

Being Future Ready



Srei Equipment Finance Limited
Annual Report **2022-23**

Corporate Information Page

(Annual Report 2022-23)

Administrator

Mr. Rajneesh Sharma

Administrator (under IBC)

Advisory Committee

Mr. Rajneesh Sharma

Mr. R Subramaniakumar (resigned w.e.f June 22, 2022)

Mr. T T Srinivasaraghav

Mr. Farokh N Subedar (resigned w.e.f Jan 31, 2023)

Mr. Venkat Nageswar Chalasani (appointed w.e.f June 23, 2022)

Mr. V Ramachandra (appointed w.e.f Jan 31, 2023)

Administrator (under IBC & Chairman of the Committee)

Member

Member

Member

Member

Member

Company Secretary

Mr. Sumit Kumar Surana

Chief Financial Officer

Mr. Yogesh Kajaria – Chief Financial Officer

Statutory Auditors

J Kala & Associates (appointed w.e.f September 22, 2022)

Chartered Accountants, ICAI Firm Registration No.118769W

Dass Gupta & Associates (appointed w.e.f September 22, 2022)

Chartered Accountants, ICAI Firm Registration No. 000112N

Secretarial Auditor

S. K. Khemka & Associates

Practicing Company Secretary

Membership No. FCS 3315, Certificate of Practice No. 2941

Registrar & Transfer Agents

Kfin Technologies Limited

(For Equityshares, Public Issue and Private Placement of Non-Convertible Debentures of the Company)

Plot No. 31& 32, Financial District, Nanakramguda Gachibowli

Hyderabad – 500032 Tel. No. : +9140-67162222

Fax No. : +9140-23420814

E-mail : einward.ris@karvy.com

S. K. Info Solutions Private Limited

(For Non-Convertible Debentures issued on Private Placement basis)

D/42, Katju Nagar, Ground Floor (Near South City Mall)

Jadavpur, Kolkata – 700032

Tel. No.: 033-24120027 & 033-24120029

Fax No.: 033-24120027

Email : skcdilip@gmail.com

Corporate Identification Number

U70101WB2006PLC109898

Registered Office

"Vishwakarma", 86C, Topsia Road

(South), Kolkata-700046

Tel: 91-33-6639-4700

Email : corporate@srei.com

Website : www.srei.com

Corporate Office

Room no. 12 & 13, 2nd Floor

6A, Kiran Shankar Roy Road, Kolkata –700001

HeadOffice

Plot : Y-10, Block EP, Sector V, Salt Lake City, Kolkata – 700091

Tel : + 913366394700, Fax : +913366022600

Listing

BSE Limited

National Stock Exchange of India Limited

Depositories

National Securities Depository Limited

Central Depository Services (India) Limited

Debenture Trustees

Catalyst Trusteeship limited

(Erstwhile GDA Trusteeship Limited)

GDA House, Plot No. 85 Paud Road

Pune – 411 038, Tel : +91 22 4922 0555

Fax : + 91 22-4922 0505

E-mail : Compliance CTL-Mumbai@ctltrustee.com

website : www.catalysttrustee.com

IDBI Trusteeship Services Limited

Ground Floor, Universal Insurance

Building, Sri Phirozshah Mehta Road, Fort

Mumbai, Maharashtra – 400 001

Tel: 022 40807000, Fax : 022 66311776

email : itsl@idbitrustee.com

website : www.idbitrustee.com

Axis Trustee Service Limited

Registered Office : Axis House Wadia

International Centre, Pandurang

Budhkar Marg Worli, Mumbai – 400 025

Corporate Office : The Ruby 2nd Floor, SW, 29

Senapati Bapat Marg, Dadar West, Mumbai – 400 028

Tel : 022- 62300451

E-mail : Debenturetrustee@Axistrustee.com

Website : www.axistrustee.in

BOARD'S REPORT

(Report of Implementation and Monitoring Committee)

DEAR MEMBERS,

The Reserve Bank of India (RBI) vide Press Release dated October 04, 2021, in exercise of the powers conferred under Section 45-IE (1) of the Reserve Bank of India Act, 1934 (RBI Act) superseded the Board of Directors of your Company on October 04, 2021 owing to governance concerns and defaults by your Company in meeting various payment obligations and the RBI appointed Mr. Rajneesh Sharma, Ex-Chief General Manager, Bank of Baroda as the Administrator of your Company under Section 45-IE (2) of the RBI Act. Thereafter, RBI vide its Press Release dated October 4, 2021, in exercise of the powers conferred under Section 45-IE 5(a) of the RBI Act, constituted a 3 (Three) member Advisory Committee comprising of Mr. R Subramaniakumar, former MD & CEO of Indian Overseas Bank, Mr. T T Srinivasaraghavan, former Managing Director of Sundaram Finance Limited, Mr. Farokh N Subedar, former Chief Operating Officer and Company Secretary, Tata Sons Limited to assist the Administrator in discharge of his duties and to advise the Administrator in the operations of your Company during the Corporate Insolvency Resolution Process (CIRP). Consequent upon resignation of Mr. R. Subramaniakumar from the Advisory Committee with effect from June 22, 2022, the RBI vide its Press Release dated June 23, 2022 decided to appoint Mr. Venkat Nageswar Chalasani, former Deputy Managing Director, State Bank of India as a member of the Advisory Committee with immediate effect. Further, RBI vide its Press Release dated January 31, 2023 has announced resignation of Shri Farokh N Subedar from the Advisory Committee with effect from January 31, 2023 and appointment of Mr. V Ramachandra, former Chief General Manager, Canara Bank as a Member of the Advisory Committee with immediate effect. Subsequent to all the changes, the Advisory Committee at the end of the Financial Year comprised of Shri Venkat Nageswar Chalasani, former Deputy Managing Director, State Bank of India, Shri T T Srinivasaraghavan, former Managing Director, Sundaram Finance Limited and Mr. Shri V Ramachandra, former Chief General Manager, Canara Bank. As per the framework of the Advisory Committee as approved by RBI, primary responsibility of the Advisory Committee was to guide the Administrator to undertake all steps that will maximize the value for all stakeholders of your Company through a successful resolution. Since the Administrator has also taken over the responsibility of the Board of Directors of your Company, the Advisory Committee has supported the Administrator in fulfillment of his role and responsibilities.

On October 08, 2021, the RBI filed a Petition before the Hon'ble National Company Law Tribunal, Kolkata Bench (Hon'ble NCLT/Adjudicating Authority) under Section 227 read with Section 239(2)(zk) of the Insolvency and Bankruptcy Code, 2016 (IBC/IBC Code/Code) read with Rules 5 and 6 of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudication Authority) Rules, 2019 (FSP Rules), to initiate CIRP against your Company. Accordingly, in terms of Rule 5(b)(i) of the FSP Rules, an interim moratorium came into effect on the date of filing of the application to initiate CIRP. Thereafter, CIRP was initiated against your Company by an Order dated October 08, 2021 of the Hon'ble NCLT. The Hon'ble NCLT, vide the said Order, confirmed the appointment of the Administrator to perform the functions of an Interim Resolution Professional/Resolution Professional to complete the CIRP of your Company as required under the provisions of the Code and also announced commencement of the moratorium under Section 14 of the Code with effect from October 08, 2021. Upon admission of the petitions for Insolvency Resolution Process by the Hon'ble NCLT in respect of your Company vide the said order dated October 08, 2021, the RBI vide its Press Release dated October 11, 2021 had decided that the three-member Committee shall continue as the Advisory Committee constituted under Rule 5 (c) of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019. The Advisory Committee shall advise the Administrator in the operations of your Company during the CIRP.

The Administrator of your Company in light of the provision of the Code had constituted the Committee of Creditors (CoC) of your Company u/s 21

of the Code read with Regulation 17 of the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016 (CIRP Regulations), based on the claims submitted by the Creditors.

Pursuant to an application filed by the Administrator with the Hon'ble NCLT seeking 'group Insolvency' for your Company and Srei Infrastructure Finance Limited (SIFL), Holding Company on December 21, 2021, the Hon'ble NCLT vide its order dated February 14, 2022 ('Consolidation Order') ordered the consolidation of the CIRP of your Company and SIFL, and has directed the Administrator to constitute a unitary and integrated CoC to conduct CIRP of both the Companies and to conduct the requisite processes in a concerted manner. The Hon'ble NCLT also directed the Administrator to call for consolidated resolution plans for both your Company and SIFL under the Code and the Regulations framed thereunder. The Administrator of your Company, pursuant to the above mentioned Order passed by Hon'ble National Company Law Tribunal on February 14, 2022 had constituted a unitary and integrated CoC to conduct CIRP of your Company and Srei Infrastructure Finance Limited (SIFL), Holding Company, and has called for consolidated resolution plans for both the Companies under the Code and the Regulations framed thereunder.

In accordance with the provisions of the Code and with the approval of the Committee of Creditors of your Company, the Administrator on February 25, 2022 invited Expressions of Interest (EOI) from prospective resolution applicants. Subsequently, resolution plans were invited from eligible prospective resolution applicants on the basis of the Request for Resolution Plan (RFRP), as approved by the CoC.

The legally compliant resolution plans were duly presented by the Administrator to the consolidated CoC held on February 15, 2023 for the consideration of the legally compliant resolution plans in accordance with the provisions of the Code, the Insolvency and Bankruptcy Board of India (Insolvency Resolution Process for Corporate Persons) Regulations, 2016 (CIRP Regulations) and the terms of the RFRP.

As per the votes cast by the CoC Members, the resolution plan submitted by National Asset Reconstruction Company Limited (NARCL) in respect of your Company was approved by 89.2% votes and was chosen as the successful resolution plan under Section 30(4) of the Code (Resolution Plan).

Thereafter, the Administrator has filed with RBI an application on February 16, 2023, seeking no objection for change in control/ownership/management of your Company in terms of Rule 5(d)(iii) of the FSP Rules and an application under Section 30(6) of the Code for submission of Resolution Plan of NARCL as approved by the consolidated CoC with the Hon'ble NCLT, Kolkata Bench on February 18, 2023. Your Company received the said no objection from RBI on March 23, 2023.

The Competition Commission of India (CCI) also approved the acquisition of control of your Company by NARCL and IDRCL as required under Insolvency and Bankruptcy Code, 2016 by its letter dated April 06, 2023 to NARCL and IDRCL.

The Hon'ble NCLT vide its Order dated August 11, 2023 (uploaded on its website on August 11, 2023) (Plan Approval Order), approved the Resolution Plan submitted by NARCL with respect to the Corporate Insolvency Resolution Process of your Company under Section 31 of the Code.

As per the Approved Resolution Plan, it is proposed that any existing encumbrance or collateral (whether enforced, crystallized or proceeded with or not) over the assets of the Corporate Debtors (created and/or perfected for debt availed by the Corporate Debtors or a third party) (collectively "Security"), by operation of applicable law, or in connection with any debt owed to financial creditors, operational creditors, other creditors or any other debt or obligation of the Corporate Debtors, or in relation to a third party (including a related party) whose obligations were secured by the Corporate Debtors by creation of any Security in favour of

another person, at any time till the effective date (as per the Approved Resolution Plan), shall stand automatically extinguished, revoked, released, cancelled, withdrawn, dismissed and deemed null and void (as the case may be) and all financial obligations in relation to such Security shall be permanently extinguished on the effective date on and with effect from the Plan Approval Date.

In accordance with the terms of the Approved Resolution Plan, an Implementation and Monitoring Committee ("IMC") has been constituted for conducting the affairs of your Company and supervising the implementation of the Resolution Plan until all the steps and actions contemplated therein have been completed.

The members of the IMC are Mr. Rajneesh Sharma, Administrator & Chairman of the Committee (elected by the Committee members); Mrs. Sudha Rathna-General Manager, State Bank of India, Member; Mr. Biswanath Das-Deputy General Manager-Canara Bank, Member; Mr. Kamod Pathak-Assistant General Manager-UCO Bank, Member; Mr. Sandeep Agarwal-representative of NARCL, Member; Mr. Pavel Podder-representative of IRDCL, Member.

Further, upon the approval of the Resolution Plan by the Plan Approval Order and in compliance with the directions of the Hon'ble NCLT in the said Plan Approval Order, the mandate of the RBI constituting the Advisory Committee as per RBI Press Release dated October 04, 2021, to advise the

Administrator in the operations of your Company during CIRP and to assist him for discharging his duties was fulfilled. Therefore, the Advisory Committee was dissolved and the same was also intimated to the respective Members of the Advisory Committee.

A detailed summary highlighting the significant portion of the Approved Resolution Plan along with the Order of the Hon'ble NCLT approving the Resolution Plan is hosted on the website of the Company at www.srei.com and the same is also intimated to the Stock Exchanges where the securities of the Company is listed vide letter dated August 12, 2023. The same is not repeated here for the sake of brevity.

The Boards' Report (Report of Implementation and Monitoring Committee chaired by the Administrator) is being taken on record by the Administrator and the Implementation and Monitoring Committee Members (IMC).

The Seventeenth Annual Report together with the Audited Accounts of your Company for the Financial Year ended March 31, 2023 is being presented. Since the Board of Directors of your Company was superseded by the RBI under Press Release dated October 04, 2021, the said following report is being presented by the Administrator and the Implementation and Monitoring Committee of the Company in fulfillment of their duties as per the Approved Resolution Plan. The summarized financial performance of your Company is as follows:

FINANCIAL SUMMARY & STATE OF COMPANY'S AFFAIRS

(₹ in Lacs)

Particulars	Year ended	
	March 31, 2023	March 31, 2022
Total Income	1,55,757	3,14,165
Total expenditure (including depreciation and other expenses etc.)	2,62,092	5,81,650
Profit/(Loss) Before Tax	(11,21,928)	(2,67,485)
Net Tax expense	-	9,807
Profit/(Loss) After Tax	(11,21,928)	(2,77,292)
Other Comprehensive Income	(901)	(238)
Total Comprehensive Income	(11,22,829)	(2,77,530)
Profit/(Loss) brought forward from earlier year	(14,74,437)	(10,75,165)
Retained Earnings amount available for Appropriation	(25,96,547)	(13,52,499)
Paid up Equity Share Capital	7,902	7,902
Amount transferred to/(from) Reserves	45,533	1,21,938
Net Worth	(23,40,940)	(11,73,342)

Note : The above figures are extracted from the financial statements for the financial year ended on March 31, 2023.

OPERATIONAL REVIEW

Some of the key highlights of your Company's performance during the year under review are:

- The loss (before depreciation, amortization, impairment, Net loss on derecognition of financial instruments under amortized cost category, Impairment on financial instruments (Net), Loss/write-off on Repossessed Assets and Assets acquired in satisfaction of debt and net tax expenses for the year was ₹ 9,06,360 Lacs as against ₹ 26,643 Lacs last year.
- Loss before taxation for the year was ₹ 11,21,928 Lacs as against ₹ 2,67,485 in the last year.
- Net loss after taxation for the year was ₹ 11,21,928 Lacs as against ₹ 2,77,292 Lacs in the last year.

The Financial Statements of your Company have been prepared in accordance with the Indian Accounting Standards (IND AS) and the relevant provisions of the Companies Act, 2013 and rules made therein, as applicable and guidelines issued by the Securities and Exchange Board of India (SEBI). Accounting policies have been consistently applied except where a newly issued accounting standard, if initially adopted or a revision to an existing

accounting standard requires a change in the accounting policy hitherto in use. Management evaluates all recently issued or revised accounting standards on an ongoing basis. Your Company discloses audited/unaudited financial results on a quarterly/half yearly basis and audited financial results on an annual basis.

Your Company has taken adequate steps and measures, including undertaking of the Compliance Audit by an external party, in order to assess the compliance position in respect of key compliance requirements prescribed by the Reserve Bank of India (RBI) including the Fair practices, Anti Money Laundering and Know Your Customer (KYC) and other applicable regulatory guidelines and policies.

LENDING OPERATIONS

Your Company did not undertake any lending operation in the year under review, due to various factors. The focus of your Company, during the year under review, was to strengthen its base and be future ready for commencing retail lending activities in more efficient and more controlled manner.

Your Company has been closely monitoring the prevalent situation and would continue to take all necessary steps as required to maximize the value of your Company and continue the organization as a going concern.

RESOURCE MOBILISATION

Your Company vide special resolution passed by the Members of your Company, under Section 180(1)(c) of the Companies Act, 2013, at the Extra Ordinary General Meeting held on January 20, 2018, authorized the Board of Directors to borrow money upon such terms and conditions as the Board may think fit in excess of the aggregate of paid-up share capital and free reserves of your Company upto an amount of ₹ 60,000 Crores (Rupees Sixty Thousand Crores only).

Your Company availed bank borrowings. Your Company had issued and allotted Non-Convertible Debentures and perpetual debentures from time to time through public issues and on private placement basis. However, during the financial year under review, your Company did not raise any funds through Non-Convertible Debentures (NCDs).

Upon commencement of the CIRP of your Company, interim moratorium/moratorium under Section 14 of Insolvency and Bankruptcy Code, 2016 (IBC Code) was imposed with effect from October 08, 2021. The moratorium on initiation and continuation of legal proceedings, including debt enforcement action ensures a stand-still period during which creditors cannot resort to individual enforcement action. The interest on the debt borrowed has also ceased to accrue from the date of commencement of CIRP, and no interest shall be applicable for the CIRP period as per legal opinion obtained by your Company. Further, any such payment of interest and principal may amount to according preferential treatment to a set of creditors to the prejudice of other stakeholders. In accordance with law, all creditors are bound by the process laid out under the IBC Code.

CREDIT RATINGS

All the debts owed to Financial Creditors have crystallized as on Insolvency Commencement Date i.e. 8th October, 2021 and these debts would be payable as per the Resolution Plan approved by Adjudicating Authority. The credit rating agencies have reaffirmed 'default grade' credit ratings of various loan facilities/financial instruments of your Company during the FY 2022-23. This reaffirmation has been done by them based on the best available information.

DIVIDEND

Owing to the loss incurred by your Company and also your Company being under CIRP for the Financial Year under review, no dividend has been declared/recommended on Equity Shares for the financial year ended March 31, 2023.

TRANSFER TO RESERVES

During the year under review, your Company incurred a loss mainly on account of increased provisioning and higher impact of impairment on financial instruments and consequently, no transfers were made to the reserves out of the amount available for appropriation.

CORPORATE INSOLVENCY RESOLUTION PROCESS

In the earlier part of this Report, sequence of events have been presented pertaining to commencement of CIRP of your Company until the approval of the resolution plan of NARCL by Hon'ble National Company Law Tribunal (NCLT), Kolkata Bench on August 11, 2023 and undergoing implementation of the approved Resolution Plan.

In accordance to Section 24 of the IBC, your Administrator had convened and conducted 34 (thirty four) meetings of consolidated CoC during the Financial Year under review, to discuss the updates in the CIRP process of your Company and to consider, analyse and approve appropriate resolution plan to revive your Company.

As part of the CIRP of your Company, the Administrator, Advisory Committee and the management team have taken various initiatives to ensure 'going concern' status of your Company as required u/s 20 of the Code. Further, the Code and Regulations thereunder stipulate prior approval by the Committee of Creditors for certain actions to be taken during the process, including as provided u/s 28 of the Code. The Administrator and the Advisory

Committee as set up by the RBI to assist the Administrator in discharge of his duties, had exercised oversight on the operations of your Company apart from running the CIRP in accordance with the provisions of the Code and Regulations under IBC, 2016. The Administrator had appointed Ernst & Young LLP and AZB & Partners as Process and Legal advisors, respectively to assist him in completion of the CIRP of your Company. Further, various committees have been constituted/re-constituted by the Administrator with a view to have a group of in-house executives of your Company who can help the business navigate its compliance obligations.

Various measures, under the directions of the Administrator, have been taken to strengthen the internal processes of your Company including review of the risk management process, conduct of Compliance Audit and Transaction Audit of your Company. These initiatives contributed to strengthen your Company's overall governance structure and control environment. On conclusion and implementation of all such initiatives, it is expected that the operational efficiency will improve and operational issues will get addressed.

The Administrator acting as the Resolution Professional under the provision of the Code, had appointed BDO India LLP as Transaction Auditor.

The Administrator on the advice of the Advisory Committee and in consultation with the Process Advisors and Legal Advisors filed necessary applications before the Hon'ble NCLT, as and when reports under the above sections were submitted by the BDO India LLP. The disclosure in relation to said filings as approved by the Advisory Committee were submitted by your Company to the Stock Exchanges pursuant to the provisions of Regulation 51 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI Listing Regulations) and also placed at website of your Company at the link <https://www.srei.com/sefi-shareholder-information>.

PUBLIC DEPOSITS

During the year under review, your Company, being a Non deposit taking Non-Banking Financial Institution (NBFI), has not accepted any deposits from the public under Section 73 of the Companies Act, 2013 read with the Companies (Acceptance of Deposits) Rules, 2014 and within the meaning of the provisions of the Non-Banking Financial Companies Acceptance of Public Deposits (Reserve Bank) Directions, 2016.

DETAILS OF SUBSIDIARY/ASSOCIATES/JOINT VENTURE COMPANY

Your Company does not have any subsidiary/associates/joint venture Company as on March 31, 2023.

RESERVE BANK OF INDIA (RBI) CLASSIFICATION

Pursuant to the circular issued by Reserve Bank of India (RBI) on Harmonization of different categories of NBFCs dated February 22, 2019, your Company has been classified as an 'NBFC - Investment and Credit Company (NBFC-ICC)'. Further, pursuant to RBI circular on Scale Based Regulation (SBR) : A Revised Regulatory Framework for NBFCs dated October 22, 2021, your Company has been placed under 'Middle Layer'.

SHARE CAPITAL

The Authorized Share Capital of your Company is ₹ 10,00,00,00,000/- (Rupees One Thousand Crore Only) divided into 50,00,00,000 Equity Shares of ₹ 10/- each and 5,00,00,000 Preference Shares of ₹ 100/- each and the paid-up Equity Share capital of your Company is ₹ 79,01,64,150 (Rupees Seventy Nine Crore One Lac Sixty Four Thousand One Hundred and Fifty only).

Presently, the entire paid-up Equity share capital of your Company is held by Srei Infrastructure Finance Limited along with their 6 (Six) nominees. There was no change in the Authorized Equity Share Capital and the Paid-up Equity Share Capital of your Company during the year under review.

TRANSFER OF LENDING BUSINESS, INTEREST EARNING BUSINESS & LEASE BUSINESS OF SREI INFRASTRUCTURE FINANCE LIMITED (SIFL), THE HOLDING COMPANY TO YOUR COMPANY AS A GOING CONCERN ON SLUMP EXCHANGE BASIS

During the Financial Year 2019-20, the Board of Directors of your Company and its holding Company, Srei Infrastructure Finance Limited (SIFL) at their respective meetings held on July 04, 2019, had for the purposes of consolidation of lending business approved the transfer, assignment and delivery of the Lending Business, Interest Earning Business & Lease Business of SIFL together with associated employees, assets & liabilities (including liabilities towards issued & outstanding non-convertible debentures), ("Transferred Undertaking") as a going concern by way of slump exchange to your Company through a Business Transfer Agreement (BTA), in exchange of fully paid up equity shares to be issued and allotted by your Company, subject to all necessary approvals.

Pursuant to the aforesaid, BTA was signed and executed by your Company and SIFL on August 16, 2019. Further, in accordance with the said BTA, the entire fund-based business division of SIFL along with all its assets and liabilities has been transferred to your Company with effect from October 01, 2019. Further, an amendment to the aforesaid BTA was executed on November 14, 2019 with SIFL. Pursuant to this, your Company has entered into various assignment agreements, in connection with the Transferred Undertaking, with SIFL to give effect of the slump exchange and accordingly your Company and SIFL has passed the relevant accounting entries in their respective books of accounts effective October 01, 2019, after receiving the necessary approvals.

Your Company had also proposed the Schemes with its Creditors and the application to that effect had been filed with the Hon'ble National Company Law Tribunal, Kolkata (Hon'ble NCLT). The BTA, inter alia, constituted an integral part of the Scheme. The Hon'ble NCLT vide order dated October 21, 2020, directed your Company to hold meetings of the Creditors to vote on the Scheme and the same was rejected by the Creditors and thus the slump exchange under the BTA did not fructify. Pending final decision in the matter, SIFL and your Company had maintained status quo for BTA as per the directions of Hon'ble NCLT.

After the commencement of CIRP, an Application was filed by the Administrator of your Company seeking to withdraw the Scheme which has been allowed by the NCLT by an order dated February 11, 2022 and hence no further action was taken in this regard consequent upon the withdrawal of Schemes as stated above. Accordingly, the status quo regarding Business Transfer Agreement, as it existed on the date of commencement of the Corporate Insolvency Resolution Process, has been maintained.

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

ECONOMIC REVIEW

a. Global Outlook

According to the International Monetary Fund (IMF), the global economy is set to grow by 6.0 per cent in 2021 and then by 4.4 per cent in 2022 after experiencing a contraction of 3.3 per cent in 2020 because of the COVID-19 induced 'Great Lockdown'. Although a globally coordinated vaccination drive is in progress, the pandemic's second wave is spreading fast, forcing governments to implement lockdowns once again, although in a much localised manner. Thus, a full-fledged economic recovery may be some time away, and therefore any projection of future growth at this stage can prove to be premature.

The fight against the pandemic is topmost on every government's agenda. A global initiative of 190 countries, COVAX (abbreviation for COVID-19 Vaccines Global Access), has been launched to ensure rapid and equitable access to COVID-19 vaccines for all countries, regardless of income level. COVAX has lined up almost 2 billion doses of existing and candidate COVID-19 vaccines for use worldwide, including delivery of at least 1.3 billion donor-funded doses of approved vaccines in 2021 to the 92 low and middle income economies. Although COVAX is principally funded by the developed countries, it has also received private sector and philanthropic contributions. Such co-ordinated global action is a welcome change with respect to the 'each country for itself' mindset that was prevalent in the last few years.

While countries have joined hands in their fight against COVID-19, the ongoing second wave has witnessed the emergence of new variants of the virus, some of which are more infectious than the original. As there is little medical evidence on how effective the present vaccines are against the new variants of the virus, there is little clarity on to what extent would the vaccination drive be able to contain the spread of the pandemic.

The global recovery in the year ahead is expected to be driven by China and the US. In fact, a broad-based recovery was visible in the last two quarters of FY21 in several countries, but the second wave has halted it somewhat. This can have economic consequences. To avoid any economic crisis, most central banks are likely to continue the accommodative monetary policies they have followed throughout FY21. During the first wave, following the example of the U.S. Federal Reserve, most central banks adopted ultra-accommodative monetary policies by reducing interest rates to historic lows. Unprecedented liquidity infusions by the central banks in the developed nations were aimed at fuelling debt-financed economic activity. Liquidity worth more than USD 12 trillion had been printed in a matter of few months. The objective has been to enable debt-fuelled demand at both individual and corporate levels.

Even before the pandemic, there was a significant build-up in indebtedness of the non-financial private sector since 2016. With the pandemic, the total global debt stood at USD 277 trillion at the end of 2020, which is 365 per cent of world GDP. The IMF pointed out that such massive recourse to debt was necessary to protect the global economy in the short term. However, a further debt overhang from continued accommodative monetary policies aimed at countering the second wave can have a long term ramifications on the global economy.

The World Trade Organization (WTO) has predicted an uneven recovery for global trade. As per WTO estimates, the world trade in merchandise, or goods, will grow 8 per cent in volume in 2021 and by 4 per cent in 2022, after falling 5.3 per cent in 2020. A surge in demand for merchandise during the final half of 2020 helped counterbalance the pandemic's initial disruption to global trade and produced more muted annual decline. The WTO believes that economic recovery across the globe will be dependent on the ramping up of production of vaccines.

The year under review was a turbulent one for most commodities. The widespread global shutdown of economic activity depressed demand and disrupted supply chains for commodities in virtually all sectors - energy, base metals, agricultural products and even the odd precious metals. The price of crude oil, for the first time in history, entered into negative territory. But during the latter half of the year, the prices of several commodities rallied spectacularly and, in certain cases, reached multi-year highs. A combination of expansionary monetary policy and a growing demand for commodities with more and more countries taking the infrastructure road to economic recovery, has been largely responsible for this.

A new world order with multiple protocols related to health, socializing, work culture and others will emerge. As each country comes up with its own protocols, going forward, trade and commerce, travel and tourism, movement of individuals among countries will increasingly be determined by bilateral deals and limited regional co-operations. These "new normal"-s will fundamentally change certain industries and they would need to re-engineer their business models in order to survive. Adapting to these "new normal"-s will have to be the focus in the short to medium term.

b. Indian Scenario

During the year under review, because of the impact of the pandemic, the Indian economy contracted by 7.3 per cent after growing at a rate of 4 per cent in FY20. The country went into a brief recession as the first two quarters of FY21 registered negative GDP growth, however it came out of the recession in the third quarter as the Q3 GDP expanded by 0.5 per cent. The GDP growth predictions for India are quite varied. While the IMF projects a more optimistic growth rate of 12.5 per cent for India in 2021 and a follow-up growth of 6.9 per cent growth in 2022, the United Nations, taking note

of the impact of the second wave, has predicted a more conservative growth rate 7.5 per cent in 2021 followed by a 10.1 per cent growth in 2022. The Reserve Bank of India (RBI) has predicted a 9.5 per cent GDP growth for India in FY22.

After recording a total FDI (equity + re-invested earnings + other capital) of USD 74.39 billion in FY20, India was able to attract FDI worth USD 81.72 billion in FY21. The disruption in global trade due to the pandemic was reflected in India's trade figures too. Total exports (goods and services combined) in FY21 stood at USD 493.19 billion and total imports stood at USD 505.94 billion (much lower than the USD 544.7 billion and USD 645.6 billion figures respectively in FY20). However, in spite of all these, India's foreign exchange reserves continued to accumulate and presently it stands at over USD 600 billion, much of which was due to a sharp narrowing of the trade deficit in FY21.

The economy was steadily losing momentum in the pre-pandemic phase. The national lockdown brought economic activity to a virtual standstill for a couple of months at the start of the year under review. The composite index of 8 core industries (namely coal, crude oil, natural gas, refinery products, fertilizers, steel, cement and electricity) contracted by 7 per cent during FY21 after a marginal growth of 0.4 per cent in FY20. The Index for Industrial Production (IIP) shrunk by 8.6 per cent in FY21 compared to a 0.8 per cent contraction in FY20. Capital goods output contracted by 19.2 per cent, infrastructure and construction goods by 9.1 per cent and consumer durables by 15.2 per cent in FY21. Sales of vehicles continued to decline second year in a row - passenger vehicles by 2.24 per cent and commercial vehicles by 20.77 per cent. Bank credit growth decelerated to an over five-decade low of 5.56 per cent in FY21. The prolonged slowdown has severely curbed consumption which, in turn, has slowed down considerably investments for fresh capacity creation.

Because of a prolonged period of slow growth, a stressed financial system and other downside risks, India's sovereign credit rating was downgraded by credit rating agency Moody's to "Baa3" with a negative outlook. Meanwhile, Fitch Ratings retained "BBB-" sovereign rating for India with a negative outlook and S&P Global Ratings also kept India's sovereign rating unchanged at "BBB-" for the next two years.

The government tried to address the urgent needs of the most vulnerable segments of the society and announced a number of initiatives aimed at reviving growth. At the same time the RBI reduced the policy rates and had taken a number of measures to preserve financial stability. During the last two quarters, a nascent recovery was visible with mixed signals emerging from a number of high frequency indicators. However, supply-side disruptions had started pushing up inflation despite a lack of consumption demand. Now with localised lockdowns and containment measures on account of the second wave, there can be a further rise in inflation, as evident from the April 2021 Wholesale Price Index (WPI) inflation (or factory-gate price inflation) figure overshooting the Consumer Price Index (CPI) inflation (or retail inflation) figure by a wide margin. Early signs of renewed stress are once again visible in the economy. In this backdrop, the RBI is likely to continue its accommodative stance, but chances of further reduction in policy interest rates are minimal now as inflationary trends are already visible.

The second wave has been more virulent with increased cases of fatalities. But, despite that, the shock to economic activity is likely to be less severe than what it was in 2020. Equipped with the experience of the first wave, the authorities are resorting to more narrow lockdowns. While the year under review has been a struggle for survival and stabilization for most enterprises, the year ahead is likely to be a phase of cautious growth.

NBFCs IN INDIA

In India, the Non Banking Financial Companies (NBFCs) play an active role in meeting the funding needs of those segments of the society who mostly remain outside the coverage of formal modes of institutional funding. NBFCs are essentially fuelling entrepreneurship by catering to the funding needs of the micro, small and medium enterprises (MSMEs), many are involved in the infrastructure sector in services like construction and

transportation. Thus, NBFCs are performing a dual role of promoting financial inclusion and nation building.

As on January 2021, there were 9,507 NBFCs registered with the RBI. This was a second consecutive challenging year for the NBFC sector. While the flow of funds to NBFCs from the institutional sources had significantly dried up in FY20, there was a drastic fall in revenues in FY21 as the RBI actively intervened to alleviate the problems of the borrower community.

The following regulatory amendments were made by the RBI during the year under review which had a significant impact on the NBFC sector :

- NBFCs were allowed to extend to their stressed borrowers a moratorium on loan payment of all installments in respect of term loans, for six months.
- NBFCs figured among the targeted pandemic-affected entities which were to receive liquidity support from the RBI under the Targeted Long-Term Repo Operations (TLTRO) 2.0. A total of up to ₹ 500 billion was to be availed under the scheme at the policy repo rate for tenors up to three years and the amount had to be deployed in investment grade bonds, Commercial Papers and Non-Convertible Debentures of NBFCs. Subsequently, on-tap TLTRO with tenors of up to three years for a total of up to ₹ 1 trillion was announced. The scheme was made available at a floating rate linked to the policy repo rate and was available up to end-FY21 with an in-built flexibility to enhance the amount and period, if required.
- NBFCs, as well as banks, were instructed to adhere to Fair Practices Code and Outsourcing Guidelines regarding the loans sourced by them over Digital Lending Platforms.
- NBFCs were instructed to allow a one-time restructuring of the stressed loan accounts of those borrowers who have been affected due to the pandemic.
- A co-lending model aimed at meeting the credit needs of priority sectors was introduced with a funding ratio of 80:20 between banks and NBFCs. The intent was to make both banks and NBFCs to benefit from each other's core strengths.
- Draft guidelines on dividend distribution by NBFCs (effective financial year beginning April 01, 2020) were proposed to infuse greater transparency and uniformity. Only those NBFCs which comply with the minimum prudential requirements (inter alia w.r.t. the Capital Adequacy, Leverage Ratio, net NPA ratio and other conditions) would be eligible to declare dividend.
- Guidelines on appointment of Statutory Auditors for commercial banks, urban co-operative banks (UCBs) and NBFCs are to be harmonized to enable these supervised entities to appoint audit firms as per their needs in a timely, transparent and effective manner.
- A discussion paper outlining a 4-layered classification of NBFCs with varied regulatory intensity has been proposed and the classification is done on the basis of parameters like asset size, type of liabilities and their relative systemic importance.
- Entry-point requirement for new NBFC registrations is proposed to be increased from ₹ 20 million to ₹ 200 million and existing NBFCs falling short need to measure up within given a timeframe.
- RBI has conditionally allowed investments from or through Financial Action Task Force (FATF) non-compliant jurisdictions, whether in existing NBFCs or in companies seeking Certification of Registration, provided investors from such jurisdictions should not directly or indirectly acquire 'significant influence' in the NBFC, as outlined under applicable accounting standards.
- Minimum loan size from NBFCs reduced from ₹ 0.5 million to ₹ 0.2 million in order to become eligible for debt recovery under SARFAESI Act, 2002.

A special liquidity scheme with an allocation of ₹ 300 billion was announced enabling investments in both primary and secondary market transactions in investment grade debt paper of NBFCs, housing finance companies (HFCs) and micro-finance institutions (MFIs), the securities being fully guaranteed by Government of India. In addition, ₹ 450 billion was allocated for a Partial Credit Guarantee Scheme 2.0 to cover borrowings such as primary issuance of bonds and commercial papers of NBFCs, HFCs and MFIs, which involve sub-AA ratings and even unrated papers. Government agreed to guarantee the first 20 per cent of the losses. These schemes were routed through the banks, but a reluctant approach on part of the banks ensured that not enough liquidity was available for all categories of NBFCs. Without a steady access to liquidity, several NBFCs, especially the small and medium sized NBFCs, found the operating environment extremely difficult.

The second wave being more pervasive and having spread into the hinterland where a significant portion of NBFCs' clients reside, it will be another challenging year for the NBFC sector. The NBFCs are already facing renewed asset quality risks and liquidity risks. The adverse impact of this on the securitisation market will thwart fund-raising for NBFCs, at least in the near term. The fragile recovery that was visible in the sector is likely to get delayed.

Operational challenges for the NBFC sector make it more difficult for the MSMEs to sustain. For the MSMEs to weather this pandemic, it is necessary to have a vibrant NBFC sector. Therefore, the government and the RBI must provide adequate regulatory support to the NBFCs, just the way they have been helping the banking sector in the last few years.

BUSINESS OUTLOOK AND FUTURE PLANS

The Post-pandemic situation is looking good after being stretched for more than a year. The government strategies at both the Centre and State levels, which had aimed to strike a fine balance are now taking shape, so that neither life nor livelihood is threatened. The central government is clearly working towards scripting an infrastructure driven economic recovery. The multiplier impact of building infrastructure is manifold in terms of generating new employment, creating entrepreneurship opportunities and fuelling demand through upstream and downstream linkages.

In Union Budget 2023-24, notwithstanding its impact on pushing up the fiscal deficit, Revenue deficit in 2023-24 is targeted at 2.9% of GDP, which is lower than the revised estimate of 4.1% in 2022-23. Fiscal deficit in 2023-24 is targeted at 5.9% of GDP, lower than the revised estimate of 6.4% of GDP in 2022-23. While the revised estimate as a percentage of GDP was the same as the budget estimate, in nominal terms, fiscal deficit was higher by ₹ 94,123 Crores (increase of 5.7%) in 2022-23. Among the top 13 ministries with the highest allocations, in 2023-24, the highest percentage increase in allocation is observed in the Ministry of Railways (49%), followed by the Ministry of Jal Shakti (31%), and the Ministry of Road Transport and Highways (25%).

The scheme providing 50-year interest free loans to state governments will be made available in 2023-24 also with an outlay of ₹ 1.3 Lac Crores. 100 critical transport infrastructure projects for last and first mile connectivity for various sectors such as ports, coal, steel will be taken up. This will have an investment of ₹ 75,000 Crores including ₹ 15,000 Crores from private sources.

The National Infrastructure Pipeline (NIP) of projects which envisages at ₹ 10,80,000 Crores, more than 97 percent of the envisaged ₹ 11,10,000 Crores investment-worth projects are currently under implementation.

The Economic Survey document noted, of these 8,964 projects were under the different stages of implementation. More than half of these belong to the transportation sector, while the rest belong to communication, energy, logistics, social infrastructure, transport, water and sanitation and commercial infrastructure.

- In 2023-24, the Ministry has allocated ₹ 330 Crores for road safety, 20% greater than the revised estimates for 2022-23. Between 2017-18 and 2022-23, the Ministry has underutilised road safety funds by about 41%. The Ministry targeted to construct 12,200 km of NHs in

2022-23, of which 5,774 km (47%) has been constructed as of December 2022. As part of the Ministry's target to construct 60,000 km of NHs between 2019-20 and 2023-24, it envisaged to construct 13,000 km in 2023-24. Allocation towards road safety provides for safety programmes, relief support for accident victims, strengthening public transport, research and development, and setting up of facilities on NHs. The 2023-24 allocation for road safety is 0.1% of the Ministry's budget. However, revised estimates in 2022-23 are greater than the actual expenditure in the past five years.

- The Indian Railways has been allocated a capital outlay of ₹ 2.4 Lac Crores in the Union Budget 2023-24. This is the highest ever allocation to the national transporter and continues on the trend followed last year with a gross budgetary support of ₹ 1.37 Lac Crores in fiscal 2022-23.
- The budget has emphasised development of metro rails in public-private partnership (PPP) mode in different parts of the country. Metro Lite and Metro Neo technologies are being adapted to provide metro rail systems at much lesser cost with similar experience in tier-2 cities and peripheral areas of tier-1 cities. The government has allocated a total of ₹ 19,518 Crores to all metro projects across India in the Union Budget 2023-24.

The outlay for this year includes equity investment of ₹ 4,471 Crores, subordinate debt of ₹ 1,324 Crores and pass through assistance ₹ 13,723 Crores. The Centre has allocated ₹ 3,596 Crores to the National Capital Region Transport Corporation (NCRTC) for the country's first Regional Rapid Transit System (RRTS) project, a fall of about 23 per cent from the outlay in the last budget.

- 100 critical transport infrastructure projects, for last and first mile connectivity for ports, coal, steel, fertiliser, and food grains sectors have been identified and will be taken up on priority with investment of ₹ 75,000 Crores, including ₹ 15,000 Crores from private sources. A revamped reforms-based result linked power distribution scheme will be launched with an outlay of ₹ 306,000 Crores over 5 years.
- With entry of commercial miners into the mining scene and India's aim to get rid of coal imports, mining activity will only increase. India has set for itself a production target of 1 billion tonne coal domestically by 2023-24.
- As the government's deadline is fast approaching for their ambitious bid to provide piped water to every rural household by 2024, the Centre's marquee Jal Jeevan Mission has been allocated ₹ 69,684 Crores, up from the ₹ 54,808 Crores which the department is expected to spend in the current financial year. This works out to a roughly 27% hike.

All these projects are expected yet again to generate significant demand for equipment required in construction and mining, and so will the financing for these equipment.

The Covid - 19 pandemic continued to impact India and world in FY23, creating unforeseen challenges. The Indian Construction and Mining Equipment Industry witnessed growth of 25% in FY23, primarily attributed to the significant slowdown observed in construction activity across the country. The most significant decline was observed in the space of Roads and Highways construction which declined to 10,993 Kms per day during FY23 vis-a-vis 12,375 Kms per day recorded in FY-22. Besides, the Revamped Graded Response Action Plan (GRAP) states that under the severe pollution category when the air quality index varies between 401- 450, there will be a ban on construction activities but "emergent and essential projects" like railways, metros, airports etc; non-polluting and non-dust generating activities such as plumbing works, electrical works and carpentry related works will be exempted, had an adverse impact on the CE industry. On a positive note, though the QoQ sales were down, a comparison with the same period of the previous financial year shows a 59% increase in sales in Q1 FY2022-23. The growth however has been registered on a lower base as India was going through the 2nd wave of COVID-19, leading to muted

sales during Q1 FY2021-22. With new CEV-IV emission standards, now completely adopted by the industry, there are significant opportunities for the Indian CE manufacturers to tap into the developed markets.

However, in recent years, India's growth story has been closely associated with a strong focus on not only physical, but also social and digital infrastructure. Budget 2023 gives a powerful thrust to these three dimensions of infrastructure development which, put together, accelerate inclusive growth. To enhance opportunities for private investment in infrastructure - Infrastructure Finance Secretariat is being established. The secretariat will assist all stakeholders for more private investment in infrastructure, including railways, roads, urban infrastructure, and power, which are predominantly dependent on public resources. Along with this a Harmonized Master List of Infrastructure will be reviewed by an expert committee for recommending the classification and financing framework. India has become the third-largest aviation market in the world. The UDAN Yojana has played an important role in this regard. To give further impetus to aviation sector fifty additional airports, heliports, water aerodromes and advance landing grounds will be revived for improving regional air connectivity. To further improve India's logistics sector, one hundred critical transport infrastructure projects, for last and first mile connectivity for ports, coal, steel, fertilizer, and food grains sectors have been identified.

These budget provisions build on the government's National Infrastructure Pipeline (NIP) combined with other initiatives such as 'Make in India' and the production-linked incentives (PLI) scheme to augment the growth of infrastructure sector. In the Union Budget 2023-24, the Capital Investment Outlay has been increased steeply for the third year in a row by 33 per cent to ₹ 10 Lac Crores, which would be 3.3 per cent of GDP. This will be almost three times the outlay in 2019-20. The Indian construction equipment industry clocked strong YoY sales growth of 23% in the third quarter of the current fiscal over Q3 FY22. This uptrend in Q3 results of FY23 comes on the back of improved performance across all equipment segments, i.e., earthmoving, material handling, material processing, and road construction equipment.

The positive industry performance in Q3 of FY23 has primarily been powered by the robust 22% YoY sales growth of earthmoving equipment (EME), which accounts for nearly three-fourths of total CE sales. Though backhoe loader sales which account for about half of the earthmoving equipment sales have been declining in recent months of November and December, excavator sales with more than 30% share in total EME sales, have been on the rise during this period, leading to the upward trend observed in the overall sales of earthmoving equipment. The material handling equipment mainly comprising pick & carry cranes, observed a YoY sales growth of 56% during the 3rd quarter, while road construction equipment sales grew by 12%.

A similar trend has been witnessed in the quarter-on-quarter (QoQ) growth as well. Sales in Q3 FY23 were up by 21% as compared to Q2 sales in the current fiscal year. While earthmoving equipment with its lion's share of CE sales grew 19% over the last quarter, material handling equipment and concrete equipment recorded QoQ sales growth of 25% and 18% respectively in the third quarter of FY23. Material processing equipment registered a 5% quarterly growth while road construction equipment, which had showed worrying downward trends over the last two quarters, staged a recovery with a whopping 75% QoQ growth in Q3 of the current fiscal year, albeit on a low base.

The Indian Construction Equipment industry recorded an excellent 26% growth YoY with sales crossing the one lakh unit mark in FY2022-23. CE sales in Q4 of FY23 (Jan-Mar 2023) increased by 23% over Q4-FY22 and by 22% over Q3-FY23. On a month-on-month basis, sales in March 2023 increased by 17% over February 2023.

The growth comes on the back of the enhanced pace of construction and mining activity during the year which resulted in a significant increase in demand for all types of construction equipment. It is estimated that road and highway construction was about 30 km/day during FY23, which created

demand for machines like excavators, motor graders, crushers & screeners, etc.

In 2023-24, the Ministry of Health and Family Welfare has been allocated ₹ 89,155 Crores. This is an increase of 13% over revised estimates for 2022-23. The Department of Health and Family Welfare has been allocated ₹ 86,175 Crores, which accounts for 97% of the Ministry's expenditure. Notably, this allocation was an increase of approximately 13% over ₹ 79,145 Crores allocated in the 2022-23 union budget. The 2023-24 budget incorporated one of the most fundamental changes in healthcare required to transform the sector. The finance minister reported that the Union Budget 2023-24 has included the establishment of 157 new nursing colleges in co-location with the current medical colleges. This move showcases the government's focus on transforming the healthcare sector by first ensuring that there are sufficient frontline medical professionals in the hospitals. Further, the increase in nursing colleges will help bridge the gap relating to the number of nurses required per bed as India continues to become the preferred healthcare destination. In addition, the providers are now focusing on creating healthcare facilities in tier 2 and tier 3 cities as well. Further, the finance minister announced the government's mission of eliminating sickle cell anemia by 2047. Once launched, the initiative will allow for universal screening of 7 Crore people between 0 and 40 years in affected tribal areas.

In 2023-24, the Ministry of Rural Development has been allocated ₹ 1, 59,964 Crores in 2023-24. The Department of Rural Development has been allocated ₹ 1, 57,545 Crores, 13% less than the revised estimates of 2022-23. Major schemes under this department are MGNREGS (38%) and PMAY-G (35%) together account for almost 75% of the budgetary allocation. This is followed by PMGSY (12%), National Rural Livelihood Mission (NRLM, 9%), and the National Social Assistance Programme (NSAP, 6%).

Tech sector looks forward to a period of growth, stability propelled by fresh policies in the Budget. With India emerging as a global hub for digital capability and the roll out of 5G services in the country, the tech sector in the country is looking forward to a period of growth and stability propelled by fresh policies and other provisions from the budget. The industry has been a propellant for positive changes for years as it braces itself for up for new ones. The budget for 2023-24 has allocated ₹ 16,549 Crores for the Ministry of Electronics and Information Technology, which is nearly 40% higher on year.

The management of your Company is closely tracking these developments in order to source new business opportunities and make the business verticals future ready with investor identification process reaching its legitimate closure.

BUSINESS REVIEW

Your Company is registered with the Reserve Bank of India (RBI) as a systemically important non-deposit taking NBFC and is one of the significant financiers in the Construction, Mining and allied Equipment (CME) sector in India. In addition to CME, your Company is also diversified into financing of tippers, IT and allied equipment, medical and allied equipment, farm equipment and other assets. The financial products and services comprise loans, for new and used equipment, and leases.

The infrastructure sector is considered as the backbone of the country's economy as it integrates projects on a large scale and strengthens its competitiveness on a global level. It is estimated that India should invest \$4.5 trillion in Infrastructure by 2030 to support faster growth. India plans to spend US\$ 1.4 trillion on infrastructure during 2019-23 to have a sustainable development of the country and to boost the expansive growth to the sector. The National Infrastructure Pipeline (NIP), which was launched in December 2019 is a part of that attempt to invest \$4.5 trillion. The aim of the National Infrastructure Pipeline (NIP) is to help make India a \$5 trillion economy by 2025. The NIP pipeline since then has been increased from 6,835 projects to more than 7600 projects. The Government has suggested investment of ₹ 50 trillion (US\$ 750 billion) for railways infrastructure from 2018-30. India and Japan have joined hands for infrastructure development in India's Northeast states and are also setting up an India-Japan Coordination Forum for Development of Northeast to undertake strategic infrastructure projects for the region.

