regulation (4) shall contain relevant financial ratios computed for both upper and lower end of the price band and also a statement drawing attention of the investors to the section titled "basis of issue price" of the offer document.	Complied with and Noted for complianc e	9, 230, 269	
250(6)  Differen	The announcement referred to in sub-regulation (4) and the relevant financial ratios referred to in sub-regulation (5) shall be disclosed on the websites of the SME exchange(s) and shall also be pre-filled in the application forms to be made available on the websites of the SME exchange(s).  tial pricing	Complied with and Noted for complianc e	9, 230, 269	1
251(1)	The issuer may offer its specified securities at different prices, subject to	Noted for	-	
201(1)	the following:	complianc		
	a) retail individual investors or retail individual shareholders or employees entitled for reservation made under regulation 254 may be offered specified securities at a price not lower than by more than ten per cent. of the price at which net offer is made to other categories of applicants, excluding anchor investors.	Noted for complianc e	-	Ī



	CHAPTED IV. INITIAL DUDI TO OBEED BY CRAFT AND ACT			rvices Limi
Regula tion	CHAPTER –IX: INITIAL PUBLIC OFFER BY SMALL AND ME Text	Complied with-	RPRISES Pg. No.	Comment
•1011		Y/N/NA	1,00	
- 1/1	b) the differential pricing and the price at which net offer is proposed to	Noted for	_	
	be made to other categories of applicants shall be within the range such	complianc		
	that the minimum application lot size shall remain uniform for all the	e		
	applicants.			
		Complied	1 0	
	c) in case of a book-built issue, the price of the specified securities	Complied	4, 8,	
	offered to the anchor investors shall not be lower than the price offered	with and	52,	
	to other applicants.	Noted for	248,	
		complianc	256,	
		e	256-	
- 10			257	
251(2)	Discount, if any, shall be expressed in rupee terms in the offer	Not	-	
	document.	Applicable		
PART V	III: ISSUANCE CONDITIONS AND PROCEDURE			
<b>Minimu</b>	m offer to public			
252	The minimum offer to the public shall be as per the provisions of clause	Complied	Cover	
	(b) of sub-rule (2) of rule 19 of Securities Contracts (Regulations)	with and	page,	
	Rules, 1957.	Noted for	52,	
	,	complianc	245an	
		e	d	
			24724	
lloooti	on in the net offer		8	
		Complied	Cover	
253 (1)	The allocation in the net offer category shall be as follows:	Complied		
	a) not less than thirty-five per cent. to retail individual investors;	with and	page,	
	b) not less than fifteen per cent. to non-institutional investors;	noted for	240,	
	c) not more than fifty per cent. to qualified institutional buyers, five per	complianc	248	
	cent. of which shall be allocated to mutual funds:	e		
	Provided that the unsubscribed portion in either of the categories			
	specified in clauses (a) or (b) may be allocated to applicants in any other			
	category:			1
	Provided further that in addition to five per cent. Allocation available in			
	terms of clause (c), mutual funds shall be eligible for allocation under			
	the balance available for qualified institutional buyers.			
253 (2)	In an issue made other than through the book building process, the	Not	-	
(_)	allocation in the net offer category shall be made as follows:	Applicable		
	(a) minimum fifty per cent. to retail individual investors; and	- FF		
	(b) remaining to:			
	(i) individual applicants other than retail individual investors; and			3
	(ii) other investors including corporate bodies or institutions,			
	irrespective of the number of specified securities applied for;			
	Provided that the unsubscribed portion in either of the categories			
	specified in clauses (a) or (b) may be allocated to applicants in the other			-
	category.			
	Explanation - For the purpose of sub-regulation (2), if the retail			
	individual investor category is entitled to more than fifty per cent. of the			
	individual investor category is entitled to more than fifty per cent. of the			
Reserva	individual investor category is entitled to more than fifty per cent. of the issue size on a proportionate basis, the retail individual investors shall be allocated that higher percentage.]			
<b>Reserva</b> 254(1)	individual investor category is entitled to more than fifty per cent. of the issue size on a proportionate basis, the retail individual investors shall	Noted for	-	



				ervices Limit
D .	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME			
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
- 7	categories of persons:	e e		
	a) employees;			
	b) shareholders (other than promoters and promoter group) of listed			
	subsidiaries or listed promoter companies			
	Provided that the issuer shall not make any reservation for the lead			
	manager(s), registrar, syndicate member(s), their promoters, directors			
	and employees and for the group or associate companies (as defined			
	under the Companies Act, 2013) of the lead manager(s), registrar, and			
	syndicate member(s) and their promoters, directors and employees.			
254(2)	The reservations on a competitive basis shall be subject to following	Noted for	_	
	conditions:	complianc		
	Conditions	e		
	a) the aggregate of reservations for employees shall not exceed five per	1		
	cent. of the post-issue capital of the issuer and the value of allotment to			
	any employee shall not exceed two lakhs rupees:			
	any employee shall not exceed two latins rupees.			
	Provided that in the event of under-subscription in the employee			
	reservation portion, the unsubscribed portion may be allotted on a			
	proportionate basis, for a value in excess of two lakhs rupees, subject to			
	the total allotment to an employee not exceeding five lakhs rupees.			
	b) reservation for shareholders shall not exceed ten per cent. of the issue	-		
	size;			
	c) no further application for subscription in the net offer can be made by	-		
	persons (except an employee and retail individual shareholder) in favour			
	of whom reservation on a competitive basis is made;			
	d) any unsubscribed portion in any reserved category may be added to	-		
	any other reserved category(ies) and the unsubscribed portion, if any,			
	after such inter-se adjustments among the reserved categories shall be			
	added to the net offer category;			
	e) in case of under-subscription in the net offer category, spill-over to	-		11
	the extent of under-subscription shall be permitted from the reserved			
	category to the net public offer.			
254(3)		Noted for		
234(3)	An applicant in any reserved category may make an application for any number of specified securities but not exceeding the reserved portion	complianc	_	
	for that category.	e		
A bridge	d prospectus			
255(1)	The abridged prospectus shall contain the disclosures as specified in	Noted for	_	
233(1)	Part E of Schedule VI and shall not contain any matter extraneous to the	complianc	_	
	contents of the offer document.	e		
255(2)	Every application form distributed by the issuer or any other person in	Noted for		
233(2)	relation to an issue shall be accompanied by a copy of the abridged	complianc	_	
		-		
ASBA	prospectus.	e	l	
256	The issuer shall accept bids using only the ASBA facility in the manner	Complied	66 –	
230	specified by the Board.	with	67	
Availahi	lity of issue material	WILLI	U 07	ı
257	The lead manager(s) shall ensure availability of the offer document and	Noted for	_	
231	other issue material including application forms to stock exchanges,	complianc		
	syndicate members, registrar to issue, registrar and share transfer agents,	e		
	depository participants, stock brokers, underwriters, bankers to the			12.0
	issue, investors' associations and self-certified syndicate banks before			B 10
	10000, myosioro associations and sen-centificu syndicate valiks verole	1	L	



n .	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND MEI			
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
	the opening of the issue.	1/IN/INA		
Duahihi				
	ion on payment of incentives	Nata d Can	202	
258	Any person connected with the distribution of the issue, shall not offer	Noted for	283	
	any incentive, whether direct or indirect, in any manner, whether in cash	complianc		
	or kind or services or otherwise to any person for making an application	e		
	in the initial public offer, except for fees or commission for services			
	rendered in relation to the issue.			
<u>Underw</u>				T
260(1)	The initial public offer shall be underwritten for hundred per cent of the	Complied	216,	
	offer and shall not be restricted up to the minimum subscription level.	with	237,	
260(2)	The lead manager(s) shall underwrite at least fifteen per cent. of the	Complied	67	
\	issue size on their own account(s).	with		
260(3)	The issuer, in consultation with lead manager(s), shall appoint merchant	Complied	67	
	bankers or stock brokers, registered with the Board, to act as	with		
	underwriters and the lead manager(s) may enter into an agreement with			
	the nominated investors indicating therein the number of specified			
	securities which they agree to subscribe at the issue price in case of			
	under- subscription.			
260(4)	The lead manager(s) shall file an undertaking to the Board that the issue	Complied	269,	
. ,	has been hundred per cent. underwritten along with the list of	with	216,	
	underwriters, nominated investors and sub-underwriters indicating the		,	
	extent of underwriting or subscription commitment made by each of			
	them, one day before the opening of issue.			
260(5)	If any of the underwriters fail to fulfil their underwriting obligations or	Noted for		
200(3)	the nominated investors fail to subscribe to the unsubscribed portion,	complianc		
	the lead manager(s) shall fulfil the underwriting obligations.	e		
260(6)	The underwriters/ sub-underwriters, other than the lead manager(s) and	Noted for		
200(0)	the nominated investors, who have entered into an agreement for	complianc	_	
	subscribing to the issue in case of under- subscription, shall not	e		
	subscribing to the issue in case of under-subscription, shall not subscribe to the issue made under this Chapter in any manner except for	C		
	fulfilling their obligations under their respective agreements with the			
260(7)	lead manager(s) in this regard.	C 1: 1	(7. (0	
260(7)	All underwriting and subscription arrangements made by the lead	Complied	67-68	
V.F. 1 4	manager(s) shall be disclosed in the offer document.	with		
	making	G :: :	60	
261(1)	The lead manager(s) shall ensure compulsory market making through	Complied	69,	
	the stock brokers of the SME exchange(s) appointed by the issuer, in the	with and	216,	
	manner specified by the Board for a minimum period of three years	Noted for	238	
	from the date of listing of the specified securities or from the date of	complianc		
	migration from the Main Board in terms of regulation 276	e		
261(2)	The market maker or issuer, in consultation with the lead manager(s)	Noted for	69	
	may enter into agreements with the nominated investors for receiving or	complianc		
	delivering the specified securities in market making, subject to the prior	e		
	approval of the SME exchange.			
261(3)	The issuer shall disclose the details of the market making arrangement	Complied	68-69	
	in the offer document.	with	<u> </u>	
261(4)	The specified securities being bought or sold in the process of market	Noted for	69	
	making may be transferred to or from the nominated investors with	complianc		
	whom the lead manager(s) and the issuer have entered into an	e		
	agreement for market making:			
	Provided that the inventory of the market maker, as on the date of		[	1



	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND MEI			ervices Limit
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment
_A	allotment of the specified securities, shall be at least five per cent. of the specified securities proposed to be listed on SME exchange.			
261(5)	The market maker shall buy the entire shareholding of a shareholder of	Noted for	69,	
	the issuer in one lot, where the value of such shareholding is less than	complianc	238	
	the minimum contract size allowed for trading on the SME exchange:	e		
	Provided that market maker shall not sell in lots less than the minimum contract size allowed for trading on the SME exchange.			
261(6)	The market maker shall not buy the shares from the promoters or	Noted for	69	
- 10	persons belonging to the promoter group of the issuer or any person	complianc		
	who has acquired shares from such promoter or person belonging to the	e		
V	promoter group during the compulsory market making period.			
261(7)	The promoters' holding shall not be eligible for offering to the market	Noted for	69	
	maker during the compulsory market making period:	complianc e		
- 4	Provided that the promoters' holding which is not locked-in as per these	C		
	regulations can be traded with prior permission of the SME exchange,			
- 1	in the manner specified by the Board.			
261(8)	The lead manager(s) may be represented on the board of directors of the	Noted for	69	
201(0)	issuer subject to the agreement between the issuer and the lead	complianc	0,	
1	manager(s) who have the responsibility of market making.	e		
Monitor	ing agency	· · · ·		
262(1)	If the issue size, excluding the size of offer for sale by selling	Not	65	We have
(-)	shareholders, exceeds one hundred crore rupees, the issuer shall make	Applicable		inserted a
	arrangements for the use of proceeds of the issue to be monitored by a	rr ·····		negative
10	credit rating agency registered with the Board:			statement
				to that
	Provided that nothing contained in this clause shall apply to an issue of			effect
	specified securities made by a bank or public financial institution or an			
	insurance company.			
262(2)	The monitoring agency shall submit its report to the issuer in the format	Not	-	
, ,	specified in Schedule XI on a quarterly basis, till hundred per cent of	Applicable		
	the proceeds of the issue have been utilised.			
262(3)	The board of directors and the management of the issuer shall provide	Not	-	
	their comments on the findings of the monitoring agency as specified in	Applicable		
	Schedule XI.			
262(4)	The issuer shall, within forty-five days from the end of each quarter,	Not	-	
	publicly disseminate the report of the monitoring agency by uploading	Applicable		
	the same on its website as well as submitting the same to the stock			-
	exchange(s) on which its equity shares are listed.			
	ommunications, publicity materials, advertisements and research repor			_
263	All public communications, publicity materials, advertisements and	Noted for	-	=
	research reports shall comply with provisions of <b>Schedule IX</b> .	complianc		
		e		
	ated advertisements			,
264(1)	Subject to the provisions of the Companies Act, 2013, the issuer shall,	Noted for	269	
	after filing the prospectus with the Registrar of Companies, make a pre-	complianc		
	issue advertisement in one English national daily newspaper with wide	e		
	circulation, Hindi national daily newspaper with wide circulation and			
	one regional language newspaper with wide circulation at the place			
	where the registered office of the issuer is situated.			*
264(2)	The pre-issue advertisement shall be in the format and shall contain the	Noted for	269	16.3



Doculo	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME			1
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment
	disclosures specified in <b>Part A of Schedule X</b> .  Provided that the disclosures in relation to price band or floor price and financial ratios contained therein shall only be applicable where the issuer opts to announce the price band or floor price along with the preissue advertisement pursuant to sub-regulation (4) of regulation 250.	complianc e		
264(3)	The issuer may issue advertisements for issue opening and issue closing advertisements, which shall be in the formats specified in <b>Parts B and C of Schedule X.</b>	Noted for complianc e	269	
264(4)	During the period the issue is open for subscription, no advertisement shall be released giving an impression that the issue has been fully subscribed or oversubscribed or indicating investors' response to the issue.	Noted for complianc e	-	
264(5)	An announcement regarding closure of the issue shall be made only after the lead manager(s) is satisfied that at least ninety per cent. of the offer has been subscribed and a certificate has been obtained to that effect from the registrar to the issue:  Provided that such an announcement shall not be made before the date on which the issue is to be closed except for issue closing advertisement made in the format prescribed in these regulations.	Noted for complianc e	-	
Opening	of the issue			
265	The issue shall be opened after at least three working days from the date of filing the offer document with the Registrar of Companies.	Noted for complianc e	Cover Page, 5-6, 233	
Period o	f subscription	I.		I.
266(1)	Except as otherwise provided in these regulations, a public issue shall be kept open for at least three working days and not more than ten working days.	Noted for complianc e	Cover Page, 05, 233, 234	,
266(2)	In case of a revision in the price band, the issuer shall extend the bidding (issue) period disclosed in the red herring prospectus, for a minimum period of three working days, subject to the provisions of subregulation (1).	Noted for complianc e	234	
266(3)	In case of force majeure, banking strike or similar unforeseen circumstances, the issuer may, for reasons to be recorded in writing, extend the bidding (issue) period disclosed in the red herring prospectus (in case of a book-built issue) or the issue period disclosed in the prospectus (in case of a fixed price issue), for a minimum period of one working day, subject to the provisions of sub-regulation (1).	Noted for complianc e	234	
267(1)	A person shall not make an application in the net offer category for a	Noted for	_	
207(1)	number of specified securities that exceeds the total number of specified securities offered to the public.	complianc e	-	
	Provided that the maximum application by non-institutional investors shall not exceed total number of specified securities offered in the issue less total number of specified securities offered in the issue to qualified institutional buyers.			
267(2)	The minimum application size shall be one lakh rupees per application.	Complied with and	231, 237,	1



Regula	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND MEI Text	Complied	Pg.	Comment
tion	Teat	with- Y/N/NA	No.	s
		noted for		
		complianc		
		e		
267(3)	The issuer shall invite applications in multiples of the minimum	Complied	231,	
(-)	application amount, an illustration whereof is given in <b>Part B of</b>	with and	262	
	Schedule XIV.	noted for		
		complianc		
		e		
267(4)	The minimum sum payable on application per specified security shall at	Noted for	-	
	least be twenty-five per cent. of the issue price:,	complianc		
		e		
	Provided that in case of an offer for sale, the full issue price for each			
	specified security shall be payable on application.			
	Evalenation: For the surross of this resulction "minimum analication			
	<b>Explanation:</b> For the purpose of this regulation, "minimum application value" shall be with reference to the issue price of the specified			
	securities and not with reference to the amount payable on application.			
llotme	nt procedure and basis of allotment			<u> </u>
268(1)	The issuer shall not make an allotment pursuant to a public issue if the	Complied	216,	
200(1)	number of allottees in an initial public offer is less than fifty.	with	220,	
	number of unotices in an initial public offer is less than integr	***1	231,	
			237,	
268(2)	The issuer shall not make any allotment in excess of the specified	Noted for	81	
200(2)	securities offered through the offer document except in case of	complianc	01	
	oversubscription for the purpose of rounding off to make allotment, in	e		
	consultation with the designated stock exchange.			
	Provided that in case of oversubscription, an allotment of not more than			
	ten per cent. of the net offer to public may be made for the purpose of			
	making allotment in minimum lots.			1
268(3)	The allotment of specified securities to applicants other than retail	Noted for	66,	
	individual investors and anchor investors shall be on proportionate basis	complianc	240-	
	within the specified investor categories and the number of securities	e	241	
	allotted shall be rounded off to the nearest integer, subject to minimum			
	allotment being equal to the minimum application size as determined			
	and disclosed in the offer document:			
	Drawided that the value of specified securities alletted to any person			
	Provided that the value of specified securities allotted to any person, except in case of employees, in pursuance of reservation made under			
	clause (a) of sub-regulation (1) or clause (a) of sub- regulation (2) of			
	regulation 254, shall not exceed two lakhs rupees.			
268(4)	The authorised employees of the stock exchange, along with the lead	Complied	277	
-55(1)	manager(s) and registrars to the issue, shall ensure that the basis of	with and	2,,	
	allotment is finalised in a fair and proper manner in accordance with the	Noted for		
	allotment procedure as specified in <b>Part A of Schedule XIV.</b>	complianc		
		e		
Allotme	nt, refund and payment of interest			
269(1)	The registrars to the issue, in consultation with the issuer and lead	Complied	282	
	manager(s) shall ensure that the specified securities are allotted and/or	with		
	application monies are refunded or unblocked within such time as may			
	be specified by the Board			1
269(2)	The lead manager(s) shall ensure that the allotment, credit of	Noted for	-	1



Regula	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND MEI Text	Complied	Pg.	Comment
tion	Text	with-	No.	S
tion		Y/N/NA	110.	3
- 1/1	dematerialised securities, refunding or unblocking of application	complianc		
- 48	monies, as may be applicable, are done electronically.	e		
269(3)	Where the specified securities are not allotted and/or application monies	Noted for		
(-)	are not refunded or unblocked within the period stipulated in sub-	complianc		
×2	regulation (1) above, the issuer shall undertake to pay interest at the rate	e		
	of fifteen per cent. per annum and within such time as disclosed in the			
	offer document and the lead manager(s) shall ensure the same.			
Post-issu	ne advertisements			
270(1)	The lead manager(s) shall ensure that advertisement giving details	Noted for	-	
` ′	relating to subscription, basis of allotment, number, value and	complianc		
	percentage of all applications including ASBA, number, value and	e		
1	percentage of successful allottees for all applications including ASBA,			
	date of completion of dispatch of refund orders, as applicable, or			
100	instructions to self-certified syndicate banks by the Registrar, date of			
	credit of specified securities and date of filing of listing application, etc.			
	is released within ten days from the date of completion of the various			
N	activities in at least one English national daily newspaper with wide			
- 1	circulation, one Hindi national daily newspaper with wide circulation			
	and one regional language daily newspaper with wide circulation at the			
	place where registered office of the issuer is situated.			
270(2)	Details specified in sub regulation (1) shall also be placed on the	Noted for	-	
` /	website of the stock exchanges.	complianc		
		e		
Post-issu	e responsibilities of the lead manager(s)			
271(1)	The responsibility of the lead manager(s) shall continue until	Noted for	_	
	completion of the issue process and for any issue related matter	complianc		
	thereafter.	e		
271(2)	The lead manager(s) shall regularly monitor redressal of investor	Noted for	-	
	grievances arising from any issue related activities.	complianc		
	g g ,	e		
271(3)	The lead manager(s) shall be responsible for and co-ordinate with the	Noted for	-	
. (-)	registrars to the issue and with various intermediaries at regular	complianc		
	intervals after the closure of the issue to monitor the flow of	e		
	applications from syndicate member(s) or collecting bank branches and			
	or self-certified syndicate banks, processing of the applications			
	including application form for ASBA and other matters till the basis of			
	allotment is finalised, credit of the specified securities to the demat			
	accounts of the allottees and unblocking of ASBA accounts/ despatch of			
	refund orders are completed and securities are listed, as applicable.			
271(4)	Any act of omission or commission on the part of any of the	Noted for	-	
	intermediaries noticed by the lead manager(s) shall be duly reported by	complianc		
	them to the Board.	e		
271(5)	In case there is a devolvement on underwriters, the lead manager(s)	Noted for	_	
-,1(3)	shall ensure that the notice for devolvement containing the obligation of	complianc		
	the underwriters is issued within a period of ten days from the date of	e		
	closure of the issue.			
271(6)	In the case of undersubscribed issues that are underwritten, the lead	Noted for		
2/1(0)	manager(s) shall furnish information in respect of underwriters who	complianc	_	
		_		
	have failed to meet their underwriting devolvement to the Board in the format specified in Schedule XVIII	e		
	format specified in <b>Schedule XVIII</b> .			1
Dologge	of subscription money			