Public Capital Investment in Union Budget of 23-24

- Public capital investment would need to do the heavy lifting to support in growth in 2023-24.
- The Centre will hike the capital expenditure (capex) outlay for 2023-24 by 33 per cent to ₹ 10 trillion. In the Budget 2023 speech, she also said that the outlay for the PM Awas Yojana will be hiked by 66 per cent to ₹ 79,000 Crores. This is the highest outlay for capex ever. In FY23, the capex outlay was ₹ 7.5 trillion. The new outlay will amount to 3.3 per cent of the gross domestic product (GDP).
- The fiscal policy statement highlighted the total expenditure is to be ₹ 45.03 Lac Crores in 2023-24; increase of 7.5% over 2022-23.
- The government has estimated a nominal GDP growth rate of 10.5% in 2023-24 (i.e., real growth plus inflation).

While the infrastructure sector continues to be one of government's primary drivers towards creating capacity and capability for the future, the current fiscal has delivered consistent growth, thus enabling a growth multiplier for all businesses across most sectors, including the construction equipment sector and the NBFC sector.

In FY2023, your Company's Total income rose to ₹ 795 Crores from ₹ 595 Crores, while expenses fell to ₹ 482 Crores from ₹ 3,986 Crores. The quarterly profit was on account of a rise in recovery of loans, which helped total income to grow, and a sharp fall in expenditure. In this challenging environment, your Company has focused on recovery of dues to improve the collection and has directed all its efforts in reducing the NPA of the Company. Your Company is re-engineering the business model through multiple stake holder partnerships with an endeavor to make the model sustainable.

Since the forthcoming year is about being future ready your Company would increase its focus on generating off-balance sheet income in progressing towards generating more value from the existing enterprise in an effort to making the future enterprise self-sustainable and unique from a business model perspective.

RISK MANAGEMENT

Management of risk remains an integral part of your Company's operations and it enables your Company to maintain high standards of asset quality at time of rapid growth of its lending business. The objectives of risk is to maintain robust asset quality alongside growth in business, optimal allocation of capital simultaneously with enhancement of shareholders' value and hedging against unforeseen events and macro-economic or environmental conditions.

Your Company has constituted a Risk Committee of the Board which meets every quarter to deal with such matter as may be referred to by the Board of Directors from time to time. Your Company has also designated a senior executive as Chief Risk Officer (CRO) pursuant to the provisions of Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016 dated September 01, 2016 issued by RBI. Your Company's risk management strategy is based on a clear understanding of various risks, and adherence to well-laid out risk policies and procedures that are benchmarked with industry best practices. Your Company has a defined Risk policy for risk management which aims to put in place a robust risk management framework to help in achieving the objectives. The broad objective of the Committee is inter alia to:

- To identify and assess various risks;
- To strengthen the risk management practices and compliance framework to manage various risks across the Company;
- To evaluate the effectiveness of mitigation strategies periodically to address material risks of the Company's operations and businesses;
- To review any material findings and recommendations of the Risk Department; prescribe and monitor appropriate action to address the identified gaps.

Risk is managed through a framework of policies and principles approved by the Board of Directors supported by an independent risk function which ensures that your Company operates within a pre-defined risk contours. The risk management function strives to proactively anticipate vulnerabilities at the transaction as well as at the portfolio level, through quantitative or qualitative examination of the embedded risks and put in place mitigants through change in policies and enhanced process controls.

Governance Structure

The risk strategy of your Company is enunciated and overseen by the Risk Committee of the Board (RCB), an independent Board level sub-committee that strives to put in place specific policies, frameworks and systems for effectively managing the various risks. Policies approved from time to time by the Board of Directors or the RCB in consultation with other sub-committees of the Board, viz. ALM & Treasury Committee (ALM) and Credit & Investment Committee, constitute the governing framework for various types of risk and business activities undertaken within this policy framework. Overall risk management is guided by well-defined procedures appropriate for the assessment and management of individual risk categories viz. credit risk, asset risk, treasury & market risk, operational risk, liquidity risk and counterparty risk supplemented by periodic validations of the methods used. Under the guidance of RCB, the Risk department is responsible for assessing and managing risks on a regular and dynamic basis. This entails, as an imperative, garnering adequate knowledge of macroeconomic trends, insights into dynamics of various sectors, understanding of regulatory environment and application of quantitative and qualitative tools facilitating an accurate assessment of risk at all times.

After the initiation of the Corporate Insolvency Resolution Process vide Order dated 8th October, 2021 of the Hon'ble National Company Law Tribunal, Kolkata Bench, the Risk Committee was reconstituted to manage the integrated risk of your Company and consisting of the senior management of the Company. The Risk Committee is further supported by the Credit and Risk Management Committee of Executives (CRMCE), Operational Risk Management Committee, and Product & Process Approval Committee (PPAC).

Credit Risk

Risk aims at mitigating the credit risk by client grading, developing scoring models, doing an industry analysis to which the client belongs, existing portfolio analysis, regional analysis, and review of credit decision. The credit proposals are vetted to provide views on the future outlook of the sector/segment for short to medium term with particular emphasis on various geographies. The perspective of governmental support, regulatory issues, growth trend & demand potential, capital intensity & back-up, competition, recoverability of receivables, and other parameters impacting credit quality are analyzed to arrive at a risk aware and risk integrated decision. Your Company has strong a framework for the appraisal and execution of finance transactions that involves a detailed evaluation of technical, commercial, financial, marketing and management factors including sponsor's financial strength and experience.

Asset Risk

As an asset financing NBFC, one of the key elements for assessing the underlying transaction risk is the intrinsic value of the asset being financed through the life of the financial facility extended. Risk department monitors the intrinsic value of assets being financed across the financing life cycle and suggests mitigation measures to counter balance the credit risk through value preservation of the asset being financed through the life cycle of the facility.

Portfolio Risk

The portfolio risk is assessed through various analytical tools to help in portfolio monitoring via reflection of trends, ratios, actual vs. budgeted etc. Various models are developed to understand the behavior pattern of the portfolio to mitigate the risk arising from the same. The patterns of the past data is analysed to determine the probability in the future. Your Company

periodically reviews the impact of the stress scenarios resulting from rating downgrades or drop in the asset values in case of secured exposures on the portfolio. Your Company works within identified limits on exposure to borrower groups, industry sectors and geographies, and regularly tracks portfolio level concentrations. These limits are periodically reviewed based on changes in macro-economic environment, regulatory environment and industry dynamics. Existing credit exposure in the portfolio is continuously monitored and reviewed. Key sectors are analyzed in details to suggest strategies considering both risks and opportunities. Corrective action is taken, wherever required, based on portfolio analysis and early warning signals.

Treasury Risk

As an integral part of the overall risk management system, your Company addresses different forms of market risks, viz., liquidity risk, capital risk, interest rate risk and foreign exchange risk.

Capital risk is generally defined as an enterprise's access to cash at any given time and balancing this with its efficient use. Your Company involves in assessing the overall cash flow position of your Company on a monthly basis over a horizon of one year comprising maturity profile of all liabilities, amortization of credit portfolio and targeted disbursement. Thereafter, the net position is sensitized with lower collection rate, based on the prevailing trend & emerging scenario for various business verticals through scenario analysis.

Liquidity risk is two-dimensional: risk of being unable to fund portfolio of assets at appropriate maturity and rates (liability dimension) and the risk of being unable to liquidate assets in a timely manner at a reasonable price (asset dimension). Your Company's Asset Liability Management Committee (ALCO) lays down a broad framework for liquidity risk management to ensure that it is in a position to meet its daily liquidity obligations as well as to withstand a period of liquidity stress from industry, market or a combination of them. The liquidity profile is analyzed on a static as well as on a dynamic basis by using the gap analysis technique supplemented by monitoring of key liquidity ratios and conduct of liquidity stress tests periodically.

Interest rate risk is the probability that variations in the interest rates will have a negative influence on the quality of a given financial instrument or portfolio, as well as on your Company's condition as a whole. Interest rate risk is generally managed through floating rate mechanism by linking the lending rate of interest to your Company's benchmark rate and is reviewed periodically with changes in your Company's cost of funds. Your Company conducts stress testing at periodical intervals to monitor vulnerability towards unfavorable interest rate movements in line with regulatory guidelines.

Exchange rate risk management becomes necessary as your Company borrows money in foreign currency and lends in domestic currency. In order to optimize the cost of funds, your Company adopts effective hedging strategies considering the overall risk appetite of your Company. Your Company measures, monitors and controls exchange rate risk through statistical measures.

Operational Risk

Operational risk is defined as the risk of loss arising out of inadequate or failed internal processes, people and systems or from external events. Your Company has Standard Operating Procedures (SOPs) for the operating processes of your Company with dual control in all major processes. The key processes are tested for adequacy of controls at periodical intervals. The Operational Risk Framework has been strengthened to include risk control matrices and risk control self-assessment framework. The Policy framework within the organization has been strengthened within the organization with review of policies of the Company viz Credit Policy, Risk Policy and Stressed Asset Management Policy.

Your Company ensures that the anti-money laundering procedures are implemented, effective and compliant with the latest statutory regulations.

It involves in setting up of a consistent system throughout your Company, with an adequate level of formalization and traceability that will serve to provide management, the Board of Directors, and regulatory bodies with reasonable assurance of risk control.

In addition, to manage operational risk prudently, 'Know Your Customer (KYC) and 'Anti- Money Laundering (AML) Policy' are in place, which helps to prevent your Company from being used intentionally or unintentionally by criminal elements for money laundering.

IT Risk

- SREI has its Data Center (DC) on AWS (Amazon Web Services) Cloud.
- **AWS Features**

Every AWS Region consists of multiple Availability Zones (AZs). Each AZ consists of more than one data centres (Mumbai region has 3 data centres), located in a separate and distinct geographic location. Each AZ is designed as an independent failure zone which means that AZs are physically separated within a typical metropolitan region and are located in lower risk flood plains. This significantly reduces the risk of a single event impacting more than one AZ. In addition to discrete Uninterruptible Power Supply (UPS) and onsite backup generation facilities, DCs located in different AZs are designed to be supplied by independent substations to reduce the risk of an event on the power grid impacting more than one AZ.

- **AWS Backup as a Service**

SREI uses **AWS Backup as a Service** which is a fully-managed service that makes it easy to centralize and automate data protection across AWS services, in the cloud. This service allows configuring backup policies and monitoring activity for our AWS resources in one place. It allows automating and consolidating backup tasks and removes the need to create custom scripts and manual processes. A complete AMI (Amazon Machine Image) backup is taken for each application and database server from the AWS console and stored on a daily, weekly and monthly basis, as per the policies defined by SREI. Servers can be restored from the AMIs which are spread across all the AZs in a region to handle disasters.

- **AWS S3 (Simple Storage Service) Backups for Databases**

Database backup dumps are also stored in Amazon S3 buckets. S3 buckets are designed to provide 99.99999999% durability and 99.99% availability of objects. S3 redundantly stores objects on multiple devices across multiple AZs in an AWS Region.

- **Backup and Restoration**

For AZ failover, in addition to data recovery from backup, it is also possible to restore the infrastructure in the recovery zone by spinning off the requisite servers in an alternate AZ.

- **Testing of Disaster Recovery**

Periodic DR Drill is carried out by the IT team where key business application /database servers (for Ambit, Newgen, Kastle& Oracle) are restored in a different AZ from the previous day's AMI. The necessary evidences for the same are stored for reference.

- Full-fledged BCP (Business Continuity Plan) has been taken up and is under process.

Regulatory Risk

Your Company has adopted a maker and checker based system for implementation and control management for ensuring regulatory compliances. This system is designed to adapt to the changes in the regulatory environment to avoid breach of compliances and provide greater clarity and confidence around the regulatory risk framework and the ability to manage regulatory change. It involves understanding of both regulator expectations and business processes and challenges. It involves identification of process improvement opportunities to ensure the effective and consistent management of compliance and regulatory obligations. However, your Company is in process to automate the regulatory compliance framework.

Your Company also takes cognizance of the interplay of the risks enumerated above in addition to other risks which could have a bearing on the above risk factors, e.g. legal, reputational risks. The recent pandemic related to Covid-19 have had impact on one or more of the risks enumerated above, particularly on Credit Risk, Portfolio Risk and Treasury Risk, Liquidity risk, etc.

HUMAN RESOURCES ACTIVITIES

The pandemic induced disruptions continued in FY 2022-2023 as well.

The first half of FY 2022 witnessed a significant impact of the third wave of the Omicron strain which was more transmissible - impacting performance of certain services but however, its impact on SEFL's operation was limited.

The organization structure which was put in place the previous year leading to a leaner, flatter and more agile organization proved highly beneficial in the current environment.

Human Resources features to be one of the most critical functions of any financial services organization.

Your Company laid special emphasis on staff governance, ethics/value sensitization workshops and compliance initiatives to create robust governance.

Your Company principally drove home the concept of, "Keep People Inspired, Keep People Involved" by way of staff engagement activities to increase employee morale, maintaining the essence of engaging through varied philanthropic reaches and also to motivate employees throughout the year.

This not only impacted the mental being but also provided a stress free environment and enabled employees to interact, share and also kept them involved, especially at the branches.

Respect for women at the workplace along with the spirit of diversity and inclusion being an integral guiding HR principal - The International Women's Day celebrations flagged off both at the HO and the branches marking the significance and acknowledging the contribution by all women employees.

Your Company in collaboration with SREI Insurance Broking Private Limited ran a series of health checkups and wellness workshops throughout the year for employees.

Staff Welfare was pitched a notch higher with the Raichak on the Ganges Guest House which was made available for employees and their families at minimal and subsidized costs thus balancing the work life pressures and encouraging all employees to spend quality time with their families.

The employee canteen that got non-operational during the pandemic was finally reopened and made functional for all.

During this period, your Company re-assessed all its internal policies and practices and brought in measures to make them more compliant as well as mitigate risks that it was being exposed to.

RBI administrator led management meetups kept the focus of "going concern" at an all-time high.

Your Company's skilled workforce needed to work together effectively as well as show quicker response time through taking increased responsibility for decision making as well as displaying greater accountability. This was successfully demonstrated throughout the past year by all teams.

A key point was the increased focus on Collections and reduction of NPA. Learning interventions were critical in order to prepare employees to adopt the new model and new focus that had been introduced.

Your Company addressed these two points mainly through learning and development initiatives.

These included:

- The focus shifting to Collections - the techniques of dealing and retail

and strategic customer collections became pivotal. This needed a large section of employees to quickly develop knowledge and skills in Collections

- De-centralized decision making without increasing risk for the organization - a key parameter for any financial institution. Teams had to learn how to shoulder greater responsibility for decision-making and display agility in working. Learning initiatives were necessitated to accelerate this.
- Huge focus on corporate governance and compliance was established resulting in need for training and awareness creation.
- HR statutory and labour compliance was 100%. Your Company has adhered to all statutory/labour compliance as per laws.

Learning and Development (L&D) initiatives adopted technology in order to increase the scope speed and the extent of its reach so as to be able to help the organization achieve the operational efficiency required.

Training continued to be a key factor in developing agility, adaptability and engaging with employees. Learning initiatives were a key driver to constantly connect with employees across the country and strengthen a culture of collaboration. Learning interventions focused on up-skilling employees, building organizational capability and achieving compliance standards.

Regulatory Training sessions commenced between the last two quarters of the year through the platform of E-Learning. The drive was to ensure all employees completed the necessary regulatory training so as to achieve a compliance driven and policy adhering environment. RBI mandated e-learning courses were 100% compliant.

The Human Resource (HR) Team has continued to lay stress on providing timely and meaningful support to each employee - reaching out to them through the HR Business Partner team, finding ways to create positivity and dialogue. Building resilience was a priority and wellness was an area of focus throughout the year. Connecting people and ensuring timely and effective communication was prioritized.

Your Company, focused on their human assets and kept instilling a feeling of pride and belonging to the organization.

A key objective was to inspire, give hope and a sense of purpose to all employees, customers and stakeholders.

On 31st March, 2023 the headcount of our Company was 668.

INFORMATION TECHNOLOGY

Information Technology plays a pivotal role in your Company's journey. Your Company continues to leverage its technology to implement a resilient and secure infrastructure.

Your Company manages a variety of risks that can significantly affect its performance and ability to meet the expectations of its customers, shareholders, regulators and other stakeholders. Information Security risks include the risks arising from unauthorized access, use, disclosure, disruption, modification or destruction of information or information systems. In view of the same, your Company has conducted IT Risk Assessment to assess its IT-related vulnerabilities and to ensure that proper controls are in place. Your Company has also developed Key Risk Indicators (KRIs) pertaining to IT Security in order to monitor changes in the levels of risk exposure and mitigate them in time.

During the year in review, your Company focussed on the formalization of an IT Disaster Recovery (DR) Plan, as a part of its overall Business Continuity Plan (BCP). This IT DR Plan is expected to support the management of critical operations in future as well. Your Company successfully conducted IT DR Drill as per the BCP Policy.

The Company's Cyber Security Operations Centre (C-SOC) continues to monitor and improve its security posture while preventing, detecting, analyzing and responding to cyber security incidents. Your Company has not yet experienced any material losses relating to cyber-attacks.

Your Company runs regular awareness campaigns to educate its employees regarding the various aspects of Information Security, through various modes like periodic advisories and online trainings.

INTERNAL CONTROL AND AUDIT

Your Company's vision, mission and core values have laid the foundation for internal controls. On the administrative controls side, your Company has a proper reporting structure, oversight Committees and rigorous performance appraisal system to ensure checks and balances. On the financial controls side, your Company has in place segregation of duties and reporting mechanism to deter and detect misstatements in financial reporting.

Your Company's internal control system is commensurate with the nature of its business and the size and complexity of its operations and ensures compliance with policies and procedures. The Internal Control Systems are being constantly updated with new as well as revised standard operating procedures.

Your Company has an Internal Audit Department, which provides comprehensive audit coverage of functional areas and operations of your Company to examine the adequacy of and compliance with policies, procedures, statutory and regulatory requirements.

Your Company has a dedicated and independent Internal Audit Department which is accountable to the Internal Committees/Advisory Committee/Administrator during CIRP period. The purpose, scope, authority and responsibility of the Internal Audit Department are delineated in the Risk Based Internal Policy and the Audit Charter approved by the Internal Committees/Advisory Committee/Administrator. Internal Audit Department influences and facilitates improvements in the control environment by constantly evaluating the internal control systems. Significant deviations are brought to the notice of Internal Committees/Advisory Committee/Administrator. Status of compliances of audit observations and follow up actions taken thereon are reported to the Internal Committees/Advisory Committee/Administrator. The Internal Committees/Advisory Committee/Administrator reviews and evaluates adequacy and effectiveness of your Company's internal control environment and monitors the implementation of audit recommendations.

Further, in accordance with the regulatory guidelines, your Company's Internal Financial Controls (IFC) have been reviewed and actions have been taken to strengthen financial reporting and overall risk management procedures. Further, an Information System (IS) Audit of the internal systems and processes is conducted at least once in a year to assess operational risks faced by your Company.

Based on the internal audit report, process owners undertake corrective action in their respective areas. All these measures help in maintaining a healthy internal control environment.

VIGIL MECHANISM/WHISTLE BLOWER POLICY

Your Company has formulated a codified Whistle Blower Policy incorporating the provisions relating to Vigil Mechanism in terms of Section 177 of the Companies Act, 2013 and Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014, in order to encourage and support Directors and Employees of your Company to report instances of illegal activities, unethical behavior, actual or suspected, fraud or violation of your Company's Code of Conduct and Code of Business Ethics and any issue of concerns impacting and compromising with the interest of your Company and its stakeholders in any way. The said Policy was last revised on April 17, 2023. Your Company is committed to adhere to highest possible standards of ethical, moral and legal business conduct and to open communication and to provide necessary safeguards for protection of employees from reprisals or victimisation, for whistle blowing in good faith. The said Policy is available on https://www.srei.com/sefl-corporate-policies/Whistle_Blower_Policy.pdf

A Whistle Blower Committee is in place that reviews all matters and guides the management to the relevant guideline in the spirit and keeps a close ridged.

NOMINATION AND REMUNERATION POLICY & PERFORMANCE EVALUATION

Prior to supersession of the Board of Directors of your Company by the RBI on October 04, 2021, your Company had a combination of Executive and Non-Executive Directors as well as Independent Directors including a Woman Independent Director on its Board of Directors.

The Nomination and Remuneration Policy of your Company, has been formulated as per the provisions of Section 178 of the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. Additional details with respect to the said policy are as annexure to the Board's Report and forms part of this Annual Report.

The said policy is available on the website of your Company at https://www.srei.com/sefl-corporate-policies/Nomination_and_Remuneration_Policy.pdf.

The Board of Directors of your Company was superseded by RBI on October 04, 2021 as stated above therefore, neither the requirement of separate meeting of the Independent Directors was relevant during the Financial Year under review nor the evaluation of performance of Directors, Board or the Committees thereof.

During the CIRP, the role of the Board and Committees was fulfilled by the Administrator supported by the Internal Committees/Advisory Committee.

CORPORATE SOCIAL RESPONSIBILITY (CSR)

Your Company perceives Corporate Social Responsibility (CSR) as a strategic social investment aimed at uplifting the society at large, empowering individuals, making them self-reliant. The CSR philosophy of your Company is embedded in its commitment to all stakeholders-consumers, employees, environment and society while your Company's approach extends both to external community as well as to your Company's large and diverse internal employee base & their families.

Your Company has in place a Corporate Social Responsibility Policy (CSR Policy), as per the provisions of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, which, inter-alia, lays down the guidelines and mechanism for undertaking socially useful projects for welfare and sustainable development of the community at large. The said Policy is available on https://www.srei.com/sefl-corporate-policies/SEFL_Corporate_Social_Responsibility_Policy.pdf.

The CSR Policy describes the multiple lines around which the CSR activities of your Company are positioned being education and skills development, social and economic welfare, environmental sustainability and such other activities included in Schedule VII of the Act as may be identified by the CSR Committee, existing prior to the Board supersession, from time to time.

Since, the Board of Directors of your Company has been superseded by the Reserve Bank of India (RBI) as mentioned earlier in this report and the Average Net Profit of the Company for the three immediately preceding financial years is negative. In the view of such conditions, your Company is having Nil CSR obligation for the year under review. The Company is however committed to remain a socially responsible organization supporting the national aspirations and missions.

During CIRP, the role of the Board and Committees was being fulfilled by the Administrator supported by the Internal Committees/Advisory Committee.

An Annual Report on CSR activities for the Financial Year 2022-23 is set out as an annexure to the Board's Report and forms part of this Annual Report.

WEBSITE

The website of your Company www.srei.com has been developed on the new responsive technology based platform known as 'Laravel', ensuring uniform display across all devices like mobile, tablet, desktop etc. and all the operating systems. The website has an inbuilt sophisticated and customized content management system for easy change in content.

A simple, improved navigation system needs a lesser number of clicks to reach the information available in the different sections of the website. The contemporary and smart look of the website ensures a customer centric approach catering to the requirements of prospective customers, investors and employees. The website carries a comprehensive database of information of interest to the investors including the financial results, financial products, corporate codes and policies, corporate presentations, stock exchange intimation and business activities of your Company and the services rendered by your Company. Some useful features like credit ratings and active and mature NCDs, registrar point, NCDs touch points, etc. are also available on the website. The customers can also download essential documents directly from the website.

MATERIAL CHANGES AND COMMITMENTS, IF ANY, AFFECTING THE FINANCIAL POSITION

No specific material changes and commitments, unless as disclosed in this Report, affecting the financial position of your Company have occurred between the end of the financial year under review, i.e. March 31, 2023 and the date of the Report.

KEY MANAGERIAL PERSONNEL (KMPs)

The Administration of your Company, post supersession of the Board of Directors, for operational convenience and for efficient conduct of business affairs of your Company, have additionally designated Mr. Devendra Kumar Vyas, Chief Business Officer; Mr. Manoj Kumar Beriwal, Chief Compliance Officer (RBI Compliances) and Ms. Nidhi Saharia, Chief Risk Officer as the KMPs of your Company, online with Section 203 of the Companies Act, 2013 read with Rule 8 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, who acted as additional KMP during the financial year under review.

The following executives of your Company are the Whole-time Key Managerial Personnel (KMPs) as on March 31, 2023, in accordance with the provisions of Section 203 of the Companies Act, 2013 -

Name	Designation
Mr. Yogesh Kajaria	Chief Financial Officer
Mr. Sumit Kumar Surana	Company Secretary
Mr. Devendra Kumar Vyas	Chief Business Officer
Ms. Nidhi Saharia	Chief Risk Officer
Mr. Manoj Kumar Beriwal	Chief Compliance Officer

None of the KMPs hold any securities of your Company except Mr. Manoj Kumar Beriwal and Mr. Yogesh Kajaria, who hold 1 (one) share each of your Company as nominees of Srei Infrastructure Finance Limited (SIFL), holding Company.

PARTICULARS OF CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTFLOW

Your Company has no activity relating to Conservation of Energy and Technology Absorption as stipulated in Rule 8(3) of the Companies (Accounts) Rules, 2014. However, your Company has always been conscious of the need for conservation of energy. Adequate measures are always taken to ensure optimum utilization and maximum possible saving of energy at the offices and branches of your Company. Your Company uses information technology extensively in its operations and also continues its endeavor to improve energy conservation and utilization, safety and environment.

During the year under review, the total foreign exchange expenditure of your Company was ₹ 7,73,56,903 (previous year ₹ 8,131 Lacs) and has not earned any foreign exchange (Previous Year - Nil).

DETAILS OF TRANSFER OF UNPAID/UNCLAIMED AMOUNTS TO THE INVESTOR EDUCATION AND PROTECTION FUND (IEPF)

In accordance with section 124(5) of the Companies Act, 2013, a Company

is required to transfer the amount lying in the unpaid dividend account, for 7 years, to the Investor Education Protection Fund (IEPF). Pursuant to the Order dated October 08, 2021 passed by the Hon'ble NCLT, Kolkata, CIRP has been initiated for your Company and the moratorium has been commenced under Section 14 of the Code read with Rule 5(b)(i) of FSP Rules effective from October 08, 2021. During the last financial year, but prior to the date of commencement of moratorium/CIRP i.e. October 08, 2021 (CIRP commencement date) an amount of ₹ 18,574/- (Rupees Eighteen Thousand Five Hundred and Seventy Four) and post commencement of moratorium/CIRP an amount of ₹ 31,633/- (Rupees Thirty One Thousand Six Hundred and Thirty Three) was transferable by your Company to IEPF in terms of Section 124 (5) of the Companies Act, 2013 being the unclaimed interest in respect of NCDs issued by your Company.

Further, during the current financial year, an amount of ₹ 25,195/- (Rupees Twenty Five Thousand One Hundred and Ninety Five), ₹ 3,17,512/- (Rupees Three Lakhs Seventeen Thousand Five Hundred and Twelve) and ₹ 2,16,518/- (Rupees Two Lacs Sixteen Thousand Five Hundred and Eighteen) was transferable by your Company to IEPF in terms of Section 125 of the Companies Act, 2013, on account of the interest on application money. However, the same have not been transferred post October 08, 2021, as your Company was under IBC.

The Company was unable to comply with the provision or Section 125 of the Companies Act, 2013 as the Company needs to comply with the General Circular No. 08/2020 issued by the Ministry of Corporate Affairs (MCA) dated 6th March, 2020 captioned "Filing of forms in the Registry (MCA-21) by the Insolvency Professional (Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator) appointed under Insolvency Bankruptcy Code, 2016 (IBC, 2016)" which states that in respect of Companies which are marked under CIRP in the Registry, Annual Return (e-form No. MGT-7) and Financial Statement (e-form AOC-4) and other documents under the provisions of the Companies Act, 2013, in accordance with directions issued by the NCLT/ NCLAT/Courts, shall be filed as attachments with e-form GNL-2 against the payment of one time normal fee only, till such time the Company remains under CIRP. Separate GNL-2 forms shall be filed for each such document, by the IRP/RP. Your Company, as a part of compliance, has filed separate Form IEPF-1 for each of the amount which was transferable to IEPF, through Form GNL-2. However since the GNL-2 form is not linked with IEPF - 1 your Company is unable to generate Service Request Number (SRN) for payment to IEPF Authorities. Due to said technical difficulty your Company could not comply with the provisions of Section 125 & other applicable provisions of the Companies Act, 2013. The Company has requested for guidance from IPEF Authorities and also requested them to file claim for pre CIRP amount. The revert from IEPF Authorities on the same is awaited.

MEETINGS OF THE BOARD AND BOARD COMMITTEES

As stated earlier in this Report, due to the supersession of the Board of Directors by RBI vide its Press Release dated October 04, 2021, your Company did not have Board of Directors during the Financial Year under review. Hence, no Board Meetings were held during the year. In view of the same, your Company also did not have any Board Committee during Financial Year under review.

ADVISORY COMMITTEE AND IMPLEMENTATION AND MONITORING COMMITTEE

RBI vide its Press Release dated October 04, 2021, in exercise of the powers conferred under Section 45 IE of the RBI Act, constituted a 3 (three) member Advisory Committee to assist the Administrator in discharge of his duties and to advise the Administrator in the operations of your Company during the Corporate Insolvency Resolution Process (CIRP).

Further as stated earlier that in accordance to the framework of the Advisory Committee as approved by RBI, primary responsibility of the Advisory Committee was to advise the Administrator in the operations of your Company during CIRP and guide the Administrator to undertake all steps that will maximize the value for all stakeholders of your Company through

a successful resolution. Since the Administrator has taken over the responsibility of the Board of Directors of your Company, the Advisory Committee has supported the Administrator in fulfillment of his role and responsibilities. The Members of the Advisory Committee during the Financial Year under review comprised of Mr. R Subramaniakumar, former MD & CEO of Indian Overseas Bank (resigned w.e.f. June 22, 2022), Mr. T T Srinivasaraghavan, former Managing Director of Sundaram Finance Limited, Mr. Farokh N Subedar, former Chief Operating Officer and Company Secretary, Tata Sons Limited (resigned w.e.f. January 31, 2023), Mr. Shri Venkat Nageshwar Chalasani, former Deputy Managing Director, State Bank of India (appointed w.e.f. June 23, 2022) and Mr. Shri V Ramachandra, former Chief General Manager, Canara Bank (appointed w.e.f. January 31, 2023).

The Administrator is the Chairman of the meetings and the minimum quorum is Chairman and at least two advisors. During the Financial Year 2022-23, 30 (Thirty) Advisory Committee Meetings were held covering a very wide range of agenda pertaining to the CIRP matters as well as your Company's status as a going concern.

Further, upon the approval of the Resolution Plan by the Order dated August 11, 2023 passed by Hon'ble NCLT, Kolkata and in compliance with the directions of Hon'ble NCLT, the purpose of the RBI constituting the Advisory Committee as per RBI press release dated October 04, 2021, to advise the Administrator in the operations of your Company during the CIRP and to assist him for discharging his duties was fulfilled. Therefore, the Advisory Committee was dissolved and the same was also intimated to the Members of the Advisory Committee.

Furthermore, an Implementation and Monitoring Committee has been constituted for smooth implementation of the approved Resolution Plan.

DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS/COURTS/TRIBUNALS IMPACTING THE GOING CONCERN STATUS AND YOUR COMPANY'S OPERATIONS IN FUTURE

Subsequent to the supersession of the Board of Directors of your Company by RBI vide its Press Release dated October 04, 2021, RBI had filed an application for initiation of Corporate Insolvency Resolution Process against your Company under Section 227 read with clause (zk) of sub-section (2) of Section 239 of the Insolvency and Bankruptcy Code (IBC) 2016 read with Rules 5 and 6 of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 before Kolkata Bench of the Hon'ble National Company Law Tribunal ("Hon'ble NCLT").

In the said petition being C.P. (IB) No. 294/KB/2021, the Hon'ble NCLT vide order dated October 08, 2021 was pleased to admit the said petition application and accordingly Corporate Insolvency Resolution Process (CIRP) was initiated against your Company.

Accordingly, Mr. Rajneesh Sharma was appointed as the Administrator of SEFL in terms of rule 5(a)(iii) of the Insolvency & Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 to carry out the functions as contemplated by Sections 15, 17, 18, 19 and 20 of the Insolvency and Bankruptcy Code, 2016. The Order further provides that there shall be moratorium in terms of Section 14 of the said Code in respect of your Company.

The Administrator on 16th February, 2023, filed an application for obtaining no-objection from the Reserve Bank of India (RBI) as required under Rule 5 of the Insolvency & Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 against the Plan.

Therefore, your Company received the said no-objection from the RBI via its letter dated March 23, 2023 in terms of Rule 5(d)(iii) of the FSP Rules.

The Administrator had also filed an application under Section 30(6) of the Code before the Hon'ble National Company Law Tribunal (NCLT), Kolkata on February 18, 2023 for its approval of the Plan.

The Hon'ble NCLT has issued an Order dated August 11, 2023, approving the resolution plan submitted by National Asset Reconstruction Company Limited with respect to the Corporate Insolvency Resolution Process of the Companies under Section 31 of the IBC ("Approved Resolution Plan"). The same can be downloaded from the link: https://nclt.gov.in/gen_pdf.php?filepath=/Efile_Document/ncltdoc/casedoc/1908134009832023/04/Order-Challenge/04_order-Challenge_004_1691756009157129507964d625e9e66a0.pdf.

DIRECTORS' RESPONSIBILITY STATEMENT

The financial statements of your Company for the financial year ended March 31, 2023 have been taken on record by the Administrator while discharging the powers of the erstwhile Board of Directors of your Company which were conferred upon him by the RBI vide its Press Release dated October 04, 2021 and subsequently, powers conferred upon him in accordance with the NCLT Order dated October 08, 2021 to run your Company as a going concern during CIRP. Hence the financial statements for the year ended March 31, 2023 have been prepared on "going concern" assumptions.

In certain instances, the amount of the claim admitted or to be admitted by the Administrator under CIRP process may differ from the amount reflecting in the books of accounts of your Company. The audited financial statements are drawn on the basis of figures appearing in the books of accounts of your Company as on March 31, 2023.

In terms of provisions of Section 134(5) of the Companies Act, 2013, your Administrator to the best of their knowledge and ability confirm that:

- (i) in the preparation of the annual accounts for the year ended March 31, 2023, the applicable accounting standards have been followed along with proper explanation relating to material departures;
- (ii) such accounting policies have been selected and applied consistently and such judgements and estimates have been made that are reasonable and prudent so as to give a true and fair view of the state of affairs of your Company at the end of the Financial Year ended March 31, 2023 and of the profit and loss of your Company for the Financial Year 2022-23;
- (iii) proper and sufficient care have been taken for the maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of your Company and for preventing and detecting fraud and other irregularities;
- (iv) the annual accounts have been prepared for the Financial Year ended March 31, 2023 on a going concern basis;
- (v) internal financial controls to be followed by your Company have been laid down and that such internal controls are adequate and are operating effectively;
- (vi) proper systems have been devised to ensure compliance with the provisions of all applicable laws to your Company and the systems are adequate and operating effectively.

AUDITORS

Pursuant to the provisions of Section 139, 141, 142 and other applicable provisions, if any, of the Companies Act, 2013 read with the Companies (Audit and Auditors) Rules, 2014, the Reserve Bank of India (RBI) Guidelines for Appointment of Statutory Central Auditors (SCAs)/Statutory Auditors (SAs) of Commercial Banks (excluding RRBs), UCBs and NBFCs (including HFCs) dated 27th April, 2021 and other applicable Laws, if any (including any statutory modification or re-enactment(s) thereof, for the time being in force) and Rules framed thereunder, and upon the recommendation of the Administrator of your Company (exercising the powers of the Board of Directors of your Company pursuant to Section 17 of the Insolvency and Bankruptcy Code, 2016), M/s. J Kala & Associates Chartered Accountants, having Firm Registration No. 118769W allotted by The Institute of Chartered Accountants of India (ICAI) and M/s. Dass Gupta & Associates, Chartered Accountants, partnership firm, having Firm Registration No. 000112N,

allotted by The Institute of Chartered Accountants of India (ICAI) were appointed as the Joint Statutory Auditors of your Company at the 16th (Sixteenth) Annual General Meeting (AGM) held on September 22, 2022 to hold office for a period of 1 (One) consecutive year from the conclusion of the 16th (Sixteenth) Annual General Meeting till the conclusion of the 17th (Seventeenth) AGM of your Company in terms of Section 139 of the Companies Act, 2013 and the Rules framed thereunder.

The Implementation and Monitoring Committee (IMC) recommended the appointment of M/s. J Kala & Associates Chartered Accountants, having Firm Registration No.118769W allotted by The Institute of Chartered Accountants of India (ICAI) and M/s. Dass Gupta & Associates, Chartered Accountants, partnership firm, having Firm Registration No. 000112N, allotted by The Institute of Chartered Accountants of India (ICAI) as the Joint Statutory Auditors of your Company for a period of 1 (One) year, to hold office from the conclusion of the 17th (Seventeenth) Annual General Meeting till the conclusion of the 18th (Eighteenth) AGM of your Company.

Both J Kala & Associates Chartered Accountants and Dass Gupta & Associates, Chartered Accountants meets the eligibility, qualifications and other requirements of the Auditors as specified in the Companies Act, 2013 and a certificate to this effect have also been furnished by them along with their consent to hold office as the Joint Statutory Auditors of your Company. Further, J Kala & Associates Chartered Accountants and Dass Gupta & Associates, Chartered Accountants have also provided a certificate to the effect that their appointment as the Statutory Auditors of your Company, if made, would be within the limit prescribed under Section 141 of the Companies Act, 2013 and that they are not disqualified to be appointed as the Statutory Auditors in terms of Sections 139 and 141 of the Act. J Kala & Associates Chartered Accountants and Dass Gupta & Associates, Chartered Accountants, have also furnished the peer review certificate issued to them by The Institute of Chartered Accountants of India (ICAI).

AUDITORS' REPORT

The Administrator (assisted by the Advisory Committee), at the Advisory Committee Meeting held on May 09, 2023 have inter-alia, considered and taken on record the Ind AS Audited Financial Results of your Company for Financial Year ended March 31, 2023, as per Regulation 52 and other applicable regulations of the SEBI Listing Regulations and in compliance with Section 129 of the Companies Act, 2013 and the Ind AS as per the provisions of the Companies (Indian Accounting Standards) Rules, 2015.

The Report of the Statutory Auditors to the Members for the Financial Year under review contains disclaimer of opinion, the management's response to the Basis for Disclaimer of Opinion contained in the Statutory Auditors' Report are given in the notes to accounts which are self-explanatory and the same is not repeated here for the sake of brevity.

SECRETARIAL AUDIT REPORT

Your Company appointed M/s. S. K. Khemka & Associates, Practicing Company Secretaries (Peer Review Certificate No. 1313/2021) as the Secretarial Auditor of your Company for the Financial Year 2022-23 to conduct the Secretarial Audit pursuant to Section 204 of the Companies Act, 2013 read with the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.

The Secretarial Audit Report confirms that your Company has complied inter alia with all the applicable provisions of the Companies Act, 2013 and the Rules made thereunder, Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder, The Foreign Exchange Management Act, 1999, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Secretarial Standards issued by The Institute of Company Secretaries of India (Secretarial Standards with respect to Meetings of Board of Directors (SS-1) and General Meetings (SS-2), SEBI (Prohibition of Insider Trading) Regulations, 2015, Securities Contracts (Regulation) Act, 1956, all the Regulations and Guidelines of SEBI as applicable to your Company, SEBI (Issue and Listing of Debt Securities) Regulations, 2008, the SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 and the Reserve

Bank of India Directions, Guidelines and Circulars applicable to Systemically Important Non-Deposit Accepting or Holding NBFCs (NBFC-ND-SI).

The Secretarial Audit Report for the Financial Year ended March 31, 2023 does not contain any qualification, reservation or adverse remark or disclaimer and the same forms part of the Annual Report.

CORPORATE POLICIES

The details of Policies adopted by your Company along with salient features are provided as annexure to the Board's Report and forms part of this Annual Report.

PARTICULARS OF CONTRACTS/ARRANGEMENTS WITH RELATED PARTIES

Your Company has in place a Related Party Transaction Policy as per the provisions of the Companies Act, 2013 read with the rules made thereunder which describes the related party transactions requiring requisite approvals and requirements of appropriate reporting and disclosure of transactions between your Company and its related parties. The said policy also defines the materiality of related party transactions and lays down the procedures of dealing with such transactions. The said Policy was last revised on July 08, 2022. The said Policy is available on https://www.srei.com/sefl-corporate-policies/SEFL_Related_Party_Transaction_Policy.pdf.

All the related party transactions of your Company are entered in the ordinary course of business and conducted on arm's length basis wherever applicable and on commercially reasonable terms and are in compliance with the applicable provisions of the Companies Act, 2013. There are no materially significant transactions entered into by your Company with Promoters, Directors or Key Managerial Personnel (KMPs), which have potential conflict with the interest of your Company at large. The related party transactions are entered into based on considerations of various business exigencies, such as synergy in operations, sectoral specialization and your Company's long-term strategy for sectoral investments, optimization of market share, profitability, legal requirements and liquidity.

Since all related party transactions entered into by your Company were in the ordinary course of business and were on an arm's length basis, Form AOC-2 is not applicable to your Company.

For the financial year ended March 31, 2023, the details of the related party transactions entered into by your Company in the ordinary course of business at arm's length basis are mentioned in the notes to the accounts forming part of the audited (standalone) financial statements.

Members may refer to the notes to the financial statements for details of related party transactions.

PARTICULARS OF EMPLOYEES

The Board of Directors of your Company has been superseded by the Reserve Bank of India vide its Press Release dated October 04, 2021 as noted above. The ratio of the remuneration of each erstwhile director holding position of director during the year under review to the median employees' remuneration and other details in terms of Section 197(12) of the Companies Act, 2013 read with Rule 5(2) & (3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 as amended by the Companies (Appointment and Remuneration of Managerial Personnel) Amendment Rules, 2016, are set out as an annexure to the Board's Report and forms a part of this Annual Report.

The statement containing particulars of employees as required under Section 197(12) of the Companies Act, 2013 read with Rule 5(2) and Rule 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, as amended by the Companies (Appointment and Remuneration of Managerial Personnel) Amendment Rules, 2016 forms part of this Report.

ANNUAL RETURN

Pursuant to Section 92(3) read with Section 134(3)(a) of the Companies Act,

2013, the extract of the Annual Return of your Company as at March 31, 2023, is available on website of your Company at <https://www.srei.com/sefl-financial-reports>.

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS

Your Company is exempt from the disclosure regarding particulars of loans made, guarantees given and securities provided in the ordinary course of its business as per the provisions of Section 186 of the Companies Act, 2013 read with Rule 11 of the Companies (Meetings of Board and its Powers) Rules as your Company is engaged in the business of financing of companies or of providing infrastructural facilities.

POLICY AGAINST SEXUAL AND WORKPLACE HARASSMENT

Your Company is committed to provide and promote a safe, healthy and congenial atmosphere irrespective of gender, caste, creed or social class of the employees. Your Company in its endeavor to provide a safe and healthy work environment for all its employees has developed a policy to ensure zero tolerance towards verbal, physical, psychological conduct of a sexual nature by any employee or stakeholder that directly or indirectly harasses, disrupts or interferes with another employee's work performance or creates an intimidating, offensive or hostile environment such that each employee can realize his/her maximum potential.

Your Company has put in place a 'Policy on Prevention of Sexual Harassment' as per The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Policy is meant to sensitize the employees about their fundamental right to have safe and healthy environment at workplace. As per the Policy, any employee may report his/her complaint to the Internal Complaint Committee constituted for this purpose. The said Policy is available on https://www.srei.com/sefl-corporate-policies/SEFL_Policy_on_Prevention_of_Sexual_Harassment.pdf.

Your Company affirms that during the year under review, adequate access was provided to any complainant who wished to register a complaint under the Policy and that your Company has complied with provisions relating to the constitution of Internal Complaints Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

During the year, your Company has received 2 (Two) complaint of sexual harassment which have been addressed by the Internal Complaints Committee duly constituted by your Company under per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

ACKNOWLEDGEMENT

Your Administrator would like to express their grateful appreciation for the excellent support and co-operation received from its Committee of Creditors (CoC), Advisory Committee, shareholders, Financial Institutions, Banks, Central & State Government Authorities, RBI, SEBI, MCA, Stock Exchanges, Depositories, Credit Rating Agencies, Customers, Manufacturers, Vendors, Suppliers, Business Associates, Debenture holders, Debenture Trustees, National Company Law Tribunal, National Company Law Appellate Tribunal and other Stakeholders during the year under review.

Your Administrator also place on record their deep appreciation for the valuable contribution of the employees for the progress of your Company during the year and look forward to their continued co-operation in realization of the corporate goals in the years ahead.

For and on behalf of Srei Equipment Finance Limited

Place: Kolkata
Date : September 26, 2023

**Sd/-
Rajneesh Sharma**

**Administrator (Acting as a member of the
IMC pursuant to Hon'ble NCLT Order dated 11th August, 2023)**

The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, who acts as agent of the Company only and without any personal liability.

Statement pursuant to Section 197(12) of the Companies Act, 2013 read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014

i. The ratio of the remuneration of each Director* to the median remuneration of the employees of the Company for the financial year 2022-23:

Sl. No.	Name of the Director	Remuneration(₹)	Median Remuneration of employees (₹)	Ratio (In times)
NA				

*The Reserve Bank of India ("RBI"), on October 04, 2021, had superseded the Board of Directors of the Company and appointed Mr. Rajneesh Sharma as the Administrator and all the erstwhile Directors ceased to be the Directors of the Company with immediate effect. Accordingly, during the Financial Year 2022-23 Company did not have any Board of Directors.

ii. The percentage increase in remuneration of each Director*, Chief Financial Officer, Chief Executive Officer, Company Secretary or Manager, if any, in the financial year 2022-23:

Sl. No.	Name	Designation	Remuneration of Previous year** (₹)	Remuneration of Current year** (₹)	% increase/ (decrease)
1.	Mr. Hemant Kanoria	Chairman	1,63,257	Nil	NA
2.	Mr. Sunil Kanoria	Vice Chairman	1,63,257	Nil	NA
3.	Mr. Devendra Kumar Vyas	Chief Business Officer	2,62,97,720	2,54,57,720	(3.30%)
4.	Mr. Indranil Sengupta	Whole-time Director	57,83,038	Nil	NA
5.	Mr. Shyamalendu Chatterjee	Independent Directors	19,10,000	Nil	NA
6.	Mr. Suresh Kumar Jain		23,00,000	Nil	NA
7.	Dr. (Mrs.) Tamali Sengupta		21,75,000	Nil	NA
8.	Mr. Uma Shankar Paliwal		22,50,000	Nil	NA
9.	Mr. Deepak Verma		7,75,000	Nil	NA
10.	Mr. Malay Mukherjee		26,25,000	Nil	NA
11.	Ms. Ritu Bhojak**		Company Secretary	10,21,650	Nil
12.	Mr. Yogesh Kajaria	Chief Financial Officer	70,27,210	82,88,053	15.21%
13.	Mr. Sumit Surana	Company Secretary	20,81,383#	37,93,128	45.13%

*The Reserve Bank of India ("RBI"), on October 04, 2021, has superseded the Board of Directors of the Company and appointed Mr. Rajneesh Sharma as the Administrator and all the erstwhile Directors ceased to be the Directors of the Company with immediate effect. Accordingly during the Financial Year 2022-23 the Company did not have any Board of Director.

**Resigned w.e.f. 10.05.2021.

#Appointed as Company Secretary w.e.f. August 20, 2021.

Note:

The remuneration of the Key Managerial Personnel (KMPs) is linked to the market and is commensurate with their diverse responsibilities and experience.

iii. The percentage increase in the median remuneration of employees in the financial year 2022-23:

Median remuneration of previous year (₹)	Median remuneration of current year (₹)	% increase
4,99,992	5,08,003	1.60%

iv. The number of permanent employees on the rolls of Company:

There were 668 (Six Hundred & Sixty Eight only) employees as on 31st March, 2023.

v. Average percentile increase already made in the salaries of employees other than the managerial personnel in the last financial year and its comparison with the percentile increase in the managerial remuneration and justification thereof and point out if there are any exceptional circumstances for increase in the managerial remuneration:

Sl. No.	Particulars	Average % increase
1.	Increase in salary of Managerial Personnel	Less than 1 % (Approx.) in PMS 2022-23
2.	Increase in salary of employee (other than Managerial Personnel)	1 % (Approx.) in PMS 2022-23

vi. Affirmation that the remuneration is as per the remuneration policy of the Company:

Yes it is confirmed.

For and on behalf of Srei Equipment Finance Limited

Place : Kolkata
Date : September 26, 2023

**Sd/-
Rajneesh Sharma**

Administrator (Acting as a member of the IMC pursuant to Hon'ble NCLT Order dated 11th August, 2023)

The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Rajneesh Sharma who acts as agent of the Company only and without any personal liability.