	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND MEI	DIUM ENTE	RPRISE	S
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment
	copies of listing and trading approvals that all formalities in connection with the issue have been completed and that the banker is free to release the money to the issuer or release the money for refund in case of failure of the issue.	complianc e		
272(2)	In case the issuer fails to obtain listing or trading permission from the stock exchanges where the specified securities were to be listed, it shall refund through verifiable means the entire monies received within four days of receipt of intimation from stock exchanges rejecting the application for listing of specified securities, and if any such money is not repaid within four days after the issuer becomes liable to repay it the issuer and every director of the company who is an officer in default shall, on and from the expiry of the fourth day, be jointly and severally	Noted for complianc e	277	
272(3)	liable to repay that money with interest at the rate of fifteen per cent. per annum.  The lead manager(s) shall ensure that the monies received in respect of the issue are released to the issuer in compliance with the provisions of	Noted for complianc	265	
	the Section 40 (3) of the Companies Act, 2013, as applicable.	e		
	re reports	NT . 10		1
273	The lead manager(s) shall submit a final post-issue report as specified in <b>Part A of Schedule XVII</b> , along with a due diligence certificate as per the format specified in <b>Form F of Schedule V</b> , within seven days of the date of finalization of basis of allotment or within seven days of refund of money in case of failure of issue.	Noted for complianc e	-	
Reportir	ng of transactions of the promoters and promoter group			•
274	The issuer shall ensure that all transactions in securities by the promoters and promoter group between the date of filing of the draft offer document or offer document, as the case may be, and the date of closure of the issue shall be reported to the stock exchanges, within twenty-four hours of such transactions.	Complied with and Noted for complianc e	82	
Listing	XXII 11. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	NT .		
275	Where any listed issuer issues specified securities in accordance with provisions of this Chapter, it shall migrate the specified securities already listed on any recognised stock exchange(s) to the SME exchange.	Not Applicable	-	,
Migratio	on to the SME exchange			
276	A listed issuer whose post-issue face value capital is less than twenty-five crore rupees may migrate its specified securities to SME exchange if its shareholders approve such migration by passing a special resolution through postal ballot to this effect and if such issuer fulfils the eligibility criteria for listing laid down by the SME exchange:	Not Applicable	-	1
	Provided that the special resolution shall be acted upon if and only if the votes cast by shareholders other than promoters in favour of the proposal amount to at least two times the number of votes cast by shareholders other than promoter shareholders against the proposal.			1
Migratio	on to the main board	1	1	1
277	An issuer, whose specified securities are listed on a SME Exchange and whose post-issue face value capital is more than ten crore rupees and up to twenty-five crore rupees, may migrate its specified securities to the main board of the stock exchanges if its shareholders approve such a migration by passing a special resolution through postal ballot to this effect and if such issuer fulfils the eligibility criteria for listing laid	Noted for Complianc e	216, 237	



Regula tion	CHAPTER –IX: INITIAL PUBLIC OFFER BY SMALL AND MEI Text	Complied with- Y/N/NA	Pg. No.	Comment
- //	down by the Main Board:			
	Provided that the special resolution shall be acted upon if and only if the			
P	votes cast by shareholders other than promoters in favour of the			
	proposal amount to at least two times the number of votes cast by			
	shareholders other than promoter shareholders against the proposal.			
PART I	X: MISCELLANEOUS			
	on on further capital issues			
278	An issuer shall not make any further issue of specified securities in any	Complied	282	
7	manner whether by way of public issue, rights issue, preferential issue,	with and		
	qualified institutions placement, issue of bonus shares or otherwise,	Noted for		
·	except pursuant to an employee stock option scheme, during the period	complianc		
	between the date of filing the draft offer document and the listing of the	e		
100	specified securities offered through the offer document or refund of			
100	application monies unless full disclosures regarding the total number of			
	specified securities or amount proposed to be raised from such further			
A	issue are made in such draft offer document or offer document, as the			
	case may be.			
Price sta	bilisation through green shoe option			
279(1)	The issuer may provide green shoe option for stabilising the post listing	Not	-	
	price of its specified securities, subject to the following:	Applicable		
	a) the issuer has been authorized, by a resolution passed in the general			
	meeting of shareholders approving the public issue, to allot specified			
	securities to the stabilising agent, if required, on the expiry of the			
	stabilisation period;			
	b) the issuer has appointed a lead manager(s) appointed by the issuer as			
	a stabilising agent, who shall be responsible for the price stabilisation			
	process;			
	c) prior to filing the draft offer document, the issuer and the stabilising			
	agent have entered into an agreement, stating all the terms and			
	conditions relating to the green shoe option including fees charged and			
	expenses to be incurred by the stabilising agent for discharging its			
	responsibilities;			
	d) prior to filing the offer document, the stabilising agent has entered			
	into an agreement with the promoters or pre-issue shareholders or both			
	for borrowing specified securities from them in accordance with clause			
	(g) of this sub-regulation, specifying therein the maximum number of			
	specified securities that may be borrowed for the purpose of allotment			
	or allocation of specified securities in excess of the issue size			
	(hereinafter referred to as the "over- allotment"), which shall not be in			
	excess of fifteen per cent. of the issue size;			
	e) subject to clause (d), the lead manager(s), in consultation with the			
	stabilising agent, shall determine the amount of specified securities to			
	be over-allotted in the public issue;  f) the draft offer decument and offer document shall contain all material.			
	f) the draft offer document and offer document shall contain all material			
	disclosures about the green shoe option specified in this regard in <b>Part</b> A of Schedule VI;			
	g) in case of an initial public offer pre-issue shareholders and promoters			
	and in case of a further public offer pre-issue shareholders holding more			
	than five per cent. specified securities and promoters, may lend			
	specified securities to the extent of the proposed over-allotment;			



Regula tion	CHAPTER –IX: INITIAL PUBLIC OFFER BY SMALL AND MEI Text	Complied with- Y/N/NA	Pg. No.	Comment
	allocation of these securities shall be made pro-rata to all successful applicants.			
279(2)	For the purpose of stabilisation of post-listing price of the specified securities, the stabilising agent shall determine the relevant aspects including the timing of buying such securities, quantity to be bought and the price at which such securities are to be bought from the market.	Not Applicable	1	
279(3)	The stabilisation process shall be available for a period not exceeding thirty days from the date on which trading permission is given by the stock exchanges in respect of the specified securities allotted in the public issue.	Not Applicable	-	
279(4)	The stabilising agent shall open a special account, distinct from the issue account, with a bank for crediting the monies received from the applicants against the over-allotment and a special account with a depository participant for crediting specified securities to be bought from the market during the stabilisation period out of the monies credited in the special bank account.	Not Applicable	-	
279(5)	The specified securities bought from the market and credited in the special account with the depository participant shall be returned to the promoters or pre-issue shareholders immediately, in any case not later than two working days after the end of the stabilization period.	Not Applicable	-	
279(6)	On expiry of the stabilisation period, if the stabilising agent has not been able to buy specified securities from the market to the extent of such securities over-allotted, the issuer shall allot specified securities at issue price in dematerialised form to the extent of the shortfall to the special account with the depository participant, within five days of the closure of the stabilisation period and such specified securities shall be returned to the promoters or pre-issue shareholders by the stabilising agent in lieu of the specified securities borrowed from them and the account with the depository participant shall be closed thereafter.	Not Applicable	-	
279(7)	The issuer shall make a listing application in respect of the further specified securities allotted under sub-regulation (6), to all the stock exchanges where the specified securities allotted in the public issue are listed and the provisions of Chapter VII shall not be applicable to such allotment.	Not Applicable	-	1
279(8)	The stabilising agent shall remit the monies with respect to the specified securities allotted under sub-regulation (6) to the issuer from the special bank account.	Not Applicable	1	
279(9)	Any monies left in the special bank account after remittance of monies to the issuer under sub- regulation (8) and deduction of expenses incurred by the stabilising agent for the stabilisation process shall be transferred to the Investor Protection and Education Fund established by the Board and the special bank account shall be closed soon thereafter.	Not Applicable	-	j
279(10	The stabilising agent shall submit a report to the stock exchange on a daily basis during the stabilisation period and a final report to the Board in the format specified in <b>Schedule XV</b> .	Not Applicable	-	
279(11	The stabilising agent shall maintain a register for a period of at least three years from the date of the end of the stabilisation period and such register shall contain the following particulars:  a) The names of the promoters or pre-issue shareholders from whom the specified securities were borrowed and the number of specified securities borrowed from each of them;  b) The price, date and time in respect of each transaction effected in the	Not Applicable	-	



	CHAPTER -IX: INITIAL PUBLIC OFFER BY SMALL AND ME	DIUM ENTE	RPRISES	S
Regula tion	Text	Complied with- Y/N/NA	Pg. No.	Comment s
/	course of the stabilisation process; and			
- 40	c) The details of allotment made by the issuer on expiry of the			
10	stabilisation process.			
	on of rights of holders of specified securities	1		1
280(1)	The issuer shall not alter the terms (including the terms of issue) of	Note for	-	
	specified securities which may adversely affect the interests of the	complianc		
	holders of that specified securities, except with the consent in writing of	e		
	the holders of not less than three-fourths of the specified securities of			
-	that class or with the sanction of a special resolution passed at a meeting			
280(2)	of the holders of the specified securities of that class.  Where the post-issue face value capital of an issuer listed on a SME	Note for	237	
280(2)	exchange is likely to increase beyond twenty five crore rupees by virtue	Complianc	231	
1	of any further issue of capital by the issuer by way of rights issue,	e		
. //	preferential issue, bonus issue, etc. the issuer shall migrate its specified	C		
///	securities listed on a SME exchange to the Main Board and seek listing			
	of the specified securities proposed to be issued on the Main Board			
N.	subject to the fulfilment of the eligibility criteria for listing of specified			
. 1	securities laid down by the Main Board:			
	Provided that no further issue of capital by the issuer shall be made unless—			
	a) the shareholders of the issuer have approved the migration by passing a special resolution through postal ballot wherein the votes cast by			
	shareholders other than promoters in favour of the proposal amount to at			
	least two times the number of votes cast by shareholders other than			
	promoter shareholders against the proposal;			
	b) the issuer has obtained an in-principle approval from the Main Board			
	for listing of its entire specified securities on it.			
Further				I
281	An issuer listed on a SME making a further issue exchange of capital by	Note for	-	
	way of a rights issue, or further public offer or preferential issue or	complianc		
	bonus issue etc. may do so by adhering to applicable requirements mentioned in these regulations.	e		

financial serv



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b),	282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	sclosures in offer document/letter of offer			
	res specified under this Part shall be made in the draft offer documents	ment or the	draft letter (	of offer and
	cument or the letter of offer, as applicable.			
nstruction			Т	Т
(a)	All information shall be relevant and updated. The source and basis of all statements and claims shall be disclosed. Terms such as "market leader", "leading player", etc. shall be used only if these can be substantiated by citing a proper source.	Complied with	-	
(b)	All blank spaces in the draft offer document shall be filled up with	Complied	-	
	appropriate data before filing the offer document, as applicable,	with and		
	with the Registrar of Companies or filing the same with the recognised stock exchanges.	Noted for Complian ce		
(c)	Simple English shall be used to enable easy understanding of the contents. Technical terms, if any, used in explaining the business of the issuer shall be clarified in simple terms.	Complied with	-	
(d)	Wherever it is mentioned that details are given elsewhere in the document, the same shall be adequately cross-referenced by indicating the paragraph heading and page number.	Complied with	-	
(e)	There shall be no forward-looking statements that cannot be substantiated.	Complied with	-	
(f)	Consistency shall be ensured in the style of disclosures. If first person is used, the same may be used throughout. Sentences that contain a combination of first and third persons may be avoided.	Complied with	-	
(g)	For currency of presentation, only one standard financial unit shall be used.	Complied with	-	
APPLICAE	BILITY			
	An issuer making a public issue or a rights issue of specified securities shall make disclosures specified in this Schedule.  Provided that:  (a) an issuer making a fast-track public issue may not make the disclosures specified in Part D of this Schedule.  (b) an issuer making a further public offer of specified securities may not make the disclosures specified in Part C of this Schedule if it satisfies the conditions specified in paragraph 2 of that Part.  (c) an issuer making a rights issue may only make the disclosures specified in Part B of this Schedule if it satisfies the conditions	Complied with to the extent applicable		
	specified in paragraph 1 of such Part.			
1	<b>COVER PAGES:</b> The cover pages shall be of adequate thickness (minimum hundred GSM quality) and shall be white in colour with no patterns.	Noted for complian ce	-	1
1(a)	Front Cover Pages:			
1(a) (1)	Front outside cover page shall contain issue and issuer details, details of selling shareholders in tabular format along with their average cost of acquisition and offer for sale details, and other details as may be specified by the Board from time to time.	Complied with	Front Cover Page	
1(a) (2)	Front inside cover page shall contain only the following issue details:			



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER				
	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239			
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
1(a) (2)(a)	The type of the offer document ("Draft Red Herring Prospectus"/ "Draft Letter of Offer", "Red Herring Prospectus", "Shelf Prospectus", "Prospectus", "Letter of Offer", as applicable).	Complied with	Front Inside Cover Page	
1(a) (2)(b)	Date of the draft offer document or offer document.	Complied with	Front Inside Cover Page	
1(a) (2)(c)	Type of issuance ("book built" or "fixed price").	Complied with	Front Inside Cover Page	Book- built Issue
1(a) (2)(d)	In case of a public issue, the following clause shall be incorporated in a prominent manner, below the title of the offer document: "Please read Section 32 of the Companies Act, 2013"	Complied with	Front Inside Cover Page	
1(a) (2)(e)	Name of the issuer, its logo, date and place of its incorporation, corporate identity number, address of its registered and corporate offices, telephone number, contact person, website address and email address (where there has been any change in the address of the registered office or the name of the issuer, reference to the page of the offer document where details thereof are given).	Complied with	Front Inside Cover Page	
1(a) (2)(f)	Names of the promoter(s) of the issuer.	Complied with	Front Inside Cover Page	
1(a) (2)(g)	Nature, number and price of specified securities offered and issue size, as may be applicable, including any offer for sale by promoters or members of the promoter group or other shareholders.	Complied with	Front Inside Cover Page	)
1(a) (2)(h)	Aggregate amount proposed to be raised through all the stages of offers made through a shelf prospectus.	Complied with	Front Inside Cover Page	
1(a) (2)(i)	In the case of the first issue of the issuer, the clause on 'Risks in relation to the First Issue' shall be incorporated in a box format:  ""This being the first issue of the issuer, there has been no formal market for the securities of the issuer. The face value of the equity shares is (). The issue price/floor price/price band should not be taken to be indicative of the market price of the specified securities after the specified securities are listed. No assurance can be given regarding an active or sustained trading in the equity shares of the issuer nor regarding the price at which the equity shares will be traded after listing'	Complied with	Front Inside Cover Page	
1(a) (2)(j)	The clause on 'General Risk' shall be incorporated in a box format:  "Investment in equity and equity related securities involve a degree	Complied with	Front Inside Cover	
	of risk and investors should not invest any funds in this offer unless they can afford to take the risk of losing their investment. Investors		Page	



PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]				
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	are advised to read the risk factors carefully before taking an investment decision in this offering. For taking an investment decision, investors must rely on their own examination of the issuer and the offer including the risks involved. The securities have not been recommended or approved by the Securities and Exchange Board of India (SEBI) nor does SEBI guarantee the accuracy or adequacy of this document. Specific attention of investors is invited to the statement of 'Risk factors' given on page number under the section 'General Risks'."			
1(a) (2)(k)	The clause on 'Issuer's Absolute Responsibility' shall be incorporated in a box format:  "The issuer, having made all reasonable inquiries, accepts responsibility for and confirms that this offer document contains all information with regard to the issuer and the issue which is material in the context of the issue, that the information contained in the offer document is true and correct in all material aspects and is not misleading in any material respect, that the opinions and intentions expressed herein are honestly held and that there are no other facts, the omission of which make this document as a whole or any of such information or the expression of any such opinions or intentions misleading in any material respect. The selling shareholders accept responsibility for and confirm the statements made by them in this offer document to the extent of information specifically pertaining to them and their respective portion of the offered shares and assume responsibility that such statements are true and correct in all material respects and not misleading in any material respect"	Complied with	Front Inside Cover Page	
1(a) (2)(l)	Names, logos and addresses of all the lead manager(s) with their titles who have signed the due diligence certificate and filed the offer document with the Board, along with their telephone numbers, website addresses and e-mail addresses. (Where any of the lead manager(s) is an associate of the issuer, it shall disclose itself as an associate of the issuer and that its role is limited to marketing of the issue.)	Complied with	Front Inside Cover Page	
1(a) (2)(m)	Name, logo and address of the registrar to the issue, along with its telephone number, website address and e-mail address.	Complied with	Front Inside Cover Page	1
1(a) (2)(n)	Issue schedule:  (i) Anchor bid period, if any  (ii) Date of opening of the issue  (iii) Date of closing of the issue  (iv) Date of earliest closing of the issue, if any	Complied with	Front Cover Page	
1(a) (2)(o)	Credit rating, if applicable.	Not Applicabl e	-	
1(a) (2)(p)	IPO grading, if any	Not Applicabl	-	