PARTICULARS OF EMPLOYEES**Information pursuant to Section 197(12) read with Rule 5(2) & (3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 for the financial year ended 31st March, 2023**

List of top 10 (Ten) employees of the Company in terms of the remuneration drawn and names of every employee who was employed for throughout and part of the year and was in receipt of remuneration exceeding the limits laid down in the Companies Act, 2013 -

Sl. No.	Name	Designation	Remuneration Received (₹)	Qualification	Experience in years	Age in years	Date of commencement of employment	Last employment held by the employee before joining the company	Percentage of equity shares held by the employee in the company
1.	Mr. Devendra Kumar Vyas	Chief Business Officer	2,54,57,720	B. Com, CA	31	54	01.04.1997	G P Agrawal & Co., Chartered Accountants (Partner)	NIL
2.	Mr. Ganesh Prasad Bagree	CEO-Financial Solution Group	87,65,785	B. Com, CA	30	54	19.06.2008	ICICI Winfra (AGM)	NIL
3.	Mr. Yogesh Kajaria	Chief Financial Officer	82,88,053	B. Com, CA	25	48	03.09.2001	Web Valley Softwares (Founder of the Company)	NIL
4.	Mr. Manoj Kumar Beriwalla	Chief Compliance Officer	73,36,091	FCA	28	51	05.12.1995	G.P. Agarwal & Co (Manager)	
5.	Mr. Binay Kumar Mishra	Senior Vice President	70,18,592	LLB	19	43	05.08.2021	Capri Global Capital Ltd, Senior Vice President	NIL
6.	Mr. Rajesh Agarwal	Senior Vice President	69,94,963	B. Com, CA	26	50	17.06.2008	ICICI Bank Ltd (Regional Head - Operation)	NIL
7.	Mr. Sandeep Kumar Ghosh	Head	66,57,111	B. Com, PGDBM	28	52	01.10.2013	Tata AIG Life (VP & National Account Head)	NIL
8.	Mr. Vinod Kumar Dubey	Head	63,50,520	CA, CS	33	57	16.01.2014	BalrampurChini Mills Ltd, Senior General Manager - Taxation	NIL
9.	Mr. Sibadatta Mohanty	Senior Vice President	59,40,836	B.Sc, MBA	29	52	03.12.2007	Tata Motor Finance (Regional Manager Collection)	NIL
10.	Mr. Somnath Bhattacharjee*	President	63,73,002	BE - Mechanical	38	60	09.12.2016	TIL Limited (President & CEO)	NIL

*Employed for part of the year

Notes:

- (a) Remuneration includes Basic Salary, House Rent Allowance (HRA), Special Allowance, Super Annuation Allowance, Commission, Ex-gratia, Leave Travel Allowance (LTA), Medical, Leave Encashment, Employer's contribution to Provident Fund, Employer's contribution to NPS, Incentives and other Perquisites.
- (b) Nature of Employment and duties: Contractual and in accordance with terms and conditions as per Company's rules and policies.

For and on behalf of Srei Equipment Finance Limited

Place : Kolkata
Date : September 26, 2023

Sd/-
Rajneesh Sharma
Administrator (Acting as a member of the IMC pursuant to Hon'ble NCLT Order dated 11th August, 2023)

The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Rajneesh Sharma who acts as agent of the Company only and without any personal liability.

Annual Report on Corporate Social Responsibility (CSR) Activities for the Financial Year 2022-23

[Pursuant to Section 135 of the Companies Act, 2013 read with Rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014 including any amendments thereof]

1. Brief outline on CSR Policy of the Company

Your Company has in place a well-defined CSR Policy framed inline with Section 135 of the Companies Act, 2013 (Act) read with Schedule VII of the Act, the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other applicable provisions of the Act. Your Company's CSR Policy is a statement containing the approach and direction to be followed by your Company and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

2. The Composition of the CSR Committee

Sl.No.	Name of Director Designation/ Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee Committee attended during the Year
Not Applicable*			

*Reserve Bank of India (RBI) vide Press Release dated October 04, 2021 superseded the Board of Directors of your Company and appointed Mr. Rajneesh Sharma as the Administrator of the Company in terms of Section 45-IE (1) of the Reserve Bank of India Act, 1934 (RBI Act) with immediate effect. The Administrator was vested with powers of the Board of Directors of your Company, pursuant to the above and as per the provisions of the Insolvency and Bankruptcy Code (IBC), 2016. During CIRP, the role of the Board and Committees was fulfilled by the Administrator by the support of Advisory Committee.

3. The web-link(s) where composition of CSR committee, CSR Policy and CSR projects approved by the Board are disclosed on the website of the Company:

Post supersession of the Board of Directors by RBI vide its Press Release dated October 04, 2021, your Company doesn't have a CSR Committee constituted in terms of Section 135 of the Companies Act, 2013 (the Act).

The Company has framed a CSR Policy in compliance with the provisions of the Companies Act, 2013 and the same is placed on the Company's website and the web link for the same is: https://www.srei.com/sefl-corporate-policies/SEFL_Corporate_Social_Responsibility_Policy.pdf.

In the light of the existing Corporate Insolvency situation, your Company has not undertaken any CSR projects during the Financial Year under review.

4. Executive summary along with web-link(s) of Impact Assessment of CSR Projects carried out in pursuance of Sub-rule (3) of Rule 8, if applicable: Not Applicable.

5. (a) Average net profit of the Company as per sub-section (5) of Section 135 of the Companies Act, 2013: (₹ 3,00,861 Lacs)

(b) Two percent of average net profit of the Company as per Sub-section (5) of Section 135 of the Companies Act, 2013: NIL

(c) Surplus arising out of the CSR projects or programmes or activities of the previous Financial Years: NIL

(d) Amount required to be set-off for the Financial Year, if any: Not Applicable

(e) Total CSR obligation for the Financial Year (5b+5c-5d): NIL

6. (a) Amount spent on CSR Projects (both Ongoing Project and other than Ongoing Project): NIL

(b) Amount spent in Administrative Overheads: NIL

(c) Amount spent on Impact Assessment, if applicable: Not Applicable

(d) Total amount spent for the Financial Year (6a+6b+6c): NIL

(e) CSR amount spent or unspent for the Financial Year:

Total Amount Spent for the Financial Year (in ₹)	Amount Unspent (in ₹)				
	Total Amount transferred to Unspent CSR Account as per Section 135(6)		Amount transferred to any fund specified under Schedule VII as per second proviso to Section 135(5)		
	Amount	Date of transfer	Name of the Fund	Amount	Date of transfer
NIL	Not Applicable		Not Applicable		

(f) Excess amount for set off, if any: N.A.

Sl. No.	Particulars	Amount (in ₹)
i.	Two percent of average net profit of the Company as per Section 135(5)	NIL
ii.	Total amount spent for the Financial Year	
iii.	Excess amount spent for the Financial Year [(ii)-(i)]	
iv.	Surplus arising out of the CSR projects or programmes or activities of the previous Financial Years, if any	
v.	Amount available for set off in succeeding Financial Years [(iii)-(iv)]	

7. (a) Details of Unspent CSR amount for the preceding three Financial Years: ₹ 96,144,838.

Sl. No.	Preceding Financial Year	Amount transferred to Unspent CSR Account under Section 135(6) (in ₹)	Balance Amount in Unspent CSR Account under sub-section (6) of Section 135 (in ₹)	Amount spent in the Financial Year (in ₹)	Amount transferred to a fund as specified under Schedule VII as per second proviso to Section 135(5), if any		Amount remaining to be spent in succeeding Financial Years (in ₹)	Deficiency, if any
					Amount (in ₹)	Date of transfer		
1.	2020-2021	Not Applicable	Not Applicable	Not Applicable	NIL		5,22,50,332	5,22,50,332
2.	2019-2020	Not Applicable	Not Applicable	Not Applicable	Not Applicable		4,38,94,506	4,38,94,506

8. Whether any capital assets have been created or acquired through CSR amount spent in the Financial Year: Not Applicable

9. Specify the reason(s), if the Company has failed to spend two per cent of the average net profit as per Section 135(5) of the Companies Act, 2013: Not Applicable.

For and on behalf of Srei Equipment Finance Limited

Place : Kolkata
Date : September 26, 2023

Sd/-
Rajneesh Sharma
Administrator (Acting as a member of the IMC pursuant to Hon'ble NCLT Order dated 11th August, 2023)

The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Rajneesh Sharma who acts as agent of the Company only and without any personal liability.

Srei Equipment Finance Limited Corporate Codes & Policies - FY 2022-23

The Summary of Key Statutory Codes & Policies that have been adopted are as follows:-

Sl. No.	Name of the Code and Policy	Salient Features	Web Link
1.	Related Party Transactions Policy	The policy provides a framework to regulate transactions between the Company and its Related Parties based on the applicable laws and regulations.	https://www.srei.com/sefl-corporate-policies/SEFL_Related_Party_Transaction_Policy.pdf
2.	Nomination and Remuneration Policy	This policy formulates the criteria for determining qualifications, competencies, positive attributes and independence for the appointment of a director (executive/non-executive) and also the criteria for determining the remuneration of the Directors, Key Managerial Personnel (KMPs) and other employees.	https://www.srei.com/sefl-corporate-policies/Nomination_and_Remuneration_Policy.pdf
3.	Corporate Governance Framework	The policy provides the framework for Corporate Governance so that executives act in accordance with the highest standards of governance while working for and on behalf of the Company.	https://www.srei.com/sefl-corporate-policies/SEFL_Corporate-Governance_Framework.pdf
4.	Code of Conduct for Board of Directors and Senior Executives	To deter wrongdoing and promote ethical conduct in the Company.	https://www.srei.com/sefl-corporate-policies/SEFL-Code-of-Conduct-for-Board-of-Directors-and-Senior-Executives.pdf
5.	Policy on Board Diversity	The Policy sets out the approach to diversity on the Board of Directors of the Company.	https://www.srei.com/sefl-corporate-policies/SEFL_Policy_on_Board_Diversity.pdf
6.	Policy on "Fit and Proper" Criteria for Directors	The Policy sets a framework to determine whether a Director is fit and proper to hold such position in the Company.	https://www.srei.com/sefl-corporate-policies/SEFL_Fit_and_Proper_criteria_for_Directors.pdf
7.	Code of Conduct for Prohibition of Insider Trading (SEFL Insider Code)	To regulate, monitor and report trading by Insiders.	https://www.srei.com/sefl-corporate-policies/SEFL_Code_of_Conduct_for_Prohibition_of_Insider_Trading.pdf
8.	Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (SEFL Fair Disclosure Code)	The policy provides the framework for following the best practices, duly compliant with Applicable Law, in the matter of disclosure of UPSI.	https://www.srei.com/sefl-corporate-policies/Code_of_Practices_and_Procedures%20for_Fair_Disclosure_of_Unpublished_Price_Sensitive_Information.pdf
9.	Corporate Social Responsibility Policy	To regulate, monitor and report Corporate Social Responsibility activities of the Company.	https://www.srei.com/sefl-corporate-policies/SEFL_Corporate_Social_Responsibility_Policy.pdf
10.	Whistle Blower Policy	The Company has adopted a whistleblower mechanism for directors and employees to report concerns about unethical behavior, actual or suspected fraud, or violation of the Company's code of conduct and ethics.	https://www.srei.com/sefl-corporate-policies/Whistle_Blower_Policy.pdf
11.	Fair Practice Code	To provide all stakeholders, especially customers effective overview of practices followed by the Company in respect of the financial facilities and services offered by the Company to its customers.	https://www.srei.com/sefl-corporate-policies/Fair_Practice_Code_May22.pdf

SI. No.	Name of the Code and Policy	Salient Features	Web Link
12.	Grievance Redressal Policy	To minimize instances of customer complaints and grievances.	https://www.srei.com/sefl-corporate-policies/Grievance_Redressal_Policy.pdf
13.	Investment Policy	The Policy lays down, inter alia, the guidelines to be followed by the Credit and Investment Committee to approve investments.	-
14.	Policy for Preservation of Documents	The Policy integrates, harmonizes and standardizes the procedure and manner for preservation and destruction of documents which are required to be prepared or maintained under the SEBI laws and the Act. This Policy also contains guidelines to identify documents that are required to be maintained and the period for which those documents should be retained.	https://www.srei.com/sefl-corporate-policies/SEFL_Policy_for_preservation_of_Documents.pdf
15.	Archival Policy	Part of Policy for preservation of documents.	https://www.srei.com/sefl-corporate-policies/SEFL_Archival_Policy.pdf
16.	Policy on Prevention of Sexual Harassment	This policy is meant to sensitize the employees about their fundamental right to have safe and healthy environment at their workplace and what conduct constitutes sexual harassment.	https://www.srei.com/sefl-corporate-policies/SEFL_Policy_on_Prevention_of_Sexual_Harassment.pdf
17.	Environmental and Social Management System Policy	This policy provides a framework to facilitate the implementation of appropriate Environmental and Social Management System (ESMS) in the Company with the prime objective of reducing Environmental and Social impacts of its portfolio.	-
18.	Credit Policy	The policy details the guidelines to be followed in terms of credit assessment standards, eligibility criteria for borrowers, funding norms, documents and monitoring mechanism.	-
19.	Risk Management Policy	The Policy aims at outlining the various types of Risk faced by the Company as a Systematically Important NBFC and the policy seeks to set out the guidelines, principles and approach for risk management in the Company and put in place a robust framework to identify, assess, measure, control and monitor various risks in a timely, efficient and an effective manner.	-

Form No. MR-3
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2023

[Pursuant to Section 204(1) of the Companies Act, 2013 and Rule No.9 of the Companies
(Appointment and Remuneration of Managerial Personnel) Rules, 2014]

To
The Members
SREI EQUIPMENT FINANCE LIMITED
'VISHWAKAMA', 86C, TOPSIA ROAD (SOUTH)
KOLKATA - 700046, WEST BENGAL.

We have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by SREI EQUIPMENT FINANCE LIMITED ('SEFL'/'Company') having CIN - U70101WB2006PLC109898 for the financial year ended 31st March, 2023 ('Audit Period'). The secretarial audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts /statutory compliances and expressing our opinion thereon.

Based on our verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company, and also the information, including certain preliminary information as listed in Annexure I, provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, we hereby report that in our opinion, the Company has, during the Audit Period covering the Financial year ended on the 31st day of March, 2023, (the 'Audit Period') complied with the statutory provisions listed hereunder, except with respect to the observations as listed in Annexure I, Annexure II, Annexure III and Annexure IV. In view of the same, our comment as to adequacy of processes and compliance-mechanism has to be read in light of the aforesaid observations and qualifications.

We have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March 2023, according to the provisions of:

1. The Companies Act, 2013 ['Companies Act'] and the rules made thereunder including any re-enactment thereof;
2. The Securities Contracts (Regulation) Act, 1956 ['SCRA'] and the rules made thereunder;
3. The Depositories Act, 1996 and the Regulations and Byelaws framed thereunder;
4. The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ['SEBI Act'], to the extent applicable:
 - (i) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (ii) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ['PIT Regulations'];
 - (iii) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
 - (iv) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
 - (v) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 ['ILDS Regulations'];
 - (vi) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ['LODR Regulations'];
 - (vii) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
 - (viii) Securities and Exchange Board of India (Debenture Trustee) Regulations, 1993;
 - (ix) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018.
5. SPECIAL LAWS APPLICABLE TO THE COMPANY
 - (A) RESERVE BANK OF INDIA REGULATIONS
 - (i) Reserve Bank of India Act, 1934;
 - (ii) Non-Banking Financial Companies (Opening of Branch/Subsidiary/ Joint Venture/Representative Office or Undertaking Investment Abroad by NBFCs Directions, 2011;
 - (iii) NBFC Auditor's Report (Reserve Bank) Directions, 2016;
 - (iv) Monitoring of Frauds in NBFCs (Reserve Banks) Directions, 2016;
 - (v) Master Directions - Information Technology Framework for the NBFC Sector;
 - (vi) Reserve Bank of India (NBFC) Returns Specifications, 1997;
 - (vii) Master Directions Miscellaneous Non-Banking Companies (Reserve Bank) Directions, 2016;
 - (viii) Non-Banking Financial Company - systematically Important non-Deposit taking Company and Deposit Taking Company (Reserve Bank) Directions, 2016;
 - (ix) Miscellaneous RBI Circulars & Notifications;
 - (x) Master Directions - Know Your Customer (KYC) Direction, 2016;
 - (B) INSURANCE LAWS
 - (i) Insurance Act, 1938,
 - (ii) Insurance Regulatory and Development Authority Act, 1999, Regulations and Rules framed hereunder;
 - (C) FEMA LAWS
 - (i) Foreign Exchange Management Act, 1999;
 - (ii) Rules framed by from time to time under FEMA;
 - (iii) Regulations notified by RBI from time to time under FEMA;
 - (iv) Foreign/Trade (Development & Regulation) Act, 1992;
 - (v) The Prevention of Money Laundering Act, 2002 and Rules framed thereunder;
 - (vi) FEDAI Rules;
 - (vii) The issue of Foreign Currency Convertible Bonds;
 - (viii) Exim Policy;
 - (ix) Consolidated foreign Direct Investment policy issued by department of industrial Policy & Promotion (DIPP);
 - (D) INSOLVENCY AND BANKRUPTCY CODE
 - (i) Insolvency and Bankruptcy Code, 2016;
 - (ii) The National Company Law Tribunal Rules, 2016;
 - (iii) The National Company Law Appellate Tribunal Rules, 2016;
6. GENERAL LAWS
 - (i) Indian Contract Act, 1872;
 - (ii) Customer Protection Act, 1986;
 - (iii) Negotiable Instruments Act, 1881;
 - (iv) Arbitration and Conciliation Act, 1996;
 - (v) Specific Reliefs Act, 1963;
 - (vi) Emblems and names (Prevention and Improper use) Act;
 - (vii) Motor Vehicles Act, 1988;
 - (viii) Transfer of Property Act, 1882;
 - (ix) Benami Transactions (Prohibition) Act, 1988;
 - (x) Code of Civil Procedure, 1908;
 - (xi) Code of Criminal Procedure, 1973;
 - (xii) Environment (Protection) Act, 1986;
 - (xiii) Indian Evidence Act, 1872;
 - (xiv) Indian Penal Code, 1860;
 - (xv) Indian Limitation Act, 1963;
 - (xvi) Power of Attorney act, 1882;
 - (xvii) Indian Trusts Act, 1882;
 - (xviii) Hire Purchase Act, 1972;

- (xix) Registration Act, 1908;
- (xx) Indian Stamp Act, 1899;
- (xxi) Indian Standard code of Practice for Selection, Installation and Maintenance of Portable First Aid fire Extinguishers Code of Practice;
- (xxii) Shops and Commercial Establishments Act;
- (xxiii) License agreements with Landlords;
- (xxiv) License for all software currently in use;
- (xxv) Information/Technology Act, 2000;
- (xxvi) The Privacy Act, 1974;
- (xxvii) Competition Act, 2002;
- (xxviii) The Representation of People Act, 1951;
- (xxix) The Rights of persons with disabilities Act, 2016;
- (xxx) The Rights of persons with disabilities Rules, 2017;
- 7. Specific laws applicable, as mentioned hereunder:
 - (E) TRADE MARKS ACT, 1999
 - (F) COPYRIGHT ACT, 1957
 - (G) PATENTS ACT, 1970
 - (H) TAXATION LAWS
 - (i) Income Tax Act, 1961 and Rules Framed hereunder;
 - (ii) Customs Act, 1962;
 - (iii) Profession Tax Act;
 - (iv) Goods & Services Act, 2016;

We have also examined compliance with the applicable clauses (with limited application owing to ongoing CIRP) of the Secretarial Standards for Board Meetings (SS-1) and for General Meetings (SS-2) issued by the Institute of Company Secretaries of India.

During the Audit Period, the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above except in relation to matters provided as in Annexure I, Annexure II, Annexure III and Annexure IV.

It is further stated that the Reserve Bank of India ['RBI'], vide its Press Release dated 4th October, 2021 issued under Section 45-IE of the Reserve Bank of India Act, 1934 ['RBI Act'] superseded the Board of Directors ['Board'] of SEFL [RBI appointed Mr. Rajneesh Sharma as the Administrator ['Administrator'] under Section 45-IE(2) of the RBI Act. Further, RBI, constituted a three-member advisory committee ['Advisory Committee'] to assist the Administrator of SEFL in discharge of his duties. Subsequently, on an application being filed by RBI under the provisions of the Insolvency and Bankruptcy Code, 2016 ['IBC'] read with the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 ['IBC Rules'], the National Company Law Tribunal, Kolkata Bench ['NCLT'], vide Order dated 8th day of October, 2021, ordered commencement of Corporate Insolvency Resolution Process ['CIRP'] with effect from the same date. The NCLT appointed Administrator as the resolution professional to discharge the functions of the resolution professional under IBC and other rules, and regulations, as may be applicable. Further, RBI, confirmed that the Advisory Committee shall continue as the advisory committee required to be constituted under Rule 5 (c) of the IBC Rules [ref., Press Release dated 4th day of October, 2021].

Accordingly, the Secretarial Audit is relating to the CIRP period.

We further report that

Since the Board of SEFL was superseded and the entire Board has resigned, Secretarial Standard 1 (SS-1) which governs the Board Meeting becomes inoperative and thus not applicable to the Company during the Audit Period.

We further report that, in the current scenario, the systems and processes for compliances in the Company, which ought to be commensurate with its size and operations to monitor and ensure compliance with applicable laws, rules, regulations and guidelines, may call for further improvement.

Management and Auditor Responsibility:

1. Maintenance of secretarial records is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.

2. We have followed the audit practices and the processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed, provide a reasonable basis for our opinion.

3. Wherever our Audit has required our examination of books and records maintained by the Company, we have relied upon electronic versions of such books and records, as provided to us through online communication. Wherever for the purposes of our Audit, there was a need for physical access to any of the places of business of the Company, the same was provided to us.

4. We have not verified the correctness and appropriateness of financial records and books of accounts of the Company as well as correctness of the values and figures reported in various disclosures and returns as required to be submitted by the Company under the specified laws, though we have relied to a certain extent on the information furnished in such returns.

5. The compliance of the provisions of corporate and other applicable laws, rules, regulations, standards is the responsibility of the management. Our examination was limited to the verification of procedure on test basis and to the extent possible under the circumstances.

6. Due to the inherent limitations of an audit including internal, financial, and operating controls as well as specific circumstances noted above, there is an unavoidable risk that some misstatements or material non-compliances may not be detected, even though the audit is properly planned and performed in accordance with audit practices.

7. The contents of this Report has to be read in conjunction with and not in isolation of the observations, if any, in the report(s) furnished/to be furnished by any other auditor(s)/agencies/authorities with respect to the Company.

8. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For S. K. Khemka & Associates
Practising Company Secretaries

Sd/-
Sushil Kumar Khemka
Membership No. FCS 3315

Place : Kolkata
Date : 10.08.2023

CP No. 2941
UDIN No. F003315E000782577

ANNEXURE I: PRELIMINARY NOTES

Our Report of even date is to be read along with this letter.

1. Maintenance of Secretarial Records is the responsibility of the Management of the Company. Our responsibility is to express an opinion on these secretarial records based on our Audit.
2. We have followed the Audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial Records. The verification was done on test check basis to ensure that correct facts are reflected in Secretarial Records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
3. Wherever our audit has required our examination of books and records maintained by the Company, we have also relied upon electronic versions of such books and records, as provided to us through online communication. Wherever for the purposes of our Audit, there was a need for physical access to any of the places of the business of the Company, the same has been done by us as much as possible.
4. We have not verified the correctness and appropriateness of financial

records and books of Accounts of the Company as well as correctness of the values and figures reported in various disclosures and returns as required to be submitted by the Company under the specified laws, though we have relied to a certain extent on the information furnished in such returns.

5. The Compliances of the provisions of Corporate and other applicable laws, Rules, Regulations and Standards is the responsibility of the management. Our examination was limited to the verification of procedures on test check basis.
6. The Secretarial Audit Report is neither an assurance as to future viability of the Company nor of the efficacy or effectiveness with which the Management has conducted the affairs of the Company.
7. Due to the inherent limitations of an Audit including internal, financial and operating controls as well as specific circumstances noted above, there is an unavoidable risk that some mis-statements of material non-compliances may not be detected even though the audit is properly planned and performed in accordance with audit practices.

ANNEXURE II: OBSERVATIONS FOR THE AUDIT PERIOD

The observations, as pertaining to the Audit Period, may not be strictly called non-compliances, as the timelines for complying with the provisions might not be specified under law, or where compliance with the provisions became impossible in the prevailing circumstances, or for similar reasons. Such observations have been listed as follows -

The Companies Act, 2013

1. As per MCA General Circular No. 08/2020 dated 06.03.2020, the resolution professional shall have to file the NCLT Order in Form INC-28 to change the MCA Master Data status to indicate that the Company is under Corporate Insolvency Resolution Process. The e-form INC-28 has been filed on 26.10.2021 and the same was taken on record and Master data changed.
2. As per Section 124(5) of the Companies Act 2013 a Company is required to transfer the amount lying in the unpaid dividend account for 7 years to Investor Education Protection Fund (IEPF). Prior to the date of commencement of CIRP i.e. October 08, 2021, an amount of ₹18,574 and post commencement of Moratorium/CIRP an amount of ₹ 5,90,858/- is transferrable by SEFL to IEPF in terms of Section 124(5) of the Companies Act 2013. The Company is unable to comply with the provisions if Section 124(5) of the Companies Act, 2013 as its compliance as it was not permitted by the MCA 21 System to upload due E- forms was in accord to breach of the moratorium in terms of Section 14 of the IBC 2016. However, the Company has

requested guidance from IEPF Authority in this regard and same is awaited for their response.

3. As per para VII of schedule VI of the Companies Act, the independent directors of the Company are required hold at least one meeting in a Financial Year, without the attendance of non-independent directors and members of management. The Company is presently undergoing CIRP and there is no Board of Directors at present, hence no such meeting was held during the period under review.

SEBI Regulations [LODR Regulations, PIT Regulations]

1. As per reg. 54(1) of LODR regulations, in respect of listed NCDs, the Company is required to maintain hundred per cent asset cover sufficient to discharge the principal amount at all times for the secured redeemable non-convertible debentures issued. As reported by the auditors in the financial results filed with the stock exchange, for the year ended 31.03.2022, the asset cover may fall short of the required asset cover to be maintained for the said debentures. Given the fact that the Company is in insolvency proceedings and pendency of the audit of the financials of the FY, it is not possible to comment on the compliance of the said regulations.
2. The Company, at present, relies on the disclosures made by the designated persons, etc. to have information on trades exceeding Ten Lacs Rupees over any calendar quarter under reg. 7(2)(a) & (b) of PIT Regulations.

ANNEXURE III: EVENTS DURING AUDIT PERIOD HAVING MAJOR BEARING ON THE COMPANY'S AFFAIRS

As per the guidance available in CSAS-4, Auditing Standard on Secretarial Audit, an event/action shall be considered as having major bearing on the auditee's affairs if it affects its going concern or alters the charter or capital

structure or management or business operation or control, etc. The events, as in our opinion, falling in any of the aforesaid categories, have been listed below -

S. No.	Particulars
1.	Events affecting going concern status, business operations or control
(a)	The Company committed defaults in repayment of NCDs.
(b)	The Reserve Bank of India superseded the Board of Directors of the Company on 04.10.2021. Subsequently, on an application filed by RBI, the NCLT (Kolkata Bench), vide Order dated 08.10.2021, ordered commencement of CIRP of the Company. Mr. Rajneesh Sharma has been appointed as the Administrator, who shall also act as the resolution professional under IBC.
(c)	Post commencement of CIRP, the Company continued its activities like a going concern.
(d)	It was informed that that the CoC has approved the Resolution Plan and the same was submitted to the Adjudicating Authority but the copy of the same was not provided to us.
2.	Events altering management, etc.
(a)	In terms of the Order of the NCLT, Kolkata Bench the Company is under CIRP and Mr. Rajneesh Sharma has been appointed as Administrator/ Resolution Professional.
(b)	During the Pre - CIRP period the Company had many Board level Committees like: <ul style="list-style-type: none"> ● Audit Committee ● Nomination and Remuneration Committee ● Corporate Social Responsibility Committee ● Stakeholders Relationship Committee ● Committee of Directors ● Credit and Investment Committee ● Asset Liability Management Committee ● Risk Committee ● IT Strategy Committee ● Strategic Coordination Committee ● Restructuring & Settlement Committee <p>After the commencement of CIRP, all the Board level committees ceased to operate due to supersession of Board of Directors. However, in order to conduct the affairs of the Company smoothly, the Administrator constituted/re-constituted many Committees which were operational during the Audit Period:</p> <ul style="list-style-type: none"> ● Core Strategic Committee ● Corporate Governance & Audit Committee ● Asset Liability Management Committee ● Nomination and Remuneration Committee ● Credit and Investment Committee ● IT Strategy Committee ● IT Steering Committee ● Alliance Committee ● Payments Advisory Committee ● Property & Premise Committee ● Joint Statutory Auditors Appointment Evaluation Committee ● People Committee ● Corporate Social Responsibility Committee
(c)	As stated earlier, RBI had superseded the Board of the Company. Also, post commencement of CIRP, the powers of the Board stand suspended, and the management of the affairs of the Company vest with the Administrator.
3.	Other Events
(a)	The Statutory Auditors of the Company, namely, M/s. Haribhakti & Co. LLP resigned as Statutory Auditors with effect from 07.07.2022. Later, M/s. J. Kala & Associates and M/s. Dass Gupta & Associates were appointed as the Joint Statutory Auditors with effect from 29-10-2021 and 08-07-2022 respectively.

ANNEXURE IV: LIST OF DOCUMENTS PERUSED

1. Minutes of the following were provided:
 - Annual General Meetings
2. Forms and returns filed with the ROC
3. Registers maintained under the Companies Act, 2013

Srei Equipment Finance Limited
REPORT ON CORPORATE GOVERNANCE

Good Corporate Governance is not simply a phrase but the hallmark of every global organisation that enthral shareholders, stakeholders and the likes. Combined with multi-disciplinary practices, efficient business functions, codes of ethics and legal compliance, an organisation's strengths grow from pillar to pillar owing to effective control and management ultimately leading to sustainable increased value and growth. Corporate Governance plays a very imperative role in assisting the differentiation between a good organisation and an extraordinary organisation because legal compliance is mandatory and stipulated whereas sound corporate governance is rare skillset.

At Srei, our focus remains in our incessant attempts to congregate our shareholders with their expectations through organisational goals. For more than decade now, our trait continues to be transparency and disclosure. Srei is committed to the adherence of global standards of Corporate Governance practices year on year. We strongly believe that the management is merely the trustee of the shareholders' capital and not the owner and therefore, prime significance is given to shareholder interests in all our policies.

Corporate Governance is not a destination but a journey for constantly improving sustainable value creation along with legal compliance, which Srei firmly believes in. It is due to this rationale that in addition to complying with mandatory statutory requirements, Srei implements effective governance practices which are continuously helping improve transparency, disclosures, internal controls and promotion of ethics at work place.

The Reserve Bank of India (RBI) has recognised the contribution of Non-Banking Financial Company (NBFCs) towards supporting real economic activity and their role as a supplemental channel of credit intermediation alongside banks. Over the years, the sector has undergone considerable evolution in terms of size, complexity, and interconnectedness within the financial sector. Many entities have grown and become systemically significant and hence RBI has realised the need to align the Regulatory Framework for NBFCs keeping in view their changing risk profile. In the light of the growing economic contribution of the NBFCs RBI has issued Scale Based Regulation (SBR): A Revised Regulatory Framework for NBFCs, to integrate Regulatory Framework for NBFCs under SBR providing a holistic view of the SBR structure and a set of fresh Regulations being introduced under such SBR.

Further, on April 19, 2022 RBI has issued Circular under SBR pursuant to which the NBFCs have to furnish additional disclosure in its Financial Statements in addition to and not in substitution of the disclosure requirements specified under other Laws, Regulations, or Accounting and Financial Reporting Standards. In accordance to the Circular, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI LODR) (Paragraph C of Schedule V - Annual Report) as amended from time to time, specifies disclosures to be made in the section on the Corporate Governance of the Annual Report. With respect to the Corporate Governance Report, Non-Listed NBFCs should also endeavor to make full disclosure in accordance with the Requirement of SEBI (LODR) Regulation, 2015. Non-Listed NBFCs at the minimum should make disclosure on its Corporate Governance practices adapted under the Corporate Governance section of the Annual Report.

In accordance to the Regulation 15(1A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), Regulation 16 to Regulation 27 of the Listing Regulations is applicable to a High Value Debt Listed Entities, i.e. Listed Entities which have listed its Non-Convertible Debt Securities and has an outstanding value of listed Non-Convertible Debt Securities of Rupees 500 (Five Hundred) Crore and above as on March 31, 2021. As your Company has outstanding Non-Convertible Debentures (NCD) listed on BSE Limited (BSE) and National Stock Exchange of India Limited (NSE) of 500 (Five Hundred) Crores and above as on March 31, 2021, hence your Company has complied with the aforementioned Regulations on a 'comply or explain' basis until March 31, 2024 and on a mandatory basis thereafter, inline with the Regulation 15(1A) of the Listing regulations, hence your Company during the Financial Year under review has endeavoured to ensure compliance with the Corporate Governance Code as required under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations, 2015") and is in the process of establishing the best Corporate Governance practices in place in its present CIRP situation. As your Company has always prioritised good Corporate Governance Practices and have endeavoured to make complete disclosure, to enhance transparency for ensuring maximization of Stakeholders' sustainable value, your Company is presenting the Corporate Governance Report forming part of the Annual Report for the Financial Year 2022-23 in terms of the RBI Circular dated April 19, 2022, issued under the SBR. The disclosures on the Corporate Governance practices adapted by your Company during the Financial Year under review are as follow:

A. MANDATORY REQUIREMENTS

1. Composition of the Board*

Sl. No.	Name of Director	Director Since	Capacity (i.e. Executive/ Non-Executive/ Chairman/ Promoter nominee/ Independent)	DIN	Number of Board Meetings		No. of other Directorships	Remuneration			No. of shares held in and convertible instruments held in the NBFC
					Held	Attended		Salary and other compensation	Sitting Fee	Commission	
NA											

Details of change in composition of the Board during the current* and previous Financial Year

Sl. No.	Name of Director	Capacity (i.e., Executive/Non-Executive/Chairman/Promoter/Nominee/Independent)	Nature of change (resignation, appointment)*	Effective date
1.	Mr. Hemant Kanoria	Chairman - Executive	Board Superseded	04.10.2021
2.	Mr. Sunil Kanoria	Vice Chairman - Executive	Board Superseded	04.10.2021
3.	Mr. Devendra Kumar Vyas	Executive - Managing Director	Board Superseded	04.10.2021
4.	Mr. Indranil Sengupta**	Executive - Whole-time Director	Board Superseded	04.10.2021
5.	Mr. Suresh Kumar Jain	Non - Executive - Independent Director	Board Superseded	04.10.2021
6.	Mr. Uma Shankar Paliwal	Non - Executive - Independent Director	Board Superseded	04.10.2021
7.	Dr. (Mrs.) Tamali Sen Gupta	Non - Executive - Independent Director	Board Superseded	04.10.2021
8.	Mr. Shyamalendu Chatterjee	Non - Executive - Independent Director	Board Superseded	04.10.2021
9.	Mr. Malay Mukherjee	Non - Executive - Independent Director	Board Superseded	04.10.2021
10.	Mr. Deepak Verma	Non - Executive - Independent Director	Appointed	23.04.2021
11.	Mr. Deepak Verma	Non - Executive - Independent Director	Board Superseded	04.10.2021

*The Reserve Bank of India (RBI) in exercise of the powers conferred under Section 45-IE (1) of the Reserve Bank of India (RBI) Act, 1934, has issued Press Release on October 04, 2021 w.r.t. the supersession of the Board of Directors of your Company and has appointed Shri Rajneesh Sharma as its Administrator under Section 45-IE (2) of the RBI Act, 1934 with immediate effect. Further, pursuant to the Order dated October 08, 2021 of the National Company Law Tribunal, Kolkata Bench (NCLT), Corporate Insolvency Resolution Process (CIRP) has been initiated against your Company as per the Provisions of the Insolvency and Bankruptcy Code, 2016 (Code). The Administrator since then is carrying out his functions as contemplated by sections 15,17,18,19 and 20 of the Code.

**Mr. Indranil Sengupta has been appointed as a Whole-time Director for a period of 1 (one) year w.e.f 1st August, 2020 ending on 31st July, 2021 at the 14th Annual General Meeting (AGM) held on 25.08.2020 and thereafter has been re-appointment of as a Director and Whole-time Director for a period of 1 (one) year w.e.f 1st August, 2021 ending on 31st July, 2022.

2. Committees of the Board and their composition

i. Mention the names of the committees of the Board

As sated earlier in this Report, due to the supersession of the Board of Directors by RBI vide its Press Release dated October 04, 2021, your Company did not have Board of Directors during the Financial Year under review. In view of the same, your Company also did not have any Board Committee during Financial Year under review.

ii. For each committee, mention the summarized terms of reference and provide the following details

Sl. No.	Name of Director	Member of Committee since	Capacity (i.e., Executive/ Non-Executive/ Chairman/ Promoter Nominee/ Independent)	Number of Meetings of the Committee		No. of shares held in the NBFC
				Held	Attended	
NA*						

As sated earlier in this Report, due to the supersession of the Board of Directors by RBI vide its Press Release dated October 04, 2021, your Company did not have Board of Directors during the Financial Year under review. In view of the same, your Company also did not have any Board Committee during Financial Year under review.

3. General Body Meetings

Give details of the date, place and special resolutions passed at the General Body Meetings.

Sl. No.	Type of Meeting (Annual/ Extra-Ordinary)	Date and Place	Special resolutions passed
1.	Extra-Ordinary	11.07.2022 at 11:30 A.M.	-
2.	Annual	22.09.2022 at 11:00 A.M.	-

4. Details of non-compliance with requirements of Companies Act, 2013

During the Financial Year under review the Company has conducted and maintained such checks as are considered necessary, including, where necessary, with external professional assistance, to ensure adequate compliance with the applicable provisions of the Companies Act, 2013 and the Rules made thereunder including any amendment thereof.

There are no instances of non-compliance were noticed during the Reporting Period except as mentioned below:

- **Filing of Form IEPF- 1 under Section 124(5) of Companies Act, 2013 for transfer of an amount of ₹ 3,92,914/- w.r.t. unclaimed and unpaid amounts to Investor Education Protection Fund (IEPF)**- Due to technical difficulties, the Company was unable to file the form and transfer the amount to IEPF. The Company has sent necessary intimation in this regard to the IEPF authorities vide mails dated December 28, 2021 and has also send reminder mails to the IEPF Authorities on various dates viz March 28, 2022, June 30, 2022, August 25, 2022 and October 28, 2022 and March 24, 2023.
- **Transfer of unspent CSR amount of ₹ 52,250,332/- (Five Crores Twenty Two Lacs Fifty Thousand Three Hundred and Thirty Two) under Section 135(5) of the Companies Act, 2013 for the Financial Year 2020-21 to the Fund specified in Schedule VII of the Companies Act, 2013** - Pursuant to Section 135(5) of the Companies Act, 2013, the Company has not transferred the unspent amount of ₹ 52,250,332/- for the Financial Year 2020-21 w.r.t. CSR contribution to a Fund specified in Schedule VII of the Companies Act, 2013 due to the establishment of Trust and Retention Account (TRA) whereby all the business payments of the Company were controlled by the Bankers and the Company had no control on its cash flows. The Company has sent necessary intimation in this regard to the MCA vide its Letter dated December 02, 2021. Another reminder Letter has been sent to MCA dated May 02, 2022.
- **Non appointment of Managing Director or Chief Executive Officer or Manager and in their absence, a Whole-time Director under Section 203(1) of the Companies Act, 2013:** Pursuant to Section 203(1) of the Companies Act, 2013, the Company needs to have a **Managing Director or Chief Executive Officer or Manager and in their absence, a Whole-time Director**. However, pursuant to orders dated 8th October, 2021 of the National Company Law Tribunal, Kolkata Bench (NCLT), Corporate Insolvency Resolution Process (CIRP) has been initiated against the Company, as per the provisions of the Insolvency and Bankruptcy Code, 2016 (Code) and Shri Rajneesh Sharma has been appointed as the Administrator for the Company. Accordingly, as per the provisions of MCA General Circular No. 08/2020 dated March 06, 2020, the MCA returns being filed by the Company is being signed by the Administrator in the capacity of the CEO of the Company.

5. Details of penalties and structures

The details of the penalties and structures as imposed on your Company by the Reserve Bank or any other statutory authority during the Financial Year under review are as follows:

- The Company had received a Letter vide Letter No. OW/EAD/BRK/PR/39704/2021 dated 28th December, 2021 from the Securities and Exchange Board of India (SEBI) being a Show Cause Notice under Rule 4(1) of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 (Rules) where the Company has been called to Show Cause as why an inquiry should not be held against the Company in terms of Rule 4 of the Rules read with 15-I of SEBI Act for the violation alleged in the Show Cause Notice. Further, the Company had replied to the aforesaid letter of SEBI vide Letter dated 28th December, 2021. Thereafter, Securities and Exchange Board of India (SEBI) had passed Order No. Order/BRK/JS/2022-23/16719 dated 31st May, 2022 wherein it had imposed a penalty of ₹ 5,00,000/- (Five Lacs) on the Company subject to the outcome of the appeal filed by SEBI before the Hon'ble Supreme Court in the matter of Securities and Exchange Board of India vs. Dewan Housing Finance Corporation Ltd. under Section 15 I of Securities and Exchange Board of India Act.
- The Central Depository Securities Limited (CDSL) and National Securities Depository Limited (NSDL) have levied a penalty of ₹ 100/- per International Securities Identification Number (ISINs) vide an email on the Company for non-extinguishment of ISINs. An email requesting waiver of penalty has been sent by the Company to NSDL.
- Email from BSE Limited (BSE) and National Stock Exchange of India Limited (NSE) has been received by the Company during the Quarter, imposing Penalty of 5900/- individually for non - compliance under Regulation 50(1) of SEBI LODR. A reply was made to BSE and NSE along with the copy of the said intimation and acknowledgement copy stating that the said intimation was duly made in its specified time, hence penalty levied was not applicable to the Company. Further, the Company has not received any further communication regarding the said matter from either Exchanges.

For and on behalf of Srei Equipment Finance Limited

Sd/-

**Rajneesh Sharma
(Administrator)**

Place: Kolkata

Date : May 09, 2023

The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Rajneesh Sharma who acts as agent of the Company only and without any personal liability.

Independent Auditors' Report

To the Members of Srei Equipment Finance Limited

Report on the Audit of the Ind AS Financial Statements

Disclaimer of Opinion

We were engaged to audit the accompanying Ind AS financial statements of Srei Equipment Finance Limited ("the Company"), which comprise the Balance Sheet as at March 31, 2023, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash Flows for the year then ended, and notes to the Ind AS financial statements including a summary of significant accounting policies and other explanatory information (hereinafter referred to as "Ind AS financial statements").

We do not express an opinion on the Ind AS financial statements of the Company. Because of the significance of the matters described in "Basis for Disclaimer of Opinion" section of this report and the uncertainties involved, we have not been able to obtain sufficient and appropriate audit evidence to provide a basis for an audit opinion on the Ind AS financial statements.

Basis for Disclaimer of Opinion

(a) Note No. 61 to the Ind AS financial statements explains that since the Administrator has taken charge of the affairs of the Company on October 4, 2021, the Administrator is not liable or responsible for any actions and regarding the information pertaining to the period prior to October 4, 2021 has relied upon the explanations, clarifications, certifications, representations and statements made by the Chief Financial Officer, Company Secretary, Chief Business Officer, Chief Risk Officer, Chief Compliance Officer and Legal Head ('the existing officials of the Company'), who were also part of the Company prior to the appointment of the Administrator. Note No. 61 to the Ind AS financial statements explains that the Administrator got conducted audits/reviews relating to the processes and compliances of the Company and has also appointed professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code. Further, as stated in Note No. 61, the Administrator of the Company received certain accountwise transaction audit reports from the professional agency appointed as the transaction auditor indicating that there are certain transactions which are fraudulent in nature as per Section 66 of the Code. Accordingly, the Administrator has filed applications under Section 60(5) and Section 66 of the Code before the Kolkata bench of the Hon'ble National Company Law Tribunal (NCLT) on various dates till May 05, 2023 for adjudication. Further, as mentioned in the said note, the transaction audit has been completed and the impact of the same has been incorporated in the Ind AS financial statements. However, the said transaction audit reports have not been made available to us and accordingly, we are unable to comment whether or not all impact of the same has been incorporated in the Ind AS financial statements.

As per Ind AS 109, for a financial asset that is credit-impaired at the reporting date, an entity shall measure the expected credit losses as the difference between the asset's gross carrying amount and the present value of estimated future cash flows discounted at the financial asset's original effective interest rate. Any adjustment is recognised in profit or loss as an impairment gain or loss. Note No. 61 to the Ind AS financial statements explains that the Company has considered impairment reserve of ₹ 5,24,931 Lacs created in

earlier periods as per RBI guidelines while calculating the impairment on such accounts which is not in accordance with Ind AS 109. Further, Note No. 63 to the Ind AS financial statements explains that basis revised ECL rates and the impairment reserve made in earlier periods in cases where they exceed gross exposure, the Company made a lesser provision under the ECL, so as to restrict the net exposure at Nil, since no withdrawal from impairment reserve is permitted which is also not in accordance with Ind AS 109.

- (b) Note No. 62 to the Ind AS financial statements which states that the Company adopted a policy, to not to recognise interest income on accounts in which transactions are determined as fraudulent by the Company. Had the Company recognised the interest income, as aforesaid, interest income would have been higher by ₹ 59,237 Lacs for the year ended March 31, 2023, and consequently the ECL provision would also have been higher by ₹ 59,237 Lacs for the year ended March 31, 2023, resulting in no change in the loss for the year ended March 31, 2023.
- (c) Note No. 63 to the Ind AS financial statements which explains that the Administrator as part of the CIRP process had appointed independent valuers to conduct valuation of the assets of the company and assets/collaterals held as securities. Since the Ind AS financial statements, disclosures, categorisation and classification of assets are subject to the outcome of such valuation and CIRP process, we are unable to comment on the impact, if any, of the Ind AS financial statements.
- (d) Note No. 64 to the Ind AS financial statements which explains that during the financial year 2019-20, the Company accounted for the slump exchange transaction and consequently recognized the relevant assets and liabilities in its books of account, pursuant to the Business Transfer Agreement ('BTA') with SIFL, with effect from October 1, 2019, subject to necessary approvals. The superseded Board of Directors and erstwhile management of the Company obtained expert legal and accounting opinions in relation to the accounting of BTA which confirmed that the accounting treatment so given is in accordance with the relevant Ind AS and the underlying guidance and framework. The Note further explains that during the financial year 2020-21, the Company had filed two separate applications under Section 230 of the Companies Act, 2013 ('the Act') before the Hon'ble NCLT proposing Schemes of Arrangement (the Schemes) with all its secured and unsecured lenders. Since applications/appeals in connection with the Scheme were pending before Hon'ble NCLT/NCLAT, the superseded Board of Directors and erstwhile management had maintained status quo on the Scheme including accounting of BTA. Both the schemes of arrangement were rejected by majority of the creditors and an application of withdrawal was filed by the Administrator in this matter which has been allowed by the Tribunal vide order dated February 11, 2022.

As stated in the said Note, the Company is in the process of consolidated resolution of SEFL and SIFL and hence no further action is being contemplated regarding establishing the validity of BTA or otherwise, consequent upon the withdrawal of Schemes. Accordingly, the status quo regarding BTA, as it existed on the date of commencement of CIRP, has been maintained. In view of the

uncertainties that exists in the matter of BTA, we are unable to comment on the accounting of BTA, as aforesaid, done by the Company and accordingly on the impact of the same, if any, on the Ind AS financial statements.

- (e) Note No. 66 to the Ind AS financial statements which explains that the Administrator has invited the financial/operational/other creditors to file their respective claims. As per the said note, admission of claims of the financial/operational/other creditor received by the Administrator is completed and the effect of the same has been given in the books of accounts. However, the figures of the claims admitted in the books of accounts might undergo change in the subsequent periods before the resolution plan is approved by Adjudicating Authority in case the Administrator comes across any additional information warranting such revision of claim amounts of the financial/operational/other creditors. Hence, adjustments, if any, arising out of such additional information, will be given effect in subsequent periods. We are unable to comment on the impact of the same, if any, on the Ind AS financial statements.

Further, Note No. 66 to the Ind AS financial statements explains that the Company as per the Code on the date of commencement of CIRP i.e. October 8, 2021 has converted foreign currency debt into INR and accordingly has not translated its foreign currency exposure as on March 31, 2023, as per requirements of Ind AS 21. We are unable to comment on the impact of the same, if any, on the Ind AS financial statements.