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER				
PART A [	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 235	9, 246(2)(b),	282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
1(a) (2)(q)	Name(s) of the stock exchanges where the specified securities are proposed to be listed and the details of their in-principle approval for listing obtained from these stock exchange(s).	Complied with	Front Inside Cover Page	
1(b)	<b>Back Cover Pages</b> : The back inside cover page and back outside cover page shall be in white.	Noted for complian ce	-	
(2)	<b>Table of Contents:</b> The table of contents shall appear immediately after the front inside cover page.	Complied with	-	
(3)	Definitions And abbrevations:	Complied with		
(A)	Conventional or General Terms.		01 & 12 - 15	
(B)	Issue related Terms.		03 - 11	
(C)	Issuer and Industry related terms.		11 -12	
(D)	Abbreviations.		12 - 15	
(4)	OFFER DOCUMENT SUMMARY:			
	shall contain summary of the following information, as applicable:	G 1: 1	21	1
4 (A)	Primary business of the Issuer and the industry in which it operates, in not more than 100 words each;	Complied with	21	
4 (B)	Names of the promoters;	Complied with	21	
4 (C)	Size of the issue disclosing separately size of the fresh issue and offer for sale;	Complied with	21	
4 (D)	Objects of the issue in a tabular format;	Complied with	22	
4 (E)	Aggregate pre-issue shareholding of the promoter and promoter group, selling shareholder(s) as a percentage of the paid-up share capital of the issuer;	Complied with	22-23	
4 (F)	Following details as per the restated consolidated financial statements for past 3 years and stub period in tabular format:  a. Share capital;  b. Net Worth;	Complied with	23	
	c. Revenue; d. Profit after tax;			
	e. Earnings per share;	1		
	f. Net Asset Value per equity share; and	1		
	g. Total borrowings (as per balance sheet).	1		
4 (G)	Auditor qualifications which have not been given effect to in the restated financial statements.	Complied with	23	
4 (H)	Summary table of outstanding litigations and a cross-reference to the section titled 'Outstanding Litigations and Material Developments'.	Complied with	23-24	
4 (I)	Cross-reference to the section titled 'Risk Factors'.	Complied with	24	
4 (J)	Summary table of contingent liabilities and a cross-reference to contingent liabilities of the issuer as disclosed in restated financial	Complied with	24	Negative statement



statements.  4 (K) Summary of related party transactions for last 3 years and cross-reference to related party transactions as disclosed in restated financial statements.  4 (L) Details of all financing arrangements whereby the promoters, members of the promoter group, the directors of the company which is a promoter of the issuer, the directors of the issuer and their relatives have financed the purchase by any other person of securities of the issuer other than in the normal course of the business of the financing entity during the period of six months immediately preceding the date of the draft offer document/offer document.	PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]				
4 (K) Summary of related party transactions for last 3 years and cross-reference to related party transactions as disclosed in restated financial statements.  4 (L) Details of all financing arrangements whereby the promoters, members of the promoter group, the directors of the issuer and their relatives have financed the purchase by any other person of securities of the issuer other than in the normal course of the business of the financing entity during the period of six months immediately preceding the date of the draft offer document/offer document.  4 (M) Weighted average price at which specified security was acquired by each of the promoters and selling shareholders in the last one year.  4 (N) Average cost of acquisition of shares for promoter and selling with shareholders:  5 (Complied with Not Applicable e)  4 (P) Any issuances of equity shares made in the last one year for consideration other than cash.  4 (Q) Any split/consolidation of equity shares in the last one year.  A (Q) Exemption from complying with any provisions of securities law, if any granted by SEBI shall be disclosed.		Text	d with-	Pg. No.	Comments
reference to related party transactions as disclosed in restated financial statements.  4 (L)  Details of all financing arrangements whereby the promoters, members of the promoter group, the directors of the company which is a promoter of the issuer, the directors of the issuer and their relatives have financed the purchase by any other person of securities of the issuer other than in the normal course of the business of the financing entity during the period of six months immediately preceding the date of the draft offer document/offer document.  4 (M)  Weighted average price at which specified security was acquired by each of the promoters and selling shareholders in the last one year.  4 (N)  Average cost of acquisition of shares for promoter and selling shareholders.  4 (O)  Size of the pre-IPO placement and allottees, upon completion of the placement.  Any issuances of equity shares made in the last one year for consideration other than cash.  Any split/consolidation of equity shares in the last one year.  Not Applicable  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split deals of the promoters and selling with any provisions of securities law, if any granted by SEBI shall be disclosed.		statements.			to this effect has been inserted in the RHP
members of the promoter group, the directors of the company which is a promoter of the issuer, the directors of the issuer and their relatives have financed the purchase by any other person of securities of the issuer other than in the normal course of the business of the financing entity during the period of six months immediately preceding the date of the draft offer document/offer document.  4 (M) Weighted average price at which specified security was acquired by each of the promoters and selling shareholders in the last one year.  4 (N) Average cost of acquisition of shares for promoter and selling shareholders.  4 (O) Size of the pre-IPO placement and allottees, upon completion of the placement.  Any issuances of equity shares made in the last one year for consideration other than cash.  4 (Q) Any split/consolidation of equity shares in the last one year.  Not Applicable  Complied with  Any split/consolidation of equity shares in the last one year.  Not Applicable  Exemption from complying with any provisions of securities law, if any granted by SEBI shall be disclosed.	4 (K)	reference to related party transactions as disclosed in restated	-	24-25	
by each of the promoters and selling shareholders in the last one year.  4 (N) Average cost of acquisition of shares for promoter and selling shareholders.  4 (O) Size of the pre-IPO placement and allottees, upon completion of the placement.  4 (P) Any issuances of equity shares made in the last one year for consideration other than cash.  4 (Q) Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Any split/consolidation of equity shares in the last one year.  Applicabler  A (R) Exemption from complying with any provisions of securities law, if any granted by SEBI shall be disclosed.	4 (L)	members of the promoter group, the directors of the company which is a promoter of the issuer, the directors of the issuer and their relatives have financed the purchase by any other person of securities of the issuer other than in the normal course of the business of the financing entity during the period of six months immediately preceding the date of the draft offer document/offer		25	
shareholders-  4 (O) Size of the pre-IPO placement and allottees, upon completion of the placement.  Any issuances of equity shares made in the last one year for consideration other than cash.  Any split/consolidation of equity shares in the last one year.  Not Applicable  e  4 (R) Exemption from complying with any provisions of securities law, if any granted by SEBI shall be disclosed.  Not Applicable  Applicable	4 (M)	Weighted average price at which specified security was acquired by each of the promoters and selling shareholders in the last one	-	25 – 26	
the placement.  Applicable  Applicable  Applicable  Applicable  Applicable  Applicable  Applicable  Complied with  Applicable  Any issuances of equity shares made in the last one year for consideration other than cash.  Any split/consolidation of equity shares in the last one year.  Not Applicable  Applicable  Applicable  Applicable  Applicable	4 (N)			26	
consideration other than cash.  4 (Q) Any split/consolidation of equity shares in the last one year.  Not Applicable e  4 (R) Exemption from complying with any provisions of securities law, if any granted by SEBI shall be disclosed.  Not Applicabl	4 (O)		Applicabl	26	We have inserted a negative statement to that effect
4 (R) Exemption from complying with any provisions of securities law, if any granted by SEBI shall be disclosed.  Applicabl  Applicabl  Applicabl  Applicabl	4 (P)			26	
if any granted by SEBI shall be disclosed.  Applicabl	4 (Q)	Any split/consolidation of equity shares in the last one year.	Applicabl	26	We have inserted a negative statement to that effect
	4 (R)	Exemption from complying with any provisions of securities law, if any granted by SEBI shall be disclosed.	Applicabl	26	We have inserted a negative statement to that effect
(5) RISK FACTORS 27-50				27-50	
5 (A) Risk factors shall be printed in a clear readable font (preferably of minimum point ten size). Complied with		minimum point ten size).	with	-	
Project and internal to the issuer and those which are external and beyond the control of the issuer.	5 (B)	project and internal to the issuer and those which are external and		27 & 45	



PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]				
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
5(C) 1	Some risks may not be material individually but may be material when considered collectively	Complied with	ı	
5(C) 2	Some risks may have an impact which is qualitative though not quantitative.	Complied with	-	
5(C) 3	Some risks may not be material at present but may have a material impact in the future.	Complied with	=	
5 (D)	Each risk factor shall appear in the following manner:  (1) The risk as envisaged by the issuer.	Complied with	-	
5 (E)	(2) Proposals, if any, to address the risk.  Proposals to address the risks shall not contain any speculative statement on the positive outcome of any matter or litigation, etc. and shall not be given for any matter that is sub-judice before any court/tribunal.	Complied with	-	
5 (F)	Risk factors shall be disclosed in the descending order of materiality. Wherever risks about material impact are stated, likely or potential implications, including financial implication, wherever quantifiable shall be disclosed. If it cannot be quantified, a distinct statement about the fact that the implications cannot be quantified shall be made.	Complied with	-	
5 (G)	Risk factors covering the following subjects, shall necessarily be disclosed wherever applicable:			
5G(1)	Material statutory clearances and approval that are yet to be received by the issuer;	Not Applicabl e	-	
5G(2)	Seasonality of the business of the issuer;	Not Applicabl e	-	,
5G(3)	Any issue of the specified securities by the issuer within the last twelve months at a price lower than the issue price (other than bonus issues);	Not Applicabl e	-	
5G(4)	Where an object of the issue is to finance acquisitions and the acquisition targets have not been identified, details of interim use of funds and the probable date of completing the acquisitions;	Not Applicabl e	-	
5G(5)	Risk associated with orders not having been placed for plant and machinery in relation to the objects of the issue, indicating the percentage and value terms of the plant and machinery for which orders are yet to be placed;	Not Applicabl e	-	1
5G(6)	Lack of significant experience of the issuer or its promoters in the industry segment for which the issue is being made;	Not Applicabl e	-	-
5G(7)	If the issuer has incurred losses in the last three financial years;	Not Applicabl e	-	
5G(8)	Dependence of the issuer or any of its business segments upon a single customer or a few customers, the loss of any one or more may have a material adverse effect on the issuer.	Complied with	29	
5G(9)	Refusal of listing of any securities of the issuer or any of its subsidiaries during last ten years by any of the stock exchanges in	Not Applicabl	-	



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER				
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	9, 246(2)(b), Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	(37(2), 291]   Commen   ts
100	India or abroad.	e		
5G(10)	Failure of the issuer or any of its subsidiary to meet the listing requirements of any stock exchange in India or abroad and the details of penalty, if any, including suspension of trading, imposed by such stock exchanges.	Not Applicabl e	-	
5G(11)	Limited or sporadic trading of any specified securities of the issuer on the stock exchanges.	Not Applicabl e	-	
5G(12)	In case of outstanding debt instruments, any default in compliance with the material covenants such as in creation of full security as per terms of issue, default in payment of interest, default in redemption, non-creation of debenture redemption reserve, default in payment of penal interest wherever applicable, non-availability or non-maintenance of asset cover, interest cover, debt-service cover, etc.	Not Applicabl e	-	
5G(13)	Unsecured loans, if any, taken by the issuer and its subsidiaries that can be recalled at any time.	Complied with	40	
5G(14)	Default in repayment of deposits or payment of interest thereon by the issuer and subsidiaries, and the roll over of liability, if any.	Not Applicabl e	-	
5G(15)	Potential conflict of interest of the promoters or directors of the issuer if involved with one or more ventures which are in the same line of activity or business as that of the issuer.	Complied with	41	
5G(16)	Shortfall in performance vis-à-vis the objects stated in any of the issues made by the listed issuer or listed subsidiaries in the last ten years, as disclosed under the heading "Performance vis-à-vis Objects" in the section "Other Regulatory and Statutory Disclosures", quantifying such shortfalls or delays.	Not Applicabl e	-	
5G(17)	Shortfall in performance vis-à-vis the objects stated in the issues made by any of its listed subsidiaries or listed promoter(s) in the previous five years, as disclosed under the heading "Performance vis-à-vis Objects" in the section "Other Regulatory and Statutory Disclosures", quantifying such shortfalls or delays.	Not Applicabl e	-	
5G(18)	Interests of the promoters, directors or key managerial personnel or senior management personnel of the issuer, other than reimbursement of expenses incurred or normal remuneration or benefits.	Complied with	31	
5G(19)	Any portion of the issue proceeds that is proposed to be paid by the issuer to the promoter, directors, key managerial personnel or senior management of the issuer.	Not Applicabl e	-	
5G(20)	Relationship of the promoter or directors of the issuer with the entities from whom the issuer has acquired or proposes to acquire land in the last 5 years, along with the relevant details.	Not Applicabl e	-	
5G(21)	Excessive dependence on any key managerial personnel or senior management for the project for which the issue is being made.	Complied with	37	
5G(22)	Any material investment in debt instruments by the issuer which are unsecured.	Not Applicabl e	-	
5G(23)	Non-provision for decline in the value of investments.	Not Applicabl	-	1



PART A	OFFER (See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	), 246(2)(b).	282(1)(f), 28	7(2), 2911
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
5G(24)	Summary of all outstanding litigations and other matters disclosed in the section titled 'Outstanding Litigations and Material Developments' in a tabular format along with amount involved, where quantifiable. Issuer shall also separately highlight any criminal, regulatory or taxation matters which may have any material adverse effect on the issuer.	e Not Applicabl e	•	
5G(25)	The delay, if any, in the schedule of the implementation of the project for which the funds are being raised in the public issue.	Not Applicabl e	-	
5G(26)	If monitoring agency is not required to be appointed as per these Regulations, the statement that deployment of the issue proceeds is entirely at the discretion of the issuer.	Complied with to the extent applicable	24	
5G(27)	Negative cash flow from operating activities in the last three financial years.	Complied with	29-30	
5G(28)	If the land proposed to be acquired from proceeds of the issue is not registered in the name of the issuer.	Not Applicabl e	-	
5G(29)	Any restrictive covenants as regards the interests of the equity shareholders in any shareholders' agreement, promoters' agreement or any other agreement for short term (secured and unsecured) and long-term borrowings.	Not Applicabl e	-	
5G(30)	Existence of a large number of pending investor grievances against the issuer and listed subsidiaries.	Not Applicabl e	-	
5G(31)	In case of issue of secured convertible debt instruments, risks associated with second or residual charge or subordinated obligation created on the asset cover.	Not Applicabl	-	
5G(32)	In case of proforma financial statements / restated consolidated financial statements has been provided by peer review Chartered Accountants who is not statutory auditor of the Company, the Issuer Company shall put this as a Top 10 Risk Factor in its Offer Document (DRHP/RHP/Prospectus)	Not Applicabl e	-	
(6)	INTRODUCTION:			
6 (A)	Issue details in brief.	Complied with	51-52	
6 (B)	Summary of consolidated financial information.	Complied with	53-58	
(7)	GENERAL INFORMATION		_	
7 (A)	Name and address of the registered and corporate offices, the registration number of the issuer, and the address of the Registrar of Companies where the issuer is registered.	Complied with	59	
7 (B)	Name, designation, address and DIN of each member of the board of directors of the issuer	Complied with	59	
7 (C)	Names, addresses, telephone numbers and e-mail addresses of the Company Secretary, legal advisor and bankers to the issuer.	Complied with	, 60, 62, 63	
7 (D)	Name, address, telephone number and e-mail address of the	Complied	60	



PARTAI	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	246(2)(b)	282(1)(f) 28	7(2) 2911
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
<b>5</b> ( <b>5</b> )	compliance officer.	with	50 5 <b>0</b> 5 <b>0</b>	
7 (E)	Names, addresses, telephone numbers, contact person, website addresses and e-mail addresses of the lead manager(s), registrars to the issue, bankers to the issue, brokers to the issue and syndicate member(s); URL of SEBI website listing out the details of self certified syndicate banks, registrar to the issue and share transfer agents, depository participants, etc.	Complied with	60,62,-65	
7 (F)	Names, addresses, telephone numbers peer review number, firm registration number and e-mail addresses of the auditors of the issuer.	Complied with	62	
7 (G)	Statement of inter-se allocation of responsibilities among lead manager(s).	Complied with	61-6263	
7 (H)	The following details of credit rating, in case of a public issue of convertible debt instruments:  (a) The names of all the credit rating agencies from which credit rating including unaccepted rating has been obtained for the issue of convertible debt instruments.  (b) The details of all the credit ratings including unaccepted rating obtained for the public issue of convertible debt instruments.  (c) All the credit ratings obtained during three years prior to the filing the draft offer document/offer document for any of the issuer's listed convertible debt instruments at the time of accessing the market through a convertible debt instrument.	Not Applicabl e	-	
7 (I)	Following details of IPO grading, if obtained:  (a) Names of all credit rating agencies from which IPO grading has been obtained.  (b) Details of all grades obtained from such credit rating agencies.  (c) Rationale or description of the grading(s), as furnished by the credit rating agencies.	Not Applicabl e	66	We have inserted a negative statement to that effect
7 (J)	Name, address, telephone number, website address and e-mail address of the debenture trustee, in case of a public issue of convertible debt instruments.	Not Applicabl e	66	We have inserted a negative statement to that effect
7 (K)	Name, address, telephone number and e-mail address of the monitoring agency, if appointed, and disclosure as to whether such appointment is pursuant to these regulations.	Not Applicabl e	65	We have inserted a negative statement to that effect
7 (L)	Name, address, telephone number and e-mail address of the appraising entity in case the project has been appraised.	Not Applicabl e	65-66	We have inserted a negative statement to that effect
7 (M)	Filing the draft offer document/draft letter of offer/offer document:	Complied	66	CIIECT



	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239												
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comme									
	(a) Under this head, the office of the Board where the draft offer document/draft letter of offer/offer document has been filed.	with											
	(b) Address of the Registrar of Companies, where copy of the offer document, having attached thereto the material contracts and documents referred to elsewhere in the offer document, has been filed.												
7 (N)	Where the issue is being made through the book building process, the brief explanation of the book building process.	Complied with	66-67										
7 (O)	Details of underwriting:	Complied	67-68										
	(a) Names, addresses, telephone numbers, and e-mail addresses of the underwriters and the amount underwritten by each of them.	with											
	(b) Declaration by the board of directors of the issuer that the underwriters have sufficient resources to discharge their respective obligations												
	(c) In case of partial underwriting of the issue, the extent of such underwriting.												
	(d) Details of the final underwriting arrangement indicating actual number of specified securities underwritten, to be provided in the prospectus before it is filed with the Registrar of Companies.												
7 (P)	Changes in the auditors during the last three years along with name, address, email address, peer review number and firm registration number of auditors and reasons thereof.	Complied with	62										
7 (Q)	Green Shoe Option, if applicable:	Not	-										
7Q(a)	The name of the stabilising agent.	Applicabl											
7Q(b)	The maximum number of equity shares, in number and as a percentage of the proposed issue size, proposed to be over-allotted by the issuer.	е											
7Q(c)	Maximum period for which the issuer proposes to avail of the stabilisation mechanism;												
7Q(d)	The stabilising agent shall disclose if it proposes to close the stabilisation mechanism prior to the maximum period.												
7Q(e)	Maximum increase in the equity share capital of the issuer and the post-issue shareholding pattern, in case the issuer is required to allot further equity shares to the extent of over-allotment in the issue.												
7Q(f)	Maximum amount of funds to be received by the issuer in case of further allotment and the use of these additional funds.												
7Q(g)	Details of the agreement or arrangement entered into by the stabilising agent with the promoters or shareholders to borrow equity shares from the latter. The details shall, inter-alia, include the name of the promoters or shareholders, their existing shareholding in the issuer, the number and percentage of equity shares to be lent by them and other important terms and conditions												
7Q(h)	including rights and obligations of each party.  Exact number of equity shares to be allotted/transferred pursuant to the public issue, stating separately the number of equity shares to be borrowed from the promoters or shareholders and over-allotted by the stabilising agent and the percentage of such equity shares in												



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b),	282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commer
(8)	CAPITAL STRUCTURE:			
8 (A)	The capital structure in the following order in a tabular form:			
8(A) (a)	Authorised, issued, subscribed and paid-up capital (number of securities, description and aggregate nominal value).	Complied with	71	
8(A) (b)	Size of the present issue, giving separately the promoters' contribution, if any, reservation for specified categories, if any, and net offer (number of securities, description, aggregate nominal value and issue amount (to be disclosed in that order) and applicable percentages in case of a book-built issue.	Complied with	71	
8(A) (c)	Paid up capital:	Complied with	71	
	(i) After the issue.	Complied with	71	
	(ii) After conversion of convertible instruments (if applicable).	Not Applicabl e	-	
8(A) (d)	Share premium account (before and after the issue).	Complied with	71	
8 (B)	The following tables/notes shall be included after the table of the capital structure:			
8(B) (a)	Details of the existing share capital of the issuer in a tabular form, indicating therein with regard to each allotment, the date of allotment, the name of allottee, nature of allotment, the number of shares allotted, the face value of the shares, the issue price and the form of consideration.	Complied with	72-73	
8(B) (b)	Where shares have been issued for consideration other than cash or out of revaluation reserves at any point of time, details in a separate table, indicating the date of issue, date of revaluation of assets, persons to whom issued, price, reasons for the issue and whether any benefits have accrued to the issuer out of the issue.	Complied with	73-74	
8(B) (c)	If shares have been allotted in terms of any scheme of arrangement approved under sections 391-394 of the Companies Act, 1956 or sections 230-234 of the Companies Act, 2013, as applicable, the details of such shares allotted, along with the page numbers where details of such scheme is given.	Not Applicabl e	74	We have inserted a negative statement to that effect
8(B) (d)	Where the issuer has issued equity shares under one or more employee stock option schemes, particulars of equity shares issued under the employee stock option schemes may be aggregated quarter-wise, indicating the aggregate number of equity shares issued and the price range within which equity shares have been issued in each quarter.	Not Applicabl e	74	We have inserted a negative statement to that effect
8(B) (e)	If the issuer has made any issue of specified securities at a price lower than the issue price during the preceding one-year, specific details of the names of the persons to whom such specified securities have been issued, whether they are part of the promoter group, reasons for such issue and the price.	Not Applicabl e	74	We have inserted a negative statement to that effect
8(B) (f)	Shareholding pattern of the issuer in the format as prescribed under Regulation 31 of the Securities and Exchange Board of India	Complied with	76	



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER OFFER			
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	9, 246(2)(b), 2 Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	(2), 291] Commen ts
	(Listing Obligations and Disclosure Requirements) Regulations, 2015:			
	(i) Following details regarding major shareholders: Names of the shareholders of the issuer holding 1% or more of the paid-up capital of the issuer as on the date of filing of the draft offer document/ or end of last week from the date of draft letter of offer and the offer document, as the case may be.  Provided that details of shareholding aggregating at least 80% of capital of company shall be disclosed.	Complied with	76	
	(ii) Number of equity shares held by the shareholders specified in clause (i) including number of equity shares which they would be entitled to upon exercise of warrant, option or right to convert a debenture, loan or other instrument.	Not Applicabl e	1	
	(iii) Particulars specified in items (i) and (ii) as on a date two years prior to the date of filing of the draft offer document/ draft letter of offer and the offer document, as the case may be.	Complied with	76	
	(iv) Particulars specified in items (i) and (ii) as on a date one year prior to the date of filing of the draft offer document/ draft letter of offer and the offer document, as the case may be.	Complied with	76	
	(v) The particulars specified in items (i) and (ii) as on a date ten days prior to the date of date of filing of the draft offer document/draft letter of offer and the offer document, as the case may be.	Complied with	76	
	(vi) If the issuer has made an initial public offer of specified securities in the preceding two years, the particulars specified in items (i), (ii), (iii) and (iv) shall be disclosed to indicate separately the names of the persons who acquired equity shares by subscription to the public issue and those who acquired the equity shares by allotment on a firm basis or through private placement.	Not Applicabl e	-	,
8(B) (g)	Proposal or intention, negotiations and consideration of the issuer to alter the capital structure by way of split or consolidation of the denomination of the shares, or issue of specified securities on a preferential basis or issue of bonus or rights or further public offer of specified securities, within a period of six months from the date of opening of the issue.	Not Applicabl e	-	
8(B) (h)	Total shareholding of each of the promoters in a tabular form, with the name of the promoter, nature of issue, date of allotment/transfer, number of shares, face value, issue price/consideration, date when the shares were made fully paid-up, percentage of the total pre and post-issue capital, if any and the number and percentage of pledged shares, if any, held by each promoter.	Complied with	77	1
8(B) (i)	The number of members/shareholders of the issuer.	Complied with	75	
8(B) (j)	The details of:  i) the aggregate shareholding of the promoter group and of the directors of the promoters, where the promoter is a body corporate.	Not Applicabl e	-	
	(ii) the aggregate number of specified securities purchased or sold by the promoter group and/or by the directors of the company	Not Applicabl	-	1



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9,246(2)(b),2	282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
	which is a promoter of the issuer and/or by the directors of the issuer and their relatives in the preceding six months.	e		
	(iii) all financing arrangements whereby the promoter group, the directors of the company which is a promoter of the issuer, the directors of the issuer and their relatives have financed the purchase by any other person of securities of the issuer other than in the normal course of the business of the financing entity in the six months immediately preceding the date of filing of the draft offer document/offer document.	Not Applicabl e	-	We have inserted a negative statement to that effect
	(iv) In case it is not possible to obtain information regarding sales and purchases of specified securities by any relatives of the promoter, details on the basis of the transfers as recorded in the books of the issuer and/or the depository, as applicable and a statement to such effect.	Not Applicabl e	-	
8(B) (k)	Promoters' contribution:			
	(i) Details of promoters' contribution and lock-in period in a tabular form, separately in respect of each promoter by name, with the date of allotment of specified securities, the date when fully paid-up, the nature of allotment (rights, bonus, preferential etc.), the number, face value and issue price, the percentage of promoters' contribution to total issued capital and the date up to which the specified securities are subject to lock-in.	Complied with and Noted for Complian ce	78-79	
	(ii) In the case of an initial public offer, details of all individual allotments from the date of incorporation of the issuer and in case of a further public offer by a listed issuer, such details for the preceding five years.	Complied with	72-73	
	(iii) In case of further public offers or rights issues, shares acquired by the promoters through a public issue, rights issue, preferential issue, bonus issue, conversion of depository receipts or under any employee stock option scheme or employee stock purchase scheme to be shown separately from the shares acquired in the secondary market and its aggregate cost of shares acquired in the secondary market, if available.	Not Applicabl e	-	,
	(iv) Details of compliance with applicable provisions of these regulations with respect to promoter's contribution and lock-in requirements.	Complied with	78-81	
	(v) If the issuer is exempt from the requirements of promoter's contribution, the relevant provisions under which it is so exempt.	Not Applicabl e	-	1
	(vi) A statement that the promoter undertakes to accept full conversion, if the promoters' contribution is in terms of the same optionally convertible debt instrument as is being offered to the public.	Not Applicabl e	-	
8(B) (l)	A statement that the issuer, its directors or the lead manager(s) have not entered into any buy-back arrangements for purchase of the specified securities of the issuer.	Complied with	81	Negative statement to that effect has been inserted



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER					
PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9,246(2)(b),	282(1)(f), 28	7(2), 291]	
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts	
	made fully paid-up, if applicable, or may be forfeited for non-payment of calls within twelve months from the date of allotment of securities.	with			
8(B) (n)	Details of shareholding, if any, of the lead manager(s) and their associates (as defined under the Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992) in the issuer	Not Applicabl e	82	Negative statement to that effect has been inserted	
8(B) (o)	Details of options granted or equity shares issued under any scheme of employee stock option or employee stock purchase of issuer, in the preceding three years (separately for each year) and on a cumulative basis for all options or equity shares issued prior to the date of the offer document.	Not Applicabl e	-	mserced	
8(B) (p)	The following details in cases where options granted to employees in pursuance of any employee stock option scheme existing prior to the initial public offer, are outstanding at the time of the initial public offer:	Not Applicabl e	-		
	(i) options granted;		-		
	(ii) options vested;		-		
	(iii) options exercised;		-		
	(iv) the exercise price;		-		
	(v) the total number of shares arising as a result of exercise of option;		ı		
	(vi) options lapsed;		-		
	(vii) variation of terms of options;		ı		
	(viii) money realised by exercise of options;		-	1	
	(ix) total number of options in force;		-		
	(x) employee-wise details of options granted to:		-		
	key managerial personnel and senior management		-		
	any other employee who receives a grant in any one year of options amounting to five per cent. or more of options granted during that year;	-	-		
	• identified employees who were granted options, during any one year, equal to or exceeding one per cent. of the issued capital (excluding outstanding warrants and conversions) of the issuer at the time of grant;	-	1	1	
	(xi) diluted Earnings Per Share pursuant to the issue of equity shares on exercise of options calculated in accordance with applicable accounting standard on 'Earnings Per Share'.	Not Applicabl e	1	-	
	(xii) where the issuer has calculated the employee compensation cost using the intrinsic value of the stock options, the difference between the employee compensation cost so computed and the employee compensation cost that shall have been recognised if it had used the fair value of the options and the impact of this difference on profits and on the Earnings Per Share of the issuer.  (xiii) description of the pricing formula and the method and	Not Applicabl e	-		



PART A	OFFER (See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b).	282(1)(f), 28	7(2), 2911
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
	significant assumptions used during the year to estimate the fair values of options, including weighted-average information, namely, risk-free interest rate, expected life, expected volatility, expected dividends, and the price of the underlying share in market at the time of grant of the option.	Not Applicabl e		
	(xiv) impact on the profits and on the Earnings Per Share of the last three years if the issuer had followed the accounting policies specified in Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014, in respect of options granted in the last three years.	Not Applicabl e	-	
	(xv) intention of the key managerial personnel, senior management and whole-time directors who are holders of equity shares allotted on exercise of options granted under an employee stock option scheme or allotted under an employee stock purchase scheme, to sell their equity shares within three months after the date of listing of the equity shares in the initial public offer (aggregate number of equity shares intended to be sold by the holders of options), if any. In case of an employee stock option scheme, this information same shall be disclosed regardless of whether the equity shares arise out of options exercised before or after the initial public offer.	Not Applicabl e	-	
	(xvi) specific disclosures about the intention to sell equity shares arising out of an employee stock option scheme or allotted under an employee stock purchase scheme within three months after the date of listing, by directors, key managerial personnel, senior management and employees having equity shares issued under an employee stock option scheme or employee stock purchase scheme amounting to more than one per cent. of the issued capital (excluding outstanding warrants and conversions), which inter-alia shall include name, designation and quantum of the equity shares issued under an employee stock option scheme or employee stock purchase scheme and the quantum they intend to sell within three months.	Not Applicabl e	-	1
	(xvii) details of the number of shares issued in employee share purchase scheme, the price at which such shares are issued, employee-wise details of the shares issued to	Not Applicabl e	-	
	key managerial personnel and senior management	-	-	
	• any other employee who is issued shares in any one year amounting to 5 per cent. or more shares issued during that year;	-	-	
	• identified employees who were issued shares during any one year equal to or exceeding 1 per cent. of the issued capital of the company at the time of issuance;	-	-	ŀ
	(xviii) diluted Earnings Per Share (EPS) pursuant to issuance of shares under employee share purchase scheme; and consideration received against the issuance of shares.	Not Applicabl e	-	
8(B) (q)	In case of a further public offer by a listed issuer, which has earlier (after being a listed issuer) made any preferential allotment or bonus issue or qualified institutions placement of specified securities in the ten years preceding the date of the draft offer document/offer document, a confirmation that the relevant	Not Applicabl e	-	



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER						
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	9, 246(2)(b), 2 Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	(37(2), 291]   Commen ts		
N.	provisions of the regulations have been complied with	2/1//1/12				
(9)	PARTICULARS OF THE ISSUE:					
9 (A)	Objects of the issue:					
9(A) 1	Objects of the issue.	Complied with	83			
9(A) 2	If one of the objects of the issue is loan repayment:	Complied	86			
	(a) details of loan proposed to be repaid such as name of the lender, brief terms and conditions and amount outstanding;	with				
	(b) certificate from the statutory auditor certifying the utilization of loan for the purposed availed.					
9(A) 3	If one of the objects is investment in a joint venture or a subsidiary or an acquisition, following additional disclosures:	Not Applicabl	-			
	(a) details of the form of investment, i.e., equity, debt or any other instrument;	e				
	(b) If the form of investment has not been decided, a statement to that effect;					
	(c) If the investment is in debt instruments, complete details regarding rate of interest, nature of security, terms of repayment,					
	subordination, etc.;					
	(d) Nature of benefit expected to accrue to the issuer as a result of the investment					
9(A) 4	If one of the objects of the issue is to grant a loan to an entity other than a subsidiary, details of the loan agreements, including the rate of interest, whether secured or unsecured, duration, nature of security, terms of repayment, subordination etc. and the nature of benefit expected to accrue to the issuer as a result of the investment. If such a loan is to be granted to any of the group companies, details of the same.	Not Applicabl e	-	,		
9(A) 5	If one of the objects of the issue is utilisation of the issue proceeds		89-92			
	for long-term working capital, the following additional disclosures	Complied				
	on a standalone basis:	with to				
		extent				
		applicable				
	(a) Basis of estimation of working capital requirement along with the relevant assumptions.	-	-			
	(b) Reasons for raising additional working capital substantiating the same with relevant facts and figures.	-	-			
	(c) Details of the projected working capital requirement, including detailed assessment of working capital after implementation of the	-	-			
	project or achievement of objects of the issue, as the case may be, capacity utilisation assumptions, break up of expected current assets into raw materials, finished goods, work in progress, sundry debtors etc., with assumption about the holding norms for each					
	type of current asset, total current liabilities, net current assets and envisaged sources of finance for net current assets, i.e., bank finance, institutional finance, own funds, etc.					
	(d) Total envisaged working capital requirement in a tabular form,	_	_	1		



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 23 Text	9, 246(2)(b), Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	(37(2), 291] Commen ts
	the margin money thereof and the portion to be financed by any bank(s) or otherwise.	2/11/11/12		
	(e) Details of the existing working capital available to the issuer with a break up for total current assets into raw materials, finished goods, work in progress, sundry debtors, etc., total current liabilities, net current assets and sources of finance for net current assets i.e. bank finance, institutional finance, own funds etc.	-	-	
	(f) If no working capital is shown as a part of project for which the issue is being made, the reasons for the same.	-	-	
9(A) 6	Land:			
	(a) Names of the entities from whom land has been acquired/proposed to be acquired along with the cost of acquisition, and the relationship, if any, of such entities to any promoter or director of the issuer, in case the proceeds of the issue are being utilised for acquisition of land.	Not Applicable	-	
	(b) Details of whether the land acquired by the issuer is free from all encumbrances and has a clear title and whether it is registered in the name of the issuer.	Not Applicable	-	
	(c) Details of whether the issuer has applied/ received all the approvals pertaining to land. If no such approvals are required to be taken by the issuer, then this fact may be indicated by way of an affirmative statement.	Not Applicable	-	
	(d) Figures appearing under this section shall be consistent with the figures appearing under the section "Cost of the Project".	Not Applicable	-	
9(A) 7	Project:	Not	-	
	If one of the objects of the issue is to fund a project, details of:	Applicabl		
	(a) location of the project;	e		
	(b) plant and machinery, technology, process, etc.;			
	i) Details shall be given in a tabular form, which shall include the			
	details of the machines required to be bought by the issuer, cost of the machines, name of the suppliers, date of placement of order and the date or expected date of supply, etc.			
	ii) In case machines are yet to be delivered, the date of quotations relied upon for the cost estimates given shall also be mentioned.			
	iii) The percentage and value terms of the plant and machinery for which orders are yet to be placed shall be stated.	-		
	(c) The details of the second hand machinery bought or proposed to be bought, if any, including the age of the machines, balance estimated life, etc. shall also be given. collaboration, performance			
	guarantee if any, or assistance in marketing by the collaborators. The following information regarding persons or entities with whom technical and financial agreements have been entered into shall be given:			
	i) place of registration and year of incorporation.	1		
	ii) paid up share capital.			
	iii) turnover of the last financial year of operation.			
	iv) general information regarding such persons relevant to the	]		



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	$9, 246(\overline{2)(b)}, 2$	282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comments
	issuer.			
	(d) infrastructure facilities for raw materials and utilities like water, electricity, etc.			
9(A) 8	Project:	Not	-	
,	If one of the objects of the issue is to purchase any property, where arrangements have been made, details of:	Applicabl e		
	(a) names address, descriptions and occupations of the vendors;			
	(b) the amount paid or payable in cash, shares or debentures to the vendor and, where there is more than one separate vendor, or the issuer is a sub purchaser, the amount so paid or payable to each vendor, specifying separately the amount, if any, paid or payable for goodwill;			
	(c) nature of the title or interest in such property acquired or to be acquired by the issuer;			
	(d) short particulars of every transaction relating to the property completed within the two preceding years, in which any vendor of the property to the issuer or any person who is, or was at the time of the transaction, a promoter, or a director or proposed director of the issuer had any interest, direct or indirect, specifying the date of the transaction and the name of such promoter, director or proposed director and stating the amount payable by or to such vendor, promoter, director or proposed director in respect of the transaction.			
	(e) The property to which sub-clause (a) to (d) apply is a property purchased or acquired by the issuer or proposed to be purchased or acquired, which is to be paid for wholly or partly out of the proceeds of the issue or the purchase or acquisition of which has not been completed as of the date of the draft offer document or offer document, as the case may be.			
9(A) 9	Plant/ Equipment/ Technology/ Process:	Complied	87-89	
	If one of the objects of the issue is to purchase any plant, machinery, technology, process, etc.  (i) Details in a tabular form, which shall include the details of the equipment required to be bought by the issuer, cost of the equipment, name of the suppliers, date of placement of order and the date or expected date of supply, etc.	with		
	<ul><li>(ii) In case the order for the equipment is yet to be placed, the date of quotations relied upon for the cost estimates given.</li><li>(iii) The percentage and value terms of the equipment for which orders are yet to be placed.</li></ul>			
	orders are yet to be placed.  (iv) The details of the second-hand equipment bought or proposed to be bought, if any, including the age of the machines, balance estimated life, etc.			
9(A) 10	In case of a public issue of secured convertible debt instruments,: description of the assets on which the security shall be created/asset cover, if required, shall be created, the basis for computation of the security cover, the valuation methods, the	Not Applicable		



DADTA	OFFER See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 152(1)(f), 22(	246(2)(b)	202(1)(£) 20	7(2) 2011
Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	Complie d with- Y/N/NA	Pg. No.	Commer
9(A) 11	If warrants are issued, the objects for which the funds from conversions of warrants are proposed to be used.		lot Applicab	le
9 (B)	REQUIREMENT OF FUNDS			
9(B) 1	Where the issuer proposes to undertake more than one activity or project, such as diversification, modernisation, expansion, etc., the total project cost activity-wise or project wise, as the case may be.	Not Applicabl e	-	
9(B) 2	Where the issuer is implementing the project in a phased manner, the cost of each phase, including the phase, if any, which has already been implemented, shall be separately given.	Not Applicabl e	-	
9(B) 3	Details of all material existing or anticipated transactions in relation to utilisation of the issue proceeds or project cost with promoters, promoter group, directors, key managerial personnel, senior management and group companies. The relevant documents shall be included in the list of material documents for inspection.	Not Applicabl e	-	
9 (C)	FUNDING PLAN (MEANS OF FINANCE):			
9(C)1	An undertaking by the issuer confirming that firm arrangements of finance have been made through verifiable means towards seventy-five per cent. of the stated means of finance for the project proposed to be funded from issue proceeds, excluding the amount to be raised through proposed issue and existing identifiable internal accruals.	Complied with	85-86	
9(C)2	Balance portion of the means of finance for which no firm arrangement has been made without specification	Not Applicabl e	ı	
9(C)3	Details of funds tied up and the avenues for deployment of excess proceeds, if any.	Not Applicabl e	-	
9 (D)	APPRAISAL:	Not Applicabl e	95	We have inserted a negative statement to that effect
9(D)1	Scope and purpose of the appraisal, if any, along with the date of appraisal.	Not Applicabl e	-	
9(D)2	Cost of the project and means of finance shall be as per the appraisal report.	Not Applicabl e	-	
9(D)3	Explanation of revision, if any, in the project cost and the means of finance after the date of issue of the appraisal report.	Not Applicabl e	-	
9(D)4	Weaknesses and threats, if any, given in the appraisal report, by way of risk factors.	Not Applicabl e	-	
9(D)5	Disclaimer clauses of the appraisal report, as applicable.			
9 (E)	SCHEDULE OF IMPLEMENTATION Schedule of implementation of the project in a tabular form and the	Complied with	84-85	



PART A [	OFFER See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b),	282(1)(f), 28°	7(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	progress made so far, giving details of land acquisition, civil works, installation of plant and machinery, trial production, date of			
	commercial production and reasons for delay, if any.			
9 (F)	DEPLOYMENT OF FUNDS	~	24.25	
9(F)1	Details of the sources of funds and the deployment of these funds on the project (where the issuer is raising capital for a project), up to a date not earlier than two months from the date of filing of the offer document, as certified by a statutory auditor of the issuer and the date of the certificate.	Complied with	84-85	
9(F)2	Where the promoters' contribution has been brought prior to the public issue, which is utilised towards means of finance for the stated objects and has already been deployed by the issuer, a cash flow statement from the statutory auditor, disclosing the use of such funds received as promoters' contribution.	Not Applicabl e	-	
9 (G)	SOURCES OF FINANCING OF FUNDS ALREADY	Not	82, 85, 95	Negative
	DEPLOYED	Applicabl		statement
	Means and source of financing, including details of bridge loan or other financial arrangement, which may be repaid from the proceeds of the issue.	e		has been inserted
9 (H)	DEPLOYMENT OF BALANCE FUNDS	Complied	85	
<i>y</i> (11)	Year-wise break-up of the expenditure proposed to be incurred on the project.	with		
9 (I)	INTERIM USE OF FUNDS	Complied	95	
	A statement that net issue proceeds pending utilization (for the stated objects) shall be deposited only in the scheduled commercial banks.	with		
9 (J)	EXPENSES OF THE ISSUE:	Noted for	93-94	
<i>y</i> (0)		Complian ce	,,,,,	1
	Expenses of the issue along with a break up for each item of	Noted for	93	
	expense, including details of the fees payable to separately as	Complian		
	under (in terms of amount, as a percentage of total issue expenses and as a percentage of total issue size):	ce	_	
	(1) Lead manager(s) fees including underwriting commission	Noted for	93	
		Complian ce		
	(2) Brokerage, selling commission and upload fees	Noted for	93	1
		Complian ce		
	(3) Registrars to the issue	Noted for	93	
		Complian		
		ce		
	(4) Legal Advisors	Noted for	93	
		Complian		
		ce		
	(5) Advertising and marketing expenses	Noted for Complian ce	93	
	(6) Regulators including stock exchanges	Noted for	93	-



	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239			37(2), 291]
egulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
		Complian ce		
	(7) Printing and distribution of issue stationary	Noted for Complian	93	
	(8) Others, if any (to be specified).	Noted for Complian	93	
9 (K)	BASIS FOR OFFER PRICE			
(K) (1)	The basis for issue price, floor price or price band, as the case may be, on a consolidated basis, after giving effect to any bonus or split of shares undertaken after the last balance sheet date:			
	(a) Earnings Per Share and Diluted Earnings Per Share, pre-issue, for the last three years (as adjusted for changes in capital).	Complied with	97	
	(b) Price to Earnings ratio pre-issue.	Noted for Complian ce	97-98	
	(c) Average Return on Net Worth in the last three years.	Complied with	98	
	(d) Net Asset Value per share based on the last balance sheet.	Complied with	98	
	(e) Net Asset Value per share after the issue and comparison thereof with the issue price	Complied with	98	
	(f) An illustrative format of disclosure in respect of the basis for issue price	Noted for Complian ce	-	
	(g) Comparison of accounting ratios of the issuer as mentioned in items (a) to (f) above with the industry average and with the accounting ratios of the peer group (i.e., companies of comparable size in the same industry), indicating the source from which industry average and accounting ratios of the peer group has been taken. In this regard, the following shall be ensured:	Complied with	98-99	
	Consistency in comparison of financial ratios of issuer with companies in the peer group, i.e., ratios on consolidated basis (wherever applicable) of issuer shall be compared with ratios on consolidated basis (wherever applicable) of peer group, respectively.  Financial information relating to companies in the peer group shall be extracted from the regulatory filings made by such companies to compute the corresponding financial ratios.			
	(h) The fact of dilution of financial ratios consequent upon issue of bonus shares, if any, and justification of the issue price after taking into account the diluted ratios with reference to the expanded capital.	Noted For Complian ce	-	
	(i) The following statement in case of a book-built issue: "The price band/floor price/issue price has been determined by the	Noted For Complian	97, 103	