- (f) Note No. 67 to the Ind AS financial statements which states that the Company has not provided for ₹ 4,66,134 Lacs for the year ended March 31, 2023 pursuant to its admission under the CIRP, in respect of its obligation for interest on all the borrowings since insolvency commencement date i.e. October 8, 2021. Had the Company provided its obligation for interest, as aforesaid, loss before tax for the year ended March 31, 2023 would have been increased by ₹ 4,66,134 Lacs.
- (g) Note No. 68 to the Ind AS financial statements which explains the reasons owing to which the Company has not been able to comply with guidelines of RBI in relation to mandatory hedging of exposure in External Commercial Borrowings amounting to ₹ 27,272 Lacs as at March 31, 2023, as per contractual terms. As stated, in the said note, the Company has reported the above fact to RBI and reply of the same is awaited from RBI. We are unable to comment on the impact of the same or any other consequences arising out of such non-compliance, if any, on the Ind AS financial statements.
- (h) Note No. 70 to the Ind AS financial statements which explains that the erstwhile management, as per the specific directions from Reserve Bank of India (RBI) in relation to certain borrowers referred to as 'probable connected parties/related parties', in line with arm's length principles, was in the process of re-assessing & re-negotiating terms and conditions with such borrowers and all other borrowers, who have been granted loans with moratorium period and at interest rate which is linked with the cash flows of the project. However, the said process was not concluded and meanwhile the Company has gone into CIRP. As stated in the said Note, the Administrator is not in a position to comment on the views adopted by the erstwhile management in relation to the RBI's direction since these pertain to the period prior to the Administrator's appointment. As stated in paragraph (a) above, the Administrator got conducted transaction audit/review relating to the process and compliance of the Company and has also appointed

professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code. Out of Accounts referred by the RBI in the directions, the Administrator has received certain account wise transaction audit reports, which has identified some of such accounts as fraudulent in nature under Section 66 of the Code. In respect of such accounts, the Administrator has filed applications under Section 60(5) and Section 66 of the Code before the Kolkata bench of the Hon'ble National Company Law Tribunal (NCLT) on various dates till May 05, 2023 for adjudication. Further, as mentioned in the said note, the transaction audit has been completed and the impact of the same has been incorporated in the Ind AS financial statements. However, the said transaction audit reports have not been made available to us and accordingly, we are unable to comment whether or not all impact of the same has been incorporated in the Ind AS financial statements. Accordingly, the Ind AS financial statements is subject to such impact, if any.

- (i) Note No. 71 to the Ind AS financial statements which explains that, during the year ended March 31, 2022, based on the directions of RBI the Company has made provisions amounting to ₹ 9,807 Lacs and ₹ 4,991 Lacs in respect of direct tax cases and indirect tax cases respectively where the Company was under various stages of appeal with the relevant tax authorities. However, the Company has not assessed whether the outflow of resource embodying economic benefits is probable or not as per the requirements of Ind AS 37- 'Provisions, Contingent Liabilities and Contingent Assets'. Hence, in absence of such assessment, we are unable to comment on any non-compliance with Ind AS and the corresponding impact of the same, if any, on the Ind AS financial statements.
- (j) Note No. 72 to the Ind AS financial statements which explains the reasons owing to which the Company was not able to comply with the requirements of Section 135 of the Companies Act, 2013 in relation to depositing unspent amount of CSR. As stated, in the said note, the Company has written to MCA seeking exemption from the obligations of the Company under portions of Section 135(5) and Section 135(7) of the Companies Act, 2013. We are unable to comment on the impact of the same or any other consequences arising out of such non-compliance, if any, on the Ind AS financial statements.
- (k) Note No. 73 to the Ind AS financial statements which states that the Company has not been able to maintain the security cover as stated in the information memorandum/debenture trust deeds etc. which is sufficient to discharge the principal and interest amount at all times for the secured non-convertible debentures issued by the Company. Further, as stated in the said Note and paragraph (c) above, latest valuations from independent valuers in respect of assets of the Company is in progress, accordingly, the percentage of security cover given in the said Note No. 73 to the Ind AS financial statements is subject to the outcome of such valuation and CIRP process. Hence, we are unable to comment on impact of the same, if any on the Ind AS financial statements.
- (l) Note No. 74 to the Ind AS financial statements which explains that in relation to certain borrowings (including secured borrowings and NCDs) acquired by the Company from SIFL pursuant to BTA as stated in Note No. 64 to the Ind AS financial statements, charges created on such borrowings are yet to be transferred in the name of the Company and are still appearing in the name of SIFL for the reasons stated in the said Note. We are unable to comment on the impact of the same or any other consequences arising out of it, if any, on the Ind AS financial statements.

- (m) Note No. 75 to the Ind AS financial statements which explains the reasons owing to which the Company was not able to comply with the requirements of Section 125 of the Act in relation to transfer of certain amounts lying unpaid for 7 years to Investor Education Protection Fund ('IEPF'). As stated, in the said note, the Company has written to IEPF authorities and requested guidance in the matter. We are unable to comment on the impact of the same or any other consequences arising out of such non-compliance, if any, on the Ind AS financial statements.
- (n) We had carried out independent balance confirmation process with respect to various parties/lenders, responses for which are pending to be received in majority of the case as on the date of signing this report. Further, the project progress report and the necessary documents for review from various parties are yet to be received. Hence, we are unable to comment on such balances and status and impact of the same on the Ind AS financial statements, if any.
- (o) We have been informed that certain information including the minutes of meetings of the Committee of Creditors and transaction audit reports are confidential in nature and accordingly has not been shared with us. We are therefore unable to comment on the possible financial effects on the Ind AS financial statements, including on presentation and disclosures, if any, that may have arisen if we had been provided access to that information.
- (p) Property, Plant and Equipment includes assets having gross book value of ₹ 5,018 Lacs and written down value of ₹ 1,018 Lacs as on March 31, 2023 are either not traceable or are not in possession of the company. No provision for the same has been made in accounts. As informed by the company, the management has initiated legal proceedings for recovery of the same. Since legal proceedings for recovery are pending, we are unable to comment on the impact of the same, if any, on the Ind AS financial statement.
- (q) In view of the possible effects of the matters described in paragraph (a) to (p) above, we are also unable to comment on the Company's compliance of the covenants in respect of all borrowings (including creation of charges) and consequential implications including disclosures etc., if any.
- (r) In view of the possible effects of the matters described in paragraph (a) to (q) above, we are also unable to comment on the Company's compliance on various regulatory ratios/other ratios/limits and consequential implications including disclosures, if any.

Material Uncertainty Related to Going Concern

We draw attention to Note No. 69 to the Ind AS financial statements which states that the Company has been admitted to CIRP and that the Company has reported net loss during the year ended March 31, 2023 and earlier year/periods as well. As a result, the Company's net worth has fully eroded and it has not been able to comply with various regulatory ratios/limits etc. All this has impacted the Company's ability to continue its operations in normal course in future. These events or conditions, along with other matters as set forth in the aforesaid Note, indicate that there is a material uncertainty which casts significant doubt about the Company's ability to continue as a 'going concern' in the foreseeable future. However, for the reasons stated in the said note, the Company has considered it appropriate to prepare the Ind AS financial statements on a going concern basis.

Emphasis of Matter

We draw attention to the following matters in the notes to the Ind AS financial statements:

- a. As stated in Note No. 63 to the Ind AS financial statements, the Company on the basis of abundant prudence, has decided to make provision to the extent of interest income recognised during the respective quarter on Net Stage – III accounts.
- b. As stated in Note No. 63 to the Ind AS financial statements, in case of Investments/Loans which were determined as fraudulent under Section 66 of the code, the Company has not undertaken the fair valuation as of March 31, 2023 of such Investments/Loans as the net impact on the Statement of Profit and Loss would have been Nil since the company has already made 100% provision on such Investments/Loans.
- c. Note No. 65 to the Ind AS financial statements which explains that in view of the impracticability for preparing the resolution plan on individual basis in the case of the Company and its Holding Company, the Administrator, after adopting proper procedure, has filed applications before the Hon'ble NCLT, Kolkata Bench, seeking, amongst other things, consolidation of the corporate insolvency processes of SIFL and SEFL. The application in the matter is admitted and the final order was received on February 14, 2022 wherein the Hon'ble NCLT approved the consolidation of the corporate insolvency of SIFL and SEFL. The Consolidated Committee of Creditors (CoC) took on record three Resolution Plans received from Prospective Resolution Applicants (PRAs) on January 18, 2023. The three Resolution Plans received by the Consolidated CoC were put to e-voting. The Consolidated CoC took on record the results of the e-voting in CoC meeting held on February 15, 2023, and the resolution plan submitted by National Asset Reconstruction Company Limited (NARCL) was duly approved by CoC by majority voting under Section 30(4) of the IBC read with Regulation 39(3) of CIRP Regulations, 2016, thereby, declaring NARCL as Successful Resolution Applicant (SRA). The approved resolution plan of NARCL was filed before Adjudicating Authority on February 18, 2023 for its approval. The Administrator has also filed all the necessary legal and regulatory approvals before the Adjudicating Authority. The approval of the resolution plan is awaited from the Adjudicating Authority pending certain litigations.
- d. Note No. 76 to the Ind AS financial statements which explains that the Company during the quarter and year ended March 31, 2022 had invoked 49% equity shares of Sanjvik Terminals Private Limited ('STPL'), which were pledged as security against the borrowings availed by one of the borrowers of the Company. The Company has taken an expert opinion, which confirms that since the Company is not exercising any significant influence/control over STPL, hence, STPL is not a subsidiary/associate in terms of Ind AS 110/Ind AS 28 and accordingly is not required to prepare consolidated financial statements with respect to its holding of 49% of the equity shares of STPL. Further the entire shares have been sold on April 11, 2023 and the same has been transferred to the demat account of purchaser on April 26, 2023.
- e. Note No. 78 to the Ind AS financial statements states that based on information available in the public domain, some of the lenders have declared the bank account of the Company as fraud. However, in case of one of the lender, on the basis of petition filed by the ex-promoter before the Hon'ble High Court of Delhi, the Hon'ble Court has passed interim relief to the petitioner vide order dated

April 22, 2022, restraining the said lender from taking any further steps or action prejudicial to the petitioner on the basis of the order declaring the bank account as fraud. The interim order dated April 22, 2022 shall continue till the next date of hearing i.e. May 15, 2023.

Responsibilities of the Administrator for the Ind AS Financial Statements

The Reserve Bank of India ('RBI') vide press release dated October 4, 2021 in exercise of the powers conferred under Section 45-IE (1) of the Reserve Bank of India Act, 1934 ('RBI Act') superseded the Board of Directors of the Company and appointed an Administrator under Section 45-IE (2) of the RBI Act. Further, RBI, in exercise of powers conferred under Section 45-IE (5) (a) of the RBI Act, has constituted a three-member Committee of Advisors for advising the Administrator.

The RBI had also filed application for initiation of Corporate Insolvency Resolution Process ('CIRP') against the Company under Section 227 read with clause (zk) of sub-section (2) of Section 239 of the Insolvency and Bankruptcy Code (IBC), 2016 ('the Code') read with Rules 5 and 6 of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 ('FSP Insolvency Rules') before the Hon'ble National Company Law Tribunal, Kolkata Bench ('Hon'ble NCLT'). Hon'ble NCLT vide its order dated October 8, 2021, admitted the application filed by RBI for initiation of CIRP against the Company. Further, Hon'ble NCLT gave orders for appointment of Mr. Rajneesh Sharma, as the Administrator to carry out the functions as per the Code and that the management of the Company shall vest in the Administrator. Further, RBI has also retained the three-member Committee of Advisors, as aforesaid, for advising the Administrator in the operations of the Company during the CIRP.

We refer to Note No. 61 to the Ind AS financial statements which states that the Ind AS financial statements has been taken on record by the Administrator while discharging the powers of the Board of Directors of the Company which were conferred upon him by the RBI and subsequently by the Hon'ble NCLT vide its order dated October 8, 2021. Further Note No. 61 explains that since the Administrator has taken charge of the affairs of the Company on October 4, 2021, the Administrator is not liable or responsible for any actions and regarding the information pertaining to the period prior to October 4, 2021 has relied upon the explanations, clarifications, certifications, representations, and statements made by the existing officials of the Company, who were also part of the Company prior to the appointment of the Administrator.

The Administrator and the existing officials of the Company ('the management') are responsible for the matters stated in Section 134(5) of the Act with respect to the preparation of these Ind AS financial statements that give a true and fair view of the financial position, financial performance (including other comprehensive income), changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including Indian Accounting Standards prescribed under Section 133 of the Act, read with Companies (Indian Accounting Standards) Rules, 2015, as amended. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating

effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the Ind AS financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the Ind AS financial statements, the management of the Company are responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Administrator either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

The management is also responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Ind AS Financial Statements

Our responsibility is to conduct an audit of the Company's Ind AS financial statements in accordance with Standards on Auditing (SAs) specified under Section 143(10) of the Act and to issue an auditor's report. However, because of the matters described in the Basis for Disclaimer of Opinion section of our report, we were not able to obtain sufficient and appropriate audit evidence to provide a basis for an audit opinion on the Ind AS financial statements.

We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India ("ICAI") together with the ethical requirements that are relevant to our audit of the Ind AS financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics.

Other Matter

The audit of Ind AS financial statements of the Company for the year ended March 31, 2022, were carried out and reported by one of the joint statutory auditors and one predecessor joint statutory auditor wherein they expressed Disclaimer of Opinion vide their report dated May 18, 2022.

Report on Other Legal and Regulatory Requirements

- (1) As required by the Companies (Auditor's Report) Order, 2020 ("the Order") issued by the Central Government of India in terms of Section 143(11) of the Act, we report in "Annexure 1", a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.
- (2) As required by Section 143(3) of the Act, we report that:
 - a. We have sought all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit, but to the extent described in the "Basis for Disclaimer of Opinion" section of this report, were unable to obtain such information;
 - b. Due to the possible effects of the matters described in the "Basis for Disclaimer of Opinion" section of this report and more particularly paragraph (c) of the same in relation to the uncertainties regarding accounting of BTA, we are unable to comment on maintenance of proper books of accounts, as required by law, by the Company so far as appears from our examination of those books;
 - c. Read with the matters described in "Basis for Disclaimer of

Opinion" section of this report, the Balance Sheet, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash Flows dealt with by this report are in agreement with the books of account;

- d. Due to the possible effects of the matters described in the "Basis for Disclaimer of Opinion" section of this report, we are unable to state whether the aforesaid Ind AS financial statements comply with the Ind AS prescribed under Section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended;
- e. The matters described under the "Basis for Disclaimer of Opinion", "Material Uncertainty Related to Going Concern" and "Emphasis of Matter" section above, in our opinion, may have an adverse effect on the functioning of the Company;
- f. We have been explained that since RBI vide press release dated October 4, 2021 in exercise of the powers conferred under Section 45-IE (1) of the Reserve Bank of India Act, 1934 ('RBI Act') superseded the Board of Directors of the Company and appointed an Administrator under Section 45-IE (2) of the RBI Act. Further, RBI, in exercise of powers conferred under Section 45-IE (5) (a) of the RBI Act, has constituted a three-member Committee of Advisors for advising the Administrator. Accordingly, the Company has filed form DIR-12 and form GNL 2 on October 11, 2021 and February 1, 2022 respectively in respect of vacation of office of the erstwhile directors of the Company.
- g. The reservation or adverse remark relating to the maintenance of accounts and other matters connected therewith are as stated in the "Basis for Disclaimer of Opinion" section of this report.
- h. With respect to the adequacy of the internal financial controls with reference to financial statements of the Company and the operating effectiveness of such controls, refer to our separate report in "Annexure 2" which expresses a disclaimer of opinion on the Company's internal financial controls with reference to financial statements of the Company for the reasons stated therein;
- i. Due to the possible effects of the matters described in the "Basis for Disclaimer of Opinion" section of this report, we are unable to comment whether the managerial remuneration paid/provided by the Company during the year is in accordance with the provisions of Section 197 of the Act;
- j. With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended, and to the best of our information and according to the explanations given to us:
 - (i) Due to the possible effects of the matters described in the "Basis for Disclaimer of Opinion" section of this report and in absence of confirmations from the legal counsels/lawyers of the Company, we are unable to state whether the Company

has disclosed the impact of pending litigations on its financial position in its Ind AS financial statements – Refer Note No. 34 on Contingent Liabilities to the Ind AS financial statements;

- (ii) Due to the possible effects of the matters described in the "Basis for Disclaimer of Opinion" section of this report, we are unable to comment whether the Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts.
- (iii) As stated in Note no. 76 to the Ind AS financial statements and paragraph (m) of the "Basis for Disclaimer of Opinion" section of this report, the Company has not been able to transfer the amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.
- (iv) (a) The management of the Company has represented that, to the best of its knowledge and belief, no funds have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the Company to or in any other person(s) or entity(ies), including foreign entities ("Intermediaries"), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, whether, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Company ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries;
- (b) The management of the Company has represented that, to the best of its knowledge and belief, no funds have been received by the Company from any person(s) or entity(ies), including foreign entities ("Funding Parties"), with the understanding, whether recorded in writing or otherwise, that the Company shall, whether, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Parties ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries;
- (c) Due to possible effects of the matters described in the "Basis for Disclaimer of Opinion" section of this report, we are unable to comment whether the representations under sub-clause (i) and (ii) of Rule 11(e), as provided under (a) and (b) above, contain any material misstatement.
- (v) As proviso to rule 3(1) of the Companies (Accounts) Rules, 2014 is applicable for the company only w.e.f. April 1, 2023, reporting under this clause is not applicable.
- (vi) The Company has not declared nor paid any dividend during the year. Hence, reporting the compliance with Section 123 of the Act is not applicable.

For J. Kala & Associates

Chartered Accountants
ICAI Firm Registration No. 118769W

Jayesh Kala

Partner
Membership No. 101686
UDIN:23101686BGXUU05429

Place : Kolkata

Date : May 09, 2023

For Dass Gupta & Associates

Chartered Accountants
ICAI Firm Registration No. 000112N

Pankaj Mangal

Partner
Membership No. 097890
UDIN:23097890BGZGWU1933

Place : Kolkata

Date : May 09, 2023

ANNEXURE 1 TO THE INDEPENDENT AUDITORS' REPORT

[Referred to in paragraph 1 under 'Report on Other Legal and Regulatory Requirements' section in the Independent Auditors' Report of even date to the members of Srei Equipment Finance Limited ("the Company") on the Ind AS financial statements for the year ended March 31, 2023]

In view of the significance of the matters described in "Basis for Disclaimer of Opinion" section of our Independent Auditors' Report of even date and the uncertainties involved, we have not been able to obtain sufficient and appropriate audit evidence to provide a basis for an audit opinion on the Ind AS financial statements and hence we do not express any opinion on the Ind AS financial statements of the Company for the year ended March 31, 2023. Our report on specific matters covered in this Annexure is based on the examination of books of account and after taking into consideration the information, explanations and written representations given to us by the management of the Company while performing our procedures and should be read along with our Independent Auditors' Report as stated above and the various matters stated therein. Accordingly, we report that:

- (i) (a) (A) The Company has maintained proper records showing full particulars, including quantitative details and situation of Property, Plant and Equipment.
- (B) The Company has maintained proper records showing full particulars of Intangible Assets.
- (b) The Company has a program of physical verification of property, plant and equipment to cover all the items in a phased manner over a period of three years, which, in our opinion, is reasonable having regard to the size of the Company and nature of its assets. Pursuant to the said program, during the year, certain Property, Plant and Equipment of the Company have been physically verified by the management and discrepancies were noticed on such verification.

The company has provided us with Physical Verification Reports (Reports) and the Fixed Asset Register (FAR) as on March 31, 2023. As per the Reports and FAR, it has been observed that Property, Plant and Equipment includes assets having Gross Book Value of ₹ 50,18,36,557/- and Written Down Value of ₹ 10,18,90,018/- as on March 31, 2023 are either not in possession or not physically found by the company. As informed by the Company, the management has initiated legal proceedings for recovery of the same and since legal proceedings for recovery are pending, we are unable to comment on the impact of the same, if any, on the Ind AS financial statements. The details of discrepancies are as under:

Particulars	No of Assets	Gross Book Value As on 31.03.2023	WDV as on 31.03.2023
Asset not in Company's possession	2,760	47,95,26,043	10,04,47,511
Asset not physically found	592	2,23,10,514	14,42,507
Total	3,352	50,18,36,557	10,18,90,018
% to Owned Assets other than Land and Building		15.70%	5.63%

- (c) The title deeds of all the immovable properties recorded as Property, Plant and Equipment and Other Non-Financial Assets (other than properties where the Company is the lessee and the lease agreements are duly executed in favour of lessee) disclosed in the Ind AS financial statements are held in the name of the Company, except for the details given below :

Description of property	Gross carrying value (INR in Lacs)	Held in name of	Whether promoter, director or their relative or employee	Period held	Reason for not being held in name of Company
Building	3,883	Srei Infrastructure Finance Limited (SIFL)	Promoter	Since October-2019	
Building	12	Srei Infrastructure Finance Limited (SIFL)	Promoter	Since October-2019	Refer Note 1 below
Land	11,800	Murti Housing and Finance Private Limited	No	Since September-2017	
Building	8	Srei Infrastructure Finance Limited (SIFL)	Promoter	Since January-2008	
Building	51	Srei Infrastructure Finance Limited (SIFL)	Promoter	Since January-2008	Refer Note 2 below
Land	4	Srei Infrastructure Finance Limited (SIFL)	Promoter	Since January-2008	
Land	639	Deccan Chronicle Secunderabad Private Limited and Deccan Chronicle Rajahmundry Private Limited	No	Since June-2018	Refer Note 3 below

Description of property	Gross carrying value (INR in Lacs)	Held in name of	Whether promoter, director or their relative or employee	Period held	Reason for not being held in name of Company
Land	678	Krystine Vintrade Private Limited Balanced Dealers Private Limited Shivdhan Sales Private Limited Well known Vinimay Private Limited Malank Dealtrade Private Limited Balanced Commotrade Private Limited Kavya Dealmark Private Limited Alaukik Commercial Private Limited Kripa Dealmark Private Limited	No	Since March-2016	Refer Note 3 below
Land	483	Mohamad Akil Shaikh and Ahmad Noor represented by its constituted attorney Mohamad Akil Shaikh	No	Since December-2016	
Building	2,400	Kakarlapudi Venkata Madhava Varma	No	Since September-2015	
Building	32	Sierra Constructions Private Limited	No	Since September-2016	Refer Note 3 below
Land	138	Kabbalamma, Smt. Sukanya & Sri Prasanna represented by constituted attorney holder Sri L. Chandrasekhar	No	Since September-2015	
Land	1,444	Wianxx Impex Private Limited	No	Since September-2017	

Note 1 - These immovable properties were transferred to the Company pursuant to the Business Transfer Agreement ('BTA')(Refer Note No. 64 to the Ind AS financial statements) entered by the Company with its Holding Company, SIFL.

Note 2 - As represented by the management, these immovable properties were transferred to the Company pursuant to the Scheme of Arrangement approved by the shareholders and sanctioned by the Hon'ble High Court of Calcutta vide Order of 28th January 2008, on a slump sale basis, pursuant to Sections 391 to 394 and other relevant provisions of the Companies Act, 1956 with effect from 1st January 2008 ('Appointed Date').

Note 3 - These immovable properties were acquired in lieu of discharge of debts as represented by the Management. Due to procedural issues, title deeds are still not registered in the name of the Company.

- (d) The Company has not revalued its Property, Plant and Equipment (including Right of Use assets) and Intangible Assets during the year. Accordingly, reporting under clause (i)(d) of paragraph 3 of the Order is not applicable.
- (e) As informed to us, to the best of the knowledge of the management of the Company, no proceedings have been initiated or are pending against the Company as at March 31, 2023 for holding any benami property under the Prohibition of Benami Property Transactions Act, 1988 and rules made thereunder ('Benami Act'). However, in absence of independent confirmations from the legal counsels/lawyers of the Company with regards to the same, we are unable to report whether any proceedings have been initiated or are pending against the Company as at March 31, 2023 for holding any benami property under the Benami Act.
- (ii) (a) The Company does not have any inventory and hence reporting under clause (ii)(a) of paragraph 3 of the Order is not applicable.
- (b) According to the information and explanations given to us and the records examined by us the Company has not been sanctioned working capital limits in excess of five crore rupees during the year, in aggregate from banks and/or financial institutions, on the basis of security of current assets and hence reporting under clause (ii)(b) of paragraph 3 of the Order is not applicable.
- (iii) (a) The Company's principal business is to give loans and therefore, reporting under clauses (iii)(a) and (e) of paragraph 3 of the Order are not applicable.
- (b) During the year, the Company has not made investment in (other than investments acquired by the Company through conversion of loan assets and existing investments), provided any guarantee (other than renewal of existing guarantee) or security or granted any loans or advances in the

nature of loans, secured or unsecured, to companies, firms, Limited Liability Partnerships or any other parties. Accordingly, reporting under clause (iii)(b) of paragraph 3 of the Order is not applicable.

- (c) The schedules of repayment of principal and payment of interest in respect of the loans and advances in the nature of loans have been stipulated in the normal course of business. The aggregate amount of loan outstanding for INR 22,771 Crores as at March 31, 2023 which are irregular in repayment of principal or payment of interest. In view of the nature of business and volume of transactions, it is not practicable to provide number of cases for the same. As required by various directions for NBFCs issued by Reserve Bank of India and Indian Accounting Standards (Ind AS), the Company has made required disclosures in Note No. 6 to the Ind AS financial statements and Note 20 of Annexure I to the Ind AS financial statements regarding asset classifications.
- (d) In respect of loans and advances in the nature of loans which are overdue for more than ninety days as at March 31, 2023, the aggregate amount of loan outstanding as at March 31, 2023 is INR 21,950 Crores. In view of the nature of business and volume of transactions, it is not practicable to provide number of cases for the same. As required by various directions for NBFCs issued by Reserve Bank of India and Indian Accounting Standards (Ind AS), the Company has made required disclosures in Note No. 6 to the Ind AS financial statements and Note 20 of Annexure I to the Ind AS financial statements regarding asset classifications. Further, the Company has taken reasonable steps for recovery thereof in the normal course of business.
- (e) As informed to us, the Company has not granted any loans or advances in the nature of loans either repayable on demand or without specifying any terms or period of repayment.
- (iv) During the year, the Company has not granted any loans, made investment in (other than investments acquired by the Company through conversion of loan assets and existing investments), or provided guarantee (other than renewal of existing guarantee) and security. Accordingly, reporting under clause (iv) of paragraph 3 of the Order is not applicable. Further, the provisions of Section 186, except for Section 186(1) of the Act are not applicable to the Company as it is engaged in the business of financing.
- (v) The Company is a Non-Banking Finance Company registered with the Reserve Bank of India to which the provisions of Sections 73 to 76 of the Act and the relevant rules made there under are not applicable. Accordingly, reporting under clause (v) of paragraph 3 of the Order is not applicable.
- (vi) The Central Government has not prescribed the maintenance of cost records for any of the products of the Company under sub-section (1) of Section 148 of the Act and the rules framed there under. Accordingly, reporting under clause (vi) of paragraph 3 of the Order is not applicable.
- (vii) (a) The Company is generally regular in depositing with the appropriate authorities, amounts deducted/accrued in the books of account in respect of undisputed statutory dues including Provident Fund, Duty of Customs, Cess and any other material statutory dues applicable to it, except as stated below.

The Company has not been regular in depositing with appropriate authorities, amounts deducted/accrued in the books of accounts in respect of undisputed statutory dues including Goods and Services tax (GST), Employees' State Insurance, Income-Tax and Professional Tax, and there have been significant delays in a large number of cases. In respect of such dues, amount outstanding, at the year end, for a period of more than six months from the date they became payable, are as follows: -

Statement of Arrears of Statutory Dues Outstanding for More than Six Months

Name of the statute	Name of the statute	Nature of the dues	Amount in (INR in Lacs)	Period to which the amount relates	Due Date	Date of Payment	Remarks if any
Goods and Services Tax	CGST, SGST & IGST	GST on taxable outward supplies	458.45	2020-21	The lease transaction wise details annexed has the due date specified (transaction wise). All the due dates are within F.Y 2020-21.	Not yet paid*	
Sales Tax	Tamil Nadu CST	Central Sales tax	3.67	2015-16 to 2016-17	20.11.2021	Not yet paid*	Kindly refer Note No 1.2 to the Ind AS financial statements
Goods and Services Tax	Karnataka GST	GST Interest	1.33	2017-18	28.02.2022	Not yet paid*	
Goods and Services Tax	Gujarat GST Audit Order as per CGST Act 2017.	Goods and Service Tax	4.40	2019-2020	18.05.2022	Not yet paid*	
Goods and Services Tax	Orissa GST	Interest on GST	0.24	2020-21	19.08.2022	Not yet paid*	

Name of the statute	Name of the statute	Nature of the dues	Amount in (INR in Lacs)	Period to which the amount relates	Due Date	Date of Payment	Remarks if any
Sales Tax	Tamil Nadu VAT Assessment	Value Added Tax & Central Sales Tax	32.60	2016-17	20.11.2021		Not yet paid*
Sales Tax	Jharkhand VAT	Jharkhand VAT	2.47	2017-18 (April to June)	05.05.2022		Not yet paid*
The Income-tax Act, 1961	The Income-tax Act, 1961	Tax Deducted at Source	308.62	January 2021 to October 2021			Not yet paid *

* As informed by the Company, Trust Retention Account (TRA) mechanism was stipulated effective November 24, 2020, pursuant to which all payments were being approved/released based on the TRA mechanism. However, this payment was not approved/released. Thereafter, as stated in Note No. 1.2, CIRP was initiated against the Company and due to the moratorium imposed under the Code, the said dues were not released in FY 2022-23, as well.

(b) There are no dues with respect to GST, Custom Duty and duty of Excise which have not been deposited on account of any dispute. The dues outstanding as at March 31, 2023 with respect to Income Tax, Entry Tax, Sales Tax, Service Tax and Value Added Tax, on account of any dispute, are as follows:

Statement of Disputed Dues***

Name of the statute	Nature of the dues	Amount@ (INR in Lacs)	Amount Paid under Protest (INR in Lacs)	Period to which the amount relates	Forum where dispute is pending
Finance Act, 1994	Service Tax	517.67	320.00	Financial Year 2006-07 to 2008-09	SVLDRS - Settlement before Commissioner
Finance Act, 1994	Service Tax	1809.46	135.70	Financial Years from 2008-09 to 2013-14	Customs Excise and Service Tax Appellate Tribunal Kolkata (CESTAT)
Telangana-Value Added Tax Act, 2005	Value Added Tax	452.39	150.79	2010-11 to 2012-13	Telangana High Court
Jharkhand Value Added Tax Act, 2005	Value Added Tax	56.97	-	2009-10	Jharkhand High Court
Maharashtra Value Added Tax Act, 2002 and Central Sales Tax Act, 1956 - for the state of Maharashtra	Value Added Tax & Central Sales Tax Act	400.61	13.72	2013-14	Joint Commissioner of Sales Tax, (Appeal VIII)
Maharashtra Value Added Tax Act, 2002 and Central Sales Tax Act, 1956 - for the state of Maharashtra	Value Added Tax & Central Sales Tax Act	285.65	14.64	2014-15	Joint Commissioner of Sales Tax, (Appeal VIII)
Madhya Pradesh Value Added Tax Act	Value Added Tax & Central Sales Tax Act	15.73	3.93	2017-18 (April to June)	The Appellate Forum. Deputy Commissioner of Commercial Tax
Central Sales Tax Act, 1956 - for the state Delhi	Central Sales Tax	0.98	-	2017-18	Delhi Objection resolution authority/Appellate Authority.
Haryana Value Added Tax Act, 2003	Value Added Tax	2.03	-	2015-16	Joint Excise and Taxation Commissioner (Appeals)
Odissa Tax Act, 1999	Entry Tax	18.71	1.24	2015-16 to 2017-18	Joint Commissioner (Appeal, CT and GST Territorial Range, Bhubaneswar)

Name of the statute	Nature of the dues	Amount@ (INR in Lacs)	Amount Paid under Protest (INR in Lacs)	Period to which the amount relates	Forum where dispute is pending
Delhi Value Added Tax Act, 2004	Value Added Tax	49.06	-	2015-16 to 2017-18	Delhi Objection Resolution Authority/Appellate Authority
Haryana Value Added Tax Act 2003	Value Added Tax	1.55	1.55	2016-17	Joint Excise and Taxation Commissioner (Appeals)
West Bengal Entry of Goods into Local Areas Act, 2012	Entry Tax	11.18	-	2017-18	The Senior Joint Commissioner Appeals
Finance Act, 1994*	Service Tax	302.36	-	2008-09 & 2009-10	Customs Excise and Service Tax Appellate Tribunal Kolkata (CESTAT)
Finance Act, 1994*	Service Tax	79.79	4.28	2011-12 to 2014-15	CGST & CX Commissioner
Finance Act, 1994*	Service Tax	4,262.62	-	2015-16	CGST & CX Commissioner, North Commissionerate, Kolkata
West Bengal VAT*	Central Sales Tax	211.43	-	2010-11	West Bengal Sales Tax Appellate and Revisional Board, Kolkata.
The Income Tax Act, 1961	Income Tax	7,156	672	Financial Year 2011-12, 2012-13, 2016-17 and 2017-18	Commissioner of Income Tax (Appeals)
The Income Tax Act, 1961*	Income Tax	9,356	-	Financial Year 2005-06 to 2008-09, 2010-11, 2011-12 and 2013-14 to 2017-18	At various levels from Commissioner of Income Tax (Appeals) to Supreme Court of India
The Income Tax Act, 1961*	Income Tax on Fringe Benefits	226	-	Financial Year 2005-06 to 2008-09	Calcutta High Court

* In terms of BTA (Refer Note No. 64 to the Ind AS financial statements), entered by the Company with its Holding Company, SIFL, the Company is liable to pay any future liability arising in relation to these dues, which are being held by SIFL, in its books of account, on behalf of the Company. Hence, these dues have been reported above.

@ This represents total disputed dues without netting off amount paid under protest.

** Also, refer paragraph (i) of "Basis of Disclaimer of Opinion" section of our Independent Auditor's Report of even date.

(viii) As informed to us, to the best of knowledge of management of the Company, there were no transaction(s) which were previously not recorded in the books of account of the Company that have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961.

(ix) (a) As stated in Note No. 1.2 to the Ind AS financial statements, the Company was admitted to CIRP on October 08, 2021 and accordingly due to the moratorium imposed as per the Code, no payments could be made thereafter to the creditors, until the resolution process is concluded. Hence, for the purpose of reporting under this clause, claims outstanding and accepted has been considered and since the borrowings including interest are overdue and in continuing default as on March 31, 2023, therefore, we are unable to provide the periods of default:

Particulars	Outstanding amount (INR in Lacs)	Period of default
Name of the Lenders :		
Axis Bank Limited	8,320.63	
Bank of Baroda	2,15,181.42	
Bank of India	97,140.72	
Bank of Maharashtra	60,988.64	
Canara Bank	3,15,607.45	
Central Bank of India	1,25,197.84	
Dhanlaxmi Bank Limited	8,478.08	
HDFC Bank Limited	21.36	
ICICI Bank Limited	24.82	
IDBI Bank Limited	40,604.32	
Indian Bank	2,03,138.15	
Indian Overseas Bank	64,165.88	
Karnataka Bank Limited	1,264.68	
The Karur Vysya Bank Limited	1,841.07	
Lakshmi Vilas Bank	10,575.17	Refer comments above
Punjab and Sind Bank	1,30,047.71	
Punjab National Bank	2,93,444.90	
South Indian Bank Limited	6,626.11	
State Bank of India	2,80,658.78	
UCO Bank	1,06,613.11	
Union Bank of India	2,69,197.64	
IFCI Limited	19,020.20	
Small Industries Development Bank of India (SIDBI)	1,00,208.66	
National Bank for Agriculture and Rural Development (NABARD)	88,363.31	
Toyota Financial Services India Limited	38.19	
Nicco Engineering Services Limited	106.00	
Non - Convertible Debentures	5,05,577.39	
External Commercial Borrowings	2,26,917.15	
Deferred Payment Liabilities	9,122.65	

* outstanding amount includes amount outstanding as on October 8, 2021 and further amended based on the claims received under CIRP (upto March 31, 2023), that are accepted and accounted for in the books of accounts as at March 31, 2023. Refer Note No. 66 to the Ind AS financial statements.

- (b) As informed to us, the Company has not been declared wilful defaulter by any bank or financial institution or government or any government authority. However, the Company has received show cause notices (SCNs) from State Bank of India and Bank of Maharashtra during the financial year 2022-23 to show cause as to why the company should not be declared as wilful defaulter. The Company has duly submitted its reply but is yet to receive any further communication from the State Bank of India and Bank of Maharashtra in this regard.
- (c) The Company did not obtain any money by way of term loans during the year. Accordingly, reporting under clause (ix)(c) of paragraph 3 of the Order is not applicable.
- (d) According to the information and explanation given to us, the Company did not obtain any money by way of short-term loans during the year. Accordingly, reporting under clause (ix)(d) of paragraph 3 of the Order is not applicable.
- (e) During the year ended March 31, 2023, the Company did not have any subsidiaries, associates or joint ventures as defined under the Act. Accordingly, reporting under clause (ix)(e) of paragraph 3 of the Order whether the company has taken any funds from any entity or persons on account of or to meet the obligations of its subsidiaries, associates or joint ventures is not applicable. Also refer to paragraph (d) under "Emphasis of Matter" section of our Independent Auditor's Report of even date on the Ind AS financial statements of the Company.

- (f) During the year ended March 31, 2023, the Company did not have any subsidiaries, associates or joint ventures as defined under the Act. Accordingly, reporting under clause (ix)(f) of paragraph 3 of the Order whether the company has raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies is not applicable. Also refer to paragraph (d) under "Emphasis of Matter" section of our Independent Auditor's Report of even date on the Ind AS financial statements of the Company.
- (x) (a) The Company has not raised money by way of initial public issue offer/further public offer (including debt instruments) during the year. Therefore, reporting under clause (x)(a) of paragraph 3 of the Order is not applicable.
- (b) The Company has not made any preferential allotment or private placement of shares or convertible debentures (fully, partially or optionally convertible) during the year. Therefore, reporting under clause (x)(b) of paragraph 3 of the Order is not applicable.
- (xi) (a) As informed to us, to the best of knowledge of management of the Company, there has been no instance of fraud during the year by the Company. However, there were seventy (70) cases of frauds on the Company amounting to ₹ 18,11,965 Lacs based on transaction audit reports conducted by transaction auditor appointed by the Administrator of the Company. The Company has reported the same to RBI in terms of the Notification Issued by Reserve Bank of India vide DNBS/2016-17/49 Master Direction DNBS. PPD.01/66.15.001/2016-17. (Refer Note 38 of Annexure – I to notes to the financial statements). Also refer Note No. 78 to the Ind AS financial statements of the Company for the year ended March 31, 2023.
- (b) No report under Section 143(12) of the Act has been filed with the Central Government by us in Form ADT-4 as prescribed under Rule 13 of Companies (Audit and Auditors) Rules, 2014, during the year or upto the date of this report. Further, as informed by the Company, the Secretarial Auditor of the Company have not filed any report under section 143(12) of the Act with the Central Government in Form ADT-4 as prescribed under Rule 13 of Companies (Audit and Auditors) Rules, 2014, during the year or upto the date of this report.
- (c) We have taken into consideration the whistle blower complaints received by the Company during the year (and upto the date of this report), while determining the nature, timing and extent of audit procedures.
- (xii) The Company is not a Nidhi Company. Therefore, reporting under clause (xii) of paragraph 3 of the Order is not applicable.
- (xiii) All transactions entered into by the Company with the related parties are in compliance with Sections 177 and 188 of the Act, where applicable and the details have been disclosed in the Ind AS financial statements as required by the applicable accounting standards. Also, refer paragraph (g) of the "Basis for Disclaimer of Opinion" section of our Independent Auditors' Report of even date on the Ind AS financial statements of the Company.
- (xiv) (a) The Company has an internal audit system commensurate with the size and nature of its business.
- (b) We have considered the Internal Audit Reports of the Company issued till date, for the period under audit.
- (xv) The Reserve Bank of India ('RBI') superseded the Board of Directors of the Company on October 4, 2021 and appointed an Administrator under Section 45IE(2) of the RBI Act along with three members Advisory Committee to assist the Administrator in discharge of his duties. Further, Hon'ble NCLT Kolkata bench gave order on October 8, 2021 for Administrator to carry out the function as per the IBC Code and that the management of the Company vest in the Administrator. Hence, provisions of Section 192 of the Act are not applicable to the Company.
- (xvi) (a) The Company is required to be registered under Section 45-IA of the Reserve Bank of India Act, 1934 and the registration has been obtained by the Company.
- (b) The Company has not conducted any Non-Banking Financial or Housing Finance activities without having a valid Certificate of Registration (CoR) from the Reserve Bank of India as per the Reserve Bank of India Act, 1934.
- (c) The Company is not a Core Investment Company (CIC) as defined in Core Investment Companies (Reserve Bank) Directions, 2016 ("Directions") by the Reserve Bank of India. Accordingly, reporting under clause (xvi)(c) of paragraph 3 of the Order are not applicable.
- (d) In absence of any specific confirmation from the management of the Company, we are unable to comment whether the Group to which the Company belongs has CIC or not as part of the Group.
- (xvii) In view of the "Disclaimer of Opinion" issued by us vide our Independent Auditor's Report dated May 09, 2023 on the Ind AS financial statements of the Company for the year ended March 31, 2023, we are unable to comment on clause (xvii) of paragraph 3 of the Order in respect of current financial year and immediately preceding financial year.
- (xviii) During the year, Haribhakti & Co. LLP, Chartered Accountants, the statutory auditors of the company for immediately preceding year, have resigned with effect from July 7, 2022. We have taken into consideration issues raised by the outgoing auditors.
- (xix) On the basis of the financial ratios, ageing and expected dates of realisation of financial assets and payment of financial liabilities, other information accompanying the Ind AS financial statements and our knowledge of the management and its plans and based on our examination of the evidence supporting the assumptions, we believe that material uncertainty exists as on the date of this audit report regarding the Company's ability to meet its liabilities existing as at the date of balance sheet. We further state that our reporting is based on the facts up to date of the audit report. We further draw attention to paragraph 'Material Uncertainty in relation to Going Concern' section of our independent auditor's report of even date, on the Ind AS financial statements of the Company, regarding the applicability of the going concern assumption.
- (xx) (a) In respect of other than ongoing projects, the Company has not transferred the unspent Corporate Social Responsibility (CSR) amount to a Fund specified in Schedule VII to the Act, within a period of six months of the expiry of the financial year in compliance with second proviso to Section 135(5) of the said Act, details of which are as follows:

Relevant Financial Year	Amount identified for Spending on CSR Activities "other than On going Projects" (INR in Lacs)	Unspent amount of (b) (INR in Lacs)	Amount Transferred to Fund specified in Sch. VII of the Act (INR in Lacs)	Due date of transfer to the specified Fund	Actual date of transfer to the specified Fund	Number of days of delay, if any
(a)	(b)	(c)	(d)	(e)	(f)	(g)
2020-21	648	523	-	September 30, 2021		*

*Refer paragraph (j) of "Basis of Disclaimer of Opinion" section of our Independent Auditor's Report of even date.

(b) The Company does not have any CSR activities for "ongoing projects" in terms of Section 135(6) of the Act and accordingly, reporting under clause (xx)(b) of paragraph 3 of the Order is not applicable.

(xxi) During the year ended March 31, 2023, the Company did not have any subsidiaries, associates or joint ventures as defined under the Act. Accordingly, reporting under clause (xxi) of paragraph 3 of the Order is not applicable. Also refer paragraph (d) under "Emphasis of Matter" section of our Independent Auditor's Report of even date on the Ind AS financial statements of the Company.

For J. Kala & Associates

Chartered Accountants
ICAI Firm Registration No. 118769W

Jayesh Kala

Partner
Membership No. 101686
UDIN:23101686BGXUU05429

Place : Kolkata

Date : May 09, 2023

For Dass Gupta & Associates

Chartered Accountants
ICAI Firm Registration No. 000112N

Pankaj Mangal

Partner
Membership No. 097890
UDIN:23097890BGZGWU1933

Place : Kolkata

Date : May 09, 2023

ANNEXURE 2 TO THE INDEPENDENT AUDITORS' REPORT

[Referred to in paragraph 2(h) under 'Report on Other Legal and Regulatory Requirements' section in our Independent Auditors' Report of even date to the members of Srei Equipment Finance Limited ('the Company') on the Ind AS financial statements for the year ended March 31, 2023]

Report on the Internal Financial Controls with reference to Financial Statements under clause (i) of sub-section 3 of Section 143 of the Companies Act, 2013 ("the Act")

We were engaged to audit the internal financial controls with reference to financial statements of the Company as of March 31, 2023 in conjunction with our audit of the Ind AS financial statements of the Company for the year ended on that date.

Administrator's Responsibility for Internal Financial Controls

As stated in "Responsibilities of the Administrator for the Ind AS Financial Statements" section of our Independent Auditor's Report of even date to the members of the Company, the Administrator and the existing officials of the Company are responsible for establishing and maintaining internal financial controls based on the internal control **with reference to financial statements criteria established by the Company considering the essential components of internal control** stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (the "Guidance Note") issued by the Institute of Chartered Accountants of India ("ICAI"). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to Company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Act.

Auditors' Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls with reference to financial statements based on our audit. We were engaged to audit in accordance with the Guidance Note and the Standards on Auditing specified under Section 143(10) of the Act to the extent applicable to an audit of internal financial controls, both issued by the ICAI.

Because of the matters described in the "Basis for Disclaimer of Opinion" section of our Independent Auditor's Report of even date on the Ind AS financial statements of the Company, we were not able to obtain sufficient appropriate audit evidence to provide a basis for an opinion on the internal financial controls with reference to financial statements.

Meaning of Internal Financial Controls with reference to Financial Statements

A company's internal financial control with reference to financial statements is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control with reference to financial statements includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorisations of management and directors of the company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorised acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Disclaimer of Opinion

Consequent to the matters mentioned in Note No. 1.2 of the Ind AS financial statements of the Company and the matters described in the "Basis for Disclaimer of Opinion" section of our Independent Auditor's Report of even date on the Ind AS financial statements of the Company, we are unable to determine if the Company has established adequate internal financial controls with reference to financial statements and whether they were operating effectively as at March 31, 2023. Accordingly, we do not express an opinion on the internal financial controls with reference to financial statements.

Explanatory Paragraph

We were engaged to audit, in accordance with the Standards on Auditing issued by the ICAI, as specified under Section 143(10) of the Act, the accompanying Ind AS financial statements of the Company, which comprise of the Balance Sheet as at March 31, 2023, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash Flows for the year then ended, and notes to the Ind AS financial statements including a summary of significant accounting policies and other explanatory information. We have considered the disclaimer of opinion reported above in determining the nature, timing, and extent of audit tests applied in our audit of the Ind AS financial statements of the Company for the year ended March 31, 2023 and this report affects our report dated May 09, 2023 which expresses a disclaimer of opinion on the Ind AS financial statements of the Company.

For J. Kala & Associates

Chartered Accountants

ICAI Firm Registration No. 118769W

Jayesh Kala

Partner

Membership No. 101686

UDIN:23101686BGXUU05429

Place : Kolkata

Date : May 09, 2023

For Dass Gupta & Associates

Chartered Accountants

ICAI Firm Registration No. 000112N

Pankaj Mangal

Partner

Membership No. 097890

UDIN:23097890BGZGWU1933

Place : Kolkata

Date : May 09, 2023

BALANCE SHEET

as at March 31st, 2023

(₹ in Lacs)

Particulars	Note No.	As at March 31st, 2023	As at March 31st, 2022
ASSETS			
(1) Financial Assets			
(a) Cash and Cash Equivalents	3	2,52,639	1,27,881
(b) Bank Balance other than (a) above	4	18,169	18,261
(c) Receivables			
(i) Trade Receivables	5	146	3,168
(d) Loans	6	9,62,385	20,47,125
(e) Investments	7	63,740	1,23,604
(f) Other Financial Assets	8	65,697	90,531
(2) Non-Financial Assets			
(a) Current Tax Assets (Net)	9	14,630	24,501
(b) Property, Plant and Equipment	10	1,22,338	1,83,412
(c) Right-of-use Assets	11	506	712
(d) Other Intangible Assets	12	541	838
(e) Other Non-Financial Assets	13	23,509	38,357
Total Assets		15,24,300	26,58,390
LIABILITIES AND EQUITY			
LIABILITIES			
(1) Financial Liabilities			
(a) Payables	14		
(i) Trade Payables			
(i) Total outstanding dues of micro enterprises and small enterprises		190	175
(ii) Total outstanding dues of creditors other than micro enterprises and small enterprises		6,224	6,243
(b) Debt Securities	15	2,59,944	2,59,552
(c) Borrowings (Other than Debt Securities)	16	26,69,340	26,76,863
(d) Subordinated Liabilities	17	2,62,458	2,61,581
(e) Lease Liabilities	11	636	828
(f) Other Financial Liabilities	18	14,766	18,672
(2) Non-Financial Liabilities			
(a) Current Tax Liabilities (Net)	19	13,635	13,652
(b) Provisions	20	15,329	15,777
(c) Other Non-Financial Liabilities	21	3,828	4,268
(3) Equity			
(a) Equity Share Capital	22	7,902	7,902
(b) Other Equity	23	(17,29,952)	(6,07,123)
Total Liabilities and Equity		15,24,300	26,58,390

Significant Accounting Policies and Notes to Financial Statements 1-79
The Notes referred to above form an integral part of the Balance Sheet.
This is the Balance Sheet referred to in our report of even date.