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER  PARE A 15 - 17 24(2)(1) 57(1)(2) 70(2) 122(2)(1) 152(1)(2) 222(2)(2)(2) 222(2)(2)(2)(2)(2)(2)(2)(2)(2)(2)(2)(2)(					
PART A   Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	Commen ts	
	book-building."				
	(j) The following statement in case of a fixed price issue:	Not	-		
	"The issue price has been determined by the issuer in consultation	Applicabl			
	with the lead manager(s) and justified by the issuer in consultation	e			
	with the lead manager(s) on the basis of the above information."				
	(k) Accounting ratios in support of basis of the issue price shall be	Not	-		
	calculated after giving effect to the consequent increase in capital	Applicabl			
	on account of compulsory conversions outstanding, as well as on	e			
	the assumption that the options outstanding, if any, to subscribe for				
	additional capital will be exercised.	1			
9(K) (2)	Issue of debt instruments bearing interest less than the bank rate:	Not	-		
	Whenever fully convertible debt instruments are issued bearing	Applicabl			
	interest at a rate less than the bank rate, disclosures about the price	e			
	that would work out to the investor, taking into account the				
	notional interest loss on the investment from the date of allotment				
	of fully convertible debt instruments to the date(s) of conversions).				
9(K)(3)	For all the Key Performance Indicators (KPIs) disclosed in				
` / ` /	the offer document, the Issuer Company and the lead merchant				
	bankers (LMs) shall ensure the following:				
	a)KPIs disclosed in the offer document and the terms used in	Complied	99-100		
	KPIs shall be defined consistently and precisely in the	with			
	"Definitions and Abbreviations" section of the offer document				
	using simple English terms /phrases so as to enable easy				
	understanding of the contents. Technical terms, if any, used				
	in explaining the KPIs shall be further clarified in simple terms.				
	b) KPIs disclosed in the offer document shall be	Complied	99-100		
	approved by the Audit Committee of the Issuer Company	with		1	
	c) KPIs disclosed in the offer document shall be certified by	Complied	99		
	the statutory auditor(s) or Chartered Accountants or firm of	with			
	Charted Accountants, holding a valid certificate issued by the Peer				
	Review Board of the Institute of Chartered Accountants of India or				
	by Cost Accountants, holding a valid certificate issued by the Peer				
	Review Board of the Institute of Cost Accountants of India.				
	d) Certificate issued with respect to KPIs shall be included in the	Noted for	-		
	list of material documents for inspection	Complian			
		ce			
	e) For each KPI being disclosed in the offer document, the details	Noted for	-		
	thereof shall be provided for period which will be co-terminus	Complian			
	with the period for which the restated financial information is	ce			
	disclosed in the offer document.				
	f) KPIs disclosed in the offer document should be	Complied	-		
	comprehensive and explanation shall be provided on how	with and			
	these KPIs have been used by the management historically to	Noted for			
	analyse, track or monitor the operational and/or financial	Complian			
	performance of the Issuer Company.	ce			
	g) Comparison of KPIs over time shall be explained based on	Noted for	-		
	additions or dispositions to the business, if any. For e.g. in	Complian			
	case the Issuer Company has undertaken a material acquisition	ce			
	or disposition of assets / business for the periods that are				



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239			
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	covered by the KPIs, the KPIs shall reflect and explain the same.			
	h) For 'Basis for Issue Price' section, the following disclosures shall be made: (i) Disclosure of all the KPIs pertaining to the Issuer Company that have been disclosed to its investors at any point of time during the three years preceding to the date of filing of the DRHP / RHP.	Noted for Complian ce	- 99-100 99	
	(ii) Confirmation by the Audit Committee of the Issuer Company that verified and audited details for all the KPIs pertaining to the Issuer Company that have been disclosed to the earlier investors at any point of time during the three years period prior to the date of filing of the DRHP / RHP are disclosed under 'Basis for Issue Price' section of the offer document.  (iii) Issuer Company in consultation with the lead merchant banker may make disclosure of any other relevant and material KPIs of the business of the Issuer Company as it deems appropriate that have a bearing for arriving at the basis for issue price.  (iv) Cross reference of KPIs disclosed in other sections of the offer document to be provided in the 'Basis for Issue Price' section of the offer document.  (v) For the KPIs disclosed under the 'Basis for Issue Price' section, disclosure of the comparison with Indian listed peer companies and/ or global listed peer companies, as the case may be (wherever available). The set of peer companies shall include companies of comparable size, from the same industry and with similar business model (if one to one comparison is not possible, appropriate notes to explain the differences may be included).  (vi) The Issuer Company shall continue to disclose the KPIs which were disclosed in the 'Basis for Issue Price' section of the offer document, on a periodic basis, at least once in a year (or for any lesser period as determined by the Issuer Company), for a duration that is at least the later of (i) one year after the listing date or period specified by the Board; or (ii) till the utilization of the issue proceeds as per the disclosure made in the objects of the issue section of the prospectus. Any change in these KPIs, during the aforementioned period, shall be explained by the Issuer Company. The ongoing KPIs shall continue to be certified by a member of an expert body as per clause 3(c).		193 100-101	
9(K)(4)	For issue price, floor price or price band, as the case may be, disclosed in the offer document, the Issuer Company and the lead merchant banker (LMs) shall disclose the details with respect to	Noted for Complian	-	
	the following:  (a) Price per share of Issuer Company based on primary /			11



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER  PARE A 15 12 24(2)(1) 57(4)(2) 27(2) 20(2)(1) 27(2) 20(1)(2) 20(2)(1) 2				
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	9, 246(2)(b), Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	7(2), 291] Commen ts
	new issue of shares (equity/convertible securities), excluding shares issued under ESOP/ESOS and issuance of bonus shares, during the 18 months preceding the date of filing of the DRHP / RHP, where such issuance is equal to or more than 5 per cent of the fully diluted paid-up share capital of the Issuer Company (calculated based on the pre-issue capital before such transaction/s and excluding employee stock options granted but not vested), in a single transaction or multiple transactions combined together over a span of rolling 30 days; and		101	
	(b) Price per share of Issuer Company based on secondary sale / acquisition of shares (equity/convertible securities), where promoter / promoter group entities or shareholder(s) selling shares through offer for sale in IPO or shareholder(s) having the right to nominate director(s) in the Board of the Issuer Company are a party to the transaction (excluding gifts), during the 18 months preceding the date of filing of the DRHP / RHP, where either acquisition or sale is equal to or more than 5 per cent of the fully diluted paid-up share capital of the Issuer Company (calculated based on the pre-issue capital before such transaction/s and excluding employee stock options granted but not vested), in a single transaction or multiple transactions combined together over a span of rolling 30 days.		102	
	Note: 1. In case there are no such transactions to report under (a) and (b), then the information shall be disclosed for price per share of the Issuer Company based on last 5 primary or secondary transactions (secondary transactions where promoter / promoter group entities or shareholder(s) selling shares through offer for sale in IPO or shareholder(s) having the right to nominate director(s) in the Board of the Issuer Company, are a party to the transaction), not older than 3 years prior to the date of filing of the DRHP / RHP, irrespective of the size of transactions.  2. Price per share disclosed, shall be adjusted for corporate actions e.g. split, bonus etc. done by the Issuer Company.  (c) Floor price and cap price being [·] times the weighted average cost of acquisition (WACA) based on primary/ secondary transaction(s) as disclosed in terms of clause (a) and (b) or Note 1 above, shall be disclosed in the following manner:		102-103	



PART A [	See regulations 17,	24(2)(b), 57(1)	(f), 70(2), 122(2)	(ii), 153(1)(f)	, 239, 246(2)(b),	282(1)(f), 28	37(2), 291]
egulatio n		Te	xt		Complie d with- Y/N/NA	Pg. No.	Commen ts
	Past Transactio ns	WACA (in Rs,)	IPO Floor Price in Rs. [·]	IPO Cap Price in Rs. [·]			
	WACA of Primary issuance		[●] times	[•] times			
	WACA of secondary transactions		[●] times	[•] times			
	price, along v financials ratio period (if any)  (e) Explanation f WACA of Priprice in vie influenced the final discontinuous forms and financial to be included price band is disclosed in	with comparison os for the last the included in the for offer price mary issuance as we of the expricing of the issuance ion of a Comparison o	price / Second ternal factors w	any's KPIs a years and s  g [•] times ary transact which may had in the Prestors' section to the prestors of t	of ion ave		
9 (L)	disclosed in 'E	Basis for Issue P	rice' section.]				
, (L)	Any special tax be issuer and its shar accordance with (Listing Obligation 2015.	enefits (under di eholders and its the Securities	material subsidian and Exchange	ries identified Board of In	d in with dia	104-107	
10	About the Issuer						
10 (A)	Industry Overvio	ndustry report is ustry report sh				108-134	
10 (B)	Business Overvie						
IV (D)		* * *					



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER					
	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 235		282(1)(f), 28	7(2), 291]	
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts	
(a)	Primary business of the Issuer;		135		
(b)	Plant, machinery, technology, process, etc.	Complied with	142		
(c)	Description of subsisting collaborations, any performance guarantee or assistance in marketing by the collaborators, infrastructure facilities for raw materials and utilities like water, electricity, etc.	Not Applicabl e	1		
(d)	Products or services of the issuer:				
	i. Nature of the product(s)/services, and the end users.	Complied with	135-139, 142-145		
	ii. Approach to marketing of products and services.	Complied with	142-145		
2	BUSINESS STRATEGY				
	Description of the business strategy of the issuer, without any forecast of projections relating to the financial performance of the issuer	Complied with	139		
3	CAPACITY AND CAPACITY UTILISATION:				
	A table shall be incorporated giving the existing installed capacities for each product, capacity utilisation for such products in the previous three years.	Complied with	145		
4	INTELLECTUAL PROPERTY RIGHTS				
(a)	If the issuer is entitled to certain intellectual property rights such as trademarks, brand names, etc. whether the same are legally held by the issuer and whether all formalities in this regard have been complied with.	Complied with	152 - 153		
(b)	In case any of the material intellectual property rights are not registered in the name of the issuer, the name of the entity with which these are registered.	Complied with to the extent applicable	152	1	
(c)	In case the intellectual property rights are registered in the name of an entity in which the promoters are interested, the salient features of the agreement entered into for the use of the intellectual property rights by the issuer	Not Applicabl e	-		
5	PROPERTY	G " '	150 151		
	Details of its material properties	Complied with	153-154	1	
(C)	KEY INDUSTRY-REGULATION (IF APPLICABLE)	Complied with	155-160		
<b>(D)</b>	HISTORY AND CORPORATE STRUCTURE OF THE ISSUER			50.	
(1)	History including the following details:				
	(a) Details of the issuer such as the date of incorporation, date of commencement of business, date of conversion of partnership into limited company or private limited company to public limited company, as applicable, dates on which names have been changed, if applicable, reasons for change of name, changes in registered offices of the issuer and reasons thereof.	Complied with	161		
		i	ii		



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 23(1)(f), 24(2)(f), 24(2)(f), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 23(1)(f), 24(2)(f), 24(2)(	9, 246(2)(b), Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	(2), 291] Commen ts
		with		
	(i) Significant financial or strategic partnerships	Complied with	163	We have inserted a negative statement to that effect
	(ii) Time/cost overrun in setting up projects	Complied with	163	We have inserted a negative statement to that effect
	(iii) Capacity/facility creation, location of plants	Complied with	163	
	(iv) launch of key products or services, entry in new geographies or exit from existing markets	Complied with	163	
	(v) Key awards, accreditations or recognition	Not Applicabl e	-	
	(vi) Defaults or rescheduling/ restructuring of borrowings with financial institutions/ banks	Complied with	163	
	(c) Details regarding material acquisitions or divestments of business/undertakings, mergers, amalgamation, any revaluation of assets etc., if any, in the last ten years.	Complied with	162	We have inserted a negative statement to that effect
(2)	Main objects as set out in the Memorandum of Association of the issuer and dates on which the Memorandum of Association of the issuer has been amended citing the details of such amendments in the last ten years.	Complied with	161	,
(3)	Details regarding holding company, subsidiary/subsidiaries and joint venture(s), if applicable, of the issuer including:  (a) Name of the holding company/subsidiary/joint venture;  (b) nature of business;  (c) capital structure;  (d) shareholding of the issuer;  (e) amount of accumulated profits or losses of the subsidiary(ies) not accounted for by the issuer.	Not Applicabl e	164	
(E)	SHAREHOLDERS' AGREEMENTS AND OTHER AGREEMENTS:  (a) Key terms of subsisting shareholders' agreements, if any (to be	Not		
	provided even if the issuer company is not a party to such an agreement but is aware of such an agreement).  (b) Any agreement entered into by a key managerial personnel or	Applicabl e Not	-	
	senior management or director or promoter or any other employee of the issuer, either by themselves or on behalf of any other person, with any shareholder or any other third party with regard to	Applicabl e		



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239			
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	compensation or profit sharing in connection with dealings in the securities of the issuer.			
	(c) Guarantees, if any, given to third parties by the promoter offering its shares in the proposed offer for sale, stating reasons, amount, obligations on the issuer, period of guarantee, financial implications in case of default, security available, consideration etc.	Not Applicabl e	-	
	(d) Key terms. dates, parties to and general nature of any other subsisting material agreements including with strategic partners, joint venture partners and/or financial partners, entered into, other than in the ordinary course of business of the issuer	Not Applicabl e	-	
	(e) All such shareholders' agreements and other agreements shall be included in the list of material contracts as required under subitem (1) of Item (18).	Not Applicabl e	-	
<b>(F)</b>	MANAGEMENT			
(a)	Board of Directors			
(a)(i)	Name, Director Identification Number, date of birth, age, qualifications, experience, address, occupation and date of expiration of the current term of office of manager, managing director, and other directors (including nominee directors and, whole-time directors), period of directorship, and their directorships in other companies	Complied with	166-168	
(a)(ii)	For each person, details of current and past directorship(s) in listed companies whose shares have been/were suspended from being traded on any of the stock exchanges, during his/her tenure, as follows:	Not Applicabl e	169	We have inserted a negative statement
	(a) Name of the Company:			to that
	(b) Listed on (give names of the stock exchange(s)):			effect
	(c) Date of suspension on the stock exchanges:			11
	(d) If trading suspended for more than three months, reasons for suspension and period of suspension.			
	(e) If the suspension of trading revoked, the date of revocation of suspension.			
	(f) Term (along with relevant dates) of the director in the above company(ies).			
	(The above details shall be given for the preceding five years. In case of fast-track issues filed under the provisions of these regulations; the period of five years shall be reckoned on the date of filing of the offer document.)			1
(a)(iii)	For each person, details of current and past directorship(s) in listed companies which have been/were delisted from the stock exchange(s), during his/her tenure, as follows:	Not Applicabl e	169	We have inserted a negative
	Name of the Company:     Listed on [give name of the stock exchange(s)]:			statement to that
		-		effect
	Date of delisting on the stock exchange(s):			
	Compulsory or voluntary delisting:	-		
	Reasons for delisting:	-		
	· If relisted, date of relisting on [give name of the stock exchange(s)]			



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	0,246(2)(b),	282(1)(f), 28	7(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	• Term (along with relevant dates) of the director in the above company/companies.			
(a)(iv)	Nature of any family relationship between any of the directors or any of the directors and key managerial personnel or senior management.	Not Applicabl e	169-170	We have inserted a negative statement to that effect
(a)(v)	Any arrangement or understanding with major shareholders, customers, suppliers or others, pursuant to which of the directors was selected as a director or member of senior management.	Not Applicabl e	169	We have inserted a negative statement to that effect
(a)(vi)	Details of service contracts entered into by the directors with the issuer providing for benefits upon termination of employment and a distinct negative statement in the absence of any such contract.	Not Applicabl e	169	We have inserted a negative statement to that effect
(a)(vii)	Details of borrowing powers.	Complied with	172,173	
(b)	Compensation of Managing Directors and/or Whole-time Directors:			
(b)(i)	The dates, parties to, and general nature of every contract appointing or fixing the remuneration of a Director, Whole-time Director, Managing Director or Manager entered into in the preceding two years. During the last financial year, the amount of compensation paid, and benefits in kind granted on an individual basis to all such persons, by the issuer for services in all capacities to the issuer and remuneration paid or payable by subsidiary or associate company (as defined under the Companies Act, 2013). The disclosure shall also cover contingent or deferred compensation accrued for the year, even if the compensation is payable at a later date.	Complied with	170-171	
(b)(ii)	If any portion of the compensation was paid pursuant to a bonus or profit- sharing plan, a brief description of the plan and the basis upon which the directors participate in the plan.	Complied with	172	We have inserted a negative statement to that effect
(b)(iii)	All such contracts shall be included in the list of material contracts required under sub-item (1) of Item (18).	Complied With	302	
(c)	Shareholding of directors, including details of qualification shares held by them, if applicable.	Complied with to the extent applicable	172	
(d)	Interest of Directors:	·	-	
(d)(i)	Nature and extent of interest, if any, of every director in the issuer, including in any property acquired or proposed to be acquired of	Complied with	172	



PART A	OFFER (See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b).	282(1)(f), 28	7(2), 2911
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
	the issuer or by the issuer or in the promotion or formation of the issuer			
(d)(ii)	Where the interest of such a director consists in being a member of a firm or company, the nature and extent of the interest of the firm or company, with a statement of all sums paid or agreed to be paid to him or to the firm or company in cash or shares or otherwise by any person either to induce him to become, or to qualify him as, a director, or otherwise for services rendered by him or by the firm or company, in connection with the promotion or formation of the issuer shall be disclosed.	Not Applicabl e	-	
(e)	Change, if any, in the directors during the last three years, and reasons, thereof.  Management Organisation Structure.	Complied with Complied	172 180	
(f)		with	160	
(g) (g)(i)	Corporate Governance:  A statement that the issuer has complied with the requirements of corporate governance relating to the composition of its board of directors, constitution of committees such as audit committee, nomination and remuneration committee, stakeholders relationship committee, etc., as provided under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Complied with	173	
(g)(ii)	Details relating to the issuer's audit committee, nomination and remuneration committee, stakeholders' relationship committee and risk management committee (if applicable) including the names of committee members and the terms of reference under which the committees operate.	Complied with	173-179	
(h)	Key Managerial Personnel and Senior Management;			
(h)(i)	Details of the key managerial personnel and senior management indicating name, date of joining, qualification, term of office with date of expiration of term and details of service contracts including termination/retirement benefits, if any, details of previous employment, etc.	Complied with	181	
(h)(ii)	Past business experience, and functions and areas of experience in the issuer. Nature of any family relationship between any of the key managerial personnel and senior management	Complied with	181	
(h)(iii)	Any arrangement or understanding with its major shareholders, customers, suppliers or others, pursuant to which any of the key managerial personnel or senior management was selected as key managerial personnel.	Complied with	181	We have inserted a negative statement to that effect
(h)(iv)	During the last financial year, the amount of compensation paid, and benefits in kind granted, to the key managerial personnel and senior management on an individual basis, by the issuer for services in all capacities to the issuer, including contingent or deferred compensation accrued for the year, even if the compensation is payable at a later date.	Complied with	170-171, 181	
(h)(v)	If any portion of the compensation or otherwise was paid pursuant to a bonus or profit-sharing plan, a brief description of the plan and	Not Applicabl	182	We have inserted a



PART A [	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	0,246(2)(b),2	282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	the basis upon which the key managerial personnel and senior management participate in the plan.	e		negative statement to that effect
(h)(vi)	Status of each key managerial personnel or senior management as a permanent employee or otherwise.	Complied with	181	
(h)(vii)	Shareholding of each key managerial personnel and senior management in the issuer.	Complied with	181	We have inserted a negative statement to that effect
(h)(viii)	Changes in the Key Managerial Personnel or senior management: Any change other than by way of retirement in the normal course in the key managerial personnel in the preceding three years	Complied with	182	enect
(h)(ix)	If the attrition of key management personnel or senior management is high compared to the industry, reasons should be disclosed.	Not Applicabl e	-	
(h)(x)	Employees:  Refer the page where disclosures regarding employees stock option scheme/ employees stock purchase scheme of the issuer, if any, as required by the Regulations or Regulations of the Board relating to Employee Stock Option Scheme and Employee Stock Purchase Scheme, is given.	Complied with	182	We have inserted a negative statement to that effect
	Payment or Benefit to key managerial personnel and senior management of the issuer (non- salary related): Any amount or benefit paid or given within the two preceding years or intended to be paid or given to any officer and consideration for payment of giving of the benefit.	Complied with	182	
( <b>G</b> )	PROMOTERS/ PRINCIPAL SHAREHOLDERS			
(a)	Where the promoters are individuals:			
(a)(i)	A complete profile of all the promoters, including their name, date of birth, age, personal addresses, educational qualifications, experience in the business or employment, positions/posts held in the past, directorships held, other ventures of each promoter, special achievements, their business and financial activities, photograph, and Permanent Account Number.	Complied with	183	
(a)(ii)	A declaration confirming that the Permanent Account Number, Bank Account Number(s) and Passport Number, Aadhar card number and driving license number of the promoters have been submitted to the stock exchanges on which the specified securities are proposed to be listed, at the time of filing the draft offer document.	Complied with	183	
(b)	Where the promoters are companies:	Not Applicabl e	-	
(b)(i)	Brief history of the promoters such as date of incorporation,	-	_	



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b),	282(1)(f), 28	7(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
	Where the promoters of such companies are again companies or bodies corporate, names of natural persons in control (i.e., holding fifteen per cent. or more voting rights) or who are on the board of directors of such bodies corporate.			
(b)(iii)	Details of change in control of the promoter companies, if any, including details of the persons who held the controlling interest in the preceding three years.	-	-	
(b)(iv)	Declaration confirming that the Permanent Account Numbers, Bank Account Numbers, the Company Registration Numbers and the addresses of the Registrars of Companies where the companies are registered have been submitted to the stock exchanges on which the specified securities are proposed to be listed, at the time of filing the draft offer document or draft letter of offer with them;	-	-	
(c)	Where alternative investment funds or foreign venture capital investors registered with the Board, are identified as promoters, the following shall be applicable,	Not Applicabl e	-	
(c)(i) (c)(ii)	Details of the Fund Manager;  Generic details of the Fund, which is the investor in the issuer company;			
(c)(iii)	Details such as total number of investors in the Fund, distribution of investors category - wise (institutional, corporate, individual etc.) and percentage stake held by each investor category;			
(c)(iv)	Details of companies funded by the Funds, namely:-  (a) Total number of companies funded;  (b) Distribution of such companies - country wise, holding period wise, sector wise;  (c) Number of companies under the control of the Fund, directly or indirectly;			
	(d) In respect of companies where such Funds have offered their shares for lock-in as part of minimum promoter's contribution:-			
	Name of the company	_		
	Date of listing on each stock exchange     Fund's shareholding in the company as on the date of listing			
	Fund's shareholding in the company as on the date of filing of the DRHP of the company that now seeks to get listed			
(c)(v)	Average holding period of the Fund's investments;			
(c)(vi) (d)	Sector focus/core specialization of the Fund, if applicable.  If the present promoters are not the original promoters and control of the issuer was acquired in the preceding five years, details regarding the acquisition of control, date of acquisition, terms of acquisition, consideration paid for acquisition and compliance with the provisions of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as applicable, and the Listing Agreement or the Securities and Exchange Board of India (Listing Obligations and Disclosure	Not Applicabl e	-	



OFFER  PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]					
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comments	
(e)	If there is no identifiable promoter, details of the shareholders who control individually or as a group, fifteen per cent. or more of the voting rights of the issuer and of persons, if any, who have the right to appoint director(s) on the board of directors of the issuer.	Not Applicabl e	1		
(f)	If the promoters do not have experience in the proposed line of business, that fact shall be disclosed explaining how the proposed activities would be carried out/managed.	Not Applicabl e	-		
(g)	If the promoters have any interest in the issuer other than as promoters, brief details of the interest	Complied with	183-184		
(h)	Full particulars of the nature and extent of the interest, if any, of promoter(s), directors or group companies:				
	(i) in the promotion of the issuer;	Complied with	183-184		
	(ii) in any property acquired by the issuer in the preceding three years or proposed to be acquired by it.	Not Applicabl e	-		
	(iii)where the interest of such a director or promoter consists in being a member of a firm or company, the nature and extent of the interest of the firm or company, with a statement of all sums paid or agreed to be paid to such director or to the firm or company in cash or shares or otherwise by any person either to induce such person to become, or to qualify such person as a director, or otherwise for services rendered by such person or by the firm or company, in connection with the promotion or formation of the issuer.	Not Applicabl e	-		
	(iv) in any transaction in acquisition of land, construction of building and supply of machinery, etc. with full details of the transaction and the amount involved	Not Applicabl e	-		
(i)	Payment or benefit to the Promoter of the Issuer: Any amount or benefit paid or given in the preceding two years or intended to be paid or given to any promoter or promoter group and consideration for payment of giving of the benefit.	Complied with	184		
(j)	Brief details of material guarantees, if any, given to third parties by the promoters with respect to specified securities of the issuer.	Complied with	184	We hav inserted negative statement to that effect	
(k)	A list of all individuals and entities forming part of the promoter group of the issuer.	Complied with	185		
(1)	If the promoters have disassociated themselves from any of the companies or firms during the preceding three years, the reasons thereof and the circumstances leading to the disassociation together with the terms of such disassociation.	Complied with	184	We hav inserted negative statement to that effect	
(H)	DIVIDEND POLICY				
	Dividend policy and mode of payment of dividend, details of	Complied	187		



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	9, 246(2)(b), Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	Commen ts
	as applicable, and the period between last audited period and the date of the filing the draft offer document / draft letter of offer/offer document.			
11	FINANCIAL STATEMENTS:			
<b>(I)</b>	Requirements in case Indian Accounting Standards (Ind AS) is applicable in the latest period presented in Restated Financial Information	Not Applicabl e	-	
	Financial information section of the offer document will be divided into two parts, viz., restated financial information and other financial information. The restated and other financial information should be complete in all respects. To avoid duplication of disclosures in the offer document, appropriate use of cross reference may be made to the restated and other financial information.	-	-	
(A)	Restated Financial information			
(i)	Consolidated Financial Statements (CFS) prepared in accordance with Ind AS for three years and the stub period (if applicable) should be audited and certified by the statutory auditor(s) or Chartered Accountants who holds a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India (ICAI). The stub period CFS shall be required, if Ind AS CFS for latest full financial year included in the offer document is older than six months from the date of filing of the draft offer document/offer document. The stub period should not end up to a date earlier than six months of the date of filing of the draft offer document/offer document. In accordance with Ind AS 34 Interim Financial Reporting, the group should present a complete Ind AS CFS for the stub period, except the issuer has been exempted from presenting comparatives for the stub period. CFS shall be prepared as per Companies Act, 2013 (as amended).	Not Applicabl e	-	
	(a) The CFS (including for the stub period if applicable) should be restated to ensure consistency of presentation, disclosures and the accounting policies for all the periods presented in line with that of the latest financial year/ stub period presented. Similarly, significant errors, non-provisions, regrouping, other adjustments, if any, should be reflected in the corresponding period. The changes in accounting policies and the correction of errors, should be disclosed in accordance with the requirements of Ind AS 8 Accounting Policies, Changes in Accounting Estimates and Errors. Changes in estimates, if any, need not to be restated, as they are events of that corresponding year. The issuer has an option to present comparatives for the stub period.	Not Applicabl e	-	
	(b) SA 705 Modification to the Opinion in the Independent Auditor's Report requires a qualified opinion, adverse opinion or disclaimer of opinion for material misstatements. With respect to an eligible issuer, audit modifications, which are quantifiable or can be estimated shall be adjusted in the restated financial information in the appropriate period. In situations where the	Not Applicabl e	-	-



	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239			37(2), 291]
degulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
	qualification cannot be quantified or estimated, appropriate disclosures should be made in the notes to account, explaining why the qualification cannot be quantified or estimated.  (c) A reconciliation explaining the differences between the audited			
	CFS equity and profit (loss) and the restated CFS should be presented in a columnar format.  (d) The auditor or chartered accountants shall issue an examination			
	report on the restated and audited financial information in accordance with the Guidance Note issued by the ICAI from time to time.			
	(e) Auditor should have a valid peer review certificate issued by the Peer Review Board of the ICAI as on the date of signing the restated financial information. If a new auditor holding a valid peer review certificate is appointed for the stub period, and the predecessor auditor did not hold a valid peer review certificate at			
	the date of signing the last annual financial statement, then the last annual financial statement would need to be re-audited by the new auditor in accordance with applicable standards. The re-audit may exclude audit reporting matters on CARO, internal financial control and other pure regulatory matters. Where auditor earlier			
	held a valid peer review certificate, but did not hold a valid certificate at the date of signing the restated financial information, the earlier certificate shall be considered valid provided there is no express refusal by the peer review board to renew the certificate and the process to renew the peer review certificate was initiated			
	by the auditor.  (f) Where an issuer does not have a subsidiary, associate or joint venture, in any financial year, the issuer shall present separate financial statements for that financial year by following the applicable requirements of a restated CFS.			
	(g) List of the related parties and all related party transactions of the consolidated entities (whether eliminated on consolidation or not), which require disclosure under Ind AS 24 and/ or covered under section 188(2) of the Companies Act, 2013 (as amended), as disclosed in the separate financial statement of the consolidated entities, should be disclosed in the restated financial information.	Not Applicabl e	-	
	All funding arrangements including inter-se guarantees among the entities consolidated; except contribution to equity share capital, shall be disclosed. The important terms and conditions of the funding arrangement and fund transfer restrictions, if any, should be disclosed in the restated financial information			
	(h) In case where Ind AS is not applicable to the Company for any of the years the principles laid down in Circular No SEBI/HO/CFD/DIL/CIR/P/2016/47 of March 31, 2016 or any other relevant circular issued by the Board from time to time, shall apply.			
(ii)	The separate audited financial statements for past three full financial years immediately preceding the date of filing of offer document of the issuer company and all its material subsidiaries			



PART A	[See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b),	282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen
	the materiality thresholds in (b) below. Alternatively, relevant link should be provided to the financial statement of subsidiaries on the Issuer's website. The link to the issuer's separate financial statement should be specified in the offer document. For this purpose, subsidiaries shall be identified based on definitions in the Companies Act, 2013. The above requirements shall apply for the periods of existence of the parent-subsidiary relationship.			
	(a) a certified English translated copy of the financial statements should be made available on the Company's website for every entity consolidated whose financial statements are not presented in English.			
	(b) The financial statements reported in any currency other than Indian Rupee shall be translated into Indian Rupee in accordance with Ind AS 21. The Effects of Changes in Foreign Exchange Rates. The financial statements of all foreign consolidated entities should be audited, unless they are not material to the CFS and the local regulation does not mandate audit. For this purpose, a consolidated entity shall be considered 'material' if it contributes 10% or more to the turnover or net-worth or profits before tax in the annual CFS of the respective year. Additionally, total unaudited information included in the in the CFS shall not exceed 20% of the turnover or net-worth or profits before tax of the CFS of the respective year. For the purpose of this clause, definition of turnover, net-worth and profits before tax should be as per Companies Act, 2013 (as amended).  (c) The financial statements of foreign entities consolidated may be audited as per the requirements of local regulation applicable in	Not Applicabl e	-	
	the respective jurisdiction. However, in cases where the local regulation does not mandate audit, financial statements should be audited as per the auditing standards/ requirements applicable in India.  (d) The financial statements of foreign subsidiaries may be acceptable in a GAAP other than Ind AS, if local laws require			
	application of local GAAP.			
<b>(B)</b>	Other Financial Information			
(i)	The following information shall be computed as per the <i>Guidance Note</i> issued by the ICAI from time to time and disclosed in other financial information  Earnings per share (Basic and Diluted)  Return on net worth	Not Applicabl e	-	-
	Net Asset Value per share     EBITDA			
(ii)	If the proceeds, fully or partly, directly or indirectly, is to be used for acquisition of one or more material businesses or entities, the audited statements of balance sheets, profit and loss, cash flow for the latest three financial years and stub period (if available) prepared as per framework applicable to the business or subsidiary proposed to be acquired shall be included in the draft offer			



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P  OFFER  OFFER			
Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	9, 246(2)(b), Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	7(2), 291] Commen ts
(iii)	acquisition (covering all businesses or subsidiaries proposed to be acquired) shall be considered material if it will make 20% or more contribution in aggregate to either turnover, or net worth or profit before tax in the latest annual CFS. The issuer may voluntarily choose to provide financial statements of above acquisitions out of the proceeds of the issue even if they are below the above materiality threshold. In cases where the general purpose financial statement of the businesses/entities to be acquired/divested are not available, combined/carved-out financial statements for that business/entity shall be prepared in accordance with <i>Guidance Note</i> issued by the ICAI from time to time. The combined/carved-out financials statements shall be audited by the auditor of the seller in accordance with applicable framework.	Not		
(iii)	Proforma financial statements – The Issuer shall provide Proforma financial statements, as certified by the statutory auditor or chartered accountants who hold a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India (ICAI) of all the subsidiaries or businesses material to the consolidated financial statements where the issuer or its subsidiaries have made an acquisition or divestment including deemed disposal after the latest period for which financial information is disclosed in the offer document but before the date of filing of the offer document. For this purpose, the acquisition/divestment would be considered as material if acquired/divested business or subsidiary in aggregate contributes 20% or more to turnover, net worth or profit before tax in the latest annual CFS of the issuer. The Proforma financial statements shall be prepared for the last completed financial year and the stub period (if any). The Proforma financial statements shall be prepared in accordance with Guidance Note issued by the ICAI from time to time and certified by the statutory. The issuer Company may voluntarily choose to provide proforma financial statements of acquisitions even when they are below the above materiality threshold. In case of one or more acquisitions or divestments, one combined set of Proforma financial statements should be presented. Where the businesses acquired/ divested does not represent a separate entity, general purpose financial statement may not be available for such business. In such cases, combined/carved-out financial statements for such businesses shall be prepared in accordance with Guidance Note issued by the ICAI from time to time. Further, in case of non-material acquisition/divestment, consideration paid/received and mode of financing shall be certified by the statutory auditor of the issuer company or chartered accountants, who hold a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India (ICAI) appointed	Not Applicabl e		
(C)	Management's Discussion and Analysis of Financial Position and Results of Operations as reflected in the restated Ind AS CFS shall be provided in other financial information.			-



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239			
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
(i)	Significant developments subsequent to the last financial year or when applicable subsequent to the stub period: A statement by the directors whether in their opinion there have arisen any circumstances since the date of the last financial statements as disclosed in the offer document and which materially and adversely affect or is likely to affect within the next twelve months:  a. the trading or profitability of the issuer; or			
	b. the value of its assets; or			
	c. its ability to pay its liabilities			
(ii) (iii)	Factors that may affect the results of operations.  Discussion on the results of operations: This information shall inter-alia contain the following:  a. A summary of the past financial results after adjustments as given in the restated financial statements for the past three full financial years and the stub period (if any) containing significant items of income and expenditure shall be given.  b. A summary of major items of income and expenditure for the last three years and most recent audit period.	Not Applicable		
	c. The income and sales on account of major product/ main activities.  d. In case, the other income constitutes more than 10% of the total income, the break-up of the same along with the nature of the income, i.e., recurring or non-recurring shall be stated.  e. If a material part of the income is dependent upon a single customer/supplier or a few major customers/suppliers, disclosure of this fact along with relevant data. Similarly if any foreign customer/supplier constitutes a significant portion of the issuer's business, disclosure of the fact along with its impact on the business on account of exchange rate fluctuations.  f. In case the issuer has deviated from applicable accounting standards for recording sales and revenues, its impact may be analysed and disclosed.  g. The nature of miscellaneous income and miscellaneous expenditure for the interim period and the preceding years	Not Applicable		
(iv)	Comparison of last three years and the stub period on the major heads of the profit and loss statement, including an analysis of reasons for the changes in significant items of income and expenditure shall also be given, <i>inter-alia</i> , containing the following:  a. unusual or infrequent events or transactions including unusual trends on account of business activity, unusual items of income, change of accounting policies and discretionary reduction of expenses etc.  b. significant economic changes that materially affected or are likely to affect income from continuing operations;  c. known trends or uncertainties that have had or are expected to have a material adverse impact on sales, revenue or income from	Not Applicabl e	-	



PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]						
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts		
	continuing operations;					
	d. expected future changes in relationship between costs and					
	revenues, in case of events such as future increase in labour or					
	material costs or prices that will cause a material change are					
	known;					
	e. the extent to which material increases in net sales or revenue					
	are due to increased sales volume, introduction of new products or					
	services or increased sales prices;					
	f. total turnover of each major industry segment in which the issuer operated;					
	g. status of any publicly announced new products or business segment, if applicable;					
	h. the extent to which business is seasonal;					
	i. any significant dependence on a single or few suppliers or customers;					
	j. competitive conditions.					
(v)	Management's Discussion and Analysis shall be based on the		-			
	restated financial information for the last three years and the stub					
	period.					
(D)	Capitalisation statement					
(i)	Capitalisation Statement showing total borrowings, total equity,					
	and the borrowing/ equity ratios before and after the issue is made					
	shall be incorporated. It shall be prepared on the basis of the					
	restated CFS for the latest financial year or when applicable at the end of the stub period					
(;;)	In case of any change in the share capital since the date as of which					
(ii)	the financial information has been disclosed in the offer document,			1		
	a note explaining the nature of the change shall be given.					
(iii)	An illustrative format of the Capitalisation Statement is specified					
(II)	Requirements in case Indian GAAP is applicable in the latest	Complied	192			
(11)	period presented in Restated Financial Information	with	172			
	Financial information section of the offer document shall be	Complied	23, 189			
	divided into two parts, viz., restated financial information and other	with	20, 10,			
	financial information. The restated and other financial information					
	should be complete in all respects. To avoid duplication of					
	disclosures in the offer document, appropriate use of cross					
	reference may be made to the restated and other financial					
	information.					
(A)	Restated Financial information		F1-F22			
(i)	Consolidated Financial Statements (CFS) prepared in accordance	Complied	-			
	with Indian GAAP for three years and stub period (if applicable)	with				
	should be audited and certified by the statutory auditor(s) or					
	Chartered Accountants who holds a valid certificate issued by the					
	Peer Review Board of the Institute of Chartered Accountants of					
	India (ICAI). The stub period CFS shall be required, if Indian					
	GAAP CFS for latest full financial year included in the draft offer document/offer document is older than six months old from the					
	date of filing of the draft offer document/offer document. The stub					



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 23(2)			
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	period should not end up to a date earlier than six months of the date of filing of the offer document. In accordance with AS 25 <i>Interim Financial Reporting</i> , the group should present a complete Indian GAAP CFS for the stub period, except the issuer has been exempted from presenting comparatives for the stub period. CFS shall be prepared as per the provisions of Companies Act, 2013 (as amended).			
	(a) The CFS (including for the stub period if applicable) should be restated to ensure consistency of presentation, disclosures and the accounting policies for all the periods presented in line with that of the latest financial year/stub period presented. Similarly, significant errors, non-provisions, regrouping, other adjustments, if any, should be reflected in the corresponding period. Changes in estimates, if any, need not to be restated, as they are events of that corresponding year. The issuer has an option to present comparatives for the stub period. Appropriate disclosures for correction of errors, changes in accounting policies and changes in accounting estimates should be made in accordance with AS 5 Net Profit or Loss for the Period, Prior Period Items and Changes in Accounting Policies.	Complied with	-	
	(b) SA 705 Modification to the Opinion in the Independent Auditor's Report requires a qualified opinion, adverse opinion or disclaimer of opinion for material misstatements. With respect to an eligible issuer, audit modifications, which are quantifiable or can be estimated shall be adjusted in the restated financial information in the appropriate period. In situations where the qualification cannot be quantified or estimated, appropriate disclosures should be made, in the notes to account, explaining why the qualification cannot be quantified or estimated.	Complied with	-	
	(c) A reconciliation explaining the difference between the audited CFS equity and profit (loss) and the restated CFS equity and profit (loss)should be presented in a columnar format.	Complied with	-	
	(d) The auditor or Chartered Accountants shall issue an examination report on the restated and audited financial information in accordance with the <i>Guidance Note</i> issued by the ICAI from time to time.	Complied with	-	
	(e) Auditor should have a valid peer review certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India (ICAI) as on the date of signing the restated financial information. If a new auditor holding a valid peer review certificate is appointed for the stub period, and the predecessor auditor did not hold a valid peer review certificate at the date of signing the last annual financial statement, then the last annual financial statement would need to be re- audited by the new auditor in accordance with applicable standards. The re-audit may exclude audit reporting matters on CARO, Internal financial control and other pure regulatory matters. Where auditor earlier held a valid peer review certificate, but did not hold a valid certificate at the date of signing the restated financial information, the earlier certificate shall be considered valid provided there is no express refusal by the peer	Complied with	-	