For J Kala & Associates
Chartered Accountants
ICAI Firm Registration No. 118769W

For Dass Gupta & Associates
Chartered Accountants
ICAI Firm Registration No. 000112N

For and on behalf of Srei Equipment Finance Limited
(a Company under Corporate Insolvency Resolution Process by an order dated October 8th, 2021 passed by Hon'ble NCLT, Kolkata)

Jayesh Kala
Partner
Membership no. 101686

Pankaj Mangal
Partner
Membership no. 097890

Rajneesh Sharma
Administrator Appointed Under IBC

Place: Kolkata
Date : May 9, 2023

Place: Kolkata
Date : May 9, 2023

Place: Kolkata
Date : May 9, 2023

The Administrator has been appointed under Rule 5(a)(iii) of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 under the Insolvency and Bankruptcy Code, 2016 (IBC or 'the Code'). The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Mr. Rajneesh Sharma, who acts as agent of the Company only and without any personal liability.

Address for Correspondence - 'Vishwakarma', 86C, Topsia Road (South), Kolkata, West Bengal, 700046
Email ID for Correspondence - sreiaministrator@srei.com

STATEMENT OF PROFIT AND LOSS

for the year ended March 31st, 2023

(₹ in Lacs)

Particulars	Note No.	Year ended March 31st, 2023	Year ended March 31st, 2022
Revenue from Operations			
Interest Income	24	1,28,403	2,54,895
Rental Income		20,034	44,061
Fees and Commission Income		904	1,374
Net gain on fair value changes	25	1,825	8,142
Others	26	2,974	6,483
(I) Total Revenue from Operations		1,54,140	3,14,955
(II) Other Income	27	1,617	(790)
(III) Total Income (I+II)		1,55,757	3,14,165
Expenses			
Finance Costs	28	7,605	2,16,754
Fees and Commission Expense		1,018	662
Net loss on fair value changes	25	11,531	35,663
Net loss on derecognition of financial instruments under amortised cost category		5,567	12,328
Impairment on Financial Instruments (Net)	29	1,53,440	2,21,149
Loss/write-off on Repossessed Assets and Assets acquired in satisfaction of debt		13,257	4,320
Employee Benefits Expenses	30	8,142	11,020
Depreciation, Amortisation and Impairment	10 to 12	43,304	56,331
Other Expenses	31	18,228	23,423
(IV) Total Expenses		2,62,092	5,81,650
(V) Profit/(Loss) Before Tax and Exceptional Items (III- IV)		(1,06,335)	(2,67,485)
(VI) Exceptional Items		10,15,593	-
(VII) Profit/(Loss) Before Tax after Exceptional Items (V- VI)		(11,21,928)	(2,67,485)
(VIII) Tax Expense:			
Income Tax in respect of earlier years		-	9,807
(IX) Profit/(Loss) After Tax (VII-VIII)		(11,21,928)	(2,77,292)
(X) Other Comprehensive Income			
A (i) Items that will not be reclassified to Profit or Loss			
Remeasurements Gains/(Losses) on Defined Benefit Plan		(182)	(42)
B (i) Items that will be reclassified to Profit or Loss			
(a) Effective portion of gains and losses on hedging instruments in a cash flow hedge		-	14
(b) Gains/(Losses) on fair valuation of Loans		(719)	(210)
SUBTOTAL (a+b)		(719)	(196)
Other Comprehensive Income [A+B]		(901)	(238)
(XI) Total Comprehensive Income (IX+X)		(11,22,829)	(2,77,530)
(XII) Earnings per Equity Share (Face value of ₹ 10/- each)	32		
Basic (in ₹)		(1419.87)	(350.93)
Diluted (in ₹)		(1419.87)	(350.93)

Significant Accounting Policies and Notes to Financial Statements 1-79
The Notes referred to above form an integral part of the Statement of Profit and Loss.
This is the Statement of Profit and Loss referred to in our report of even date.

For J Kala & Associates
Chartered Accountants
ICAI Firm Registration No. 118769W

For Dass Gupta & Associates
Chartered Accountants
ICAI Firm Registration No. 000112N

For and on behalf of Srei Equipment Finance Limited
(a Company under Corporate Insolvency Resolution Process by an order dated October 8th, 2021 passed by Hon'ble NCLT, Kolkata)

Jayesh Kala
Partner
Membership no. 101686

Pankaj Mangal
Partner
Membership no. 097890

Rajneesh Sharma
Administrator Appointed Under IBC

Place: Kolkata
Date : May 9, 2023

Place: Kolkata
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The Administrator has been appointed under Rule 5(a)(iii) of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 under the Insolvency and Bankruptcy Code, 2016 (IBC or 'the Code'). The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Mr. Rajneesh Sharma, who acts as agent of the Company only and without any personal liability.

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Email ID for Correspondence - sreiaministrator@srei.com

STATEMENT OF CASH FLOWS

for the year ended March 31st, 2023

(₹ in Lacs)

Particulars	Year ended March 31st, 2023	Year ended March 31st, 2022
A. Cash Flows from Operating Activities		
Profit/(Loss) Before Tax	(11,21,928)	(2,67,485)
Adjustments for:		
Depreciation, Amortisation and Impairment	43,304	56,331
Impairment on Financial Instruments (Net)	1,53,440	2,21,149
Impairment on Financial Instruments (Net) on Exceptional items	9,37,100	-
Impairment (gain)/loss on capital advance	-	(29)
Net loss on derecognition of Financial Instruments	5,567	12,328
Loss/write-off on Repossessed Assets and Assets acquired in satisfaction of debt	13,257	4,320
Net loss on derecognition of Property, Plant and Equipment	7,555	7,413
Liabilities no longer required written back	(304)	(3,087)
Finance Costs	7,605	2,16,754
Interest on Loans	(1,17,835)	(2,53,273)
Rental Income	(20,034)	(44,061)
Interest on Fixed Deposits with Banks	(9,617)	(1,421)
Interest income from Investment	(951)	-
Net unrealised (gain)/loss on foreign currency transaction and translation	-	(3,555)
Net unrealised fair value loss	9,706	22,557
Net unrealised fair value (gain)/loss on exceptional items	78,493	-
Operating profit/(loss) before working capital changes	(14,642)	(32,059)
Changes in working capital:		
Adjustments for:		
(Increase)/Decrease in Trade Receivables and Others Assets	6,312	29,561
(Increase)/Decrease in Loans Assets	57,956	63,807
Increase/(Decrease) in Trade Payables and Others Liabilities	(5,974)	(4,609)
(Increase)/Decrease in Other Bank Balances	1,369	79,839
Cash generated/(used) in operations	45,021	1,36,539
Finance Costs paid	(939)	(96,766)
Interest on Loans received	42,891	54,013
Rental income received	18,124	32,388
Interest on Fixed Deposits with Banks received	8,342	1,978
Interest income from Investment received	951	-
Advance taxes (paid)/refund (including Tax deducted at Source)	9,854	(118)
Net Cash generated/(used) in Operating Activities	1,24,243	1,28,034
B. Cash Flows from Investing Activities		
Purchase of Property, Plant and Equipment	-	(25)
Sale/(Purchase) of Investments (Net)	367	-
Proceeds from Sale of Property, Plant and Equipment	10,945	9,309
Net Cash generated/(used) in Investing Activities	11,312	9,284
C. Cash Flows from Financing Activities		
Increase/(Decrease) in Working Capital facilities (Net)	-	(15,500)
Repayments of Other Borrowings	(10,798)	(35,579)
Net Cash generated/(used) in Financing Activities	(10,798)	(51,079)
Net Increase in Cash and Cash Equivalents (A+B+C)	1,24,758	86,239
Cash and Cash Equivalents at the beginning of the year	1,27,881	41,642
Cash and Cash Equivalents at the end of year (Refer Note No. 3)	2,52,639	1,27,881

Cash and Cash Equivalents at the end of the year comprises of:

(₹ in Lacs)

Particulars	Year ended March 31st, 2023	Year ended March 31st, 2022
Cash on hand	7	21
Balances with Banks - in Current Account	28,407	67,541
Balances with Banks - in Fixed Deposit Accounts having original maturity of upto 3 months	2,24,225	60,319
	2,52,639	1,27,881

Explanations:

The above Statement of Cash Flows has been prepared under the Indirect Method as set out in the Ind AS 7 'Statement of Cash Flows'. This is the Statement of Cash Flows referred to in our report of even date.

For J Kala & Associates

Chartered Accountants
ICAI Firm Registration No. 118769W

Jayesh Kala

Partner
Membership no. 101686

Place: Kolkata

Date : May 9, 2023

For Dass Gupta & Associates

Chartered Accountants
ICAI Firm Registration No. 000112N

Pankaj Mangal

Partner
Membership no. 097890

Place: Kolkata

Date : May 9, 2023

For and on behalf of Srei Equipment Finance Limited

(a Company under Corporate Insolvency Resolution Process by an order dated October 8th, 2021 passed by Hon'ble NCLT, Kolkata)

Rajneesh Sharma

Administrator Appointed Under IBC

Place: Kolkata

Date : May 9, 2023

The Administrator has been appointed under Rule 5(a)(iii) of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 under the Insolvency and Bankruptcy Code, 2016 (IBC or 'the Code'). The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Mr. Rajneesh Sharma, who acts as agent of the Company only and without any personal liability.

Address for Correspondence - 'Vishwakarma', 86C, Topsia Road (South), Kolkata, West Bengal, 700046
Email ID for Correspondence - sreiaadministrator@srei.com

STATEMENT OF CHANGES IN EQUITY

as at March 31st, 2023

A. Equity Share Capital

	(₹ in Lacs)	
	Issued during the year	Reductions during the year
Balance as at April 1st, 2022	-	Balance as at March 31st, 2023
	7,902	7,902
Balance as at April 1st, 2021	-	Balance as at March 31st, 2022
	7,902	7,902

B. Other Equity

Particulars	Reserves and Surplus										Total
	Special Reserve (created pursuant to Section 45-1C of The Reserve Bank of India Act, 1934)	Income Tax Special Reserve (created pursuant to Section 36(1)(viii) of the Income Tax Act, 1961)	Capital Reserve	Securities Premium	Debenture Redemption Reserve	Retained Earnings	Impairment Reserve	Debt Instruments through Other Comprehensive Income	Equity Instruments through Other Comprehensive Income	Effective portion of Cash Flow Hedges	
Balance as at April 1st, 2022	40,822	15,770	2,403	1,97,084	39,824	(14,74,437)	5,70,463	948	-	-	(6,07,123)
Profit/(Loss) after tax for the year	-	-	-	-	-	(11,21,928)	-	-	-	-	(11,21,928)
Other comprehensive income (net of tax)	-	-	-	-	-	(182)	-	(719)	-	-	(901)
Transferred (from)/to retained earnings	-	-	-	-	-	(45,533)	45,533	-	-	-	-
Balance as at March 31st, 2023	40,822	15,770	2,403	1,97,084	39,824	(26,42,080)	6,15,996	229	-	-	(17,29,952)

Particulars	Reserves and Surplus										Total
	Special Reserve (created pursuant to Section 45-1C of The Reserve Bank of India Act, 1934)	Income Tax Special Reserve (created pursuant to Section 36(1)(viii) of the Income Tax Act, 1961)	Capital Reserve	Securities Premium	Debenture Redemption Reserve	Retained Earnings	Impairment Reserve	Debt Instruments through Other Comprehensive Income	Equity Instruments through Other Comprehensive Income	Effective portion of Cash Flow Hedges	
Balance as at April 1st, 2021	40,822	15,770	2,403	1,97,084	39,824	(10,75,165)	4,47,464	1,158	1,061	(14)	(3,29,593)
Profit/(Loss) after tax for the year	-	-	-	-	-	(2,77,292)	-	-	-	-	(2,77,292)
Other comprehensive income (net of tax)	-	-	-	-	-	(42)	-	(210)	-	14	(238)
Transferred (from)/to retained earnings	-	-	-	-	-	(1,21,938)	1,22,999	-	(1,061)	-	-
Balance as at March 31st, 2022	40,822	15,770	2,403	1,97,084	39,824	(14,74,437)	5,70,463	948	-	-	(6,07,123)

Refer Note No. 23 for nature and purpose of reserves.

This is the Statement of Changes in Equity referred to in our report of even date.

For J Kala & Associates
Chartered Accountants
Registration No. 118769W

Jayesh Kala
Partner
Membership no. 101686

Place: Kolkata
Date: May 9, 2023

For Dass Gupta & Associates
Chartered Accountants
ICAI Firm Registration No. 000112N

Pankaj Mangal
Partner
Membership no. 097890

Place: Kolkata
Date: May 9, 2023

For and on behalf of Srei Equipment Finance Limited
(a Company under Corporate Insolvency Resolution Process by ICAI Firm
an order dated October 8th, 2021 passed by Hon'ble NCLT, Kolkata)

Rajneesh Sharma
Administrator Appointed Under IBC

Place: Kolkata
Date: May 9, 2023

The Administrator has been appointed under Rule 5(a)(iii) of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 under the Insolvency and Bankruptcy Code, 2016 (IBC or 'the Code'). The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Mr. Rajneesh Sharma, who acts as agent of the Company only and without any personal liability.

Address for Correspondence - 'Vishwakarma', 86C, Topsia Road (South), Kolkata, West Bengal, 700046
Email ID for Correspondence - sreiaadministrator@srei.com

NOTES TO THE FINANCIAL STATEMENTS

1. CORPORATE INFORMATION

1.1 Background and General Information

Srei Equipment Finance Limited ('the Company'), a wholly owned subsidiary of Srei Infrastructure Finance Limited, is a Public Limited Company domiciled in India and incorporated under the provisions of the Companies Act, 1956. The Company's non-convertible debentures are listed on either Bombay Stock Exchange Limited (BSE) or both BSE and National Stock Exchange of India Limited (NSE). The Company had received a Certificate of Registration from the Reserve Bank of India ('RBI') on September 3, 2008 to commence/carry on the business of Non-Banking Financial Company ('NBFC') without accepting public deposits, classified as Systemically Important NBFC (NBFC-NDSI). Subsequently, the Company has been issued a new certificate by the RBI dated February 19, 2014 consequent to conversion from Private Limited Company to Public Limited Company. The principal business of the Company is financial services. The registration details are as follows:

RBI	N.05.06694
Corporate Identity Number (CIN)	U70101WB2006PLC109898

The registered office of the Company and the principal place of business is "Vishwakarma", 86C, Topsia Road (South), Kolkata- 700046.

These financial statements were approved for issue by the Administrator Appointed Under IBC on May 9, 2023.

1.2 Supersession of Board of Directors and Implementation of Corporate Insolvency Resolution Process

The Reserve Bank of India ('RBI') vide press release dated October 4, 2021 in exercise of the powers conferred under Section 45-IE (1) of the Reserve Bank of India Act, 1934 ('RBI Act') superseded the Board of Directors of the Company ('the Company' or 'SEFL') and appointed an Administrator under Section 45-IE (2) of the RBI Act. Further, RBI, in exercise of powers conferred under Section 45-IE (5) (a) of the RBI Act, constituted a three-member Advisory Committee to assist the Administrator in discharge of his duties.

Thereafter, RBI filed applications for initiation of Corporate Insolvency Resolution Process ('CIRP') against the Company under Section 227 read with clause (zk) of sub-section (2) of Section 239 of the read with Rules 5 and 6 of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 ('FSP Insolvency Rules') before the Hon'ble National Company Law Tribunal, Kolkata Bench ('Hon'ble NCLT'). Hon'ble NCLT vide its order dated October 8, 2021 admitted the application made by RBI for initiation of CIRP against the Company. Further, Hon'ble NCLT gave orders for appointment of Mr. Rajneesh Sharma, as the Administrator to carry out the functions as per the Code and that the management of the Company shall vest in the Administrator. Further, Hon'ble NCLT also retained the three-member Advisory Committee, as aforesaid, for advising the Administrator in the operations of the Company during the CIRP. There has been changes in the composition of the Advisory Committee on June 22, 2022 and January 31, 2023.

The Consolidated Committee of Creditors (CoC) took on record three Resolution Plans received from Prospective Resolution Applicants (PRAs) on January 18, 2023. The three Resolution Plans received by the Consolidated CoC were put to e-voting. The Consolidated CoC took on record the results of the e-voting in CoC meeting held on February 15, 2023, and the resolution plan submitted by National Asset Reconstruction Company Limited (NARCL) was duly approved by CoC by majority voting under Section 30(4) of the IBC read with Regulation 39(3) of CIRP Regulations, 2016, thereby, declaring NARCL as Successful Resolution Applicant (SRA).

The approved resolution plan of NARCL was filed before Adjudicating Authority i.e., Hon'ble NCLT, Kolkata on February 18, 2023 for its approval. The Administrator has also filed all the necessary legal and regulatory approvals before the Adjudicating Authority. The approval of the resolution plan is awaited from the Adjudicating Authority pending certain litigations.

2. SIGNIFICANT ACCOUNTING POLICIES

2.1 Basis of preparation and presentation

The financial statements have been prepared in accordance with Indian Accounting Standards (Ind AS) as per the Companies (Indian Accounting Standards) Rules, 2015 as amended from time to time and notified under Section 133 of the Companies Act, 2013 ('the Act') along with other relevant provisions of the Act, the Master Direction – Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016 ('the NBFC Master Directions'), as amended and notification for Implementation of Indian Accounting Standards vide circular RBI/2019-20/170 DOR (NBFC).CC.PD.No.109/22.10.106/2019-20 dated March 13, 2020 ('RBI Notification for Implementation of Ind AS') issued by RBI.

These financial statements have been prepared on the historical cost basis, except for certain items which are measured at fair values at the end of each reporting period, as explained in the accounting policies below. Historical cost is generally based on the fair value of the consideration given in exchange for goods and services.

The preparation of these financial statements requires the use of certain critical accounting estimates and assumptions that affect the reported amounts of assets and liabilities, revenue and expenses and disclosed amount of contingent liabilities. Areas involving a higher degree of judgement or complexity or areas where assumptions are significant to the Company are discussed in Note No. 2.23 'Significant accounting judgements, estimates and assumptions'.

The management believes that the estimates used in the preparation of these financial statements are prudent and reasonable. Actual results could differ from those estimates and the differences between the actual results and the estimates would be recognised in the periods in which the results are known/materialised.

The financial statements are presented in Indian Rupees (INR) and all values are rounded off to the nearest Lacs, except otherwise indicated. Comparative information has been regrouped/rearranged to accord with changes in presentations made in the current period, except where otherwise stated.

The financial statements of the Company are presented as per Schedule III (Division III) to the Act applicable to NBFCs, as notified by the Ministry of Corporate Affairs ('MCA').

The audited financial statements of the Company for the year ended March 31, 2023 have been taken on record by the Administrator on May 09, 2023 while discharging the powers of the Board of Directors of the Company which were conferred upon him by the RBI press release dated October 4, 2021 and subsequently, powers conferred upon him in accordance with Hon'ble NCLT order dated October 8, 2021. Since the Administrator has taken charge of the affairs of the Company on October 4, 2021, the Administrator is not liable or responsible for any actions and has no personal knowledge of any such actions of the Company prior to his appointment and has relied on the position of the financial results of the Company as they existed on October 4, 2021. Regarding information pertaining to period prior to October 4, 2021 the Administrator has relied upon the explanations, clarifications, certifications, representations and statements made by the Chief Financial Officer, Company Secretary, Chief Business Officer, Chief Risk Officer, Chief Compliance Officer and Legal Head ('the existing officials of the Company'), who were also part of the Company prior to the appointment of the Administrator. It is also incumbent upon the Resolution Professional, under Section 20 of the, to manage the operations of the Company as a going concern. As a part of the CIRP, the Administrator got conducted audits/reviews relating to the processes and compliances of the Company and has also appointed professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code.

The accounting policies for some specific items of financial statements are disclosed in the respective notes to the financial statements. Other significant accounting policies and details of significant accounting assumptions and estimates are set out below in Note No. 2.2 to 2.23.

2.2 Revenue recognition

Revenue is recognised to the extent it is probable that the economic benefits will flow to the Company and the revenue can be reliably measured. Revenue from Operations is recognised in the Statement of Profit and Loss on an accrual basis as stated herein below:

- (a) Interest income for financial assets other than those financial assets classified as at Fair value through profit or loss ("FVTPL") is recognised based on the effective interest rate method. Income from Credit Impaired Financial Assets is recognised on net basis i.e. after considering Impairment Loss Allowance. Interest Income for borrowers whose transactions are determined as fraudulent in nature by the Company is not recognised from the start of the quarter in which the same is determined as fraudulent.
- (b) Penal Interest on delayed payments by customers are treated to accrue only on realisation, due to uncertainty of realisation and are accounted accordingly.
- (c) Income or net gain on fair value changes for financial assets classified as measured at FVTPL and Fair value through Other Comprehensive Income ("FVTOCI") is recognised as discussed in Note No. 2.3.3.
- (d) Finance lease income is allocated to accounting periods so as to reflect a constant periodic rate of return on the Company's net investment outstanding in respect of the leases.
- (e) Interest income on fixed deposits/margin money/pass through certificates is recognised on a time proportion basis taking into account the amount outstanding and the rate applicable.
- (f) Rental income from operating leases is recognised on a straight-line basis over the term of the relevant lease, unless another systematic basis is more representative of the time pattern in which the benefit derived from the leased asset is diminished or the rentals are structured solely to increase in line with expected general inflation to compensate for the Company's expected inflationary cost increases.
- (g) Referral income is recognised when it becomes due under the terms of the relevant mutually agreed arrangement.
- (h) Fees and Commission Income other than those forming part of Interest income are recognised as revenue in the Statement of Profit and Loss, when the performance obligations are satisfied.
- (i) Income from dividend is recognised when the Company's right to receive such dividend is established, it is probable that the economic benefits associated with the dividend will flow to the entity, the dividend does not represent a recovery of part of cost of the investment and the amount of dividend can be measured reliably.
- (j) Income from joint controlled operation is recognised to the extent of the Company's share in jointly controlled operations arising out of sale of units generated as per the terms of the respective power purchase agreements with the State Electricity Boards.
- (k) In case of assignment transactions, as the Company retains the contractual right to receive some of the interest amount due on the transferred assets, the present value of such interest receivable is recorded as 'Interest retained on pools assigned' with corresponding gain recognised in the Statement of Profit and Loss.

2.3 Financial Instruments

Classification of Financial Instruments

The Company classifies its Financial Assets into the following measurement categories:

1. Financial Assets to be measured at amortised cost

2. Financial Assets to be measured at FVTOCI
3. Financial Assets to be measured at FVTPL

The classification depends on the contractual terms of the financial assets' cash flows and the Company's business model for managing financial assets which are explained below:

Business model assessment

The Company determines its business model at the level that best reflects how it manages groups of financial assets to achieve its business objective. The Company's business model is not assessed on an instrument-by-instrument basis, but at a higher level of aggregated portfolios and is based on observable factors.

The business model assessment is based on reasonably expected scenarios without taking 'worst case' or 'stress case' scenarios into account. If cash flows after initial recognition are realised in a way that is different from the Company's original expectations, the Company does not change the classification of the remaining financial assets held in that business model, but incorporates such information when assessing newly originated or newly purchased financial assets going forward.

The Solely Payments of Principal and Interest (SPPI) test

As a second step of its classification process the Company assesses the contractual terms of financial assets to identify whether they meet the SPPI test.

'Principal' for the purpose of this test is defined as the fair value of the financial asset at initial recognition and may change over the life of the financial asset.

In making this assessment, the Company considers whether the contractual cash flows are consistent with a basic lending arrangement i.e. interest includes only consideration for the time value of money, credit risk, other basic lending risks and a profit margin that is consistent with a basic lending arrangement. Where the contractual terms introduce exposure to risk or volatility that are inconsistent with a basic lending arrangement, the related financial asset is classified and measured at FVTPL.

The Company classifies its financial liabilities at amortised cost unless it has designated liabilities at FVTPL or is required to measure liabilities at FVTPL such as derivative liabilities.

2.3.1 Recognition of Financial Instruments:

Financial Assets and Financial Liabilities are recognised when the Company becomes a party to the contractual provisions of the financial instruments. Loans & advances and all other regular way purchases or sales of financial assets are recognised and derecognised on the trade date basis.

2.3.2 Initial Measurement of Financial Instruments:

Financial Assets and Financial Liabilities are initially measured at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities (other than financial assets and financial liabilities at FVTPL) are added to or deducted from the fair value of the financial assets or financial liabilities, as appropriate, on initial recognition. Transaction costs directly attributable to the acquisition of financial assets or financial liabilities at FVTPL are recognised immediately in the Statement of Profit and Loss.

2.3.3 Subsequent Measurement:

(A) Financial Assets

Financial Assets carried at Amortised Cost:

A financial asset is measured at amortised cost if it is held within a business model whose objective is to hold the asset in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

The decision to dispose-off assets under amortised cost category for any of the reasons shall be taken at the level of Asset Liability Committee (ALCO) and other Board level committee.

Financial Assets at Fair Value through FVTOCI:

A financial asset is measured at FVTOCI if it is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Investment in equity instruments that are neither held for trading nor contingent consideration recognised by the Company in a business combination to which Ind AS 103 'Business Combinations' applies, are measured at FVTOCI, where an irrevocable election has been made by management on an instrument-by-instrument basis. These investments are initially measured at fair value plus transaction costs. Subsequently, they are measured at fair value with gains and losses arising from changes in fair value recognised in other comprehensive income ("OCI") and accumulated in the reserves. The cumulative gain or loss is not reclassified to the Statement of Profit and Loss on disposal of the investments. Dividends on such investments are recognised in the Statement of Profit and Loss unless the dividend clearly represents a recovery of part of the cost of the investment.

Debt instruments measured at FVTOCI are subsequently measured at fair value. Interest income under effective interest method, foreign exchange gains and losses and impairment are recognised in the Statement of Profit and Loss. Other net gains and losses are recognised in OCI. On derecognition, gains and losses accumulated in OCI are reclassified to the Statement of Profit and Loss.

Financial Assets at FVTPL:

A financial asset which is not classified as Amortised Cost or FVTOCI is measured at FVTPL. A financial asset that meets the amortised cost criteria or debt instruments that meet the FVTOCI criteria may be designated as at FVTPL upon initial recognition if such designation eliminates or significantly reduces a measurement or recognition inconsistency that would arise from measuring assets or liabilities or recognising the gains and losses on them on different bases. The Company has not designated any debt instrument at FVTPL.

Financial assets at FVTPL are measured at fair value at the end of each reporting period, with any gains or losses arising on re-measurement recognised in the Statement of Profit and Loss.

Effective Interest Rate (EIR) Method:

The Effective Interest Rate Method is a method of calculating the amortised cost of a debt instrument and of allocating interest income or expense over the relevant period. The Effective Interest Rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial asset or financial liability to the gross carrying amount of a financial asset or to the amortised cost of a financial liability on initial recognition.

Impairment of Financial Assets:

The Company applies the expected credit loss model for recognising impairment loss on financial assets measured at amortised cost, debt instruments at FVTOCI, trade receivables, other contractual rights to receive cash or other financial asset, and financial guarantees not designated as at FVTPL.

The Company measures the loss allowance for a financial instrument at an amount equal to the lifetime expected credit losses if the credit risk on that financial instrument has increased significantly since initial recognition. If the credit risk on a financial instrument has not increased significantly since initial recognition, the Company measures the loss allowance for that financial instrument at an amount equal to 12-month expected credit losses.

When making the assessment of whether there has been a significant increase in credit risk since initial recognition, the Company uses the change in the risk of a default occurring over the expected life of the financial instrument instead of the change in the amount of expected credit losses. To make that assessment, the Company compares the risk of a default occurring on the financial instrument as at the reporting date with the risk of a default occurring on the financial instrument as at the date of initial recognition and considers reasonable and supportable information, that is available without undue cost or effort, that is indicative of significant increases in credit risk since initial recognition.

In case of debt instruments measured at FVTOCI, the loss allowance measured in accordance with the above requirements is recognised in OCI with a corresponding effect to the Statement of Profit and Loss but is not reduced from the carrying amount of the financial asset in the Balance Sheet; so the financial asset continues to be presented in the Balance Sheet at its fair value.

No Expected Credit Loss is recognised on equity investments.

For trade receivables or any contractual right to receive cash or another financial asset that result from transactions that are within the scope of Ind AS 115, the Company measures the loss allowance at an amount equal to the expected credit losses.

Further, for the purpose of measuring expected credit loss allowance for trade receivables, the Company has used a practical expedient as permitted under Ind AS 109. The expected credit loss allowance is computed based on a provision matrix which takes into account historical credit loss experience.

Derecognition of Financial Assets:

The Company derecognises a financial asset when the contractual rights to the cash flows from the asset expire, or when it transfers the financial asset and substantially all the risks and rewards of ownership of the asset to another party.

On derecognition of a financial asset accounted under Ind AS 109 in its entirety:

- a) for financial assets measured at amortised cost, the gain or loss is recognised in the Statement of Profit and Loss.
- b) for financial assets measured at FVTOCI, the cumulative fair value adjustments previously taken to reserves are reclassified to the Statement of Profit and Loss unless the asset represents an equity investment in which case the cumulative fair value adjustments previously taken to reserves is reclassified within equity.

If the transferred asset is part of a larger financial asset and the part transferred qualifies for derecognition in its entirety, the previous carrying amount of the larger financial asset shall be allocated between the part that continues to be recognised and the part that is derecognised, on the basis of the relative fair values of those parts on the date of the transfer.

If the Company neither transfers nor retains substantially all the risks and rewards of ownership and continues to control the transferred asset, it recognises its retained interest in the assets and an associated liability for amounts it may have to pay.

If the Company retains substantially all the risks and rewards of ownership of a transferred financial asset, it continues to recognise the financial asset and also recognises a liability for the proceeds received.

Modification/revision in estimates of cash flows of financial assets:

When the contractual cash flows of a financial asset are renegotiated or otherwise modified and the renegotiation or modification does not result in the derecognition of that financial asset in accordance with Ind AS 109, the Company recalculates the gross carrying amount of the financial asset and recognises a modification gain or loss in the Statement of Profit and Loss.

Various quantitative and qualitative factors are considered to determine whether the renegotiated terms are substantially different and whether the same would amount to extinguishment of financial asset and recognition of a new financial asset. The gross carrying amount of the financial asset is recalculated as the present value of the renegotiated or modified contractual cash flows that are discounted at the financial asset's original effective interest rate. Any costs or fees incurred are adjusted to the carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

(B) Financial Liabilities and Equity Instruments:

Classification as Debt or Equity:

Financial liabilities and equity instruments issued are classified according to the substance of the contractual arrangements entered into and the definitions of a financial liability and an equity instrument.

Equity Instruments:

An Equity Instrument is any contract that evidences a residual interest in the assets of the Company after deducting all of its liabilities. Repurchase of the Company's own equity instruments is recognised and deducted directly in equity. No gain or loss is recognised in the Statement of Profit and Loss on the purchase, sale, issue or cancellation of the Company's own equity instruments.

Financial Liabilities:

The Company classifies all financial liabilities as subsequently measured at amortised cost, except for financial liabilities at FVTPL. Such liabilities, including derivatives that are liabilities, shall be subsequently measured at fair value.

Financial liabilities at FVTPL

Financial liabilities at FVTPL include financial liabilities held for trading and financial liabilities designated upon initial recognition as at FVTPL. Financial liabilities are classified as held for trading, if they are incurred for the purpose of repurchasing in the near term. This category also includes derivative financial instruments that are not designated as hedging instruments in hedge relationships as defined by Ind AS 109.

Financial liabilities measured at amortised cost

After initial recognition, interest bearing loans and borrowings are subsequently measured at amortised cost using the EIR method except for those designated in an effective hedging relationship.

Amortised cost is calculated by taking into account any discount or premium and fee or costs that are an integral part of the EIR. The EIR amortisation is included in finance costs in the Statement of Profit and Loss. Any difference between the proceeds (net of transaction costs) and the redemption amount is recognised in profit or loss over the period of the borrowings using the EIR method.

Trade and other payables

A payable is classified as 'trade payable' if it is in respect of the amount due on account of goods purchased or services received in the normal course of business. These amounts represent liabilities for goods and services provided to the Company prior to the end of financial year, which are unpaid. They are recognised initially at their fair value and subsequently measured at amortised cost.

Financial Guarantee Contracts

Financial guarantees issued by the Company are those guarantees that require a payment to be made to reimburse the holder of the guarantee for a loss incurred by the holder because the specified debtor fails to make a payment, when due, to the holder in accordance with the terms of a debt instrument.

Financial guarantee are initially measured at their fair values and, if not designated as at FVTPL, are subsequently measured at the higher of:

- the amount of loss allowance determined in accordance with impairment requirements of Ind AS 109; and
- the amount initially recognised less, when appropriate, the cumulative amount of income recognised in accordance with the principles of Ind AS 115.

Derecognition of financial liabilities:

The Company derecognises financial liabilities when, and only when, the Company's obligations are discharged, cancelled or have expired. An exchange between with a lender of debt instruments with substantially different terms is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. Similarly, a substantial modification of the terms of an existing financial liability (whether or not attributable to the financial difficulty of the debtor) is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. The difference between the carrying amount of the financial liability derecognised and the consideration paid and payable is recognised in the Statement of Profit and Loss.

2.4 Fair value Measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

- a) In the principal market for the asset or liability, or
- b) In the absence of a principal market, in the most advantageous market for the asset or liability

The principal or the most advantageous market must be accessible by the Company.

The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

The Company uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised into Level 1, 2, or 3 based on the degree to which the inputs to the fair value measurements are observable and the significance of the inputs to the fair value measurement in its entirety, which are as follows:

Level 1 financial instruments: Those where the inputs used in the valuation are unadjusted quoted prices from active markets for identical assets or liabilities that the Company has access to at the measurement date. The Company considers markets as active only if there are sufficient trading activities with regards to the volume and liquidity of the identical assets or liabilities and when there are binding and exercisable price quotes available on the Balance Sheet date.

Level 2 financial instruments: Those where the inputs that are used for valuation and are significant, are derived directly or indirectly from observable market data available over the entire period of the instrument's life. Such inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical instruments in inactive markets and observable inputs other than quoted prices such as interest rates and yield curves, implied volatilities, and credit spreads. In addition, adjustments may be required for the condition or location of the asset or the extent to which it relates to items that are comparable to the valued instrument. However, if such adjustments are based on unobservable inputs which are significant to the entire measurement, the Company will classify the instruments as Level 3.

Level 3 financial instruments: Those that include one or more unobservable input that is significant to the measurement as whole.

2.5 Overview of the Expected Credit Loss (ECL) principles

ECL is the probability-weighted estimate of credit losses (i.e., the present value of all cash shortfalls) over the expected life of the financial instrument. A cash shortfall is the difference between scheduled or contractual cash flows and actual expected cash flows. Consequently, ECL subsumes both the amount and timing of payments. A credit loss would arise even when a receivable was realised in full but later than when contractually due.

The Company uses the Expected Credit Loss (ECL) Methodology to assess the impairment on both loan assets and trade receivables. The Company has bucketed its portfolio into different homogeneous categories based on finance amount, as the same reflects similar customer behaviour, and the Probability of Default (PD) of each of the buckets is computed basis such historical data. Based on the historical data, the company has computed the realisable value of the securities hypothecated to it and thus derived the Loss Given Default (LGD). The combination of the PD and LGD is applied on the Exposure at Default (EAD) to compute the ECL provision, which is further adjusted for forward looking information, if any. Additionally, the Company reviews its large exposures to identify cases where the expected credit loss is expected to be higher than that derived from the model and recognises such impairments additionally.

In case of assets identified to be significantly credit-impaired to the extent that default has happened or seems to be a certainty rather than probability, ECL would be determined by directly estimating the receipt of cash flows and timing thereof, and applying net present value (NPV) on the shortfalls.

Unsegmented portfolio for ECL

In case of Loans transferred to the Company under slump exchange, financing was restricted to a large extent to the infrastructure sectors and having limited count over the past years. Considering the limitations of count, ECL is computed on an unsegmented portfolio basis.

Staging:

The loan portfolio would be classified into three stage-wise buckets – Stage 1, Stage 2 and Stage 3 corresponding to the contracts assessed as performing, under-performing and non-performing, in accordance with the Ind AS guidelines.

While the presumption for inter-stage threshold for Stage 1 is 30 days, the Company has rebutted the presumption and has considered 60 days as the threshold. As the borrowers are typically operating in infrastructure sector, where receivables tend to be stretched, notwithstanding whether the principals are government/quasi-government entities or private sector entities. As per current market practice, NBFCs typically tend to be paid later than banks by borrowers since banks control their working capital financing.

Methodology:

The basis of the ECL calculations are outlined below which is intended to be more forward-looking. Key elements of ECL are, as follows:

PD is an estimate of the likelihood of default over a given time horizon. A default may only happen at a certain time over the assessed period, if the facility has not been previously derecognised and is still in the portfolio.

EAD is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and interest, whether scheduled by contract or otherwise, expected drawdowns on committed facilities, and accrued interest from missed payments.

LGD is an estimate of the loss arising in the case where a default occurs at a given time. It is based on the difference between the contractual cash flows due and those that the lender would expect to receive, including from the realisation of any collateral. It is usually expressed as a percentage of the EAD.

The key tenets of Company's methodology are as under:

Past performance as basis for ECL discovery: Company's ECL methodology is based on discovery of the relevant parameters namely EAD, PD and LGD from the company's actual performance of past portfolios.

Write-offs

The Company reduces the gross carrying amount of a financial asset when the Company has no reasonable expectations of recovering a financial asset in its entirety or a portion thereof. Any subsequent recoveries against such loans are credited to the statement of profit and loss.

2.6 Leasing

Leases are classified as finance leases whenever the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee. All other leases are classified as operating leases.

The Company as lessor

Amounts due from lessees under finance leases are recognised as receivables at the amount of the Company's net investment in the leases. Assets given on operating leases are included in Property, Plant and Equipment.

Initial direct costs incurred in negotiating and arranging an operating lease are added to the carrying amount of the leased asset and recognised on a straight-line basis over the lease term.

For the revenue recognition policy on Lease Contracts, refer Note No. 2.2.

The Company as lessee

Assets held under finance leases are initially recognised as assets of the Company at their fair value at the inception of the lease or, if lower, at the present value of the minimum lease payments. The corresponding liability to the lessor is included in the Balance Sheet as a finance lease obligation. Lease payments are apportioned between finance expenses and reduction of the lease obligation so as to achieve a constant rate of interest on the remaining balance of the liability. Finance expenses are recognised immediately in the Statement of Profit and Loss, unless they are directly attributable to qualifying assets, in which case they are capitalised in accordance with the Company's general policy on borrowing costs (see Note No. 2.8 below). Contingent rentals are recognised as expenses in the periods in which they are incurred.

The Company's operating lease asset classes primarily consist of leases for buildings or part thereof. The Company assesses whether a contract contains a lease, at inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company assesses whether: (i) the contract involves the use of an identified asset (ii) the Company has substantially all of the economic benefits from use of the asset through the period of the lease and (iii) the Company has the right to direct the use of the asset.

At the date of commencement of the lease, the Company recognises a right-of-use asset ("ROU") and a corresponding lease liability for all lease arrangements in which it is a lessee, except for leases with a term of twelve months or less (short-term leases). For these short-term leases, the Company recognises the lease payments as an operating expense on a straight-line basis over the term of the lease.

Certain lease arrangements include the options to extend or terminate the lease before the end of the lease term. ROU assets and lease liabilities excludes these options as there is no reasonable certainty that they will be exercised.

The right-of-use assets are initially recognised at cost, which comprises the initial amount of the lease liability plus any initial direct costs. They are subsequently measured at cost less accumulated depreciation and impairment losses.

ROU assets are depreciated from the commencement date on a straight-line basis over the lease term. The lease liability is initially measured at amortised cost at the present value of the future lease payments. The lease payments are discounted using the average cost of borrowing rates in the country of domicile of these leases. Lease liabilities are remeasured with a corresponding adjustment to the related right of use asset if the Company changes its assessment if whether it will exercise an extension or a termination option.

Lease liability and ROU assets have been separately presented in the Balance Sheet and lease payments have been classified as cash flows from financing activities.

2.7 Foreign Currency Transactions

The financial statements are presented in INR in Lacs, being the functional currency of the Company. Functional currency is the currency of the primary economic environment in which the Company operates.

- Initial recognition of all transactions:
Recorded at the rates of exchange prevailing at the dates of the respective transactions.

- Conversion:

Foreign currency monetary items are restated using the exchange rate prevailing at the reporting date.

Non-monetary items (carried at fair value) as on reporting date are restated using the exchange rate prevailing at the date when the fair value was determined. Translation differences on such items are reported as part of the fair value gain or loss on such items.

For non-monetary items (carried at historical cost) as on reporting date restatement is not required.

Foreign Exchange Gains and Losses:

Financial Assets:

The fair value of financial assets denominated in a foreign currency is determined in that foreign currency and translated using the exchange rate prevailing at the reporting date.

- For monetary financial assets measured at amortised cost, FVTOCI or FVTPL and non-monetary financial assets measured at amortised cost or FVTPL, the exchange differences are recognised in the Statement of Profit and Loss except for those which are designated as hedging instruments in a hedging relationship.
- Foreign currency changes for non-monetary financial assets measured at FVTOCI are recognised in OCI.

The fair value of financial assets denominated in a foreign currency is determined in that foreign currency and translated using the exchange rate prevailing at the reporting date.

Financial Liabilities:

The fair value of financial liabilities denominated in a foreign currency is determined in that foreign currency and translated using the exchange rate prevailing at the reporting date.

For monetary financial liabilities measured at amortised cost, FVTOCI or FVTPL and non-monetary financial liabilities measured at amortised cost or FVTPL, the exchange differences are recognised in the Statement of Profit and Loss except for those which are designated as hedging instruments in a hedging relationship. For financial liabilities that are measured as at FVTPL, the foreign exchange component forms part of the fair value gains or losses and is recognised in Statement of Profit and Loss.

Foreign currency changes for non-monetary financial liabilities measured at FVTOCI are recognised in OCI.

2.8 Borrowing costs

Borrowing costs consist of interest and other costs that an entity incurs in connection with the borrowing of funds including interest expense calculated using the effective interest method.

Borrowing costs directly attributable to the acquisition, construction or production of qualifying assets, which are assets that necessarily take a substantial period of time to get ready for their intended use or sale, are added to the cost of those assets, until such time as the assets are substantially ready for their intended use or sale.

Other income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalisation.

All other borrowing costs are recognised in Statement of Profit and Loss in the period in which they are incurred.

2.9 Employee Benefits

(A) Retirement benefit costs and other termination benefits:

Defined Contribution Plans:

Contributions to Provident Fund and Superannuation Fund are considered as defined contribution plans and are charged to the Statement of Profit and Loss based on the amount of contribution required to be made and when services are rendered by the employees.

Defined Benefit Plans:

Gratuity Liability and Long Term compensated absences are defined benefit plans. The cost of providing benefits is determined in accordance with the advice of independent, professionally qualified actuaries, using the projected unit credit method.

Re-measurement, comprising actuarial gains and losses, the effect of the changes to the asset ceiling (if applicable) and the return on plan assets (excluding net interest), is reflected immediately in the Balance Sheet with a charge or credit recognised in OCI in the period in which they occur. Re-measurements recognised in OCI is reflected immediately in retained earnings and is not reclassified to the Statement of Profit and Loss. Past service cost is recognised in the Statement of Profit and Loss in the period of a plan amendment. Net interest is calculated by applying the discount rate at the beginning of the period to the net defined benefit liability or asset. Defined benefit costs are categorised as follows:

- service cost (including current service cost, past service cost, as well as gains and losses on curtailments and settlements);
- net interest expense or income; and
- re-measurement

The Company presents the first two components of defined benefit costs in the Statement of Profit and Loss in the line item 'Employee benefits expense'. Curtailment gains and losses are accounted for as past service costs.

The present value of the defined benefit plan liability is calculated using a discount rate which is determined by reference to market yields at the end of the reporting period on government bonds.

The retirement benefit obligation recognised in the Balance Sheet represents the actual deficit or surplus in the Company's defined benefit plans. Any surplus resulting from this calculation is limited to the present value of any economic benefits available in the form of refunds from the plans or reductions in future contributions to the plans.

(B) Short-term and other long-term employee benefits:

A liability is recognised for benefits accruing to employees in respect of wages and salaries, annual leave and sick leave in the period the related service is rendered at the undiscounted amount of the benefits expected to be paid in exchange for that service.

Liabilities recognised in respect of short-term employee benefits are measured at the undiscounted amount of the benefits expected to be paid in exchange for the related service.

Liabilities recognised in respect of other long-term employee benefits are measured at the present value of the estimated future cash outflows expected to be made by the Company in respect of services provided by employees up to the reporting date.

2.10 Taxation

Income tax expense represents the sum of the tax currently payable and deferred tax.

Current tax

Current Tax is determined at the amount of tax payable in respect of taxable profit for the year as per the Income-tax Act, 1961. Taxable profit differs from 'profit before tax' as reported in the Statement of Profit and Loss because of items of income or expense that are taxable or deductible in other years and items that are never taxable or deductible. The Company's current tax is calculated using tax rate that has been enacted or substantively enacted by the end of the reporting period.

MAT credit is recognised as an asset only when and to the extent there is convincing evidence that the Company will pay normal income tax during the specified period. In the year in which the MAT credit becomes eligible to be recognised as an asset, the said asset is created by way of a credit to the Statement of Profit and Loss and shown as MAT credit entitlement. The Company reviews the same at each balance sheet date and writes down the carrying amount of MAT credit entitlement to the extent there is no longer convincing evidence to the effect that the Company will pay normal income tax during the specified period.

Deferred tax

The Company's deferred tax is calculated using tax rate that are substantively enacted by the end of the reporting period.

Deferred tax is recognised on temporary differences between the carrying amounts of assets and liabilities in the financial statements and the corresponding tax bases used in the computation of taxable profit. Deferred tax liabilities are generally recognised for all taxable temporary differences. Deferred tax assets are generally recognised for all deductible temporary differences to the extent that it is probable that taxable profits will be available against which those deductible temporary differences can be utilised. Such deferred tax assets and liabilities are not recognised if the temporary difference arises from the initial recognition of assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit.

The carrying amount of deferred tax assets is reviewed at the end of each reporting period and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realised, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period.

The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Company expects, at the end of the reporting period, to recover or settle the carrying amount of its assets and liabilities.

Current and deferred tax for the year

Current and deferred tax are recognised in the Statement of Profit and Loss, except when they relate to items that are recognised in OCI or directly in equity, in which case, the current and deferred tax are also recognised in OCI or directly in equity respectively.

2.11 Property, Plant and Equipment

Property, Plant and Equipment shown in the Balance Sheet consist of assets used in operations. Assets used in operations are those used in the provision of services or for administrative purposes, and include assets leased by the Company as lessor under operating leases.

a) Initial and subsequent recognition

Property, Plant and Equipment are initially recognised at purchase price plus directly attributable costs, together with borrowing costs where a long period of construction or adaptation is required before the asset can be brought into service. Cost comprises the purchase price and any directly attributable cost of bringing the asset to its working condition for its intended use.

Subsequent to initial recognition, Property, Plant and Equipment are measured at cost less accumulated depreciation and any impairment losses.

Subsequent costs are included in the asset's carrying amount or recognised as a separate asset, as appropriate, only when it is probable that the future economic benefits associated with the item will flow to the Company and the cost of the item can be measured reliably. The carrying amount of any component accounted for as a separate asset is de-recognised when replaced. All other repairs and maintenance are charged to the Statement of Profit and Loss during the reporting period in which they are incurred.

b) De-recognition

An item of property, plant and equipment is de-recognised upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on the disposal or retirement of an item of property, plant and equipment is determined as the difference between the net disposal proceeds and the carrying amount of the asset and is recognised in the Statement of Profit and Loss.

c) Depreciation

Depreciation of these assets commences when the assets are ready for their intended use. It is recognised so as to amortise the cost of assets (other than freehold land) less their residual values over their useful lives, using the straight-line method.

The estimated useful lives, residual values and depreciation method are reviewed at the end of each reporting period, with the effect of any changes in estimate accounted for on a prospective basis.

Average useful life of the assets determined is as under:

Operating lease Assets

Class of Assets	Useful Life as per the Companies Act 2013	Useful Life as followed by the management
Computer Equipment	3 years/6 years	5 years
Earth Moving Equipment	9 years	7 years
Motor Vehicles	8 years	7 years
Plant and Machinery	15 years/30 years	8 years/15 years
Windmill	22 years	20 years

Own Use Assets

Class of Assets	Useful Life as per the Companies Act 2013	Useful Life as followed by the management
Computer Equipment	3 years/6 years	5 years
Motor Vehicles	8 years	7 years
Plant and Machinery	15 years/22 years	8 years/22 years

Management believes that the revised useful lives of the assets reflect the periods over which these assets are expected to be used.

Assets held under finance leases are depreciated over their expected useful lives on the same basis as owned assets. However, when there is no reasonable certainty that ownership will be obtained by the end of the lease term, assets are depreciated over the shorter of the lease term and their useful lives.

Leasehold assets including improvements are amortised over estimated useful life or lease period, whichever is lower. Freehold Land is not depreciated.