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	7(2), 291] Commen ts
	review board to renew the certificate and the process to renew the peer review certificate was initiated by the auditor.			
	(f) Where an issuer does not have a subsidiary, associate or joint venture in any financial year, the issuer shall present separate financial statements for that financial year by following the applicable requirements of a restated CFS	Not Applicabl e	-	
	(g) List of the related parties and all related party transactions of the consolidated entities (whether eliminated on consolidation or not), which require disclosure under AS 18 and/ or covered under section 188(2) of the Companies Act, 2013 (as amended), as disclosed in the separate financial statement of the consolidated entities, should be disclosed in the restated financial information.	Complied with	24-25, 191	
	All funding arrangements including inter-se guarantees among the entities consolidated; except contribution to equity share capital, shall be disclosed. The important terms and conditions of the funding arrangement and fund transfer restrictions, if any, should be disclosed in the restated financial information.	Not Applicabl e	-	
	(h) The following disclosures shall be made in the restated financial information on the basis of amounts recognized and measured as per Indian GAAP and in accordance with the Guidance Note of the ICAI issued from time to time:  (i) Disclosures as per AS 13	Not Applicabl e	-	
	(ii) Disclosures as per AS 14			
(ii)	The separate audited financial statements for past three full financial years immediately preceding the date of filing of offer document of the issuer company and all its material subsidiaries should be made available on issuer's website in accordance with the materiality thresholds in (b) below. Alternatively, relevant link should be provided to the financial statement of subsidiaries on the Issuer's website. The link to the issuer's separate financial statement should be specified in the offer document. For this purpose, subsidiaries shall be identified based on definitions in the Companies Act, 2013. The above requirements shall apply for the periods of existence of the parent-subsidiary relationship.	Noted for complian ce	189	www.atcg roup.co
	(a) a certified English translated copy of the financial statements should be made available on the Company's website for every entity consolidated whose financial statements are not presented in English	Noted for complian ce	-	
	(b) The financial statements reported in any currency other than Indian Rupee shall be translated into Indian Rupee in accordance with Ind AS 21 <i>The Effects of Changes in Foreign Exchange Rates</i> . The financial statements of all foreign consolidated entities should be audited, unless they are not material to the CFS and the local regulation does not mandate audit. For this purpose, a consolidated entity shall be considered 'material' if it contributes 10% or more to the turnover or net-worth or profits before tax in the annual CFS of the respective year. Additionally, total unaudited CFS shall not exceed 20% of the turnover or net-worth or profits before tax of the CFS of the respective year. For the purpose of this clause, definition of turnover, net-worth and profits before tax should be as	Not Applicabl e	-	



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9,246(2)(b),	282(1)(f), 28	7(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comme ts
	per Companies Act, 2013 (as amended).			
	(c) The financial statements of foreign entities consolidated may be audited as per the requirements of local regulation applicable in the respective jurisdiction. However, in cases where the local regulation does not mandate audit, financial statements should be audited as per the auditing standards/ requirements applicable in India.	Not Applicabl e	-	
	(d) The financial statements of foreign subsidiaries may be acceptable in a GAAP other than Indian GAAP, if local laws require application of local GAAP.	Not Applicabl e	-	
(B)	Other Financial Information	C		
(i)	The following information shall be computed as per the <i>Guidance Note</i> issued by the ICAI from time to time and disclosed in other financial information	Complied with	189 - 190	
	· Earnings per share (Basic and Diluted)	Complied with		
	· Return on net worth	Complied with		
	· Net Asset Value per share	Complied with		
	· EBITDA	Complied with		
(ii)	If the proceeds, fully or partly, directly or indirectly, is to be used for acquisition of one or more material businesses or entities, the audited statements of balance sheets, profit and loss, cash flow for the latest three financial years and stub period (if available) prepared as per framework applicable to the business or subsidiary proposed to be acquired shall be included in the draft offer document/offer document. For this purpose, the proposed acquisition (covering all businesses or subsidiaries proposed to be acquired) shall be considered material if it will make 20% or more contribution in aggregate to either turnover, or net worth or profit before tax in the latest annual CFS. The issuer Company may voluntarily choose to provide financial statements of above acquisitions out of the proceeds of the issue even if they are below the above materiality threshold. In cases where the general purpose financial statement of the businesses/entities to be acquired/divested are not available, combined/ carved-out financial statements for that business/entity shall be prepared in accordance with <i>Guidance Note</i> issued by the ICAI from time to time. The combined/carved-out financials statements shall be audited by the auditor of the seller in accordance with applicable framework	Not Applicabl e		
(iii)	Proforma financial statements – The Issuer shall provide Proforma financial statements, as certified by the statutory auditor or the chartered accountants, who hold a valid certificate issued by the Peer Review Board of Institute of Chartered Accountants of India (ICAI), of all the subsidiaries or businesses material to the consolidated financial statements where the issuer or its subsidiaries have made an acquisition or divestment including	Not Applicabl e	-	



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b), 2	PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]						
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts					
	information is disclosed in the offer document but before the date of filing of the offer document. For this purpose, the acquisition/divestment would be considered as material if acquired/ divested business or subsidiary in aggregate contributes 20% or more to turnover, net worth or profit before tax in the latest annual CFS of the issuer. The Proforma financial statements shall be prepared for the period covering last completed financial year and the stub period (if any). The Proforma financial statements shall be prepared in accordance with Guidance Note issued by the ICAI from time to time and certified by the statutory auditor. The issuer Company may voluntarily choose to provide proforma financial statements of acquisitions even when they are below the above materiality threshold. In case of one or more acquisitions or divestments, one combined set of Proforma financial statements should be presented. Where the businesses acquired/ divested does not represent a separate entity, general purpose financial statement may not be available for such business. In such cases, combined/ carved-out financial statements for such businesses shall be prepared in accordance with <i>Guidance Note</i> issued by the ICAI from time to time. Further, in case of non-material acquisitions/divestments disclosures in relation to the fact of the acquisition/divestment, consideration paid/received and mode of financing shall be certified by the statutory auditor of the issuer company or chartered accountants, who hold a valid certificate issued by the Peer Review Board of the Institute of Chartered Accountants of India (ICAI) appointed by the issuer company.								
(C)	Management's Discussion and Analysis of Financial Position and Results of Operations as reflected in the restated Indian GAAP CFS shall be provided in other financial information.								
(i)	Significant developments subsequent to the last financial year or when applicable subsequent to the stub period: A statement by the directors whether in their opinion there have arisen any circumstances since the date of the last financial statements as disclosed in the offer document and which materially and adversely affect or is likely to affect within the next twelve months:  a. the trading or profitability of the issuer; or  b. the value of its assets; or  c. its ability to pay its liabilities	Complied with	200						
(ii)	Factors that may affect the results of operations.	Complied with	194	1					
(iii)	Discussion on the results of operations: This information shall, inter-alia, contain the following:  a. A summary of the past financial results after adjustments as given in the auditor's report for the past three full financial years and the stub period (if any) containing significant items of income and expenditure shall be given.  b. A summary of major items of income and expenditure for the last three years and most recent audit period	Complied with	195-196						



Complie d with-Y/N/NA	C. The income and sales on account of major product/ main activities.	Regulatio n
ıl e		
e n s e e d d e e s f f l l l l l l l l l l l l l l l l l	d. In case the other income constitutes more than 10% of the total income, the break-up of the same along with the nature of the income, i.e., recurring or non-recurring shall be stated.  e. If a material part of the income is dependent upon a single customer/supplier or a few major customer/suppliers, disclosure of this fact along with relevant data. Similarly if any foreign customer/supplier constitutes a significant portion of the issuer's business, disclosure of the fact along with its impact on the business on account of exchange rate fluctuations.  f. In case the issuer has deviated from statutorily prescribed manner for recording sales and revenues, its impact may be analysed and disclosed.  g. The nature of miscellaneous income and miscellaneous expenditure for the interim period and the preceding years, if applicable.  Comparison of last three years and the stub period on the major heads of the profit and loss statement, including an analysis of reasons for the changes in significant items of income and expenditure shall also be given, inter-alia, containing the following:  a. unusual or infrequent events or transactions including unusual trends on account of business activity, unusual items of income, change of accounting policies and discretionary reduction of expenses etc.  b. significant economic changes that materially affected or are likely to affect income from continuing operations;  c. known trends or uncertainties that have had or are expected to have a material adverse impact on sales, revenue or income from continuing operations;  d. expected future changes in relationship between costs and revenues, in case of events such as future increase in labour or material costs or prices that will cause a material change are known;  e. the extent to which material increases in net sales or revenue are due to increased sales volume, introduction of new products or services or increased sales volume, introduction of new products or services or increased sales prices;  f. total turnover of each major i	(iv)



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P			
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comments
	period.			
<b>(D)</b>	Capitalisation statement	Complied	201	
(i)	Capitalisation Statement showing total borrowings, total equity, and the borrowing/ equity ratios before and after the issue is made shall be incorporated. It shall be prepared on the basis of the restated CFS for the latest financial year or when applicable at the end of the stub period.	with		
(ii)	In case of any change in the share capital since the date as of which the financial information has been disclosed in the offer document, a note explaining the nature of the change shall be given.			
(iii)	An illustrative format of the Capitalisation Statement is specified.			
(III)	Financial Information of the Issuer in further public offers:	•		•

Not Applicable as this is an Initial Public Issue

12	LEGAL AND OTHER INFORMATION:			
(A)	Outstanding Litigations and Material Developments:			
1	Pending Litigations involving the issuer/ its directors/ promoters/ subsidiaries:	Complied with	204	We have inserted a negative statement to that effect
	(i) All criminal proceedings;	Complied with	204-205	
	(ii) All actions by regulatory authorities and statutory authorities;	Complied with	205	
	(iii) Disciplinary action including penalty imposed by SEBI or stock exchanges against the promoters in the last five financial years including outstanding action;	Not Applicabl e	, 204,	We have inserted a negative statement to that effect
	(iv) Claims related to direct and indirect taxes, in a consolidated manner, giving the number of cases and total amount;	Complied with	-205, 206	
	(v) Other pending litigations - As per the policy of materiality defined by the board of directors of the issuer and disclosed in the offer document.	Not Applicabl e	-	1
2	Outstanding dues to creditors:  (i) Based on the policy on materiality defined by the board of directors of the issuer, details of creditors which include the consolidated number of creditors and the aggregate amount involved	Complied with	207	
	(ii) Consolidated information on outstanding dues to micro, small and medium enterprises and other creditors, separately giving details of number of cases and amount involved;	Complied with	207	
	(iii) Complete details about outstanding over dues to material creditors along with the name and amount involved for each such	Complied with	207	



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	$9, \overline{246(2)(b)},$	282(1)(f), 28	7(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	material creditor shall be disclosed, on the website of the company with a web link thereto			
3	If any of the above-mentioned litigations, material developments, dues to creditors etc., arise after the filing the offer document, the facts shall be incorporated appropriately in the offer document. In case there are no such cases, a distinct negative statement is required to be made in this regard in the offer document. Material developments since the date of the last balance sheet.	Complied with and noted for complian ce	-	
4	Disclosures pertaining to wilful defaulters or a fraudulent borrower in case of a further public offer or a rights issue: If the issuer or any of its promoter or director has been declared as a wilful defaulter or a fraudulent borrower, it shall make the following disclosures with respect to each such person separately:  (a) Name of the person declared as a wilful defaulter or a fraudulent borrower;	Not Applicabl e	-	
	<ul> <li>(b) Name of the Bank declaring the person as a wilful defaulter or a fraudulent borrower;</li> <li>(c) Year in which the person was declared as a wilful defaulter or a fraudulent borrower;</li> <li>(d) Outstanding amount when the person was declared as a wilful defaulter or a fraudulent borrower;</li> </ul>			
	<ul> <li>(e) Steps taken, if any, by the person for removal of its name from the list of wilful defaulters or a fraudulent borrower;</li> <li>(f) Other disclosures, as deemed fit by the issuer, in order to enable investors to take an informed decision;</li> <li>(g) Any other disclosure as specified by the Board.</li> </ul>			
5	The fact that the issuer or any of its promoters or directors is a wilful defaulter or a fraudulent borrower shall be disclosed prominently on the cover page with suitable cross-referencing to the inside pages.	Not Applicabl e	-	
6	Disclosures specified herein shall be made in a separate chapter or section, distinctly identifiable in the Index /Table of Contents.	Not Applicabl e	-	
( <b>B</b> )	Government approvals:			
1	Investment approvals (GoI/RBI, etc., as applicable), letter of intent or industrial license and declaration of the Central Government, Reserve Bank of India or any regulatory authority about the non-responsibility for financial soundness or correctness of the statements;	Not Applicabl e	-	
2	All government and other approvals which are material and necessary for carrying on the business and operations of the issuer and material subsidiaries.	Complied with	208 - 214	
13	INFORMATION WITH RESPECT TO GROUP COMPANIES	Not Applicabl		
(A)	In case of an issuer not being a government company, statutory authority or corporation or any special purpose vehicle set up by any of them, the names and registered office address of all the group companies shall be disclosed in the Offer Document.  The following information based on the audited statements, in	e	-	The Company does no have any Group



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	$0, \overline{246(2)(b)}, 2$	282(1)(f), 28	7(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	respect of top five group companies (based on market			Compani
	capitalization for listed/ based on turnover in case of unlisted) for			es as on
	the preceding three years shall be hosted on the website of the respective group company (listed/unlisted)			present date.
	(i) reserves (excluding revaluation reserves)			date.
	(ii) sales			
	(iii) profit after tax			
	(iv) earnings per share			
	(v) diluted earnings per share; and			
	(vi) Net Asset Value;			
	The offer document shall refer the website where the details of the			
	group companies shall be available.			
(D)	Any pending litigation involving the group company which has a material impact on the issuer.			
(G)	Common Pursuits:			
	(i) In case there are common pursuits amongst the group companies/ subsidiaries/associates companies and the issuer, the			
	reasons and justification for the same shall be spelt out and the			
	conflict of interest situations shall be stated.			
	(ii) The related business transactions within the group and their			
	significance on the financial performance of the issuer.			
	(iii) If any of the other group companies/subsidiaries/ associate			
	companies has business interests in the issuer then the amount of			
	commercial business that the said company has /proposes to have			
	with the issuer may be quantified. If no, a distinct negative			
14	statement may be incorporated to this effect.  OTHER REGULATORY AND STATUTORY			1
14	OTHER REGULATORY AND STATUTORY DISCLOSURES:			
(A)	Authority for the issue and details of resolution(s) passed for the	Complied	215	
` /	issue	with		
(B)	A statement by the issuer that the issuer, promoters, promoter	Complied	215	
	group, directors, person(s) in control of the promoter or issuer, if	with		
	applicable, or are not prohibited from accessing the capital market			
	or debarred from buying, selling or dealing in securities under any order or direction passed by the Board or any securities market			
	regulator in any other jurisdiction or any other authority/court			1
(C)	A confirmation that the issuer, its promoters, promoter group or is	Complied	216	
	in compliance with the Companies (Significant Beneficial	with		
	Ownership) Rules, 2018.			1
(D)	A confirmation whether any of the directors of the issuer are	Complied	216	
	associated with the securities market in any manner, and if yes, any	with		
	outstanding action against them initiated by the Board in the past			
(E)	five years.  Eligibility of the issuer to enter the capital market in terms of these	Complied	216-217	
(E)	Regulations. (Details of compliance with eligibility requirements to	Complied with	Z1U-Z1/	
	make a fast-track issue, if applicable.)	** 1 (.11		
(F)	Compliance with Part B of this Schedule, as the case may be, if	Not	_	
· · /	applicable.	Applicabl		



<u>PAR</u> T A [	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9,246(2)(b),	282(1)(f), 28	7(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
		e		
(G)	Disclaimer clauses:	C 1: 1	220	
1	The offer document shall contain the disclaimer clause of SEBI in bold capital letters:  "It is to be distinctly understood that submission of the draft offer document/draft letter of offer/offer document to the Securities and Exchange Board of India (SEBI) should not in any way be deemed or construed that the same has been cleared or approved by SEBI. SEBI does not take any responsibility either for the financial soundness of any scheme or the project for which the issue is proposed to be made or for the correctness of the statements made	Complied with	220	
	or opinions expressed in the draft offer document/draft letter of offer/offer document. The lead manager(s), has certified that the disclosures made in the draft offer document/draft letter of offer/offer document are generally adequate and are in conformity with the Regulations. This requirement is to facilitate investors to take an informed decision for making investment in the proposed issue. It should also be clearly understood that while the issuer is primarily responsible for the correctness, adequacy and disclosure			
	of all relevant information in the draft offer document/draft letter of offer/offer document, the lead manager(s) is expected to exercise due diligence to ensure that the issuer discharges its responsibility adequately in this behalf and towards this purpose, the lead manager(s) has furnished to SEBI a due diligence certificate dated in the format prescribed under Schedule V(A) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 2018. The filing of the draft offer			
	document/draft letter of offer/offer document does not, however, absolve the issuer from any liabilities under the 460[Companies Act, 2013] or from the requirement of obtaining such statutory or other clearances as may be required for the purpose of the proposed issue. SEBI further reserves the right to take up, at any point of time, with the lead manager(s) any irregularities or lapses in the draft offer document/draft letter of offer/offer document."			
2	Disclaimer Statement from the issuer and lead manager(s): A statement to the effect that the issuer and the lead manager(s) accept no responsibility for statements made otherwise than in the draft offer document/draft letter of offer/offer document or in the advertisement or any other material issued by or at the instance of the issuer and that anyone placing reliance on any other source of information would be doing so at their own risk.	Complied with	221	
(H)	Disclaimer in respect of jurisdiction: A brief paragraph mentioning the jurisdiction under which provisions of law and the rules and regulations are applicable to the draft offer document/ draft letter of offer/ offer document.	Complied with	221-222	
(I)	Disclaimer clause of the stock exchanges.	Complied with	222-	
	Disclaimer clause of the Reserve Bank of India, the Insurance	Not		t



	LE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED P OFFER			
	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239		282(1)(f), 28	
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	relevant regulatory authority.	e		
(K)	Listing: Names of the designated stock exchange and other stock exchanges to which application has been made for listing of the specified securities offered in the present issue.	Complied with	223	
(L)	Consent of the directors, auditors, solicitors or advocates, lead manager(s), registrar to the issue, bankers to the issuer and experts.	Complied with	223-224	
(M)	Expert opinion obtained, if any.	Complied with	224	
(N)	Previous public or rights issues, if any, during the last five years:	Not	-	
	(1) Closing date.	Applicabl		
	(2) Date of allotment.	e		
	(3) Date of refunds.			
	(4) Date of listing on the stock exchange(s).			
	(5) If the issue(s) was at premium or discount, the amount thereof			
(O)	Commission or brokerage on previous issues in last five years.	Complied with	225	We have inserted a
		with		negative statement to that effect
(P)	Following particulars in regard to the issuer and other listed group companies/subsidiaries/associates which made any capital issue during the last three years shall be given:	Not Applicabl e	225	We have inserted a negative
	(1) Name of the Company.			statement
	(2) Year of Issue.			to that
	(3) Type of Issue (public/rights/composite).			effect
	(4) Amount of issue.			1
	( )			
	(6) Date of allotment and date of credit of securities to the demat account.			
	(7) Date of completion of the project, where object of the issue was financing the project.			
	(8) Rate of dividend paid.			
(Q)	Performance vis-à-vis objects:	Not Applicabl e	225	We have inserted a negative statement to that
	(1) Issuer:			effect
	(a) A list of all the public/rights issues made during the preceding five years, along with the year of issue.	Not Applicabl e	-	
	(b) Details of non-achievement of objects, with quantification of shortfall and delays for such public/rights issues.	Not Applicabl e	-	
	(2) Listed Subsidiaries/Listed Promoters:			



PART A	OFFER [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	246(2)(b)	282(1)(f) 28	7(2) 2911														
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comments														
	(a) A separate paragraph entitled "Performance vis-à-vis objects - Last one public/rights issue of subsidiaries/Listed Promoters ", indicating whether all the objects mentioned in the offer document of the last one issue of each of such companies during the preceding five years were met.	Not Applicabl e	-															
	(b) If not, details of non-achievement of objects, with quantification of shortfall and delays.	Not Applicabl e	-															
(R)	Price information of past issues handled by the lead manager(s) in the given format;	Complied with	225-226															
	(5) In case the 30th/60th/90th calendar day is a holiday, data from previous trading day to be considered.																	
	(6) Designated Stock Exchange as disclosed by the respective Issuer at the time of the issue shall be considered for disclosing the price information.																	
(S)	Stock market data for equity shares of the issuer, if listed:	Not	-	-														
	Particulars of:  (1) high, low and average market prices of the equity shares of the issuer during the preceding three years;	Applicabl e																
	(2) monthly high and low prices for the six months preceding the date of filing the draft offer document with the Board which shall be updated till the time of filing the offer document with the Registrar of Companies;																	
	(3) number of shares traded on the days when high and low prices were recorded in the relevant stock exchange(s) during the said period of (a) and (b) above and indicating the total number of days of trading during the preceding six months and the average volume of equity shares traded during that period and a statement if the project have some part for example traded.						stock exchange(s) during the ndicating the total number of six months and the average g that period and a statement y traded; ove shall be shown separately capital structure, with such the relevant stock exchange											
	if the equity shares were not frequently traded;  (4) stock market data referred to above shall be shown separately for periods marked by a change in capital structure, with such period commencing from the date the relevant stock exchange recognises the change in the capital structure (e.g. when the shares have become ex-rights or ex-bonus);																	
	<ul> <li>(5) market price of equity shares immediately after the date on which the resolution of the board of directors approving the issue;</li> <li>(6) volume of securities traded in each month during the six months preceding the date on which the offer document is filed with the Registrar of Companies; and</li> </ul>																	
(7) price per  Exp tha for	(7) volume of shares traded along with high, low and average prices of shares of the issuer shall also be stated for respective periods.																	
	<b>Explanation</b> : If the equity shares of the issuer are listed on more than one stock exchange, the above information shall be provided for each stock exchange separately. Average market prices in point (1) above should be calculated on closing price on the stock exchange.																	



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b),	282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comments
(T)	Mechanism evolved for redressal of investor grievances:	Complied with	227	
	(1) arrangements or mechanism evolved by the issuer for redressal of investor grievances including through SEBI Complaints Redress System (SCORES)	Complied with	227	
	(2) number of investor complaints received during the preceding three years and the number of complaints disposed off during that period	Not Applicabl e	227-228	Company has no received
	(3) number of investor complaints pending on the date of filing the draft offer document.			investor complain
	(4) number of investor complaints pending on the date of filing the draft offer document in respect of the five largest (in terms of market capitalization) listed group companies.			s in preceding 3 years.
	<ul><li>(5) time normally taken by the issuer for disposal of various types of investor grievances.</li><li>(6) Disclosures prescribed under sub-clauses (2) to (5) shall also</li></ul>			
	be made in regard to the listed subsidiaries.			
(U)	Exemption from complying with any provisions of securities law, if any, granted by SEBI shall be disclosed.	Not Applicabl e	-	
15	OFFERING INFORMATION:			
(A)	Terms of the Issue:			
(a)	Statement that the shares issued in the issue shall be pari passu with the existing shares in all respects including dividends. In case of companies having SR equity shares, a statement that the shares issued in the issue shall be pari passu with the existing shares (excluding SR equity shares) in all respects including dividends.	Complied with	229	
(b)	Statement that in the case of offer for sale, the dividend for the entire year shall be payable to the transferees.	Not Applicabl e	-	
(c)	Face value and issue price/ floor price/ price band.	Noted for Complian ce	-	
(d)	Rights of the instrument holders. In case of an issuer having SR equity shares, the special rights of such SR shareholders shall be disclosed along with the circumstances in which the SR equity shares shall be treated as ordinary equity shares.	Not Applicabl e	-	
(e)	Market lot	Noted for complian ce	-	
(f)	Nomination facility to investor	Complied with	232-233	
(g)	Period of subscription list of public issue	Complied with	232	
(h)	Statement that "if, as prescribed, minimum subscription in the issue shall be 90% of the fresh issue portion" the issuer does not receive the minimum subscription of ninety per cent. of the offer through offer document (except in case of an offer for sale of specified securities) on the date of closure of the issue, or if the	Complied with	237	



PART A	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239		282(1)(f), 28	37(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts
	subscription level falls below ninety per cent. after the closure of			
	issue on account of cheques having being returned unpaid (in case			
	of rights issues) or withdrawal of applications, or after technical			
	rejections, or if the listing or trading permission is not obtained			
	from the stock exchanges for the securities so offered under the offer document, the issuer shall forthwith refund the entire			
	subscription amount received. If there is a delay beyond fifteen			
	days after the issuer becomes liable to pay the amount, the issuer			
	and every director of the issuer who are officers in default, shall			
	pay interest at the rate of fifteen per cent. per annum."			
(i)	For Composite Issues: Statement that the requirement of	Not	-	
	'minimum subscription' is satisfied both jointly and severally, i.e.,	Applicabl		
	independently for both rights and public issues, and that if the	e		
	issuer does not receive the minimum subscription in either of the			
V	issues, the issuer shall refund the entire subscription received			
(j)	Arrangements for Disposal of Odd Lots:	Noted for	238	
	(a) Any arrangements made by the issuer for providing liquidity	complian		
	for and consolidation of the shares held in odd lots, particularly	ce		
	when such odd lots arise on account of issues by way of rights,			
	bonus, conversion of debentures or warrants, etc., shall be			
	intimated to the shareholders or investors.	Noted for		
	(b) The issuer is free to make arrangements for providing liquidity in respect of odd lot shares through any investment or finance	complian	-	
	company, broking firms or through any other agency and the	ce		
	particulars of such arrangement, if any, may be disclosed in the	CC		
	offer document related to the concerned issue of capital.			
	(c) The lead merchant banker shall ascertain whether the issuer	Not	-	
	coming for fresh issue of capital proposes to set up trusts in order	Applicabl		
	to provide service to the investors in the matter of disposal of odd	e		
	lot shares of the issuer held by them and if so, disclosures relating			
	to setting up and operation of the trust shall be contained in the			
	offer document.			
	(d) Whenever any issue results in issue of shares in odd lots, the	Noted for	-	
	issuer, shall as far as possible issue certificates in the denomination	Complian		
(k)	of 1-2-5-10-20-50 shares  Restrictions, if any, on transfer and transmission of shares or	Complied	239	
(K)	debentures and on their consolidation or splitting.	Complied with	239	
(1)	New Financial Instruments: Terms and conditions including	Not	238	We have
(1)	redemption, security, conversion and any other relevant features of	Applicabl	230	inserted a
	any new financial instruments such as deep discount bonds,	e		negative
	debentures with warrants, secured premium notes etc.			statement
				to that
				effect
(m)	Allotment only in Dematerialised Form: A statement to the	Complied	238	
	effect that specified securities shall be allotted only in	with		
	dematerialised form.			
(B)	ISSUE PROCEDURE	~		
(1)	Fixed price issue or book building procedure as may be applicable,	Complied	-	
	including details regarding bid form/application form, who can bid/apply, maximum and minimum bid/application size, bidding	with		T T



PART A	OFFER [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239	9, 246(2)(b),	282(1)(f), 28°	7(2), 291]
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comme
	process, bidding, bids at different price levels, etc.			
(2)	Issue of securities in dematerialized form:	Complied With	238, , 248	
(B)(2)(a)	In case of a public issue or rights issue (subject to sub-regulation (1) of regulation 91, the specified securities issued shall be issued only in dematerialized form in compliance with the Companies Act, 2013. A statement that furnishing the details of depository account is mandatory and applications without depository account shall be treated as incomplete and rejected. Investors will not have the option of getting the allotment of specified securities in physical form. However, they may get the specified securities rematerialized subsequent to allotment.	Complied with	231, 238, 242, 248	
(B)(2)(b)	Statement that the specified securities, on allotment, shall be traded on stock exchanges in demat mode only.	Complied with	248	
B(2)(c)	Statement that single bid from any investor shall not exceed the investment limit/maximum number of specified securities that can be held by such investor under the relevant regulations/statutory guidelines.	Complied with	254	
B(2)(d)	Statement that the correct procedure for applications by Hindu Undivided Families and the fact that applications by Hindu Undivided Families would be treated as on par with applications by individuals;	Complied with	255	
B(2)(e)	Applications by mutual funds:  (i) Statement under the heads "Procedure for applications by mutual funds" and "Multiple Applications" to indicate that a separate application can be made in respect of each scheme of an Indian mutual fund registered with the Board and that such applications shall not be treated as multiple applications.  (ii) Statement that applications made by an asset management company or a custodian of a mutual fund shall clearly indicate the name of the concerned scheme for which the application is being made.	Complied with	255-256	
B(2)(f)	Applications by non-resident Indians:  (i) Statement that "Non-resident Indian applicants may please note that only such applications as are accompanied by payment in free foreign exchange shall be considered for allotment under the reserved category. The non-resident Indians who intend to make payment through Non-Resident Ordinary (NRO) accounts shall use the form meant for Resident Indians and shall not use the forms meant for	Complied with	257	



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER  PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]					
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen	
	reserved category."				
B(2)(g)	Application by ASBA investors:  i. Details of Application Supported by Blocked Amount process including specific instructions for submitting Application Supported by Blocked Amount.	Complied with	265		
	ii. A statement that each application form shall bear the stamp of the syndicate member/SCSBs/registrar and share transfer agents/depository participants/stock brokers and if not, the same shall be rejected.				
B(3)	Escrow mechanism for anchor investors: Escrow account of the issuer,	Complied with	266		
B(4)	Terms of payment and payment into the escrow collection account by anchor investors.	Complied with	266		
B(5)	Electronic registration of bids.	Complied with	267-268		
B(6)	Build-up of the book and revision of bids. In this regard, it may be specifically disclosed that qualified institutional buyers and non-institutional investors can neither lower or withdraw their bids at any stage and retail individual investors can withdraw or revise their bids till issue closure date.	Complied with	268		
B(7)	Price discovery and allocation.	Complied with	269-270		
B(8)	Signing of underwriting agreement.	Complied with	269		
B(9)	Filing of the offer document.	Complied with	269		
B(10)	Announcement of pre-issue advertisement.	Complied with	269		
B(11)	Issuance of Confirmation of Allocation Note ("CAN") and allotment in the Issue.	Complied with	245	1	
B(12)	Designated date				
B(13)	General instructions:  a. Do's and Don'ts b. Instructions for completing the bid form. c. Bidders' bank account details. d. Bids by non-resident Indians or foreign portfolio investors, foreign venture capital investors on repatriation basis	Complied with	270-272		



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER					
PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]					
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen ts	
B(14)	Payment instructions:	Complied with	266		
	a) Payment into escrow account of the issuer.				
	b) Payment instructions for Application Supported by Blocked Amount				
B(15)	Submission of bid form.	Complied with	247-248		
B(16)	Other instructions:	Complied with	273		
	a) Joint bids in the case of individuals.				
	b) Multiple bids.				
	c) Instructions to the applicants to mention the Permanent Account Number of the sole / first holder in the application form, irrespective of the amount for which application or bid is made, along with the instruction that applications without Permanent Account Number would be rejected except where the requirement to hold a permanent account number has been specifically exempt under applicable law.				
	d) Instances when an application would be rejected on technical grounds				
	e) Equity shares in demat form with the depositories.				
	f) Investor's attention shall also be invited to contact the compliance officer in case of any pre-issue or post-issue related problems regarding share certificates/demat credit/refund orders/ unblocking etc.				
B(17)	Disposal of applications.	Complied with	276		
B(18)	Provisions of the Companies Act, 2013, as applicable, relating to punishment for fictitious applications, including to any person who:	Complied with	276		
	a) makes or abets making of an application in a fictitious name to a company for acquiring, or subscribing for, its securities, or				



OFFER  PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]				
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Comments
	b) makes or abets making of multiple applications to a company in different names or in different combinations of his/her name or surname for acquiring or subscribing for its securities, shall be punishable with fine and/or imprisonment for such amount and/or term as may be prescribed under section 447 of the Companies Act 2013.			
B(19)	Interest on refund of excess bid amount, in case of anchor investors.	Complied with	256-257	
B(20)	Names of entities responsible for finalising the basis of allotment in a fair and proper manner.	Complied with	277	
B(21)	Procedure and time of schedule for allotment and demat credit.	Noted for complian ce	-	
B(22)	Method of allotment as may be prescribed by the Board from time to time.	Complied with	261,278	
B(23)	Letters of Allotment or refund orders or instructions to Self-Certified Syndicate Banks in Application Supported by Blocked Amount process. The issuer shall ensure that "at par" facility is provided for encashment of refund orders for applications other than Application Supported by Blocked Amount process.	Noted for complian ce	-	
B(24)	Mode of making refunds:	Complied with	277	
B(24)(a)	The mode in which the issuer shall refund the application money to applicants in case of an oversubscription or failure to list.	Complied with	282	
B(24)(b)	If the issuer proposes to use more than one mode of making refunds to applicants, the respective cases where each such mode will be adopted.	Not Applicabl e	-	
B(24)(c)	The permissible modes of making refunds and unblocking of funds are as follows:  i. In case of applicants residing in any of the centres specified by the Board: by crediting of refunds to the bank accounts of applicants through electronic transfer of funds by or NACH (National Automated Clearing House), as applicable, Direct Credit, RTGS (Real Time Gross Settlement) or NEFT (National Electronic Funds Transfer), as is for the time being permitted by the Reserve Bank of India;  ii. In case of other applicants: by dispatch of refund orders	Noted for Complian ce	-	



PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]					
Regulatio n	Text	Complie d with- Y/N/NA	Pg. No.	Commen	
B(25)	Payment of Interest in case of delay in despatch of allotment letters or refund orders/instruction to self-certified syndicate banks by the registrar in the case of public issues:	Complied with	273		
B(25)(a)	In case of a fixed price issue, a statement that the issuer shall allot securities offered to the public shall be made within the period prescribed by the Board. The issuer shall also pay interest at the rate of fifteen per cent. per annum if the allotment letters or refund orders have not been dispatched to the applicants or if, in a case	Not Applicabl e	-		
	where the refund or portion thereof is made in electronic manner, the refund instructions have not been given to the clearing system in the disclosed manner within eight days from the date of the closure of the issue. However applications received after the closure of issue in fulfilment of underwriting obligations to meet the minimum subscription requirement, shall not be entitled for the said interest.				
B(25)(b)	In case of a book-built issue, a statement that the issuer shall allot securities offered to the public within the period prescribed by the Board. The issuer further agrees that it shall pay interest at the rate of fifteen per cent. per annum if the allotment letters or refund orders/ unblocking instructions have not been despatched to the applicants or if, in a case where the refund or portion thereof is made in electronic manner, the refund instructions have not been given to the clearing system in the disclosed manner within six days from the date of the closure of the issue.	Complied with	278		
B(25)(c)	In case of a rights issue, a statement that the issuer shall allot securities offered to the shareholders within fifteen days of the closure of the rights issue. The issuer further agrees that it shall pay interest at the rate of fifteen per cent. per annum if the allotment letters or refund orders/ unblocking instructions have not been despatched to the applicants or if, in a case where the refund or portion thereof is made in electronic manner, the refund instructions have not been given to the clearing system in the disclosed manner within fifteen days from the date of the closure of the issue.	Not Applicabl e	-	,	
(26)	Undertaking by the issuer:				
26(a)	The following undertaking by the issuer shall be disclosed:	Complied with	282		
26(a)(i)	that the complaints received in respect of the issue shall be attended to by the issuer expeditiously and satisfactorily;	Complied with	282		
26(a)(ii)	that all steps for completion of the necessary formalities for listing and commencement of trading at all stock exchanges where the securities are to be listed are taken within the period prescribed by	Complied with	282	1	



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER					
PART A [ Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	9, 246(2)(b), 2 Complie d with- Y/N/NA	282(1)(f), 28 Pg. No.	7(2), 291] Commen ts	
	the Board;				
26(a)(iii)	that the issuer shall apply in advance for the listing of equities on the conversion of debentures/ bonds;	Not Applicabl e	-		
26(a)(iv)	that the funds required for making refunds/unblocking to unsuccessful applicants as per the mode(s) disclosed shall be made available to the registrar to the issue by the issuer;	Complied with	282		
26(a)(v)	that where refunds are made through electronic transfer of funds, a suitable communication shall be sent to the applicant within the specified period of closure of the issue giving details of the bank where refunds shall be credited along with amount and expected date of electronic credit of refund;	Complied with	282		
26(a)(vi)	that the promoters' contribution in full, wherever required, shall be brought in advance before the Issue opens for public subscription and the balance, if any, shall be brought on a pro rata basis before the calls are made on public in accordance with applicable provisions in these regulations;	Complied with	283		
26(a)(vii)	that no further issue of securities shall be made till the securities offered through the offer document are listed or till the application monies are refunded on account of non-listing, under subscription, etc., other than as disclosed in accordance with regulation 56;	Complied with	283		
26(a)(viii)	that adequate arrangements shall be made to collect all Applications Supported by Blocked Amount and to consider them similar to non-ASBA applications while finalizing the basis of allotment;	Complied with	283		
	Provisions of 26(b) are not applicable in our case				
26(c)	A statement that the issuer reserves the right not to proceed with the issue after the bidding and if so, the reason thereof as a public notice within two days of the closure of the issue. The public notice shall be issued in the same newspapers where the pre-issue advertisement had appeared. The stock exchanges where the			1	
	specified securities were proposed to be listed shall also be informed promptly.				
26(d)	a statement that if the issuer withdraws the issue at any stage including after closure of bidding, the issuer shall be required to file a fresh draft offer document with the Board.				
(27)	Utilisation of Issue Proceeds:				
27(a)	A statement by the board of directors of the issuer to the effect that:				
27(a)(i)	all monies received out of issue of specified securities to the public	Complied with	283	11	



DADTA	OFFER See regulations 17, 24(2)(b) 57(1)(f) 70(2) 122(2)(ii) 152(1)(f) 22	0. 246(2)(1-)	202(1)(6) 20	7(2) 2011
Regulatio n	See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239  Text	Complie d with- Y/N/NA	Pg. No.	Commen
	shall be transferred to a separate bank account other than the bank account referred to in the Companies Act,2013;			
27(a)(ii)	details of all monies utilised out of the issue referred to in sub- item(i) shall be disclosed and continue to be disclosed till the time any part of the issue proceeds remains unutilised under an appropriate separate head in the balance sheet of the issuer indicating the purpose for which such monies had been utilised;	Complied with	283	
	And			
27(a)(iii)	details of all unutilised monies out of the issue of specified securities referred to in sub-item (i) shall be disclosed under an appropriate separate head in the balance sheet of the issuer indicating the form in which such unutilised monies have been invested.			
27(b)	For an issue other than an offer for sale or a public issue made by any scheduled commercial bank or a public financial institution, a statement of the board of directors of the issuer to the effect that:	Not Applicabl e	-	
27(b)(i)	the utilisation of monies received under promoters' contribution and from reservations shall be disclosed and continue to be disclosed under an appropriate head in the balance sheet of the issuer, till the time any part of the issue proceeds remains unutilised, indicating the purpose for which such monies have been utilised;	Noted for complian ce	-	
27(b)(ii)	the details of all unutilised monies out of the funds received under promoters' contribution and from reservations shall be disclosed under a separate head in the balance sheet of the issuer, indicating the form in which such unutilised monies have been invested	Noted for complian ce	-	
(28)	Restrictions on foreign ownership of Indian securities, if any:	Complied with	284	
	<ul><li>a. Investment by non-resident Indians.</li><li>b. Investment by foreign portfolio investors.</li><li>c. Investment by other non-residents.</li></ul>			
(C)	Description of Equity Shares and Terms of the Articles of Association:	Complied with	288	
	Main provisions of the Articles of Association including rights of the members regarding voting, dividend, lien on shares and the process for modification of such rights, forfeiture of shares and restrictions, if any, on transfer and transmission of securities and			
	their consolidation or splitting.			



SCHEDULE VI: DISCLOSURES IN OFFER DOCUMENT, ABRIDGED PROSPECTUS AND LETTER OF OFFER  PART A [See regulations 17, 24(2)(b), 57(1)(f), 70(2), 122(2)(ii), 153(1)(f), 239, 246(2)(b), 282(1)(f), 287(2), 291]					
	this Part, which have been indicated in [Part D], need not be made.	Applicabl			
(18)	Other Information:	e			
	List of material contracts and inspection of documents for inspection:				
18(1)	Material contracts.	Complied with	302		
18(2)	Material Documents	Complied with	302-304		
18(3)	Time and place at which the contracts, together with documents, will be available for inspection from the date of the offer document until the date of closing of the subscription list.	Complied with	302-304		
	[Provided that the material contracts and material documents shall also be made available for inspection through online means.]				
18(4)	IPO grading reports for each of the grades obtained.	Not Applicabl e	-		
18(5)	The draft offer document/ draft letter of offer and offer document shall be approved by the Board of Directors of the issuer and shall be signed by all directors including the Managing Director within the meaning of the Companies Act, 2013 or Manager, within the meaning of the Companies Act, 2013 and the Chief Financial Officer or any other person heading the finance function and discharging that function. The signatories shall further certify that all disclosures are true and correct.	Complied with	305-311	1	
	<b>DECLARATION BY THE ISSUER:</b> We hereby declare that all relevant provisions of the Companies Act, 2013 and the guidelines/regulations issued by the Government of India or the guidelines/regulations issued by the Securities and Exchange Board of India, established under section 3 of the Securities and Exchange Board of India Act, 1992, as the case may be, have been complied with and no statement made in the Red Herring Prospectus is contrary to the provisions of the Companies Act, 2013, the Securities and Exchange Board of India Act, 1992 or rules made or guidelines or regulations issued there under, as the case may be. We further certify that all statements are true and correct.	Complied with	305-311	1	

For & on behalf of Indorient Financial Services Limited

Email: wecare@indorient.in | Contact: +91 79772 12186 | Website: www.indorient.in





**Authorised Signatory** Name: Ivor Anil Misquith

**Designation: Joint Managing Director and CEO** 

DIN: 07025270