Depreciation on assets purchased/sold during the period is recognised on a pro-rata basis.

2.12 Intangible Assets

Intangible assets with finite useful lives that are acquired separately are carried at cost less accumulated amortisation and accumulated impairment losses. Amortisation is recognised on a straight-line basis over their estimated useful lives.

Useful life of 5 years is used in the calculation of amortisation for Software.

Software includes license amortised over license life or 5 years whichever is earlier.

The estimated useful life and amortisation method are reviewed at the end of each reporting period, with the effect of any changes in estimate being accounted for on a prospective basis.

An intangible asset is de-recognised on disposal, or when no future economic benefits are expected from use or disposal. Gains or losses arising from de-recognition of an intangible asset, measured as the difference between the net disposal proceeds and the carrying amount of the asset are recognised in the Statement of Profit and Loss when the asset is de-recognised.

2.13 Impairment of tangible and intangible assets

At the end of each reporting period, the Company reviews the carrying amounts of its tangible and intangible assets to determine whether there is any indication that those assets have suffered an impairment loss. If any such indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss (if any). When it is not possible to estimate the recoverable amount of an individual asset, the Company estimates the recoverable amount of the cash-generating unit to which the asset belongs.

Intangible assets with indefinite useful lives and intangible assets not yet available for use are tested for impairment on an annual basis, and whenever there is an indication that the asset may be impaired.

Recoverable amount is the higher of fair value less costs of disposal and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset for which the estimates of future cash flows have not been adjusted.

If the recoverable amount of an asset (or cash-generating unit) is estimated to be less than its carrying amount, the carrying amount of the asset (or cash-generating unit) is reduced to its recoverable amount. An impairment loss is recognised immediately in the Statement of Profit and Loss.

When an impairment loss subsequently reverses, the carrying amount of the asset (or a cash-generating unit) is increased to the revised estimate of its recoverable amount, but so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognised for the asset (or cash-generating unit) in prior years. A reversal of an impairment loss is recognised immediately in the Statement of Profit and Loss.

2.14 Provisions, Contingent Liabilities and Contingent Assets

Provisions are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, it is probable that the Company will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation.

The amount recognised as a provision is the best estimate of the consideration required to settle the present obligation at the end of the reporting period, taking into account the risks and uncertainties surrounding the obligation. If the effect of the time value of money is material, provisions are discounted using a current pre-tax rate that reflects, when appropriate, the risks specific to the liability. When discounting is used, the increase in the provision due to the passage of time is recognised as a finance cost.

When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, a receivable is recognised as an asset if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured reliably.

A provision for onerous contracts is recognised when the expected benefits to be derived by the Company from a contract are lower than the unavoidable cost of meeting its obligations under the contract. The provision is measured at the present value of the lower of the expected cost of terminating the contract and the expected net cost of continuing with the contract.

In case of litigations, provision is recognised once it has been established that the Company has a present obligation based on information available up to the date on which the Company's financial statements are finalised and may in some cases entail seeking expert advice in making the determination on whether there is a present obligation.

Contingent Liabilities

Contingent liability is a possible obligation that arises from past events whose existence will be confirmed by the occurrence or non-occurrence of one or more uncertain future events beyond the control of the Company or a present obligation that is not recognised because it is not probable that an outflow of resources will be required to settle the obligation. A contingent liability also arises in extremely rare cases where there is a liability that cannot be recognised because it cannot be measured reliably. The Company does not recognise a contingent liability but discloses its existence in the financial statements.

Contingent Assets

Contingent assets are not recognised in the financial statements, but are disclosed where an inflow of economic benefits is probable.

2.15 Cash and Cash Equivalents

Cash and Cash Equivalents comprise of cash in hand and balances with banks, cheques on hand, remittances in transit and short-term investments with an original maturity of three months or less that are readily convertible to known amount of cash and which are subject to an insignificant risk of change in value.

2.16 Segment Reporting

Operating Segments are reported in a manner consistent with the internal reporting provided to the Chief Operating Decision Maker (CODM). The CODM assess the financial performance and position of the Company and makes strategic decisions.

The Company is predominantly engaged in a single reportable segment of 'Financial Services' as per the Ind AS 108 - Segment Reporting.

2.17 Earnings per share

The Company reports basic and diluted earnings per share in accordance with Ind AS 33 on Earnings per share. Basic earnings per share is calculated by dividing the net profit or loss for the period attributable to equity shareholders by the weighted average number of equity shares outstanding during the year.

Diluted earnings per equity share is computed by dividing the net profit attributable to the equity holders of the Company by the weighted average number of equity shares considered for deriving basic earnings per equity share and also the weighted average number of equity shares that could have been issued upon conversion of all dilutive potential equity shares. The dilutive potential equity shares are adjusted for the proceeds receivable had the equity shares been actually issued at fair value (i.e. the average market value of the outstanding equity shares). Dilutive potential equity shares are deemed converted as of the beginning of the period, unless issued at a later date. Dilutive potential equity shares are determined independently for each period presented.

2.18 Repossessed Assets and Assets Acquired in Satisfaction of Debt

Repossessed assets and assets acquired in satisfaction of debt are those assets whose carrying amount is recovered principally through a sale transaction rather than through continuing use. These assets are disclosed as part of 'other non-financial assets' and are carried at the lower of their carrying amount and fair value less costs to sell.

2.19 Offsetting Financial Instruments

Financial assets and liabilities are offset and the net amount is reported in the Balance Sheet where there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis or realise the assets and settle the liabilities simultaneously.

2.20 Derivative Financial Instruments

The Company enters into a variety of derivative financial instruments to manage its exposure to interest rate and foreign exchange rate risks, including foreign exchange forward contracts, interest rate swaps and cross currency swaps. Further details of derivative financial instruments are disclosed in notes to the financial statements.

Derivatives are initially recognised at fair value at the date the derivative contracts are entered into and are subsequently re-measured to their fair value at the end of each reporting period. The resulting gain or loss is recognised in the Statement of Profit and Loss immediately unless the derivative is designated and effective as a hedging instrument, in which event the timing of the recognition in the Statement of Profit and Loss depends on the nature of the hedging relationship and the nature of the hedged item.

2.21 Embedded derivatives

Derivatives embedded in non-derivative host contracts that are not financial assets within the scope of Ind AS 109 are treated as separate derivatives when their risks and characteristics are not closely related to those of the host contracts and the host contracts are not measured at FVTPL.

2.22 Hedge Accounting

The Company designates certain derivatives, in respect of foreign currency risk and interest rate risk, as cash flow hedges. Hedges of foreign exchange risk on firm commitments are accounted for as cash flow hedges.

At the inception of the hedge relationship, the entity documents the relationship between the hedging instrument and the hedged item, along with its risk management objectives and its strategy for undertaking various hedge transactions. Furthermore, at the inception of the hedge and on an ongoing basis, the Company documents whether the hedging instrument is highly effective in offsetting changes in cash flows of the hedged item attributable to the hedged risk.

Cash flow hedges

The effective portion of changes in the fair value of the designated portion of derivatives that qualify as cash flow hedges is recognised in OCI and accumulated under the heading of 'Effective portion of cash flow hedges'. The gain or loss relating to the ineffective portion is recognised immediately in the Statement of Profit and Loss, and is included in the 'Net gain on fair value changes' or 'Net loss on fair value changes' line item.

Amounts previously recognised in OCI and accumulated in equity relating to effective portion as described above are reclassified to the Statement of Profit and Loss in the periods when the hedged item affects the Statement of Profit and Loss, in the same line as the recognised hedged item.

Hedge accounting is discontinued when the hedging instrument expires or is sold, terminated, or exercised, or when it no longer qualifies for hedge accounting. Any gain or loss recognised in OCI and accumulated in equity at that time remains in equity and is recognised when the forecast transaction is ultimately recognised in the Statement of Profit and Loss. When a forecast transaction is no longer expected to occur, the gain or loss accumulated in equity is recognised immediately in the Statement of Profit and Loss.

2.23 Significant accounting judgements, estimates and assumptions

The preparation of financial statements in conformity with the Ind AS requires the management to make judgments, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities and the accompanying disclosure and the disclosure of contingent liabilities, at the end of the reporting period. Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimates are revised and future periods are affected. Although these estimates are based on the management's best knowledge of current events and actions, uncertainty about these assumptions and estimates could result in the outcomes requiring a material adjustment to the carrying amounts of assets or liabilities in future periods.

In particular, information about significant areas of estimation, uncertainty and critical judgments in applying accounting policies that have the most significant effect on the amounts recognised in the financial statements is included in the following notes:

2.23.1. Expected credit loss on loans and advances

The Company has used its judgement in determining various parameters of expected credit loss. These parameters includes defining pools, staging, default, discount rates, expected life, significant increase in credit risk, amount and timing of future cash flows. In estimating these cash flows, the Company makes judgement about the realisable value of the securities hypothecated/mortgaged to it, based on the historical data and/or independent valuation reports.

These assumptions are based on the assumptions about a number of factors and actual results may differ, resulting in future changes to the impairment allowance.

A collective assessment of impairment takes into account data from the loan portfolio (such as credit quality, nature of assets underlying assets financed, levels of arrears, credit utilization, loan to collateral ratios etc.), and the economic data (including levels of unemployment, country risk and performance of different individual groups). These critical assumptions have been applied consistently to all periods presented.

2.23.2. Business Model Assessment

Classification and measurement of financial assets depends on the results of the SPPI and the business model test. The Company determines the business model at a level that reflects how groups of financial assets are managed together to achieve a particular business objective. The

Company monitors financial assets measured at amortised cost or at FVTOCI that are derecognised prior to their maturity to understand the reason for their disposal and whether the reasons are consistent with the objective of the business for which the asset was held. Monitoring is part of the Company's continuous assessment of whether the business model for which the remaining financial assets are held continues to be appropriate and if it is not appropriate whether there has been a change in business model and so a prospective change to the classification of those assets.

2.23.3. Hedge Designation

The appropriateness of the designation of certain derivative instruments such as cash flow hedges, and the measurement of hedge effectiveness at the inception/origination of the transaction.

2.23.4. Provisions other than ECL on loans and advances

Provisions are held in respect of a range of future obligations such as employee entitlements, litigation provisions, etc. Some of the provisions involve significant judgement about the likely outcome of various events and estimated future cash flows. The measurement of these provisions involves the exercise of management judgements about the ultimate outcomes of the transactions.

2.23.5. Fair value measurement

When the fair values of financial assets and financial liabilities recorded in the Balance Sheet cannot be measured based on quoted prices in active markets, their fair value is measured using various valuation techniques. The inputs to these models are taken from observable markets where possible, but where this is not feasible, a degree of judgment is required in establishing fair values. Judgments include considerations of inputs such as liquidity risk, credit risk and volatility. Changes in assumptions about these factors could affect the reported fair value of financial instruments.

2.23.6. Identification of Related Parties

Related Parties for the purpose of Companies Act, 2013 and relevant Ind AS, is identified by the Company, for necessary compliance/reporting/disclosures etc, as per the Board approved Related Party Transactions (RPT) Policy.

2.24 Recent pronouncements

Ministry of Corporate Affairs ("MCA") notifies new standard or amendments to the existing standards under Companies (Indian Accounting Standards) Rules as issued from time to time. On March 31, 2023, MCA amended the Companies (Indian Accounting Standards) Rules, 2015 by issuing the Companies (Indian Accounting Standards) Amendment Rules, 2023, applicable from April 1, 2023, as below:

Ind AS 1 – Presentation of Financial Statements

The amendments require companies to disclose their material accounting policies rather than their significant accounting policies. Accounting policy information, together with other information, is material when it can reasonably be expected to influence decisions of primary users of general purpose financial statements. The Company does not expect this amendment to have any significant impact in its financial statements.

Ind AS 12 – Income Taxes

The amendments clarify how companies account for deferred tax on transactions such as leases and decommissioning obligations. The amendments narrowed the scope of the recognition exemption in paragraphs 15 and 24 of Ind AS 12 (recognition exemption) so that it no longer applies to transactions that, on initial recognition, give rise to equal taxable and deductible temporary differences. The Company does not expect this amendment to have any significant impact in its financial statements.

Ind AS 8 – Accounting Policies, Changes in Accounting Estimates and Errors

The amendments will help entities to distinguish between accounting policies and accounting estimates. The definition of a change in accounting estimates has been replaced with a definition of accounting estimates. Under the new definition, accounting estimates are "monetary amounts in financial statements that are subject to measurement uncertainty". Entities develop accounting estimates if accounting policies require items in financial statements to be measured in a way that involves measurement uncertainty. The Company does not expect this amendment to have any significant impact in its financial statements.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

3. Cash and Cash Equivalents

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
Cash on hand	7	21
Balances with Banks - in Current Account #	28,407	67,541
Balances with Banks - in Fixed Deposit Accounts having original maturity of upto 3 months (Including accrued interest)	2,24,225	60,319
Total	2,52,639	1,27,881

Includes ₹ 2,589 Lacs pertaining to a cash credit account with a bank, having a debit balance as at March 31st, 2023 (March 31st, 2022 : ₹ 5,097 Lacs)

4. Bank Balance other than above

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
Balance with Banks - in Fixed Deposit Accounts having original maturity of more than 3 months *(Including accrued interest)	12,993	13,173
Earmarked Balances	5,176	5,088
Total	18,169	18,261

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
Under lien #:		
- Letter of Credit/Bank guarantee	8,194	9,917
- Borrowings	40	38
- Others	2,729	2,697

Does not include Interest accrued but not due as at March 31st, 2023 ₹ 138 Lacs (March 31st, 2022 : ₹ 204 Lacs)

(i) Changes in Cash Flows from Financing Activities

(₹ in Lacs)

Particulars	As at March 31st, 2022	Movement**		As at March 31st, 2023
		Cash	Non-Cash	
Debt Securities	2,59,552		392	2,59,944
Borrowings (Other than Debt Securities)	26,76,863	(10,773)	3,250	26,69,340
Subordinated Liabilities	2,61,581		877	2,62,458
Total	31,97,996	(10,773)	4,519	31,91,742

** Includes adjustments on account of effective interest rate and other adjustments

(₹ in Lacs)

Particulars	As at March 31st, 2021	Movement**		As at March 31st, 2022
		Cash	Non-Cash	
Debt Securities	2,44,148	-	15,404	2,59,552
Borrowings (Other than Debt Securities)	26,47,553	(51,120)	80,430	26,76,863
Subordinated Liabilities	2,45,531	41	16,009	2,61,581
Total	31,37,232	(51,079)	1,11,843	31,97,996

** Includes adjustments on account of effective interest rate and other adjustments

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

5. Receivables:
(I) Trade Receivables

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
(a) Considered good - Secured	-	-
Less: Allowance for impairment loss allowance	-	-
(b) Considered good - Unsecured	130	3,166
Less: Allowance for impairment loss allowance	5	70
	125	3,096
(c) Trade Receivables which have significant increase in credit risk	23	73
Less: Allowance for impairment loss allowance	2	1
	21	72
(d) Credit impaired	-	-
Less: Allowance for impairment loss allowance	-	-
Total	146	3,168

(a) In determining the allowances for credit losses of trade receivables, the Company has used a practical expedient by computing the expected credit loss allowance based on a provision matrix. The provision matrix takes into account historical credit loss experience. The expected credit loss allowance is based on the ageing of the receivables that are due and rates used in the provision matrix.

(b) Trade Receivables ageing schedule as at March 31st, 2023

(₹ in Lacs)

Particulars	Outstanding for following periods from due date of payment					Total
	Less than 6 months	6 months- 1 year	1-2 years	2-3 years	More than 3 years	
(i) Undisputed Trade Receivables - considered good	125	-	-	-	-	125
(ii) Undisputed Trade Receivables -which have significant increase in credit risk	21	-	-	-	-	21
(iii) Undisputed Trade Receivables -credit impaired	-	-	-	-	-	-
(iv) Disputed Trade Receivables - considered good	-	-	-	-	-	-
(v) Disputed Trade Receivables -which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade Receivables - credit impaired	-	-	-	-	-	-
Total	146	-	-	-	-	146

Trade Receivables ageing schedule as at March 31st, 2022

(₹ in Lacs)

Particulars	Outstanding for following periods from due date of payment					Total
	Less than 6 months	6 months- 1 year	1-2 years	2-3 years	More than 3 years	
(i) Undisputed Trade Receivables - considered good	3,096	-	-	-	-	3,096
(ii) Undisputed Trade Receivables -which have significant increase in credit risk	72	-	-	-	-	72
(iii) Undisputed Trade Receivables -credit impaired	-	-	-	-	-	-
(iv) Disputed Trade Receivables - considered good	-	-	-	-	-	-
(v) Disputed Trade Receivables -which have significant increase in credit risk	-	-	-	-	-	-
(vi) Disputed Trade Receivables - credit impaired	-	-	-	-	-	-
Total	3,168	-	-	-	-	3,168

(c) Movements in Expected Credit Losses Allowance is as below:

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
Balance at the beginning of the year	71	27
Charge in Statement of Profit and Loss	7	49
Utilized during the year	(71)	(5)
Balance at the end of the year	7	71

(d) Ageing of Trade Receivables and Credit Risk arising therefrom is as below:

(₹ in Lacs)

	As at March 31st, 2023		
	Gross carrying amount	Allowance for credit loss	Net carrying amount
Overdue till three months	153	7	146
Overdue between three to six months	-	-	-
Overdue between six months to one year	-	-	-
More than 1 year overdue	-	-	-
	153	7	146

	As at March 31st, 2022		
	Gross carrying amount	Allowance for credit loss	Net carrying amount
Overdue till three months	3,239	71	3,168
Overdue between three to six months	-	-	-
Overdue between six months to one year	-	-	-
More than 1 year overdue	-	-	-
	3,239	71	3,168

The contractual amount outstanding on financial assets that were written off during the reporting period but are still subject to enforcement activity is ₹ 2,200 Lacs (March 31st, 2022 ₹ Nil).

The change in Expected Credit Loss Allowance of the portfolio was driven by a change in the size of the portfolio and movements between age buckets as a result of increase or decrease in credit risk of the receivables.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

6. Loans

(₹ in Lacs)

Particulars	As at March 31st, 2023					As at March 31st, 2022						
	Amortised Cost		At Fair Value			Amortised Cost		At Fair Value				
	(1)	(2)	(3)	(4)	(5=2+3=4)	(6)	(7)	(8)	(9)	(10)=(7)+(8)+(9)		
(A)												
(i) Term Loans	27,06,460	2,687	19,091	-	21,778	27,28,238	27,59,046	16,462	39,187	-	55,649	28,14,695
(ii) Leasing (Refer Note No. 6.1)	2,633	-	-	-	-	2,633	6,140	-	-	-	-	6,140
(iii) Others												
Inter-Corporate Deposits	25,848	-	-	-	-	25,848	25,901	-	-	-	-	25,901
Total (A) Gross	27,34,941	2,687	19,091	-	21,778	27,56,719	27,91,087	16,462	39,187	-	55,649	28,46,736
Less: Impairment loss allowance	17,94,334	-	-	-	-	17,94,334	7,99,611	-	-	-	-	7,99,611
Total (A) Net	9,40,607	2,687	19,091	-	21,778	9,62,385	19,91,476	16,462	39,187	-	55,649	20,47,125
(B)												
(i) Secured by tangible assets/ cash flows*	25,68,888	2,687	19,091	-	21,778	25,90,666	25,91,496	16,462	39,187	-	55,649	26,47,145
(ii) Unsecured	1,66,053	-	-	-	-	1,66,053	1,99,591	-	-	-	-	1,99,591
Total (B) Gross	27,34,941	2,687	19,091	-	21,778	27,56,719	27,91,087	16,462	39,187	-	55,649	28,46,736
Less: Impairment loss allowance	17,94,334	-	-	-	-	17,94,334	7,99,611	-	-	-	-	7,99,611
Total (B) Net	9,40,607	2,687	19,091	-	21,778	9,62,385	19,91,476	16,462	39,187	-	55,649	20,47,125
(C)												
In India												
(i) Public Sector	732	-	-	-	-	732	1,078	-	-	-	-	1,078
(ii) Others	27,34,209	2,687	19,091	-	21,778	27,55,987	27,90,009	16,462	39,187	-	55,649	28,45,658
Total (C) Gross	27,34,941	2,687	19,091	-	21,778	27,56,719	27,91,087	16,462	39,187	-	55,649	28,46,736
Less: Impairment loss allowance	17,94,334	-	-	-	-	17,94,334	7,99,611	-	-	-	-	7,99,611
Total (C) Net	9,40,607	2,687	19,091	-	21,778	9,62,385	19,91,476	16,462	39,187	-	55,649	20,47,125

* Loans are secured by underlying hypothecated assets/receivables/immovable properties and in certain cases, are additionally secured by pledge of equity shares of the borrowers by way of collateral security. Exposures which are secured by charge over future toll revenue/cash flows/receivables etc. have been considered as secured. Securities created by the borrowers, against loan assets are based on valuation of the underlying assets, where applicable, carried out by an external valuer and relied upon. Also refer Note No. 63 for valuation of the assets of the Company and assets/collateral held as securities.

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

6. Loans (continued)
i. An analysis of changes in the gross carrying amount of loans is as follows:

Particulars	As at March 31st, 2023				As at March 31st, 2022					
	Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount - opening balance	5,82,898	1,00,145	21,24,506	-	28,07,549	8,09,825	95,852	18,51,525	-	27,57,202
New assets originated or purchased/net disbursement @@	14,323	-	-	-	14,323	107	-	-	-	107
Assets derecognised or repaid (excluding write offs and includes interest accruals adjusted) #	(10,602)	3,063	(37,421)	-	(44,960)	(31,625)	4,569	(2,935)	-	(29,991)
Effective interest on net carrying amount	-	-	49,723	-	49,723	-	-	1,20,669	-	1,20,669
Other Balances (Refer Note below)	82,619	-	-	-	82,619	-	-	-	-	-
Transfers to Stage 1	600	(208)	(392)	-	-	2,02,720	(857)	(2,01,863)	-	-
Transfers to Stage 2	(3,571)	3,582	(11)	-	-	(7,032)	10,442	(3,410)	-	-
Transfers to Stage 3	(5,87,520)	(1,02,977)	6,90,497	-	-	(3,73,747)	(9,701)	3,83,448	-	-
Amounts written off	(9,607)	(7)	(79,393)	-	(89,007)	(17,350)	(160)	(22,928)	-	(40,438)
Gross carrying amount - closing balance @	69,140	3,598	27,47,509	-	28,20,247	5,82,898	1,00,145	21,24,506	-	28,07,549

Note: Other balances includes shortfall in payment to Company lenders who were assigned the pool loans (Refer Note No.61)

@ Excludes gross carrying amount of loans designated at fair value through profit or loss amounting to ₹19,091 Lacs (March 31st, 2022 ₹ 39,187 Lacs) out of which ₹19,091 Lacs (March 31st, 2022 ₹ 25,924 Lacs) is classified as Stage 3 assets.

@@ On conversion of investment to loan.

Represents balancing figure.

- ii. Reconciliation of ECL balance is given below: *

Particulars	As at March 31st, 2023				As at March 31st, 2022					
	Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance - opening balance	35,573	4,174	7,60,517	-	8,00,264	36,049	4,395	5,83,598	-	6,24,042
New assets originated or purchased/net disbursement	3,111	-	-	-	3,111	1	-	-	-	1
Impact on year end ECL of Exposures transferred between stages during the year and reversal of ECL on account of Recovery #	(9,665)	169	10,67,624	-	10,58,128	(20,482)	19	2,07,707	-	1,87,244
Transfers to Stage 1	12,417	(52)	(12,365)	-	-	34,869	(128)	(34,741)	-	-
Transfers to Stage 2	(80)	95	(15)	-	-	(63)	708	(645)	-	-
Transfers to Stage 3	(27,914)	(3,930)	31,844	-	-	(13,843)	(780)	14,623	-	-
Amounts written off	(451)	(1)	(66,487)	-	(66,938)	(958)	(40)	(10,025)	-	(11,023)
ECL allowance - closing balance	12,991	455	17,81,118	-	17,94,564	35,573	4,174	7,60,517	-	8,00,264

* Includes ECL allowance of ₹ 7,541 Lacs (March 31st, 2022 ₹ 6,273 Lacs) on off balance sheet exposure.

* Includes ECL allowance created on loan assets measured through other comprehensive income of ₹ 229 Lacs (March 31st, 2022 ₹ 653 Lacs).

Represents balancing figure.

- iii. The contractual amount outstanding on loan assets that were written off during the reporting period but are still subject to enforcement activity is ₹ 59,186 Lacs (March 31st, 2022 ₹ 5,090 Lacs).

iv. The change in Expected Credit Loss Allowance of the portfolio was driven by a change in the size of the portfolio, change in the composition of the portfolio and movements between stages as a result of increase or decrease in credit risk of the borrowers.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

6.1 In the capacity of lessor (Finance Lease)

The Company has given assets under finance lease arrangement for periods ranging between 1 to 6 years. Such arrangement does not have clause for contingent rent and hence, the Company has not recognised any contingent rent as income during the year.

The details of gross Investments, unearned finance income and future minimum lease payments in respect of the above non-cancellable finance lease are as follows:

Gross Investments

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
i. not later than one year	2,996	4,430
ii. later than one year and not later than five years	932	3,226
iii. later than five years	-	-
Total	3,928	7,656

Unearned finance Income

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
i. not later than one year	304	1,159
ii. later than one year and not later than five years	41	358
iii. later than five years	-	-
Total	345	1,517

Minimum lease payments

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
i. not later than one year	2,692	3,271
ii. later than one year and not later than five years	890	2,868
iii. later than five years	-	-
Total	3,582	6,139

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

7. Investments

Particulars	As at March 31st, 2023													
	As at March 31st, 2023					As at March 31st, 2022								
	Amortised Cost	Through Other Comprehensive Income	Through profit or less	Designated at fair value through profit or loss	Subtotal	Others	Total	Amortised Cost	Through Other Comprehensive Income	Through profit or less	Designated at fair value through profit or loss	Subtotal	Others	Total
(1)	(2)	(3)	(4)	(5=2+3+4)	(6)	(7)=(1)-(5)+(6)	(1)	(2)	(3)	(4)	(5)=(2)+(3)+(4)	(6)	(7)=(1)-(5)+(6)	
Debt Securities*	18,572	-	9,125	-	9,125	-	27,697	16,574	-	57,812	-	57,812	-	74,386
Equity Instruments**	-	-	44,543	-	44,543	-	44,543	-	-	57,900	-	57,900	-	57,900
In Units of Trusts and Scheme of Venture Funds***@	-	-	1,090	-	1,090	-	1,090	-	-	908	-	908	-	908
Total Gross (A)	18,572	-	54,758	-	54,758	-	73,330	16,574	-	1,16,620	-	1,16,620	-	1,33,194
(i) Overseas Investments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
(ii) Investments in India	18,572	-	54,758	-	54,758	-	73,330	16,574	-	1,16,620	-	1,16,620	-	1,33,194
Total (B)	18,572	-	54,758	-	54,758	-	73,330	16,574	-	1,16,620	-	1,16,620	-	1,33,194
Less: Impairment loss allowance (C)	9,590	-	-	-	-	-	9,590	9,590	-	-	-	-	-	9,590
Total - Net D = (A)-(C)	8,982	-	54,758	-	54,758	-	63,740	6,984	-	1,16,620	-	1,16,620	-	1,23,604

* 950 nos. Non-Convertible Debentures (NCD's) having face value ₹ 10,00,000 each issued by Fortis Healthcare Holdings Private Ltd were received from Srei Infrastructure Finance Limited (SIFL) by way of slump exchange to the Company through a Business Transfer Agreement ("BTA") (Refer Note No. 64). Since these NCD's are matured, the depository has rejected the transfer request given by SIFL in favour of the Company. Therefore, these NCD's are being held by SIFL for the benefit of the Company.

** Refer Note No. 76 and 63(ii)

*** Anagha Steel Marketing Limited (erstwhile Essar Steel Marketing Limited and formerly Essar Pellets Marketing Limited) had against a loan granted by SIFL pledged 32,57,400 units of Infrastructure Project Development Fund (IPDF) having face value ₹ 100/- each as security for the loan. Pursuant to the BTA (Refer Note No. 64) the said Loan was transferred to the Company. Due to non-payment of the dues by Anagha Steel Marketing Limited, the pledge was invoked by virtue of which the units were transferred to SIFL on February 24th, 2022. SIFL continues to hold the units on behalf of the Company. Further, the Company has initiated the process to get the units transferred in its name.

@ Fair Valuation of Infrastructure Project Development Fund (IPDF) units investment is based on last available valuation report of dated October 19, 2022.

* Non Principal Protected Debentures (NPPD) issued by Assets Care & Reconstruction Enterprise Limited were unilaterally redeemed from SEFL Demat account by respective issuer by using a auto corporate action dated May 27, 2022 for which the necessary accounting has not been considered in books pending clarifications/relevant documents.

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

8. Other Financial Assets

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
Security Deposits		
To Related Parties	17,350	17,350
Less: Impairment loss allowance on Security Deposits to Related Parties	(15,705)	-
To Others	992	1,047
Less: Impairment loss allowance on Security Deposits to Others	(708)	(7,739)
Rental accrued but not due	546	19
Less: Impairment loss allowance for Rental accrued but not due [Refer Note No. 5(l)(a)]	(19)	(2)
Interest retained on Pool Assigned	591	5,753
Less: Impairment loss allowance for Interest retained on Pool Assigned	(193)	(1,351)
Claims Receivable (measured at fair value through profit or loss) #	62,196	72,542
Loan to Employees	17	54
Less: Impairment loss allowance on Loan to Employee	(2)	-
Others ##	749	2,704
Less: Impairment loss allowance on Others	(117)	-
Total	65,697	90,531

Amount as at March 31st, 2023 represents fair value of claims assigned in favour of Company in satisfaction of Debt and the said amount is subject matter of legal proceedings.

Includes receivables from the lenders on account of 'interest on interest' charged by the lenders during the moratorium period, i.e. March 1st, 2020 to August 31st, 2020 in conformity with the Hon'ble Supreme Court of India's judgement in the matter of Small Scale Industrial Manufacturers Association vs UOI & Ors. and other connected matters on March 23rd, 2021 amounting to ₹ Nil (March 31st, 2022 : ₹ 1,064 Lacs) and also includes amount receivable from holding Company, Srei Infrastructure Finance Limited (SIFL) amounting to ₹ 107 Lacs excluding impairment loss allowance of ₹ 32 Lacs (March 31st, 2022 : ₹ Nil).

9. Current Tax Assets (Net)

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
Security Deposits		
Advance income tax [net of Income tax provision of ₹ 32,596 Lacs (March 31st, 2022 : ₹ 32,596 Lacs)]	14,630	24,501
Total	14,630	24,501

9(i) Income Tax Expense

The reconciliation of estimated income tax to income tax expense for current and previous year is as below:

(₹ in Lacs)		
Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Profit/(Loss) Before Tax	(11,21,928)	(2,67,485)
Statutory Income Tax Rate	25.168%	25.168%
Expected income tax expense at statutory income tax rate	(2,82,367)	(67,321)
Adjustments for :		
(i) Reversal of MAT Credit entitlement due to adoption of new tax regime		
(ii) Deferred Tax Asset not recognised on loss under Income Tax	2,50,313	14,413
(iii) Expenses allowable for tax purpose when paid	2,062	38,130
(iv) Provision against disputed statutory dues under litigation (Refer Note No. 71)	-	9,807
(v) Other adjustments	29,992	14,778
Total Tax Expense recognised in the Statement of Profit and Loss	9,807	9,807

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

10. Property, Plant and Equipment

Particulars	Gross Block			Depreciation/Amortisation/Impairment			Net book value (₹ in Lacs)
	As at April 1st, 2022	Additions	Disposals and other adjustments	As at April 1st, 2022	Amortisation Charge	Impairment Charge	
Assets for Own use							
Land- Freehold	3,307	-	-	3,307	-	-	3,307
Buildings*	3,973	-	-	3,973	77	-	3,700
Furniture and fixtures	3,156	1	28	3,129	473	24	2,622
Plant and Machinery	22,474	-	22,474	5,115	1,023	-	6,138
Motor vehicles	402	-	-	402	47	-	320
Leasehold Improvements	2,324	-	-	1,573	511	-	2,084
Computers and office equipment	1,099	1	426	1,039	37	425	651
(A)	36,735	2	454	36,283	2,168	449	11,728
Assets for Operating lease							
Aircrafts	-	-	-	-	-	-	-
Earthmoving Equipment	1,18,848	-	20,546	98,302	12,794	-	13,822
Motor vehicles	81,875	-	20,365	61,510	8,183	-	14,505
Plant and Machinery	1,57,445	-	10,450	1,46,995	13,386	-	6,226
Wind Mills	7,821	-	7,821	3,671	734	-	4,405
Computers	35,138	-	23,208	11,930	4,595	-	22,308
Furniture and fixtures	8,227	-	1,890	6,337	715	-	11,499
(B)	4,09,354	2	76,459	3,32,895	40,407	57,964	2,35,112
Total for Property, Plant and Equipment (C) = (A+B)	4,46,089	2	76,913	3,69,177	42,575	58,413	2,46,839

* Buildings includes ₹ 3,895 Lacs (Net book value of ₹ 3,632 Lacs) in respect of which conveyance is pending. These immovable properties were transferred to the Company pursuant to BTA (Refer Note No. 64).
The property situated in Chennai and Bally are given as the security against the specific secured debt securities, and the carrying value of such properties is ₹ 60 Lacs as on March 31st, 2023 (March 31st, 2022 ₹ 62 Lacs).

Particulars	Gross Block			Depreciation/Amortisation/Impairment			Net book value (₹ in Lacs)
	As at April 1st, 2021	Additions	Disposals and other adjustments	As at April 1st, 2021	Amortisation Charge	Impairment Charge	
Assets for Own use							
Land- Freehold	3,307	-	-	3,307	-	-	3,307
Buildings**	3,973	-	-	3,973	77	-	3,777
Furniture and fixtures	3,191	35	35	3,156	520	28	1,813
Plant and Machinery	22,474	-	22,474	4,092	1,023	-	5,115
Motor vehicles	402	-	-	402	52	-	273
Leasehold Improvements	2,324	-	-	2,324	607	-	1,573
Computers and office equipment	1,102	3	6	1,099	75	5	1,039
(A)	36,773	3	41	36,735	2,354	33	10,009
Assets for Operating lease							
Aircrafts	379	-	379	162	18	-	180
Earthmoving Equipment	134,706	-	15,858	72,671	18,119	-	8,892
Motor vehicles	88,694	-	6,819	50,324	11,687	-	3,579
Plant and Machinery	169,347	-	11,902	157,445	15,382	-	5,801
Wind Mills	7,821	-	-	7,821	734	-	3,671
Computers	36,556	-	1,418	35,138	24,078	-	1,222
Furniture and fixtures	8,255	-	28	8,227	838	-	15
(B)	445,758	-	36,404	409,354	53,134	-	19,689
Total for Property, Plant and Equipment (C) = (A+B)	482,531	3	36,445	446,089	55,488	-	19,722

** Buildings includes ₹ 3,895 Lacs (Net book value of ₹ 3,707 Lacs) in respect of which conveyance is pending. These immovable properties were transferred to the Company pursuant to BTA (Refer Note No. 63 of the Financial Statements for the year ended March 31st, 2022).

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

11. Leases

a) In the capacity of Lessee

The Company has taken various premises (offices and yards) under lease. Generally, the lease agreements provide for cancellation by either party and contain clause for escalation and renewal of agreements.

Following are the changes in the carrying value of right-of-use assets for the year ended March 31st, 2023:

Particulars	(₹ in Lacs)	
	As at March 31st, 2023	As at March 31st, 2022
Opening Balance	712	1,069
Addition	228	817
Deletion	2	666
Depreciation	432	508
Closing Balance	506	712

The aggregate depreciation expense on right-of-use assets is included under Depreciation, Amortisation and Impairment expense in the Statement of Profit and Loss.

The following is the movement in lease liabilities during the year ended March 31st, 2023:

Particulars	(₹ in Lacs)	
	As at March 31st, 2023	As at March 31st, 2022
Opening Balance	828	1,142
Addition	228	817
Deletion	23	670
Finance cost accrued during the year	88	132
Payment of lease liabilities	485	593
Closing Balance	636	828

The table below provides details regarding the contractual maturities of lease liabilities as at March 31st, 2023 on an undiscounted basis:

Particulars	(₹ in Lacs)	
	As at March 31st, 2023	As at March 31st, 2022
Less than one year	352	387
One to five years	291	505
More than five years	-	-
Total	643	892

The Company does not face a significant liquidity risk with regard to its lease liabilities as the current assets are sufficient to meet the obligations related to lease liabilities as and when they fall due.

Rental expense recorded for short-term leases is ₹ 575 Lacs for the year ended March 31st, 2023 (₹ 172 Lacs for the year ended March 31st, 2022).

b) In the capacity of Lessor (Operating lease)

The Company has given assets on operating lease arrangements (refer Note No. 10) for periods ranging between 1 to 15 years. Some of the arrangements have clauses for contingent rent. Total contingent rent recognized as income in the Statement of Profit and Loss for the year ended March 31st, 2023 is amounting to ₹ 55 Lacs (As at March 31st, 2022 : ₹ 566 Lacs).

The future minimum lease receivables in respect of non-cancellable operating leases are as follows:

Particulars	(₹ in Lacs)	
	As at March 31st, 2023	As at March 31st, 2022
Not later than one year	35,736	52,414
Later than one year but not later than five years	2,071	14,012
Total	37,807	66,426

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

12. Other Intangible Assets

Particulars	Gross Block			Depreciation/Amortisation/Impairment				Net book value	
	As at April 1st, 2022	Additions	Disposals and other adjustments	As at March 31st, 2023	As at April 1st, 2022	Depreciation / Amortisation Charge	Impairment Charge	Disposals and other adjustments	As at March 31st, 2023
Assets for Own use									
Softwares	3,200	1	313	2,888	2,364	297	-	314	541
(A)	3,200	1	313	2,888	2,364	297	-	314	541
Assets for Operating lease									
Softwares	554	-	111	443	552	2	-	111	443
(B)	554	-	111	443	552	2	-	111	443
Total for Other Intangible assets (A+B)	3,754	1	424	3,331	2,916	299	-	425	541

Particulars	Gross Block			Depreciation/Amortisation/Impairment				Net book value	
	As at April 1st, 2021	Additions	Disposals and other adjustments	As at March 31st, 2022	As at April 1st, 2021	Depreciation / Amortisation Charge	Impairment Charge	Disposals and other adjustments	As at March 31st, 2022
Assets for Own use									
Softwares	3,200	-	-	3,200	2,047	317	-	-	836
(A)	3,200	-	-	3,200	2,047	317	-	-	836
Assets for Operating lease									
Softwares	614	-	60	554	594	18	-	60	2
(B)	614	-	60	554	594	18	-	60	2
Total for Other Intangible assets (A+B)	3,814	-	60	3,754	2,641	335	-	60	838

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

13. Other Non-Financial Assets

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
Capital Advances	30	33
Reposessed Assets and Assets acquired in satisfaction of debt*	21,492	36,127
Advance to Vendors	332	451
Advances to Employees	26	29
Balances with Service Tax/VAT/GST authorities	1,367	1,410
Others	262	307
Total	23,509	38,357

* Includes reposessed assets amounting to ₹ 3,282 Lacs (March 31st, 2022: ₹ 17,917 Lacs) and also includes assets/collaterals acquired in satisfaction of debt amounting to ₹ 18,210 Lacs (March 31st, 2022: ₹ 18,210 Lacs)

14. Payables

I Trade Payables

(i) Total outstanding dues of micro enterprises and small enterprises (Refer Note No. 66)

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
a) The principal amount and interest due thereon remaining unpaid to any supplier #	190	175
b) The amount of interest paid by the buyer in terms of Section 16 of the Micro, Small and Medium Enterprises Development Act, 2006, along with the amount of payment made to the supplier beyond the appointed day	-	-
c) The amount of interest due and payable for the period of delay in making payment (which have been paid but beyond the appointed day) but without adding the interest specified under the Micro, Small and Medium Enterprises Development Act, 2006	-	-
d) The amount of interest accrued and remaining unpaid	-	-
e) The amount of further interest remaining due and payable even in the succeeding year until such date when the interest dues above are actually paid to the small enterprise, for the purpose of disallowance of a deductible expenditure under Section 23 of the Micro, Small and Medium Enterprises Development Act, 2006	-	-
Total	190	175

Dues to Micro and Small Enterprises have been determined to the extent such parties have been identified on the basis of information available.

The Company is currently undergoing CIRP (Refer Note No. 1.2) under the provisions of the Code. Accordingly, a moratorium has been declared under Section 14 of the Code. No interest was payable till the insolvency commencement date i.e. October 8th, 2021 and post CIRP the Company has not provided for any interest.

(ii) Total outstanding dues of creditors other than micro enterprises and small enterprises (Refer Note No. 66)

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
Due to others		
Other than Acceptance	6,224	6,243
Total	6,224	6,243

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

Trade Payables ageing schedule as at March 31st, 2023:

(₹ in Lacs)

Particulars	Outstanding for following periods from due date of payment				Total
	Less than 1 year	1-2 years	2-3 years	More than 3 years	
(i) MSME	4	186	-	-	190
(ii) Others	1,938	2,302	477	980	5,697
(iii) Disputed dues-MSMEs	-	-	-	-	-
(iv) Disputed dues-Others	50	-	419	58	527
Total	1,992	2,488	896	1,038	6,414

Trade Payables ageing schedule as at March 31st, 2022:

(₹ in Lacs)

Particulars	Outstanding for following periods from due date of payment				Total
	Less than 1 year	1-2 years	2-3 years	More than 3 years	
(i) MSME	175	-	-	-	175
(ii) Others	3,244	892	583	472	5,191
(iii) Disputed dues-MSMEs	-	-	-	-	-
(iv) Disputed dues-Others	138	233	433	248	1,052
Total	3,557	1,125	1,016	720	6,418

15. Debt Securities

	As at March 31st, 2023				As at March 31st, 2022			
	At Amortised cost	At fair value through profit or loss	Designated at fair value through profit or loss	Total	At Amortised cost	At fair value through profit or loss	Designated at fair value through profit or loss	Total
	(1)	(2)	(3)	(4)=(1)+(2)+(3)	(1)	(2)	(3)	(4)=(1)+(2)+(3)
Secured (Refer Note No. 66 and 74)								
Non-convertible debentures (Refer Note No. 15.1)	2,55,895	-	-	2,55,895	2,55,503	-	-	2,55,503
Long-Term Infrastructure Bond (Refer Note No. 15.2)	4,049	-	-	4,049	4,049	-	-	4,049
Total	2,59,944	-	-	2,59,944	2,59,552	-	-	2,59,552
Debt securities in India	2,59,944	-	-	2,59,944	2,59,552	-	-	2,59,552
Debt securities outside India	-	-	-	-	-	-	-	-
Total	2,59,944	-	-	2,59,944	2,59,552	-	-	2,59,552

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

15.1 Secured Non-Convertible Debentures

Date of Allotment	Face Value per Debenture (₹)	Amount outstanding (₹ in Lacs) ##		Interest rate (%) *	Earliest redemption date/ Balance tenure (years)
		As at March 31st, 2023 (Refer Note No. 1.2, 64, 65, 66 & 67)	As at March 31st, 2022 (Refer Note No. 1.2, 63, 64, 65 & 66 to the Financial Statements for the year ended March 31st, 2022)		
Private Placement:					
18 January, 2018	10,00,000	1,000	1,000	11.00%	18 January, 2028
20 December, 2016	10,00,000	1,000	1,000	11.00%	20 December, 2026
26 March, 2018	10,00,000	1,650	1,650	11.00%	26 March, 2025
09 December, 2014 **	10,00,000	1,900	1,900	12.05%	09 December, 2024
03 October, 2017	10,00,000	600	600	10.99%	03 October, 2024
15 September, 2017	10,00,000	2,350	2,350	10.50%	15 September, 2024
22 June, 2017	10,00,000	2,000	2,000	11.23%	22 June, 2024
20 June, 2014 \$\$	10,00,000	1,000	1,000	12.90%	20 June, 2024
13 June, 2014 \$\$	10,00,000	1,000	1,000	12.92%	13 June, 2024
10 June, 2014 **	10,00,000	1,000	1,000	13.40%	10 June, 2024
31 May, 2017	10,00,000	1,000	1,000	11.32%	31 May, 2024
26 May, 2017	10,00,000	2,000	2,000	11.45%	26 May, 2024
30 January, 2019	10,00,000	30,000	30,000	12.50%	30 January, 2024
02 December, 2016	10,00,000	500	500	11.00%	02 December, 2023
29 November, 2013 **	10,00,000	450	450	13.10%	29 November, 2023
04 April, 2018	10,00,000	1,400	1,400	10.30%	04 April, 2023
14 March, 2018	10,00,000	500	500	10.30%	14 March, 2023
24 January, 2013 **	10,00,000	110	110	13.50%	24 January, 2023
05 October, 2012 **	10,00,000	2,000	2,000	13.35%	05 October, 2022
31 July, 2012 **	10,00,000	130	130	13.40%	31 July, 2022
08 June, 2012 \$	10,00,000	70	70	13.40%	08 June, 2022
29 October, 2011 **	10,00,000	3,000	3,000	13.90%	29 October, 2021
06 October, 2016	10,00,000	500	500	11.95%	06 October, 2021
09 September, 2011 **	10,00,000	1,000	1,000	13.90%	09 September, 2021
Public Issue:					
11 May, 2015 #	1,000	3,215	3,215	12.25%-12.50%	7 years
17 January, 2017 #	1,000	33,842	33,842	11.11%-11.75%	5 years
25 May, 2018	1,000	41,598	41,598	10.75%-11.60%	3 - 10 years
24 January, 2019	1,000	14,005	14,005	11.81%-12.75%	3 - 5 years
06 October, 2016 **	1,000	15,585	15,585	11.60%-12.00%	5 years
27 February, 2017 **	1,000	17,547	17,547	11.12%-11.75%	5 years
16 March, 2018 **	1,000	27,110	27,110	10.43%-11.26%	5 years
15 May, 2019 **	1,000	9,363	9,363	12.05%-13.00%	3 - 5 years
Total		2,18,425	2,18,425		

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

* Includes penal interest

Does not include effective interest rate adjustment ₹ Nil (March 31st, 2022: ₹ Nil), Interest Accrued and not due ₹ Nil (March 31st, 2022: ₹ Nil), discounting on face value impact of ₹ Nil (March 31st, 2022: ₹ Nil) and overdue interest ₹ 37,470 Lacs (March 31st, 2022: ₹ 37,078 Lacs).

Security: (Refer Note No. 73 and 74)

** The Secured Non-Convertible Debentures are secured by first pari-passu charge by mortgage of immovable property at West Bengal/Tamil Nadu, the Company had filed necessary e-forms for Debenture Trust Deed (DTD) novated from Srei Infrastructure Finance Limited (SIFL) with ROC but the same have not been approved and exclusive and/or specific charge on the specific & identified receivables of the Company.

\$ The Secured Non-Convertible Debentures were secured by way of pari passu on immovable properties located at West Bengal and Delhi being in the books of Srei Infrastructure Finance Limited and at West Bengal owned by Controlla Electrotech Pvt Limited for which necessary e-form post novation is not filed with ROC.

\$\$ The Secured Non-Convertible Debentures are secured by way of pari-passu charge on the Company's immovable properties located at West Bengal and exclusive & specific charge on the identified receivables of the Company.

The public issue of Secured Non-Convertible Debentures are secured by way of pari-passu charge on the Company's immovable properties located at Tamil Nadu and exclusive and/or specific charge on specific receivables/assets of the Company.

All the above Non-Convertible Debentures except those marked #,\$,\$\$,** are secured by way of pari-passu charge on immovable properties and/or exclusive first charge on the specific receivables/assets of the Company.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

15.2 Long-Term Infrastructure Bond

Date of Allotment	Face Value per Debenture (₹)	Amount outstanding (₹ in Lacs) ***		Interest rate (%) **	Earliest redemption date/ Balance tenure (years)
		As at March 31st, 2023 (Refer Note No. 1.2, 64, 65, 66 & 67)	As at March 31st, 2022 (Refer Note No. 1.2, 63, 64, 65 & 66 to the Financial Statements for the year ended March 31st, 2022)		
22 March, 2012	1,000	967	967	11.15%	22 March, 2027
22 March, 2012	1,000	1,055	1,055	10.90%	22 March, 2022
Total		2,022	2,022		

The above debentures are redeemable at par in single instalment.

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

** Includes penal interest

*** Does not include Interest Accrued and not due ₹ Nil (March 31st, 2022: ₹ Nil) and overdue interest ₹ 2,027 Lacs (March 31st, 2022: ₹ 2,027 Lacs).

Security:

Long-term infrastructure bonds are secured by way of pari-passu mortgage/charge on immovable properties located at West Bengal, the company had filed necessary e-forms for DTD novated from Srei Infrastructure Finance Limited with ROC but the same have not been approved and exclusive charge on specific receivables of the Company.

16. Borrowings (Other than Debt Securities)

Particulars	As at March 31st, 2023				As at March 31st, 2022			
	Amortised cost	At fair value through profit or loss	Designated at fair value through profit or loss	Total	Amortised cost	At fair value through profit or loss	Designated at fair value through profit or loss	Total
	(1)	(2)	(3)	(4)=(1)+(2)+(3)	(1)	(2)	(3)	(4)=(1)+(2)+(3)
SECURED (Refer Note No. 74)								
(a) Term Loans (Refer Note No. 16.1 and 66)								
(i) From Banks								
Rupee loans	2,19,881	-	-	2,19,881	2,19,716	-	-	2,19,716
Foreign currency loans	95,196	-	-	95,196	95,196	-	-	95,196
(ii) From Others								
Rupee loans	2,07,630	-	-	2,07,630	2,07,630	-	-	2,07,630
Foreign currency loans	74,778	-	-	74,778	74,778	-	-	74,778
(b) Working capital facilities (Refer Note No. 16.2 and 66)								
(i) From Banks								
Rupee loans	20,02,432	-	-	20,02,432	19,99,378	-	-	19,99,378
(c) Collateralised Borrowings (Refer Note No. 16.3)	3,251	-	-	3,251	13,993	-	-	13,993
UNSECURED								
(a) Term Loans (Refer Note No. 16.4 and 66)								
(i) From Banks								
Foreign currency loans	31,765	-	-	31,765	31,765	-	-	31,765
(ii) From Others								
Foreign currency loans	25,178	-	-	25,178	25,178	-	-	25,178
(b) Deferred payment liabilities (Refer Note No. 16.5 and 66)	9,123	-	-	9,123	9,123	-	-	9,123
(c) Inter corporate deposit (Refer Note No. 16.6 and 66)	106	-	-	106	106	-	-	106
Total	26,69,340	-	-	26,69,340	26,76,863	-	-	26,76,863
Borrowings in India	24,42,423	-	-	24,42,423	24,49,946	-	-	24,49,946
Borrowings outside India	2,26,917	-	-	2,26,917	2,26,917	-	-	2,26,917
Total	26,69,340	-	-	26,69,340	26,76,863	-	-	26,76,863

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

16.1 Secured Term Loans

Particulars	Outstanding		Repayment terms			Balance tenure (years)	Rate of Interest per annum	Nature of security (Refer Note No. 74)
	(₹ in Lacs)	(₹ in Lacs)	Overdue @	Monthly	Quarterly			
		As at March 31st, 2023						
Rupee term loans								
From Banks	2,19,881	2,19,881	-	-	-	0 - 3	8%-19%	Hypothecation of specific assets covered by hypothecation loan agreements and /or lease agreements with customers and /or receivables arising there from.
From Financial Institutions	2,07,630	2,07,630	-	-	-	0 - 2	8%-16%	
Total	4,27,511	4,27,511	-	-	-	-	-	
Foreign currency term loans								
From Banks	95,196	95,196	-	-	-	0 - 2	<10%	Hypothecation of specific assets covered by respective hypothecation loan agreements and lease agreements with customers and /or receivables arising there from.
From Financial Institutions	74,778	74,778	-	-	-	0 - 6	5%-12%	
Total	1,69,974	1,69,974	-	-	-	-	-	

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

Does not include effective interest rate adjustment and Interest Accrued and not due ₹ Nil.

@ It includes interest overdue.

Particulars

Particulars	Outstanding		Repayment terms			Balance tenure (years)	Rate of Interest per annum	Nature of security (Refer Note No. 74)
	(₹ in Lacs)	(₹ in Lacs)	Overdue @	Monthly	Quarterly			
		As at March 31st, 2022						
Rupee term loans								
From Banks	2,19,716	2,19,716	-	-	-	0 - 4	8%-19%	Hypothecation of specific assets covered by hypothecation loan agreements and /or lease agreements with customers and /or receivables arising there from.
From Financial Institutions	2,07,630	2,07,630	-	-	-	0 - 3	8%-16%	
Total	4,27,346	4,27,346	-	-	-	-	-	
Foreign currency term loans								
From Banks	95,196	95,196	-	-	-	1 - 3	<10%	Hypothecation of specific assets covered by respective hypothecation loan agreements and lease agreements with customers and /or receivables arising there from.
From Financial Institutions	74,778	74,778	-	-	-	0 - 7	5%-12%	
Total	1,69,974	1,69,974	-	-	-	-	-	

@ It includes interest overdue.

16.2 Secured Working capital facilities

(Refer Note No. 1.2, 64, 66 & 67 and for previous year refer note no. 1.2, 63, 64, 65 & 66 to the Financial Statements for the year ended March 31st, 2022).

Working capital facilities (earmarked against cash credit limits) from banks are secured by hypothecation of underlying assets covered by respective hypothecation loan agreements and lease agreements with customers and receivables arising therefrom ranking pari-passu (excluding assets specifically charged to others) (Refer Note No. 74). Further collateral security in the form of fixed deposits amounting to ₹ 41 Lacs (March 31st, 2022; ₹ 39 Lacs) is also given on behalf of the consortium. Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

a) As at March 31st, 2023, Working capital facilities from banks include Working capital demand loans (WC DL) aggregating to ₹ 6,85,646 Lacs (March 31st, 2022; ₹ 6,85,517 Lacs). Does not include Interest accrued and not due ₹ Nil (March 31st, 2022; ₹ Nil). Rate of interest for WC DL ranges from 8% to 19% per annum (March 31st, 2022; from 8% to 19% per annum). The above WC DL includes principal and interest overdue.

b) As at March 31st, 2023, Working capital facilities from banks includes Funded Interest Term Loan (FITL) ₹ 81,625 Lacs (March 31st, 2022; ₹ 81,506 Lacs). Does not include Interest accrued and not due ₹ Nil (March 31st, 2022; ₹ Nil). Rate of interest for FITL ranges from 9% to 19% per annum (March 31st, 2022; from 9% to 19% per annum). The above FITL amount includes principal and interest overdue.

c) As at March 31st, 2023, for other working capital facilities (Cash credit) aggregating to ₹ 12,35,162 Lacs (March 31st, 2022; ₹ 12,32,355 Lacs) includes overdue interest, rate of interest ranges from 9% to 18% per annum (March 31st, 2022; from 9% to 18% per annum).

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16.3 Secured Collateralised Borrowings

Particulars	Outstanding (₹ in Lacs)		Repayment terms (₹ in Lacs)			Balance tenure (years)	Rate of Interest per annum	Nature of security
	As at March 31st, 2023	Overdue @#	Monthly	Quarterly	Single instalment			
Collateralised Borrowings	3,370	47	3,246	77	-	0-3	8%-13%	This represents amount against assignment of future lease rentals.
Total	3,370	47	3,246	77	-			

Does not include effective interest rate adjustment ₹ 134 Lacs and Interest accrued and not due ₹ 15 Lacs.

@ It also includes interest overdue.

The overdue is due to outstanding receivables from the customers.

Particulars	Outstanding (₹ in Lacs)		Repayment terms (₹ in Lacs)			Balance tenure (years)	Rate of Interest per annum	Nature of security
	As at March 31st, 2022	Overdue @#	Monthly	Quarterly	Single instalment			
Collateralised Borrowings	14,212	750	10,834	2,628	-	0-4	8%-13%	This represents amount against assignment of future lease rentals.
Total	14,212	750	10,834	2,628	-			

Does not include effective interest rate adjustment ₹ 321 Lacs and Interest accrued and not due ₹ 102 Lacs.

@ It also includes interest overdue.

The overdue is due to outstanding receivables from the customers.

16.4 Unsecured term loans

Particulars	Outstanding (₹ in Lacs)		Repayment terms (Refer Note No.1.2, 64, 65, 66 & 67) (₹ in Lacs)				Balance tenure (years)	Rate of Interest per annum
	As at March 31st, 2023	Overdue @	Quarterly	Half yearly	Yearly			
Foreign currency term loan from bank	31,765	31,765	-	-	-	3-6	<10%	
Foreign currency term loan from financial Institutions	25,178	25,178	-	-	-	0-5	<10%	
Total	56,943	56,943	-	-	-			

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

Does not include effective interest rate adjustment ₹ Nil and Interest accrued and not due ₹ Nil.

@ It also includes interest overdue.

Particulars	Outstanding (₹ in Lacs)		Repayment terms (Refer Note No. 1.2, 63, 64, 65 & 66 to the Financial Statements for the year ended March 31st, 2022) (₹ in Lacs)				Balance tenure (years)	Rate of Interest per annum
	As at March 31st, 2022	Overdue @	Quarterly	Half yearly	Yearly			
Foreign currency term loan from bank	31,765	31,765	-	-	-	4-7	<10%	
Foreign currency term loan from financial Institutions	25,178	25,178	-	-	-	0-6	<10%	
Total	56,943	56,943	-	-	-			

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

Does not include effective interest rate adjustment ₹ Nil and Interest accrued and not due ₹ Nil.

@ It also includes interest overdue.

16.5 Unsecured Deferred payment liabilities

Particulars	Outstanding (₹ in Lacs)		Repayment terms (Refer Note No. 1.2, 65, 66 & 67) (₹ in Lacs)				Balance tenure (years)	Rate of Interest per annum
	As at March 31st, 2023	Overdue @	Monthly	Quarterly	Half yearly	Yearly		
Deferred payment liabilities	9,123	9,123	-	-	-	-	0-1	0%-10%
Total	9,123	9,123	-	-	-	-		

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

@ It also includes interest overdue.

Particulars	Outstanding (₹ in Lacs)		Repayment terms (Refer Note No. 1.2, 64, 65 & 66 to the Financial Statements for the year ended March 31st, 2022) (₹ in Lacs)				Balance tenure (years)	Rate of Interest per annum
	As at March 31st, 2022	Overdue @	Monthly	Quarterly	Half yearly	Yearly		
Deferred payment liabilities	9,123	9,123	-	-	-	-	0-2	0%-10%
Total	9,123	9,123	-	-	-	-		

@ It also includes interest overdue.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

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16.6 Inter-corporate deposits

Particulars	Outstanding (₹ in Lacs)	Repayment terms (Refer Note No. 1.2, 65, 66 & 67) (₹ in Lacs)				Balance tenure (years)	Rate of Interest per annum
		Overdue @	Monthly	Quarterly	Half yearly		
	As at March 31st, 2023						
Inter-corporate deposits	106	106	-	-	-	-	7%
Total	106	106	-	-	-	-	

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

Does not includes Interest accrued and not due ₹ Nil.

@ It also includes interest overdue.

Particulars	Outstanding (₹ in Lacs)	Repayment terms (Refer Note No. 1.2, 64, 65 & 66 to the Financial Statement for the year ended March 31st, 2022) (₹ in Lacs)				Balance tenure (years)	Rate of Interest per annum
		Overdue @	Monthly	Quarterly	Half yearly		
	As at March 31st, 2022						
Inter-corporate deposits	106	106	-	-	-	0-1	7%
Total	106	106	-	-	-		

Does not includes Interest accrued and not due ₹ Nil.

@ It also includes interest overdue.

17. Subordinated Liabilities

Particulars	(₹ in Lacs)							
	As at March 31st, 2023				As at March 31st, 2022			
	Amortised cost	At fair value through profit or loss	Designated at fair value through profit or loss	Total	Amortised cost	At fair value through profit or loss	Designated at fair value through profit or loss	Total
	(1)	(2)	(3)	(4)=(1)+(2)+(3)	(1)	(2)	(3)	(4)=(1)+(2)+(3)
UNSECURED								
Subordinated perpetual debentures (Tier I Capital) (Refer Note No. 17.1 and 66)	15,164	-	-	15,164	15,015	-	-	15,015
Rupee subordinated loans (Tier II Capital) (Refer Note No. 17.2 and 66)	16,825	-	-	16,825	16,825	-	-	16,825
Subordinated redeemable non convertible debentures (Tier II Capital) (Refer Note No. 17.3 and 66)	2,30,469	-	-	2,30,469	2,29,741	-	-	2,29,741
Total	2,62,458	-	-	2,62,458	2,61,581	-	-	2,61,581
Subordinated Liabilities in India	2,62,458	-	-	2,62,458	2,61,581	-	-	2,61,581
Subordinated Liabilities outside India	-	-	-	-	-	-	-	-
Total	2,62,458	-	-	2,62,458	2,61,581	-	-	2,61,581

17.1 Unsecured subordinated perpetual debentures (Tier I Capital) *

During the year ended March 31st, 2023, the Company raised Unsecured subordinated perpetual debentures amounting ₹ Nil (March 31st, 2022 : ₹ Nil). As at March 31st, 2023, the amount of principal outstanding in respect of unsecured subordinated perpetual debentures is ₹ 13,750 Lacs (March 31st, 2022 : ₹ 13,750 Lacs). These perpetual debentures have call option as per contractual terms which is exercisable with prior approval of RBI. These perpetual debentures have a step up coupon rate of 100 basis points per annum for subsequent years, if Call Option is not exercised by the Company at the end of 10th year from the date of allotment.

Date of Allotment	Face value per debenture (₹)	Amount outstanding (₹ in Lacs)			
		As at March 31st, 2023 (Refer Note No. 1.2, 64, 65, 66 & 67)	As at March 31st, 2022 (Refer Note No. 1.2, 63, 64, 65 & 66 to the Financial Statements for the year ended March 31st, 2022)	Interest rate (%) ***	Earliest call option date
13 December, 2018	10,00,000	10,000	10,000	13.00%	13 December, 2028
30 December, 2011 **	10,00,000	3,750	3,750	14.50%	30 December, 2021
Total		13,750	13,750		

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

* Does not include effective interest rate adjustment ₹ Nil (March 31st, 2022: ₹ Nil), Interest accrued and not due ₹ Nil (March 31st, 2022: ₹ Nil) and overdue interest ₹ 1,414 Lacs (March 31st, 2022: ₹ 1,265 Lacs).

** CIRP has been initiated against the Company, as stated in Note No. 1.2 and accordingly, as per the Code, the Administrator has invited the financial/operational/other creditors to file their respective claims as on October 8th, 2021 (i.e. date of commencement of CIRP). Considering the same, the Company has not able to exercise Call Option at the end of 10th year from the date of allotment.

*** Includes penal interest.

17.2 Unsecured Rupee subordinated loans (Tier II Capital)

Particulars	Outstanding		Repayment terms		Balance tenure (years)	Rate of Interest per annum
	(₹ in Lacs)		(₹ in Lacs)			
	As at March 31st, 2023	Overdue @	Quarterly	Single instalment		
Rupee Subordinated term loans (Tier II Capital) *	16,825	16,825	-	-	-	10%-11%
Total	16,825	16,825	-	-		

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

* Does not include effective interest rate adjustment ₹ Nil and interest accrued and not due ₹ Nil

@ It also includes interest overdue.

Particulars	Outstanding		Repayment terms		Balance tenure (years)	Rate of Interest per annum
	(₹ in Lacs)		(₹ in Lacs)			
		Overdue @	Quarterly	Single instalment		
Rupee Subordinated term loans (Tier II Capital)	16,825	16,825	-	-	0 - 1	10%-11%
Total	16,825	16,825	-	-		

Does not include effective interest rate adjustment ₹ Nil and interest accrued and not due ₹ Nil.

@ It also includes interest overdue.

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17.3 Unsecured subordinated redeemable non-convertible debentures (Tier II Capital)

During the year ended March 31st, 2023, the Company raised subordinated redeemable non-convertible debentures qualifying for Tier II Capital amounting ₹ Nil (March 31st, 2022 ₹ Nil). The following table sets forth, outstanding as at the Balance Sheet date:

Date of Allotment	Face value per debenture (₹)	Amount outstanding (₹ in Lacs)#		Interest rate (%) *	Earliest redemption date/ Balance tenure (years)
		As at March 31st, 2023 (Refer Note No. 1.2, 64, 65, 66 & 67)	As at March 31st, 2022 (Refer Note No. 1.2, 63, 64, 65 & 66 to the Financial Statements for the year ended March 31st, 2022)		
Private Placement:					
10 October, 2018	10,00,000	500	500	12.25%	10 October, 2028
23 June, 2017	10,00,000	4,500	4,500	11.00%	23 June, 2027
30 March, 2017	10,00,000	5,000	5,000	12.25%	30 March, 2027
04 November, 2016	10,00,000	1,000	1,000	11.85%	04 November, 2026
07 October, 2016	10,00,000	4,000	4,000	12.75%	07 October, 2026
04 October, 2016	10,00,000	1,500	1,500	12.75%	04 October, 2026
24 August, 2016	10,00,000	3,000	3,000	11.50%	24 August, 2026
26 May, 2016	10,00,000	350	350	12.25%	26 May, 2026
25 May, 2016	10,00,000	2,000	2,000	12.75%	25 May, 2026
31 March, 2016	10,00,000	2,000	2,000	12.00%	31 March, 2026
18 March, 2016	10,00,000	500	500	12.70%	18 March, 2026
05 February, 2016	10,00,000	500	500	12.60%	05 February, 2026
20 January, 2016	10,00,000	500	500	12.60%	20 January, 2026
11 January, 2016	10,00,000	1,500	1,500	12.60%	11 January, 2026
24 September, 2015	10,00,000	500	500	12.50%	24 September, 2025
20 August, 2015	10,00,000	1,000	1,000	12.50%	20 August, 2025
13 August, 2015	10,00,000	15,000	15,000	12.75%	13 August, 2025
16 March, 2015	10,00,000	500	500	13.00%	16 March, 2025
01 March, 2017	10,00,000	500	500	12.40%	01 June, 2024
03 July, 2018	10,00,000	5,000	5,000	12.25%	03 May, 2024
25 October, 2016	10,00,000	5,000	5,000	11.80%	25 April, 2024
10 March, 2017	10,00,000	7,500	7,500	12.95%	10 March, 2024
17 July, 2013	10,00,000	2,300	2,300	12.75%	17 July, 2023
29 June, 2013	10,00,000	3,540	3,540	12.75%	29 June, 2023
07 May, 2013	10,00,000	2,080	2,080	13.25%	07 May, 2023
24 September, 2015	10,00,000	1,200	1,200	12.40%	24 April, 2023
29 March, 2016	10,00,000	200	200	12.70%	29 March, 2023
28 March, 2013	10,00,000	1,650	1,650	13.25%	28 March, 2023
01 March, 2013	10,00,000	1,750	1,750	13.25%	01 March, 2023
28 January, 2013	10,00,000	700	700	13.80%	28 January, 2023
24 January, 2013	10,00,000	900	900	13.25%	24 January, 2023
24 January, 2013	10,00,000	6,070	6,070	13.80%	24 January, 2023
16 January, 2013	10,00,000	250	250	13.70%	16 January, 2023
16 January, 2013	10,00,000	7,000	7,000	13.85%	16 January, 2023
17 December, 2012	10,00,000	1,700	1,700	13.50%	17 December, 2022
31 October, 2012	10,00,000	490	490	13.70%	31 October, 2022
18 October, 2012	10,00,000	1,060	1,060	13.70%	18 October, 2022
28 September, 2012	10,00,000	2,890	2,890	13.70%	28 September, 2022
13 August, 2015	10,00,000	5,000	5,000	12.75%	13 August, 2022
31 July, 2012	1,00,000	1,206	1,206	13.50%	31 July, 2022
09 March, 2017	10,00,000	500	500	12.18%	09 June, 2022
01 June, 2012	1,00,000	1,130	1,130	13.50%	01 June, 2022
30 March, 2012	10,00,000	10,000	10,000	13.40%	30 March, 2022
12 January, 2012	1,00,000	8,410	8,410	13.90%	12 January, 2022
11 January, 2012	1,00,000	6,600	6,600	13.90%	11 January, 2022
23 December, 2011	1,00,000	6,905	6,905	13.90%	23 December, 2021
01 February, 2016	10,00,000	700	700	12.15%	01 May, 2021
24 September, 2015	10,00,000	2,360	2,360	12.30%	24 April, 2021
Public Issue:					
24 January, 2019	1,000	1,428	1,428	12.75%-13.00%	10 years
08 August, 2017	1,000	56,199	56,199	11.25%-11.70%	5 - 10 years
16 March, 2018	1,000	2,702	2,702	11.12%-11.75%	10 years
Total		1,98,770	1,98,770		

All the above debentures are redeemable at par in single instalment.

Pursuant to initiation of CIRP (Refer Note No. 1.2), amount outstanding as at March 31st, 2023 are overdue.

* Includes penal interest

Does not include effective interest rate adjustment ₹ Nil (March 31st, 2022: ₹ Nil), Interest Accrued and not due ₹ Nil (March 31st, 2022: ₹ Nil), discounting on face value impact of ₹ Nil (March 31st, 2022: ₹ Nil) and overdue interest ₹ 31,699 Lacs (March 31st, 2022: ₹ 30,971 Lacs).

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18. Other Financial Liabilities

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
Trade deposits received	8,510	11,784
Advance From Operating Lease customer	1,977	2,065
Payable to Employees	1,251	1,306
Liability for Operating Expenses	2,590	2,949
Financial Guarantee Contract Liability	105	85
Unclaimed debentures and interest accrued thereon (Refer Note No. 75)	333	333
Others	-	150
Total	14,766	18,672

19. Current Tax Liabilities (Net)

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
Current Tax Liabilities [net of advance income tax of ₹ 23,976 Lacs (March 31st, 2022 : ₹ 23,959 Lacs)]	13,635	13,652
Total	13,635	13,652

20. Provisions

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
Provision for Gratuity	-	338
Provision for compensated absence	321	438
Others		
Provision against disputed statutory dues under litigation (Refer Note No. 71)	15,008	15,001
Total	15,329	15,777

21. Other Non-Financial Liabilities

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
Pre-received amount for lease contracts	93	290
Interest Capitalisation Account	1,878	1,495
Statutory dues payable	1,857	2,483
Total	3,828	4,268

22. Equity Share Capital

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
Authorised		
Equity shares, ₹ 10/- face value		
50,00,00,000 (March 31st, 2022 : 50,00,00,000) Equity shares	50,000	50,000
Preference shares, ₹ 100/- face value		
5,00,00,000 (March 31st, 2022 : 5,00,00,000) Preference shares	50,000	50,000
	1,00,000	1,00,000
Issued, Subscribed and fully paid-up		
Equity shares, ₹ 10/- face value		
7,90,16,415 (March 31st, 2022 : 7,90,16,415) Equity shares	7,902	7,902
Total	7,902	7,902

NOTES TO THE FINANCIAL STATEMENT AS AT AND

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22.1.1 Reconciliation of the number of Equity Shares outstanding

The reconciliation of the number of Equity Shares outstanding and the corresponding amount thereof as at the Balance Sheet date is set out below:

Equity Shares	As at March 31st, 2023		As at March 31st, 2022	
	No. of shares	₹ in Lacs	No. of shares	₹ in Lacs
At the beginning of the year	7,90,16,415	7,902	7,90,16,415	7,902
Add: Issued as fully paid during the year	-	-	-	-
At the end of the year	7,90,16,415	7,902	7,90,16,415	7,902

22.1.2 Rights, preferences and restrictions in respect of each class of shares

The Company's authorised capital consists of two classes of shares referred to as Equity Shares and Preference Shares having face value of ₹ 10/- each and ₹ 100/- each, respectively. Each holder of Equity Shares is entitled to one vote per share. Preference shareholders have a preferential right over equity shareholders, in respect of repayment of capital and payment of dividend. However, no such Preference Shares have been issued by the Company till date. The Company declares and pays dividend in Indian rupees. The dividend, if any, proposed by Administrator Appointed Under IBC (Refer Note No. 1.2) is subject to the approval of the shareholders in the ensuing Annual General Meeting.

In the event of liquidation of the Company, the holders of Equity Shares will be entitled to receive any of the remaining assets of the Company, after distribution of all preferential amounts. The distribution will be in proportion to the number of Equity Shares held by the shareholders.

22.1.3 The details of shareholders holding more than 5% of the equity shares each:

Class of shares and names of shareholders	As at March 31st, 2023		As at March 31st, 2022	
	No. of shares	₹ in Lacs	No. of shares	₹ in Lacs
Equity shares, ₹ 10/- face value				
Srei Infrastructure Finance Limited (Holding Company)§	7,90,16,415	100	7,90,16,415	100

§ Including nominee shareholders

22.1.4 The details of shares held by promoters* as at March 31st, 2023:

Shares held by promoters at the end of the year

Promoter Name	No. of Shares**	% of total shares	% change during the year
Srei Infrastructure Finance Limited (Holding Company) §	7,90,16,415	100%	-

§ Including nominee shareholders

22.1.4A The details of shares held by promoters* as at March 31st, 2022:

Shares held by promoters at the end of the year

Promoter Name	No. of Shares**	% of total shares	% change during the year
Srei Infrastructure Finance Limited (Holding Company) §	7,90,16,415	100%	-

§ Including nominee shareholders.

* Promoter here means promoter as defined in the Companies Act, 2013.

** Class of shares is Equity Shares, ₹10/- face value.

22.1.5 Aggregate number and class of shares allotted as fully paid up pursuant to contract(s) without payment being received in cash.

In the financial year 2019-20, the Company had given the effect of the BTA (Refer Note No. 64) with its Holding Company, SIFL wef October 1st, 2019. Accordingly, the Company had allotted 1,93,56,415 equity shares of ₹ 10/- each to SIFL at a premium of ₹ 481/- per share thereby increasing the share capital by ₹ 1,936 Lacs and securities premium by ₹ 93,104 Lacs. The Company has not issued any shares without payment being received in cash from financial year 2017-18 to financial year 2018-19 and financial year 2020-21 to financial year 2021-22.

22.1.6 Refer Note No. 49 - "Capital Management" for the Company's objectives, policies and processes for managing capital.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

23. Other Equity

Particulars	As at March 31st, 2023	As at March 31st, 2022
Special Reserve (created pursuant to Section 45-IC of The Reserve Bank of India Act, 1934)		
Opening balance	40,822	40,822
Add: Transferred from Retained Earnings	-	-
Closing balance	40,822	40,822
Income Tax Special Reserve (created pursuant to Section 36(1)(viii) of the Income Tax Act, 1961)		
Opening balance	15,770	15,770
Add: Transferred from Retained Earnings	-	-
Closing balance	15,770	15,770
Capital Reserve		
Opening balance	2,403	2,403
Add/Less: Transferred from/to Retained earnings	-	-
Closing balance	2,403	2,403
Securities Premium		
Opening balance	1,97,084	1,97,08
Add: Received on issue of equity shares for the year	-	-
Closing balance	1,97,084	1,97,084
Debenture Redemption Reserve		
Opening balance	39,824	39,824
Add: Transferred from Retained Earnings	-	-
Less: Transferred to Retained Earnings on redemption	-	-
Closing balance	39,824	39,824
Retained Earnings		
Opening balance	(14,74,437)	(10,75,165)
Add: Profit/(Loss) after tax for the year	(11,21,928)	(2,77,292)
Add: Other Comprehensive Income (net of tax)	(182)	(42)
Amount available for appropriation	(25,96,547)	(13,52,499)
Appropriations:		
Less: Amount transferred to Impairment Reserve (Refer Note No. 63)	(45,533)	(1,22,999)
Add: Amount transferred from Debt Redemption Reserve on Redemption	-	-
Add: Amount transferred from Equity Instruments through Other Comprehensive Income	-	1,061
Closing balance	(26,42,080)	(14,74,437)
Impairment Reserve		
Opening balance	5,70,463	4,47,464
Add: Transferred from Retained Earnings (Refer Note No. 63)	45,533	1,22,999
Closing balance	6,15,996	5,70,463
Debt Instruments through Other Comprehensive Income		
Opening balance	948	1,158
Add: Addition/(Reduction) during the year	(719)	(210)
Closing balance	229	948
Equity Instruments through Other Comprehensive Income		
Opening balance	-	1,061
Add: Addition during the year	-	-
Less: Reclassified to Retained Earnings	-	(1,061)
Closing balance	-	-
Effective portion of Cash Flow Hedges		
Opening balance	-	(14)
Add: Addition during the year	-	14
Closing balance	-	-
Total	(17,29,952)	(6,07,123)

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

23. Other Equity (continued)

Nature and purpose of Reserves

Special Reserve (created pursuant to Section 45-IC of The Reserve Bank of India Act, 1934)

"Every year the Company transfers a sum of not less than twenty percent of net profit after tax of that year as disclosed in the Statement of Profit and Loss to its Statutory Reserve pursuant to Section 45-IC of The Reserve Bank of India Act, 1934.

The conditions and restrictions for distribution attached to Special Reserve is as follows:

No appropriation of any sum from the reserve fund shall be made by the Company except for the purpose as may be specified by the RBI from time to time and every such appropriation shall be reported to the RBI within twenty-one days from the date of such withdrawal. RBI may, in any particular case and for sufficient cause being shown, extend the period of twenty one days by such further period as it thinks fit or condone any delay in making such report.

Income Tax Special Reserve (created pursuant to Section 36(1)(viii) of the Income Tax Act, 1961)

This reserve has been created pursuant to Section 36(1)(viii) of the Income Tax Act, 1961 and any withdrawal from same will be taxable as per provisions of the Income Tax Act, 1961.

Capital Reserve:

Pursuant to the scheme of arrangement (the Scheme) between BNP Paribas Lease Group (BPLG) and SIFL, approved by shareholders and sanctioned by Hon'ble High Court of Calcutta vide order of 28th January 2008, and further in the financial year 2019-20, the Company has given the effect of the BTA with its Holding Company, SIFL w.e.f 1st October, 2019. The surplus, being the difference between the net book value of assets and liabilities taken over and shares issued as consideration has been accounted for as Capital Reserve in the books of the Company.

Securities Premium:

This reserve represents the premium on issue of shares and can be utilised in accordance with the provisions of the Companies Act, 2013.

Debenture Redemption Reserve (DRR):

Pursuant to Section 71 of the Companies Act, 2013 and circular 04/2013, read with notification issued date June 19th, 2016 issued by Ministry of Corporate Affairs, the Company is required to transfer 25% of the value of the outstanding debentures issued through public issue as per the present SEBI (Issue and Listing of Debt Securities) Regulation, 2008 to DRR and no DRR is required in case of privately placed debenture.

As per the notification G.S.R. 574(E) dated August 16th, 2019, the Ministry of Corporate Affairs has amended the Companies (Share Capital & Debentures) Rules, DRR is not required for debentures issued by NBFCs regulated by Reserve Bank of India for both public as well as private placement debentures.

Retained Earnings:

This reserve represents the cumulative profits/(loss) of the Company. This can be utilised in accordance with the provisions of the Companies Act, 2013.

Impairment Reserve:

Impairment reserve created pursuant to paragraph 2 (b) of Annex to the guidelines DOR (NBFC).CC.PD.No.109/22.10.106/2019-20 dated March 13, 2020 issued by RBI on Implementation of Indian Accounting Standards for Non-Banking Finance Companies and Asset Reconstruction Companies comprises of the excess provision as per Income Recognition, Asset classification and Provisioning norms (IRAC norms) as compared to the provision as per the ECL model adopted by the Company.

Debt Instruments through Other Comprehensive Income:

Debt instruments measured at Fair Value through Other Comprehensive Income (FVTOCI) are subsequently measured at fair value. Interest income under effective interest method, foreign exchange gains and losses and impairment are recognised in the statement of profit and loss. Other net gains and losses on account of fair value changes are recognised in Other Comprehensive Income (OCI). On derecognition, gains and losses accumulated in OCI are reclassified to the Statement of Profit and Loss.

Equity Instruments through Other Comprehensive Income:

This Reserve represents the cumulative gains (net of losses) arising on account of change in Fair Value of Equity Instruments measured at FVTOCI, net of amounts reclassified, if any, to Retained Earnings when those instruments are disposed off.

Effective portion of Cash Flow Hedges:

For designated and qualifying cash flow hedges, the effective portion of the cumulative gain or loss on the hedging instrument is initially recognised directly in OCI within equity (cash flow hedge reserve). When the hedged cash flow affects the Statement of Profit and Loss, the effective portion of the gain or loss on the hedging instrument is recorded in the corresponding income or expense line of the Statement of Profit and Loss.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

24. Interest Income

Particulars	For the year ended March 31st, 2023				For the year ended March 31st, 2022			
	On Financial Assets measured at fair value through OCI	On Financial Assets measured at Amortised Cost	Interest Income on Financial Assets classified at fair value through profit or loss	Total	On Financial Assets measured at fair value through OCI	On Financial Assets measured at Amortised Cost	Interest Income on Financial Assets classified at fair value through profit or loss	Total
Interest on Loans	389	1,14,447	2,999	1,17,835	2,458	2,48,026	2,789	2,53,273
Interest income from Investment	-	527	424	951	-	178	23	201
Interest on Fixed Deposits with Banks	-	9,617	-	9,617	-	1,421	-	1,421
Total	389	1,24,591	3,423	1,28,403	2,458	2,49,625	2,812	2,54,895

(₹ in Lacs)

25. Net gain/(loss) on fair value changes

Particulars	For the year ended March 31st, 2023		For the year ended March 31st, 2022	
	Net Gain	Net Loss	Net Gain	Net Loss
Net gain/(loss) on financial instruments at fair value through profit or loss				
(i) Trading Portfolio				
- Derivatives	-	-	1,128	-
(ii) Others				
- Investments	-	(11,415)	-	(22,664)
- Loan	-	(116)	-	(12,999)
- Claims Receivable	1,825	-	7,014	-
Total Net gain/(loss) on fair value changes	1,825	(11,531)	8,142	(35,663)
Fair Value changes:				
- Realised	-	-	(507)	(4,964)
- Unrealised	1,825	(11,531)	8,649	(31,206)
Total Net gain/(loss) on fair value changes	1,825	(11,531)	8,142	(35,663)

(₹ in Lacs)

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

26. Others

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Liabilities no longer required written back	304	3,087
Income from joint controlled operation	1,928	1,913
Referral Income	(199)	49
Others	941	1,434
Total	2,974	6,483

27. Other Income

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Net gain or (loss) on foreign currency transaction and translation (other than considered as finance cost)	-	(1,074)
Others	1,617	284
Total	1,617	(790)

28. Finance Costs

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023 (Refer Note No. 67)			For the year ended March 31st, 2022 (Refer Note No. 66 of the Financial Statements for the year ended March 31st, 2022)		
	On Financial liabilities measured at fair value through profit or loss	On Financial liabilities measured at Amortised Cost	Total	On Financial liabilities measured at fair value through profit or loss	On Financial liabilities measured at Amortised cost	Total
Interest on Borrowings	-	6,077	6,077	-	1,84,789	1,84,789
Interest on Debt Securities	-	392	392	-	15,413	15,413
Interest on Subordinated Liabilities	-	874	874	-	16,051	16,051
Other Interest Expense	-	262	262	-	501	501
Total	-	7,605	7,605	-	2,16,754	2,16,754

29. Impairment on Financial Instruments (Net)

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023			For the year ended March 31st, 2022		
	On Financial Instruments measured at fair value through OCI	On Financial instruments measured at Amortised Cost	Total	On Financial Instruments measured at fair value through OCI	On Financial Instruments measured at Amortised cost	Total
Loans	(424)	1,52,117	1,51,693	(57)	2,14,870	2,14,813
Others	-	1,747	1,747	-	6,336	6,336
Total	(424)	1,53,864	1,53,440	(57)	2,21,206	2,21,149

30. Employee Benefits Expenses

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Salaries and Wages	7,534	10,217
Contribution to provident and other funds*	522	724
Staff Welfare Expenses	86	79
Total	8,142	11,020

* This includes amount expended under defined contribution plans of ₹ 423 Lacs (March 31st, 2022: ₹ 570 Lacs).

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

31. Other Expenses

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Rates & Taxes	66	5,547
Rent	627	173
Electricity charges	187	250
Repairs and Maintenance - Machinery	1,846	1,764
- Others	556	890
Communication Costs	183	247
Printing and Stationery	61	66
Advertisement and Subscription	9	76
Director's fees, Allowances and Expenses	-	131
Auditor's Fees and Expenses (Refer Note No. 31.1)	307	357
Legal and Professional charges	3,549	3,497
Insurance	400	227
Travelling and Conveyance	1,060	1,252
Net loss on derecognition of Property, Plant and Equipment	7,555	7,413
Repossession Expenses	333	659
Corporate Social Responsibility Expenses (Refer Note No. 31.2)	-	-
Conference and Seminar	-	2
Exchange Fluctuations (Net)	-	1
Impairment loss on capital advance	-	(29)
CIRP Expense (Refer Note No. 31.3)	1,505	884
Other Expenditure	(16)	16
Total	18,228	23,423

31.1 Payments to the Auditor (including GST)

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
As Auditor - Statutory Audit & Limited Reviews	207	300
As Auditor - Tax Audit	27	-
Other Services (Certification etc.)	42	38
For Reimbursement Expenses	31	19
Total	307	357

31.2 Corporate Social Responsibility Expenses

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
(a) Gross amount required to be spent by the Company during the year	-	-
(b) Amount of expenditure incurred (paid in cash)	-	-
(c) Shortfall at the end of the year	-	-
(d) Total of previous years shortfall	523	523
(e) Reason for shortfall	Refer Note No. 72	Refer Note No. 72
(f) Nature of CSR activities	Not Applicable	Not Applicable
(g) Details of related party transactions, e.g., contribution to a trust controlled by the Company in relation to CSR expenditure as per relevant Accounting Standard	Not Applicable	Not Applicable
(h) Where a provision is made with respect to a liability incurred by entering into a contractual obligation, the movements in the provision during the year shall be shown separately.	Not Applicable	Not Applicable

31.3 CIRP Expense

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Fees to Resolution professionals	1,248	701
Manpower Cost	137	67
Reimbursement of expenses	91	6
Other Expenses	29	110
Total	1,505	884

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

32. Earnings Per Share

Particulars	(₹ in Lacs)	
	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Net Profit attributable to Equity Shareholders (₹ in Lacs)	(11,21,928)	(2,77,292)
Weighted average number of Equity Shares Basic (Nos.)	7,90,16,415	7,90,16,415
Weighted average number of Equity Shares Diluted (Nos.)	7,90,16,415	7,90,16,415
Nominal Value of Equity per share (in ₹)	10	10
Basic and Diluted Earnings per share (in ₹)	(1419.87)	(350.93)

33. Deferred Tax (Assets)/Liabilities (Net)

Particulars	(₹ in Lacs)	
	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Deferred Tax Liabilities on		
Property, Plant and Equipment and Intangible Assets	4,111	10,715
Gross deferred tax liabilities	4,111	10,715
Deferred Tax Assets on		
Financial assets and liabilities at fair value	26,407	20,404
Financial assets and liabilities at amortised cost	18,055	32,879
Loss under Income Tax	4,26,078	1,75,773
Expenses allowable for tax purpose when paid	40,200	38,130
Other timing differences	(32)	85
Gross deferred tax assets	5,10,708	2,67,271
Deferred tax liabilities/(Assets) (Net) *	(5,06,597)	(2,56,556)

* The Company as a matter of prudence has not recognised deferred tax assets as it is not probable that taxable profit will be available against which the deductible temporary differences can be utilised.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

34. Contingent Liabilities and Commitments (to the extent not provided for)

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
Contingent liabilities		
Claims against the Company not acknowledged as debt *		
Disputed demands		
- Entry Tax [deposits made under protest March 31st, 2023: ₹ 1 Lac (March 31st, 2022 : ₹ 1 Lac)]	-	-
- Value Added Tax (VAT) [deposits made under protest March 31st, 2023: ₹ 186 Lacs (March 31st, 2022 : ₹ 186 Lacs)]	1,212	1,212
- Central Sales Tax [deposits made under protest March 31st, 2023: ₹ 1 lac (March 31st, 2022 : ₹ 1 lac)]	-	-
- Service tax [deposits made under protest March 31st, 2023: ₹ 455 Lacs (March 31st, 2022 : ₹ 455 Lacs)] #	1,410	1,410
- Income Tax [deposits made under protest March 31st, 2023: ₹ 672 Lacs (March 31st, 2022 : ₹ 672 Lacs)]	6,931	6,931
(A) **	9,553	9,553
Disputed demands ##		
- Service Tax [deposits made under protest March 31st, 2023: ₹ 4 Lacs (March 31st, 2022: ₹ 4 Lacs)]	382	382
- Income Tax	-	-
(B) ***	382	382
Bank guarantees	79	79
(C)	79	79
Total (A+B+C)	10,014	10,014
Commitments		
Estimated amount of capital contracts remaining to be executed [Net of advances of ₹ 30 Lacs (March 31st, 2022: ₹ 33 Lacs)]	-	****

* The management believes that the ultimate outcome of these proceedings will not have a material adverse effect on the Company's financial position and result of operations.

Based on the directions of RBI, during the year ended March 31st, 2022 the Company has made provision amounting to ₹ 9,807 Lacs and ₹ 4,991 Lacs in respect of direct tax cases and indirect tax cases respectively where the Company was under various stages of appeal with the relevant tax authorities (Refer Note No. 71), details of which is as given below:

** Entry Tax - ₹ 30 Lacs, Value Added Tax - ₹ 86 Lacs, Central Sales Tax - ₹ 1 Lacs, Service tax - ₹ 400 Lacs, Income Tax - ₹ 225 Lacs.

*** Central Sales Tax - ₹ 211 Lacs, Service tax - ₹ 4,263 Lacs, Income Tax - ₹ 9,582 Lacs.

Further, during the year ended March 31st, 2023 the Company had made provision amounting to ₹ 7 Lacs in respect of indirect tax cases with the relevant tax authorities details of which is as given below:

Goods and Service Tax - ₹ 5 Lacs, Value Added Tax - ₹ 2 Lacs.

**** ₹ 40,103/- only.

Net of ₹ 518 Lacs (March 31st, 2022: ₹ 518 Lacs) already provided for in the books of accounts.

During the year ended March 31st, 2020, the Company has given the effect of the BTA with its Holding Company, SIFL w.e.f October 1st, 2019, by virtue of which the Company has undersigned to repay any liability with respect to disputed demands for the Transferred Undertaking (refer Note No. 64), if any arising in future. Accordingly the same has been shown as contingent liability.

For the purpose of above disclosure, pursuant to initiation of CIRP (Refer Note No. 1.2) any order received after the CIRP date i.e October 8th, 2021 has not been considered as per Section 14 of the code.

35. Financial Guarantees

(₹ in Lacs)

Particulars	As at March 31st, 2023	As at March 31st, 2022
Bank Guarantee @	29,185	36,141
Corporate Guarantee @@	2,330	9,289
Total	31,515	45,430

@ Represents bank guarantees issued on behalf of the customer and other parties.

@ Includes ₹ 301 Lacs (March 31st, 2022 : ₹ 416 Lacs) issued on behalf of its holding Company including out of banks credit line which was transferred to the Company as part of BTA (refer Note No. 64).

@@ Represents corporate guarantee issued on behalf of the customers.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

36. Title deeds of Immovable Properties not held in name of the Company

Relevant line item in the Balance Sheet	Description of item of property	Gross carrying value (₹ in Lacs) @		Title deeds held in the name of	Whether title deed holder is promoter*, director or relative # of promoter/director or employee of promoter/ director	Property held since which date \$	Reason for not being held in the name of the Company
		As at March 31st, 2023	As at March 31st, 2022				
Property, Plant and Equipment	Building	3895 ##	3895 ##	Srei Infrastructure Finance Limited	Promoter	October-2019	These immovable properties were transferred to the Company pursuant to the BTA (Refer Note No. 64) entered by the Company with its Holding Company, SIFL. These immovable properties are still in the name of SIFL.
	Building	59 ##	59 ##	Srei Infrastructure Finance Limited	Promoter	January-2008	These immovable properties were transferred to the Company pursuant to the Scheme of Arrangement approved by the shareholders and sanctioned by the Hon'ble High Court of Calcutta vide Order of 28th January 2008, on a slump sale basis, pursuant to Sections 391 to 394 and other relevant provisions of the Companies Act, 1956 with effect from 1st January 2008 ('Appointed Date').
	Land	4 ##	4 ##	Srei Infrastructure Finance Limited	Promoter	January-2008	
Other Non-Financial Assets - Assets acquired in satisfaction of debt	Land	11,800	11,800	Murti Housing and Finance Private Limited	No	September-2017	The immovable property was transferred to the Company pursuant to the BTA (Refer Note No. 64) entered by the Company with its Holding Company, SIFL.
	Land	639	639	Deccan Chronicle Secunderabad Private Limited and Deccan Chronicle Rajahmundry Private Limited	No	June-2018	Due to procedural issues, title deeds are not registered in the name of the Company.
	Land	678	678	Krystine Vintrade Pvt. Ltd Balanced Dealers Pvt. Ltd Shivdhan Sales Pvt. Ltd Wellknown Vinimay Pvt. Ltd Malank Dealtrade Pvt. Ltd Balanced Commotrade Pvt. Ltd Kavya Dealmark Pvt. Ltd Alaukik Commercial Pvt. Ltd Kripa Dealmark Pvt. Ltd	No	March-2016	
	Land	483	483	Mohamad Akil Shaikh and Ahmad Noor represented by its constituted attorney Mohamad Akil Shaikh	No	December-2016	
	Building	2,400	2,400	Kakarlapudi Venkata Madhava Varma	No	September-2015	
	Building	32	32	Sierra Constructions Pvt. Ltd	No	September-2016	
	Land	138	138	"Kabbalamma, Smt. Sukanya & Sri Prasanna represented by constituted attorney holder Sri L. Chandrasekhar"	No	September-2015	
	Land	1,444	1,444	Wianxx Impex Private Limited	No	September-2017	

* Promoter here means promoter as defined in the Companies Act, 2013.

Relative here means relative as defined in the Companies Act, 2013.

This represents Gross Block of PPE.

@ Gross carrying value represents value of Assets acquired in satisfaction of debt as disclosed in Other Non-Financial Assets given in Note No. 13.

\$ Month and year since the property is acquired by the Company

37. No proceedings have been initiated or pending against the company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (45 of 1988) and the rules made thereunder during the year ended March 31st, 2023 and March 31st, 2022.

38. Relationship with Struck off Companies

(₹ in Lacs)					
Name of struck off Company	Nature of transactions with struck off Company	Balance outstanding as on March 31st, 2023	Balance outstanding as on March 31st, 2022	Relationship with the Struck off Company, if any, to be disclosed #	
Vishal Packaging Private Limited	Receivables (Loans outstanding)	210	210	Not Applicable	
Uday Associates Private Limited	Receivables (Loans outstanding)	64	107	Not Applicable	
Bhatti Automobiles Private Limited	Receivables (Loans outstanding)	36	34	Not Applicable	
Ishanika Plywoods Private Limited	Receivables (Loans outstanding)	34	34	Not Applicable	
Shakti Infraestate And Trade Mart Private Limited	Receivables (Loans outstanding)	4	4	Not Applicable	
Raffles Supply Chain Solutions Private Limited	Receivables (Loans outstanding)	-	2,158	Not Applicable	
Rajbala RBR Realcon Private Limited	Receivables (Loans outstanding)	43	-	Not Applicable	
Magnate Marketing Services Private Limited	Receivable (Stamp Duty Charges)	-	*	Not Applicable	
Four Seasons Hotel Private Limited	Payable (Fooding & Hotel Expense)	**	-	Not Applicable	
Grandways Courier Services Private Limited	Payable (Postage & Courier)	***	***	Not Applicable	

* ₹ 33,000

** ₹ 2,630.59

*** ₹ 648.46

As per the definition of 'related party' under Section 2(76) of the Act.

Reduction in balance outstanding amount is due to collection, written off etc.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

39. Undisclosed Income

There are no transactions not recorded in the books of accounts during the year ended March 31st, 2023 and March 31st, 2022 that has been surrendered or disclosed as income in the tax assessments under the Income Tax Act, 1961.

There are no previously unrecorded income and related assets to be recorded in the books of account during the year ended March 31st, 2023 and March 31st, 2022.

40. Registration of charges or satisfaction with Registrar of Companies (ROC)

Any charges or satisfaction yet to be registered with ROC beyond the statutory period, details and reasons thereof is disclosed as below:

Satisfaction yet to be registered with ROC

(₹ in Lacs)

Facility Name	Charge ID	Date of charge Creation/Modification	Name of charge holder	Charge amount	
				As at March 31st, 2023	As at March 31st, 2022
Collateralised Borrowings	100275885	June 12th, 2019	Axis Trustees Services Limited	-	8,178
Debt Securities	100150739	December 28th, 2017	Catalyst Trusteeship Limited	500	500
Term Loans	100084037	March 16th, 2017	Small Industries Development Bank of India	10,000	10,000
Term Loans	100055724	September 26th, 2016	The Karur Vysya Bank Limited	7,500	7,500
Term Loans	10261668	November 24th, 2010	Axis Trustees Services Limited	36,800	36,800
Total				54,800	62,978

Charges not yet registered with ROC

(₹ in Lacs)

Facility Name	Name of lender	Reason for Non-registration	Amount*	
			As at March 31st, 2023	As at March 31st, 2022
Debt Securities	Catalyst Trusteeship Limited 10,836	Form CHG-9 filed with ROC but not approved ** (As at March 31st, 2022 : Form CHG-9 filed with ROC but yet to be approved **)	10,872	10,872
Debt Securities	Axis Trustee Services Limited		86,739	86,575
Debt Securities	Axis Trustee Services Limited	Novation Agreement signed but Form CHG-9 not filed ** (As at March 31st, 2022 : Form CHG-9 filed with ROC but yet to be approved **)	81	81
Term Loans	HDFC Bank Limited	Form CHG-1 not filed with ROC	21	21
Term Loans	ICICI Bank Limited		25	25
Term Loans	Toyota Financial Services India Limited		38	38
Term Loans	Bank of India		38,101	38,147
Term Loans	Canara Bank	Novation Agreement not signed **	8,956	8,956
Term Loans	IFCI Limited		19,020	19,020
Term Loans	Indian Bank		6,862	6,862
Term Loans	Lakshmi Vilas Bank		1,113	1,113
Term Loans	Punjab and Sind Bank		3,953	3,953
Term Loans	Punjab National Bank		18,802	18,586
Term Loans	South Indian Bank Limited		295	295
Term Loans	State Bank of India		2,639	2,759
Term Loans	Union Bank of India		23,965	23,897
Working Capital Facilities ***	Consortium with Lead Bank Axis Bank Limited		8,78,861	8,76,761
Total				11,00,343

The Location of ROC is Kolkata.

* This represents amount outstanding and does not include effective interest rate adjustment and interest accrued and not due.

** Refer Note No. 64 and 74.

*** Includes WCDL, FITL and Cash credit.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

41. The Company has not been declared as wilful defaulter by any bank or financial Institution or other lender during the year ended March 31st, 2023 and March 31st, 2022 (Also refer Note No. 78).

42. The Company does not have any subsidiary as at March 31st, 2023 and March 31st, 2022 and accordingly clause (87) of Section 2 of the Act read with Companies (Restriction on number of Layers) Rules, 2017 is not applicable.

43. The Company has taken borrowings from banks or financial institutions on the basis of security of current assets.

Pursuant to initiation of CIRP (Refer Note No. 1.2), the Company has not filed quarterly returns or statements of current assets with banks or financial institutions for the quarters ended June 30th, 2022, September 30th, 2022, December 31st, 2022 and March 31st, 2023.

During the previous year, quarterly returns or statements of current assets filed by the Company with banks or financial institutions for the quarter ended June 30th, 2021 and September 30th, 2021 are in agreement with the books of accounts. Further, pursuant to initiation of CIRP (Refer Note No. 1.2), the Company has not filed quarterly returns or statements of current assets with banks or financial institutions for the quarter ended December 31st, 2021 and March 31st, 2022.

Current assets for this purpose includes loans and other receivables which are expected to be realised within twelve months after the reporting date.

44. Utilisation of Borrowed funds and share premium:

(A) During the year ended and as at March 31st, 2023 and March 31st, 2022, the Company has not advanced or loaned or invested funds (either borrowed funds or share premium or any other sources or kind of funds) to any other person(s) or entity(ies), including foreign entities (Intermediaries) with the understanding (whether recorded in writing or otherwise) that the Intermediary shall:

(i) directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Company (Ultimate Beneficiaries) or

(ii) provide any guarantee, security or the like to or on behalf of the Ultimate Beneficiaries.

(B) During the year ended and as at March 31st, 2023 and March 31st, 2022, the Company has not received any fund from any person(s) or entity(ies), including foreign entities (Funding Party) with the understanding (whether recorded in writing or otherwise) that the Company shall:

(i) directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party (Ultimate Beneficiaries) or

(ii) provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.

45. Details of Crypto Currency or Virtual Currency

The Company has not traded or invested in Crypto currency or Virtual Currency during the year ended March 31st, 2023 and March 31st, 2022.

46. Disclosure pursuant to Ind AS 19 - Employee Benefits

I. Defined Contribution Plan

Contributions under Defined Contribution Plan as recognised in the Statement of Profit and Loss by the Company are as follows:

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
(₹ in Lacs)		
Employer contribution towards:		
- Provident Fund	414	555
- Employee State Insurance	9	15

II. Defined Benefit Plan

(A) Gratuity Fund:

The Company makes periodic contributions to the Srei Equipment Finance Limited Employees' Gratuity Fund, a funded defined benefit-plan for qualifying employees. The trustees of the gratuity scheme for the employees of the Company have entrusted the administration of the scheme to the Life Insurance Corporation of India (LIC). The plan provides for a lump-sum payment to vested employees at retirement, death while in employment or on termination of employment of an amount equivalent to 15 days salary payable for each completed year of service. Vesting occurs upon completion of five years of service. The Company makes annual contributions to gratuity funds established as trusts or insurance companies. The Company accounts for the liability for gratuity benefits payable in the future based on an actuarial valuation.

(B) Long-term Compensated Absence:

The employees' long-term compensated absence scheme, which is a Defined Benefit Plan is unfunded.

Risk Management

The Defined Benefit Plans expose the Company to risk of actuarial deficit arising out of interest rate risk, salary cost inflation risk and demographic risk.

(a) **Interest rate risk:** The defined benefit obligation calculated uses a discount rate based on government bonds. If bond yields fall, the defined benefit obligation will tend to increase.

(b) **Salary Inflation risk:** Higher than expected increases in salary will increase the defined benefit obligation.

(c) **Demographic risk:** This is the risk of variability of results due to unsystematic nature of decrements that include mortality, withdrawal, disability and retirement. The effect of these decrements on the defined benefit obligation is not straight forward and depends upon the combination of salary increase, discount rate and vesting criteria. It is important not to overstate withdrawals because in the financial analysis the retirement benefit of a short career employee typically costs less per year as compared to a long service employee.

The most recent actuarial valuation of plan assets and the present value of the defined benefit obligation was carried out as at March 31st, 2023.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

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46.1. Particulars in respect of post retirement defined benefit plans of the Company are as follows:

(₹ in Lacs)

Description	Gratuity (Funded)		Compensated absence (Unfunded)	
	As at March 31st, 2023	As at March 31st, 2022	As at March 31st, 2023	As at March 31st, 2022
1. Change in the defined benefit obligation (DBO)				
Present value of obligation at the beginning of the year	1,111	1,265	78	517
Current Service Cost	101	139	94	1
Interest Cost	69	71	*	2
Settlement (Credit)/Cost	-	-	-	105
Past Service Costs - plan amendments	-	-	-	-
Acquisitions Cost/(Credit)	-	-	-	-
Actuarial (gain)/loss - experience	18	63	38	121
Actuarial (gain)/loss - demographic assumptions	-	-	-	-
Actuarial (gain)/loss - financial assumptions	166	(29)	13	(2)
Benefits paid	(261)	(399)	(144)	(666)
Present value of obligation at the end of the year	1,204	1,110	79	78
2. Change in plan assets				
Fair value of Plan Assets at the beginning of the year	773	967	-	-
Acquisitions adjustment	-	-	-	-
Interest income on plan assets	71	57	-	-
Contributions by the employer	747	156	-	-
Return on Plan assets greater/(lesser) than discount rate	2	(8)	-	-
Benefits paid	(261)	(399)	-	-
Fair value of Plan Assets at the end of the year	1,332	773		

* ₹ 0.42 Lacs

Basis used to determine the Expected Rate of Return on Plan Assets

The expected rate of return on plan assets is determined based on government bond rate

(₹ in Lacs)

Description	Gratuity (Funded)		Compensated absence (Unfunded)	
	As at March 31st, 2023	As at March 31st, 2022	As at March 31st, 2023	As at March 31st, 2022
3. Amount recognised in Balance Sheet consists of:**				
Fair value of Plan Assets at the end of the year (A)	1,333	773	-	-
Present Value of Obligation at the end of the year (B)	1,204	1,111	79	78
Funded status [surplus/(deficit)] (A-B)	129	(338)	(79)	(78)
Net defined benefit Asset/(Liabilities) (A-B)	129	(338)	(79)	(78)

** Also includes DBO in respect of sick leave amounting to ₹ 242 Lacs as at March 31st, 2023 (As at March 31st, 2022 ₹ 360 Lacs).

(₹ in Lacs)

Description	Gratuity (Funded)		Compensated absence (Unfunded)	
	For the year ended March 31st, 2023	For the year ended March 31st, 2022	For the year ended March 31st, 2023	For the year ended March 31st, 2022
4. Expenses recognised in the Statement of Profit and Loss consists of:				
Employee benefits expenses:				
Current Service cost	101	139	94	106
Net Interest cost	(2)	15	*	2
Actuarial (Gain)/Loss due to DBO experience	-	-	51	119
Actuarial (Gain)/Loss due to DBO assumptions changes	-	-	-	-
Total [A]	99	154	145	227
Other Comprehensive Income				
Actuarial (Gain)/Loss due to DBO experience	18	63	38	121
Actuarial (Gain)/Loss due to DBO assumptions changes	166	(29)	13	(2)
Actuarial (Gain)/Loss during the year	184	34	51	119
Return on Plan assets (greater)/lesser than discount rate	(2)	8	-	-
Actuarial (Gains)/Losses recognised in OCI [B]	182	42	-	-
Adjustment for limit on net asset	-	-	-	-
Expense recognised during the year [A+B]	281	196	145	227

* ₹ 0.42 Lacs

The expense for the Defined Benefits (referred to in note no. 46.1 above) are included in the line item under 'Contribution to Provident and other Funds' in Note No. 30.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

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46.2. Particulars in respect of post retirement defined benefit plans and long term employment benefits of the Company are as follows:

Description	Gratuity (Funded) % Invested		Compensated absence (Unfunded) % Invested	
	As at March 31st, 2023	As at March 31st, 2022	As at March 31st, 2023	As at March 31st, 2022
5. Investment Details of Plan Assets				
Schemes of insurance-conventional products	100%	100%	Not Applicable	Not Applicable
6. Principle assumptions at the Balance Sheet date are as follows:				
Discount rate per annum	7.20%	7.00%	7.20%	7.00%
Salary escalation rate per annum	7.50%	5.00%	7.50%	5.00%
Mortality rate	Indian Assured Lives Mortality (2006-08) Ultimate	Indian Assured Lives Mortality (2006-08) Ultimate	Indian Assured Lives Mortality (2006-08) Ultimate	Indian Assured Lives Mortality (2006-08) Ultimate
Method used	Projected Unit Credit Method		Projected Unit Credit Method	

46.3. The estimate of future salary increases considered in actuarial valuation takes into account inflation, seniority, promotion and other relevant factors such as supply and demand in employee market.

46.4. Sensitivity Analysis

The sensitivity results below determine their individual impact on the plan's end of year Defined Benefit Obligation. In reality, the plan is subject to multiple external experience items which may move the Defined Benefit Obligation in similar or opposite directions, while the plan's sensitivity to such changes can vary over time.

Description	As at March 31st, 2023				As at March 31st, 2022			
	Gratuity (Funded)		Compensated absence (Unfunded)		Gratuity (Funded)		Compensated absence (Unfunded)	
	%	(₹ in Lacs)	%	(₹ in Lacs)	%	(₹ in Lacs)	%	(₹ in Lacs)
1. Discount Rate + 1%	-7.80%	(94)	-7.30%	(6)	-8.00%	(89)	-8.40%	(7)
2. Discount Rate - 1%	8.90%	107	8.40%	7	9.10%	101	9.60%	8
3. Salary Increase Rate + 1%	7.00%	85	8.30%	7	7.50%	83	9.70%	8
4. Salary Increase Rate - 1%	-6.50%	(78)	-7.40%	(6)	-7.00%	(77)	-8.60%	(7)

46.5. Maturity analysis of the defined benefit obligation are as follows:

(₹ in Lacs)

Description	As at March 31st, 2023		As at March 31st, 2022	
	Gratuity (Funded) (Funded)	Compensated absence (Unfunded)	Gratuity (Funded)	Compensated absence (Unfunded)
Within 1 year	96	16	51	3
1-2 years	49	2	98	5
2-3 years	77	3	63	3
3-4 years	112	5	80	4
4-5 years	95	4	113	5
5-10 years	905	35	833	47

The Company expects to contribute ₹ Nil to the fund in the next financial year.

46.6. Weighted average duration of the defined benefit obligation is 9 years for compensated absence (unfunded) (Previous years : 9 years) and 10 years for gratuity (funded) (Previous year: 9 years).

NOTES TO THE FINANCIAL STATEMENT AS AT AND

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47. Disclosure pursuant to Ind AS 24, Related Party Disclosures

List of Related Parties

Entities related to the Company

Name	Nature of Relationship
Adisri Commercial Private Limited	Ultimate Parent Company
Srei Infrastructure Finance Limited	Parent Company
Controlla Electrotech Private Limited	Fellow Subsidiary
Bengal Srei Infrastructure Development Limited	Fellow Subsidiary
Srei Capital Markets Limited	Fellow Subsidiary
Srei Insurance Broking Private Limited	Fellow Subsidiary
Trinity Alternative Investment Managers Limited (erstwhile Srei Alternative Investment Managers Limited)	Fellow Subsidiary
Srei Equipment Finance Limited Employees Gratuity Fund	Employees' Benefit Plan

Key Management Personnel (KMP)

Name	Designation
Mr. Rajneesh Sharma (w.e.f October 4th, 2021)*	Administrator
Mr. Hemant Kanoria (till October 4th, 2021)*	Chairman
Mr. Sunil Kanoria (till October 4th, 2021)*	Vice Chairman
Mr. Devendra Kumar Vyas (till October 4th, 2021)* and (w.e.f March 1st, 2022)	Managing Director (till October 4th, 2021) Chief Business Officer (w.e.f March 1st, 2022)
Mr. Indranil Sengupta (w.e.f August 1st, 2020) (till October 4th, 2021)*	Whole Time Director
Mr. Manoj Kumar Beriwal (till June 29th, 2021) and (w.e.f March 1st, 2022)	Chief Financial Officer (till June 29th, 2021) Chief Compliance Officer - RBI Compliances (w.e.f March 1st, 2022)
Mr. Yogesh Kajaria (w.e.f June 30th, 2021)	Chief Financial Officer
Ms. Ritu Bhojak (till May 10th, 2021)	Company Secretary
Mr. Sumit Kumar Surana (w.e.f August 20th, 2021)	Company Secretary
Ms. Nidhi Saharia (w.e.f March 1st, 2022)	Chief Risk Officer
Mr. Suresh Kumar Jain (till October 4th, 2021)*	Independent Director
Dr. Tamali Sengupta (till October 4th, 2021)*	Independent Director
Mr. Uma Shankar Paliwal (till October 4th, 2021)*	Independent Director
Mr. Shyamalendu Chatterjee (w.e.f April 2nd, 2020) (till October 4th, 2021)*	Independent Director
Mr. Malay Mukherjee (w.e.f March 6th, 2021) (till October 4th, 2021)*	Independent Director
Mr. Deepak Verma (w.e.f April 23rd, 2021) (till October 4th, 2021)*	Independent Director

Others

Name	Nature of Relationship
Yogesh Kajaria - HUF (w.e.f June 30th, 2021)	KMP is Karta
Manoj Kumar Beriwal - HUF (till June, 29th, 2021) and (w.e.f March 1st, 2022)	KMP is Karta
Vandana Kumari (w.e.f April 1st, 2021)	Relative of KMP of Parent Company
Prabha Sureka (w.e.f March 1st, 2022)	Relative of KMP
Sangita Agarwal (w.e.f March 21st, 2022)	Relative of KMP of Parent Company

*Refer Note No. 1.2

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47. Disclosure pursuant to Ind AS 24, Related Party Disclosures (Contd.)

47(a) Summary of Transactions/Balance Outstanding

(₹ in Lacs)

Name of the Related Party	Nature of relationship/designation	Nature of transactions	For the year ended March 31st, 2023	Balance as at March 31st, 2023	For the year ended March 31st, 2022	Balance as at March 31st, 2022
Srei Infrastructure Finance Limited	Parent Company	Rent paid for Leased Premises	79	229	20	229
		Security Deposit paid for Leased Premises - Excluding impairment loss allowance of ₹15,000 Lacs as at March 31st, 2023 (₹ 7,500 Lacs as at March 31st, 2022)	-	15,000	-	15,000
		Rent received for Leased Premises	14	-	3	3
		Intercorporate Deposit Given (on maximum outstanding basis) - Excluding impairment loss allowance of ₹ 12,836 Lacs as at March 31st, 2023 (₹13,316 Lacs as at March 31st, 2022)	31	25,671	19	25,723
		Refund of Intercorporate Deposit Given	84	-	2,350	-
		Reimbursement of IT Expense	20	-	-	-
		Other Receivables : Amount received	208	-	-	-
		Other Receivables : Amount paid	208	-	-	-
		Other Receivables : Advance Given #	-	-	1,559	-
		Other Receivables : Refund of Advance Given #	-	-	3,315	-
		Bank Guarantee released (Refer Note No. 64)	-	-	88	-
Bank Guarantee issued (Refer Note No. 64)	-	301	-	416		
Pre-CIRP Claim Receivable - Excluding impairment loss allowance of ₹ 32 Lacs as at March 31st, 2023 (₹ Nil as at March 31st, 2022)	107	107	-	-		
Closure of Bank Guarantee	116	-	-	-		
Bengal Srei Infrastructure Development Limited	Fellow Subsidiary	Loan Given (Secured) (Refer Note No. 64) - Excluding impairment loss allowance of ₹ 37 Lacs as at March 31st, 2023 (₹ 21 Lacs as at March 31st, 2022)	-	123	-	119
		Interest Income on Loan Given	4	-	15	-
Trinity Alternative Investment Managers Limited (erstwhile Srei Alternative Investment Managers Limited)	Fellow Subsidiary	Loan Given (Secured) - Excluding impairment loss allowance of ₹ 3,039 Lacs as at March 31st, 2023 (₹ 1,190 Lacs as at March 31st, 2022)	-	3,039	-	3,089
		Interest Income on Loan Given	126	-	309	-
Controlla Electrotech Private Limited	Fellow Subsidiary	Rent paid for Leased Premises	312	156	156	156
		Security Deposit paid for Leased Premises - Excluding impairment loss allowance of ₹ 705 Lacs as at March 31st, 2023 (Nil as at March 31st, 2022)	-	2,350	-	2,350
		Interest Received on Security Deposit - Excluding impairment loss allowance of ₹ 34 Lacs as at March 31st, 2023 (Nil as at March 31st, 2022)	235	113	117	113
Srei Capital Markets Limited	Fellow Subsidiary	Rent received for Leased Premises	3	-	1	1
Srei Insurance Broking Private Limited	Fellow Subsidiary	Rent received for Leased Premises	14	1	3	-
Mr. Rajneesh Sharma	Administrator (w.e.f October 4th, 2021)	Consultancy Fees	54	-	27	-
Mr. Hemant Kanoria	Chairman (till October 4th, 2021)	Short-term employee benefits	-	54	2	54
Mr. Sunil Kanoria	Vice Chairman (till October 4th, 2021)	Short-term employee benefits	-	18	2	18
Mr. Devendra Kumar Vyas	Managing Director (till October 4th, 2021) and Chief Business Officer (w.e.f March 1st, 2022)	Short-term employee benefits	237	84	158	93
		Post-employment benefits	17	5	10	5
Mr. Indranil Sengupta	Whole Time Director (w.e.f August 1st, 2020) (till October 4th, 2021)	Short-term employee benefits	-	2	45	2
		Post-employment benefits	-	-	2	-
Mr. Yogesh Kajaria	Chief Financial Officer (w.e.f June 30th, 2021)	Short-term employee benefits	78	5	49	8
		Post-employment benefits	5	-	3	-
Mr. Manoj Kumar Beriwal	Chief Financial Officer (till June, 29th, 2021) and Chief Compliance Officer - RBI Compliances (w.e.f March 1st, 2022)	Short-term employee benefits	69	10	27	10
		Post-employment benefits	4	-	1	-
Ms. Ritu Bhojak	Company Secretary (till May 10th, 2021)	Short-term employee benefits	-	-	6	-
		Post-employment benefits	-	-	*	-
Ms. Nidhi Saharia	Chief Risk Officer (w.e.f March 1st, 2022)	Short-term employee benefits	41	3	4	3
		Post-employment benefits	2	-	**	-
Mr. Sumit Kumar Surana	Company Secretary (w.e.f August 20th, 2021)	Short-term employee benefits	36	3	20	1
		Post-employment benefits	2	-	1	-
Mr. Shyamalendu Chatterjee	Independent Director (w.e.f April 2nd, 2020) (till October 4th, 2021)	Sitting Fees	-	***	19	***
Mr. Suresh Kumar Jain	Independent Director (till October 4th, 2021)	Sitting Fees	-	-	23	-
Dr. Tamali Sengupta	Independent Director (till October 4th, 2021)	Sitting Fees	-	2	22	2
Mr. Uma Shankar Paliwal	Independent Director (till October 4th, 2021)	Sitting Fees	-	-	23	-
Mr. Malay Mukherjee	Independent Director (w.e.f March 6th, 2021) (till October 4th, 2021)	Sitting Fees	-	3	26	3
Mr. Deepak Verma	Independent Director (w.e.f April 23rd, 2021) (till October 4th, 2021)	Sitting Fees	-	-	8	-
Yogesh Kajaria - HUF	KMP is Karta (w.e.f June 30th, 2021)	Car Hire Charges	6	2	5	2
Manoj Kumar Beriwal - HUF	KMP is Karta (till June, 29th, 2021) and KMP is Karta (w.e.f March 1st, 2022)	Car Hire Charges	6	3	2	3
Vandana Kumari	Relative of KMP of Parent Company (w.e.f April 1st, 2021)	Car Hire Charges	6	-	3	-
Prabha Sureka	Relative of KMP (w.e.f March 1st, 2022)	Car Hire Charges	6	-	****	-
Sangita Agarwal	Relative of KMP of Parent Company (w.e.f March 21st, 2022)	Car Hire Charges	6	-	-	-

* ₹ 20,077/-

** ₹ 17,739/-

*** ₹ 45,000/-

**** ₹ 50,000/-

This represents amount receivable from Parent Company, SIFL in TRA.

Note 1. Settlement of outstanding balances as at year end generally occurs in cash.

Note 2. Income or expenses are presented excluding GST.

Note 3. All the related party transactions have been made in the ordinary course of business and the same are generally at arm's length price.

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for the year ended March 31st, 2023

47(b) Compensation to KMPs

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Short-term employee benefits	462	432
Other long-term employee benefits	9	14
Post-employment benefits	31	18

48. As at March 31st, 2023 and as at March 31st, 2022, there are no loans or advances in the nature of loans granted to promoters, directors, KMPs and the related parties (as defined under the Companies Act, 2013), either severally or jointly with any other person that are repayable on demand or without specifying any terms or period of repayment.

49. Capital Management

The primary objectives of the Company's capital management is to ensure that the Company complies with externally imposed capital requirements and maintains strong credit ratings and healthy capital ratios in order to support its business and to maximise shareholder value.

The Company manages its capital structure and makes adjustments to it according to changes in economic conditions and the risk characteristics of its activities. In order to maintain or adjust the capital structure, the Company may adjust the amount of dividend payment to shareholders, return capital to shareholders or issue capital securities. No changes have been made to the objectives, policies and processes from the previous years. However, in view of deteriorating asset quality and substantial increase in the loan loss provisioning and liquidity problems faced by the Company, the net worth of the Company has been fully eroded. The Company is presently under CIRP wef October 8th, 2021 (Refer Note No. 1.2) and continues to operate as a going concern.

In view of present situation, any improvement in the capital structure is envisaged through a successful implementation of the Resolution plan. Also refer Note No. 63, 64, 65 and 69.

(₹ in Lacs)

	As at March 31st, 2023	As at March 31st, 2022
Tier I capital	(23,52,073)	(11,86,181)
Tier II capital	7,613	22,892
Total capital *	(23,52,073)	(11,86,181)
Risk weighted assets **	6,09,021	18,31,340
Tier I Ratio	(386.21)%	(64.77)%
Tier II Ratio	1.25%	1.25%

* If Tier II capital exceeds Tier I capital, amount exceeding Tier I capital is not considered for Total capital funds & if Tier I capital is negative, Tier II capital is ignored. Further, as at March 31st, 2023 subordinated debts have not been considered in Tier II capital as Tier I capital is negative.

** Does not include off-balance sheet items as considering the same under the scenario of negative Tier I capital will have a favourable impact on Tier I Ratio.

Regulatory capital consists of Tier I capital, which comprises share capital, securities premium, retained earnings including current year loss, statutory reserves and other free reserves less deferred revenue expenditure and intangible assets etc. The other component of regulatory capital is Tier II Capital Instruments, which includes subordinate debts.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

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50. Financial Instruments and Related Disclosures

This section gives an overview of the significance of financial instruments for the Company and provides additional information on balance sheet items that contain financial instruments. The details of significant accounting policies, including the criteria for recognition, the basis of measurement and the basis on which income and expenses are recognised in respect of each class of Financial Asset, Financial Liability and Equity Instrument are disclosed in Note No. 2 to the financial statements.

A) Categories of Financial Instruments

Set out below, is a comparison by class of the carrying value and fair value of the Company's financial instruments:

(₹ in Lacs)

Particulars	As at March 31st, 2023		As at March 31st, 2022	
	Carrying Value	Fair Value	Carrying Value	Fair Value
Financial Assets				
a) Measured at Amortised Cost				
i) Cash and Cash Equivalents	2,52,639	2,52,639	1,27,881	1,27,881
ii) Bank Balance other than (i) above	18,169	18,169	18,261	18,261
iii) Trade Receivables	146	146	3,168	3,168
iv) Loans	9,40,607	9,67,970	19,91,476	20,27,362
v) Investments	8,982	8,994	6,984	6,996
vi) Other Financial Assets	3,501	3,501	17,989	17,989
Sub-total	12,24,044	12,51,419	21,65,759	22,01,657
b) Measured at Fair value through Profit or Loss				
i) Loans	19,091	19,091	39,187	39,187
ii) Investments	54,758	54,758	1,16,620	1,16,620
iii) Other Financial Assets	62,196	62,196	72,542	72,542
Sub-total	1,36,045	1,36,045	2,28,349	2,28,349
c) Measured at Fair value through Other Comprehensive Income				
i) Loans	2,687	2,687	16,462	16,462
Sub-total	2,687	2,687	16,462	16,462
Total Financial Assets	13,62,776	13,90,151	24,10,570	24,46,468
Financial Liabilities				
a) Measured at Amortised Cost				
i) Trade Payables	6,414	6,414	6,418	6,418
ii) Debt Securities	2,59,944	2,59,944	2,59,552	2,59,552
iii) Borrowings (Other than Debt Securities)	26,69,340	26,69,423	26,76,863	26,76,992
iv) Subordinated Liabilities	2,62,458	2,62,458	2,61,581	2,61,581
v) Lease Liabilities	636	636	828	828
vi) Other Financial Liabilities	14,766	14,766	18,672	18,672
Total Financial Liabilities	32,13,558	32,13,641	32,23,914	32,24,043

Below are the methodologies and assumptions used to determine fair values for the above financial instruments which are not recorded and measured at fair value in the Company's financial statements. These fair values were calculated for disclosure purposes only. The below methodologies and assumptions relate only to the instruments in the above tables:

Loans measured at amortised cost

The fair values of loan assets are estimated using a discounted cash flow model based on contractual future cash flows based on terms, discounted at average lending rate.

Investments measured at amortised cost

The fair values of Investments at amortised cost (quoted bonds) are estimated using the most recent quoted price available from a recognised stock exchange.

Other Financial Assets measured at amortised cost

For other financial assets that have a short-term maturity (less than twelve months), the carrying amounts, which are net of impairment, are a reasonable approximation of their fair value.

Such instruments majorly include: Cash and Cash Equivalents, Other Bank Balances, Trade and Other Receivables and Security Deposits.

Debt Securities, Subordinated Liabilities and Other Borrowings measured at amortised cost

The fair values of collateralised borrowings are estimated using a discounted cash flow model based on contractual future cash flows based on terms, discounted at average borrowing rate. For all other Debt Securities, Subordinated Liabilities and Other Borrowings, pursuant to CIRP (Refer Note No. 1.2, 66) the carrying value as at March 31st, 2023 has been considered as fair value.

Other Financial Liabilities and Lease Liabilities measured at amortised cost

For other financial liabilities and Lease Liabilities that have a short-term maturity (less than twelve months), the carrying amounts are a reasonable approximation of their fair value.

Such instruments majorly include: Trade and Other payables and Trade Deposits.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

50. Financial Instruments and Related Disclosures (contd.)

B) Fair value hierarchy

The following table provides an analysis of financial instruments that are measured subsequent to initial recognition at fair value, grouped into Level 1 to Level 3, as described below:

Quoted prices in an active market (Level 1): Level 1 hierarchy includes financial instruments measured using quoted prices. This includes listed equity instruments that have quoted price. The fair value of all equity instruments which are traded in the stock exchanges is valued using the closing price as at the reporting period.

Valuation techniques with observable inputs (Level 2): The fair value of financial instruments that are not traded in an active market (for example over-the-counter derivatives) is determined using valuation techniques which maximise the use of observable market data and rely as little as possible on entity-specific estimates. If all significant inputs required to fair value an instrument are observable, the instrument is included in level 2.

Valuation techniques with significant unobservable inputs (Level 3): If one or more of the significant inputs is not based on observable market data, the instrument is included in level 3. This is the case for unlisted equity securities, Loans and Other Financial Assets and Liabilities included in level 3.

(₹ in Lacs)

Particulars	As at March 31st, 2023			
	Level 1	Level 2	Level 3	Total
Financial Assets				
Loans	-	-	21,778	21,778
Investments	4,761	1,439	48,558	54,758
Other Financial Assets	-	-	62,196	62,196
	4,761	1,439	1,32,532	1,38,732

(₹ in Lacs)

Particulars	As at March 31st, 2022			
	Level 1	Level 2	Level 3	Total
Financial Assets				
Loans	-	-	55,649	55,649
Investments	421	1,484	1,14,715	1,16,620
Other Financial Assets	-	-	72,542	72,542
	421	1,484	2,42,906	2,44,811

Fair value of the Company's assets and liabilities that are measured at fair value on a recurring basis

(₹ in Lacs)

Particulars	Fair Value as at		Fair Value Hierarchy	Valuation Technique and Key Inputs	Significant Unobservable Inputs
	March 31st, 2023	March 31st, 2022			
Financial Assets					
Loans	21,778	55,649	Level 3	Note (i)	Note (v) and (vi)
Investments	4,761	421	Level 1	Note (ii)	Not applicable
Investments	1,439	1,484	Level 2	Note (iii) & (iv)	Not applicable
Investments	48,558	1,14,715	Level 3	Note (i)	Note (v)
Other Financial Assets	62,196	72,542	Level 3	Note (i)	Note (vii)

(i) Income Approach

The discounted cash flow method was used to capture the present value of the the expected future benefits (including contractual cash flows) to be derived from the Loans, Investments and Other Financial Assets.

(ii) Quoted Prices

Quoted bid prices of an active market was used.

(iii) Price to Revenue/Earnings Multiple Method

Price was derived as a multiple of revenue/earnings based on relevant information from companies operating in similar economic environment and industry.

(iv) Net Asset Value Method

The adjusted net asset value is arrived at after making adjustments for the Fair value of Assets and Liabilities as on the date of valuation.

(v) Discount rate, determined using average lending rate of the company or discount rate considered by the Valuer.

(vi) The fair value of loans is derived based on the valuation of the underlying assets.

(vii) Probability of recovery and discount rate considered by the Valuer.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

50. Financial Instruments and Related Disclosures (contd.)

Reconciliation of Level 3 fair value measurements

Reconciliation	(₹ in Lacs)					
	Investments		Loans		Other Financial Assets	
	March 31st, 2023	March 31st, 2022	March 31st, 2023	March 31st, 2022	March 31st, 2023	March 31st, 2022
Opening Balance	1,14,715	1,01,265	55,649	98,402	72,542	65,897
Addition	627	36,174	2,190	9,769	-	-
Repayment/Transfers to amortised cost *	(13,870)	(6)	(13,501)	(43,824)	-	(1,804)
Transfers into Level 3	-	-	-	-	-	-
Transfers from Level 3	-	-	-	-	-	-
Unrealised income/(loss) #	(52,914)	(22,718)	(22,265)	(8,546)	(10,346)	8,449
Other Comprehensive Income	-	-	(295)	(152)	-	-
Closing Balance	48,558	1,14,715	21,778	55,649	62,196	72,542

* includes write off

includes Exceptional Items

Sensitivity of fair value measurements to changes in unobservable market data

The table below describes the effect of changing the significant unobservable inputs to reasonable possible alternatives. Sensitivity data are calculated using a number of techniques, including analysing price dispersion of different price sources, adjusting model inputs to reasonable changes within the fair value methodology.

The ranges are not comparable or symmetrical as the model inputs are usually not in the middle of the favourable/unfavourable range.

Below table shows impact of increase/decrease in fair valuation measurement at 2%.

Particulars	(₹ in Lacs)			
	As at March 31st, 2023		As at March 31st, 2022	
	Favourable Changes	Unfavourable Changes	Favourable Changes	Unfavourable Changes
Loans at FVTOCI	-	-	419	(378)
Loans at FVTPL	666	(631)	1,657	(1,556)
Investments at FVTPL @	684	(658)	6,911	(6,114)
Other Financial Assets at FVTPL	1,723	(1,172)	1,983	(1,894)
Total	3,073	(2,461)	10,970	(9,942)

@ Impact of increase/decrease in the fair value measurement at 2% excludes those cases of Security Receipts, wherein provision as per RBI circular DOR.STR.REC.51/21.04.048/2022-23 dated June 28, 2022 is higher than fair value measurement as derived by registered valuer.

C) Financial risk management objectives

The Company's activities expose it to market risk, liquidity risk and credit risk.

The Company is currently undergoing CIRP (Refer Note No. 1.2) under the provisions of the Code. Accordingly, a moratorium has been declared under Section 14 of the Code. Post CIRP, the Company has reconstituted the Risk Management Committee including constitution of its sub committees viz Operational Risk Management Committee of Executives, Credit Risk Management Committee of Executives and the Product & Process Approval Committee. The Asset Liability Management Committee (ALCO) has also been reconstituted. The Financial risk management framework would undergo revision post implementation of the approved resolution plan.

a) Market risk

The Company's Financial Instruments are exposed to market changes. The Company is exposed to the following significant market risk:

- Foreign Currency Risk
- Interest Rate Risk
- Price Risk

i. Foreign currency risk

The Company undertakes transactions denominated in foreign currency which results in exchange rate fluctuations. Such exchange rate risk primarily arises from transactions made in foreign exchange and reinstatement risks arising from recognised assets and liabilities, which are not in the Company's functional currency (Indian Rupees).

The Company is currently undergoing CIRP (Refer Note No. 1.2) under the provisions of the Code. Accordingly, a moratorium has been declared under Section 14 of the Code. The foreign currency liabilities have been crystallised into INR as on October 8th, 2021 (Insolvency Commencement Date or 'ICD'). Hence, there is no foreign currency risk and consequently foreign currency sensitivity is not applicable as at March 31st, 2023.

Foreign Currency Exposure

(₹ in Lacs)			
As at March 31st, 2023	USD	EURO	Total
Borrowings (Other than Debt Securities)	1,46,388	80,529	2,26,917
As at March 31st, 2022	USD	EURO	Total
Borrowings (Other than Debt Securities)	1,46,388	80,529	2,26,917

(₹ in Lacs)			
Hedged Foreign Currency balances:	As at March 31st, 2023		As at March 31st, 2022
Borrowings (Other than Debt Securities)	USD	-	-
	EURO	-	-

(₹ in Lacs)			
Unhedged Foreign Currency balances:*	As at March 31st, 2023		As at March 31st, 2022
Borrowings (Other than Debt Securities)	USD	1,46,388	1,46,388
	EURO	80,529	80,529

* Includes Overdue Principal and Interest. Also Refer Note No. 68.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

50. Financial Instruments and Related Disclosures (contd.)

Foreign currency sensitivity

Impact on increase in 2%

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
USD	-	-
EURO	-	-

Impact on decrease in 2%

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
USD	-	-
EURO	-	-

ii. Interest rate risk

The Company is exposed to interest rate risk as the Company borrows foreign currency funds at fixed plus floating interest rate benchmarks. The Company manages this risk by maintaining an appropriate mix between fixed and floating rate borrowings, and by use of derivative hedging products like interest rate swaps and cross currency interest rate swaps. It is pertinent to note that the Company is absolutely dependent on banks for such hedging limits.

The Company is currently undergoing CIRP (Refer Note No. 1.2) under the provisions of the Code. Accordingly, a moratorium has been declared under Section 14 of the Code. The borrowings have been crystallised into INR as on October 8th, 2021 (Insolvency Commencement Date or 'ICD'). Hence, there is no interest rate risk and consequently interest rate sensitivity is not applicable as at March 31st, 2023 for the borrowings of the Company.

The Company is further exposed to interest rate risk as the Company also lends funds at floating interest rates.

Interest Rate Exposure [Financial Instruments at variable interest rates]

(₹ in Lacs)				
As at March 31st, 2023	INR	USD	EURO	Total
Financial Assets				
Loans	5,70,810	-	-	5,70,810
Financial Liabilities				
Borrowings (Other than Debt Securities)	-	-	-	-
Subordinated Liabilities	-	-	-	-
As at March 31st, 2022	INR	USD	EURO	Total
Financial Assets				
Loans	8,06,434	-	-	8,06,434
Financial Liabilities				
Borrowings (Other than Debt Securities)	-	-	-	-
Subordinated Liabilities	-	-	-	-

The following table demonstrates the sensitivity to a reasonably possible change in interest rates (all other variables being constant) of the Company's profit and loss and equity.

Interest Rate sensitivity

Impact on increase in 2%

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
INR	11,416	16,129
USD	-	-
EURO	-	-

Impact on decrease in 2%

(₹ in Lacs)		
Particulars	As at March 31st, 2023	As at March 31st, 2022
INR	(11,416)	(16,129)
USD	-	-
EURO	-	-

The sensitivity analysis above has been determined based on the exposure to interest rates for assets and liabilities at the end of the reporting period. For floating rate assets and liabilities, the analysis is prepared assuming the amount of the liabilities/assets outstanding at the end of the reporting period was outstanding for the whole year and the rates are reset as per the applicable reset dates.

iii. Price risk

Equity price risk is related to change in market reference price of investments in equity securities held by the Company. The fair value of quoted investments held by the Company exposes the Company to equity price risks. In general, these investments are not held for trading purposes. The fair value of quoted investments in equity, classified as fair value through profit or loss as at March 31st, 2023 is ₹ 277 Lacs (March 31st, 2022 ₹ 421 Lacs).

A 10% change in equity prices of such securities held as at March 31st, 2023 would result in an impact of ₹ 28 Lacs (March 31st, 2022 ₹ 42 Lacs).

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

50. Financial Instruments and Related Disclosures (contd.)

(II) Public disclosure on Liquidity Risk

Disclosure on liquidity risk under RBI circular no. RBI/2019-20/88 DOR.NBFC (PD) CC. No.102/03.10.001/2019-20 dated November 4th, 2019 on Liquidity Risk Management Framework for Non-Banking Financial Companies and Core Investment Companies.

(i) Funding Concentration based on significant counterparty (both deposits and borrowings)

As at	Number of Significant Counterparties** #	Amount (₹ in Lacs) *	% of Total deposits	% of Total Liabilities
March 31st, 2023	15	24,46,942	Not applicable	75%
March 31st, 2022	16	24,98,661	Not applicable	77%

* Does not include overdue interest on Secured Non-convertible debentures, Secured Long Term Infrastructure Bond, Subordinated perpetual debentures and Subordinated redeemable non convertible debentures.

** Significant counterparties are calculated basis participants in case of syndicated loan.

Above does not include Collateralised Borrowings.

(ii) Top 20 large deposits (amount in ₹ in Lacs and % of total deposits) - Not applicable (March 31st, 2022: Not applicable)

(iii) Top 10 borrowings (amount in ₹ in Lacs and % of total borrowings)

As at March 31st, 2023		As at March 31st, 2022	
Amount (₹ in Lacs) **	% of Total Borrowings	Amount (₹ in Lacs) *	% of Total Borrowings
20,93,179	66%	20,58,519	64%

*Does not include overdue interest on Secured Non-convertible debentures, Secured Long Term Infrastructure Bond, Subordinated perpetual debentures and Subordinated redeemable non convertible debentures.

#Above does not include Collateralised Borrowings.

(iv) Funding Concentration based on significant instrument/product

Sr. No.	Name of the instrument/product ##	As at March 31st, 2023		As at March 31st, 2022	
		Amount (₹ in Lacs) #	% of Total Liabilities	Amount (₹ in Lacs) #	% of Total Liabilities
1	Term Loan from Banks				
a.	Rupee Term loans - Secured	2,19,881	7%	2,19,716	7%
b.	Foreign currency Term loans - Secured	95,196	3%	95,196	3%
2	Working capital facilities	20,02,432	62%	19,99,379	61%
3	Term Loan from Others				
a.	Rupee Term loans - Secured	2,07,630	6%	2,07,630	6%
b.	Foreign currency Term loans - Secured	74,778	2%	74,778	2%
4	Non-convertible debentures - Secured	2,55,895	8%	2,55,503	8%
5	Subordinated Non convertible debentures (Tier II Capital)	2,30,469	7%	2,29,741	7%

Amount is as per commercial terms.

##Above does not include Collateralised Borrowings.

(v) Stock Ratios:

Sr. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
1	Commercial Papers to Total Public Funds	-	-
2	Commercial Papers to Total Liabilities	-	-
3	Commercial Papers to Total Assets	-	-
4	NCDs (Original Maturity < 1 yr.) to Total Public Funds	-	-
5	NCDs (Original Maturity < 1 yr.) to Total Liabilities	-	-
6	NCDs (Original Maturity < 1 yr.) to Total Assets	-	-
7	Other Short-Term Liabilities to Total Public Funds	@	@
8	Other Short-Term Liabilities to Total Liabilities	@	@
9	Other Short-Term Liabilities to Total Assets	@	@

@ Repayments of Trade Payable, Debt Securities, Borrowings (Other than Debt Securities) excluding collateralised borrowings, Subordinate liabilities admitted as claims pursuant to initiation of CIRP (Refer Note No 1.2) are not determinable as these liabilities would be payable as per the resolution plan to be approved by adjudicating authority and hence it is not practical to disclose the stock ratios.

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

50. Financial Instruments and Related Disclosures (contd.)

(vi) Institutional set-up for liquidity risk management:

Post suppression of the Board of the Company by the RBI in exercise of the powers conferred under Section 45-IE (1) of the RBI Act, 1934, has vide Order/Press Release dated 4th October, 2021, ALCO has been reconstituted wef December 10th, 2021.

Notes:

1. The Reserve Bank of India ('RBI') vide press release dated October 4, 2021 in exercise of the powers conferred under Section 45-IE (1) of the Reserve Bank of India Act, 1934 ('RBI Act') superseded the Board of Directors of the Company ('the Company' or 'SEFL') and appointed an Administrator under Section 45-IE (2) of the RBI Act. Further, RBI, in exercise of powers conferred under Section 45-IE (5) (a) of the RBI Act, constituted a three-member Advisory Committee to assist the Administrator in discharge of his duties. Thereafter, RBI filed applications for initiation of Corporate Insolvency Resolution Process ('CIRP') against the Company under Section 227 read with clause (zk) of sub-section (2) of Section 239 of the Insolvency and Bankruptcy Code (IBC), 2016 ('the Code') read with Rules 5 and 6 of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 ('FSP Insolvency Rules') before the Hon'ble National Company Law Tribunal, Kolkata Bench ('Hon'ble NCLT'). Hon'ble NCLT vide its order dated October 8, 2021 admitted the application made by RBI for initiation of CIRP against the Company. Further, Hon'ble NCLT gave orders for appointment of Mr. Rajneesh Sharma, as the Administrator to carry out the functions as per the Code and that the management of the Company shall vest in the Administrator. Further, Hon'ble NCLT also retained the three-member Advisory Committee, as aforesaid, for advising the Administrator in the operations of the Company during the CIRP. There has been changes in the composition of the Advisory Committee on June 22, 2022 and January 31, 2023. The Consolidated Committee of Creditors (CoC) took on record three Resolution Plans received from Prospective Resolution Applicants (PRAs) on January 18, 2023. The three Resolution Plans received by the Consolidated CoC were put to e-voting. The Consolidated CoC took on record the results of the e-voting in CoC meeting held on February 15, 2023, and the resolution plan submitted by National Asset Reconstruction Company Limited (NARCL) was duly approved by CoC by majority voting under Section 30(4) of the IBC read with Regulation 39(3) of CIRP Regulations, 2016, thereby, declaring NARCL as Successful Resolution Applicant (SRA).

The approved resolution plan of NARCL was filed before Adjudicating Authority i.e., Hon'ble NCLT, Kolkata on February 18, 2023 for its approval. The Administrator has also filed all the necessary legal and regulatory approvals before the Adjudicating Authority. The approval of the resolution plan is awaited from the Adjudicating Authority pending certain litigations.

2. Significant counterparty is defined as a single counterparty or group of connected or affiliated counterparties accounting in aggregate for more than 1% of the NBFC-NDSI's, NBFC-Ds total liabilities as defined in RBI Circular RBI/2019-20/88 DOR.NBFC (PD) CC.No.102/03.10.001/2019-20 dated November 4th, 2019 on Liquidity Risk Management Framework for Non-Banking Financial Companies and Core Investment Companies.

3. Significant instrument/product is defined as a single instrument/product of group of similar instruments/products which in aggregate amount to more than 1% of the NBFC-NDSI's, NBFC-Ds total liabilities, as defined in RBI Circular RBI/2019-20/88 DOR.NBFC (PD) CC.No.102/03.10.001/2019-20 dated November 4th, 2019 on Liquidity Risk Management Framework for Non-Banking Financial Companies and Core Investment Companies.

4. Total Liabilities has been computed as sum of all liabilities (Total of Balance Sheet less Total Equity).

5. Public funds includes funds raised either directly or indirectly through public deposits, inter-corporate deposits, bank finance and all funds received from outside sources such as funds raised by issue of Commercial Papers, debentures etc. but excludes funds raised by issue of instruments compulsorily convertible into equity shares within a period not exceeding 5 years from the date of issue, as defined in Master Direction - Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Direction, 2016.

6. CIRP has been initiated against the Company, as stated in Note No. 1 above and accordingly, as per the Code, the Administrator has invited the financial/operational/other creditors to file their respective claims as on October 8, 2021 (i.e. date of commencement of CIRP). As per the Code, the Administrator has to receive, collate and verify all the claims submitted by the creditors of the Company.

Admission of claims of financial/operational/other creditors so received by the Administrator is completed and the effect of the same has been given in the books of accounts. However, the figures of claims admitted in the books of accounts might undergo change in the subsequent periods before the resolution plan is approved by adjudicating authority (AA) in case Administrator comes across additional information warranting such revision of claim amounts of financial/operational/ other creditors.

Further, the foreign currency debt of the Company has been converted into INR as per the Code on the date of commencement of CIRP and accordingly, the Company has not translated its foreign currency exposure as on March 31, 2023 as per the requirements of Ind AS 21 'The effects of changes in foreign exchange rates'.

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

50. Financial Instruments and Related Disclosures (contd.)

b) Liquidity risk

Liquidity Risk is the risk that the Company will encounter difficulty in meeting the obligations associated with its financial liabilities that are settled by delivering cash or another financial asset.

The Company's ALCO lays down a broad framework for liquidity risk management to ensure that it is in a position to meet its daily liquidity obligations as well as to withstand a period of liquidity stress from industry, market or a combination of them. The liquidity profile is analyzed on a static as well as on a dynamic basis by using the gap analysis technique supplemented by monitoring of key liquidity ratios and conduct of liquidity stress tests periodically.

The Company is currently undergoing CIRP (Refer Note No. 1.2) under the provisions of the Code, accordingly, a moratorium has been declared under Section 14 of the Code. The current liquidity risk management is therefore restricted to the management of current assets and liabilities and the day to day cash flows of the company. The Liquidity risk management framework would undergo revision post implementation of the approved resolution plan.

(i) Liquidity risk management:

	As at March 31st, 2023								Total
	Upto 30/31 days	Over 1 month upto 2 Months	Over 2 months upto 3 Months	Over 3 months & upto 6 Months	Over 6 Months & upto 1 year	Over 1 year & upto 3 years	Over 3 years & upto 5 years	Over 5 years	
A: Financial Assets									
i) Cash and Cash Equivalents	2,52,639	-	-	-	-	-	-	-	2,52,639
ii) Bank Balance other than above	607	304	45	4,963	6,477	5,201	572	-	18,169
iii) Trade Receivables	153	-	-	-	-	-	-	-	153
iv) (a) Loans	1,08,907	2,200	1,743	9,810	20,447	44,204	1,14,542	26,53,330	29,55,183
(b) Liability towards Assignment \$	(1,92,858)	(862)	(1,226)	(1,868)	(1,310)	(79)	-	-	(1,98,203)
v) Investments	2,476	-	1,155	152	750	37,379	3,327	18,501	63,740
vi) Other Financial Assets @ %	1,971	22	31	22,289	25,940	16,870	204	7	67,334
Total	1,73,895	1,664	1,748	35,346	52,304	1,03,575	1,18,645	26,71,838	31,59,015
B: Financial Liabilities									
i) Trade Payables #	-	-	-	-	2,464	-	-	-	6,414
ii) Debt Securities *	-	-	-	-	-	-	-	-	2,59,944
iii) Borrowings (Other than Debt Securities) *	549	446	411	657	798	525	-	-	26,69,474
iv) Subordinated Liabilities *	-	-	-	-	-	-	-	-	2,62,458
v) Lease Liabilities	36	34	33	91	158	291	-	-	643
vi) Other Financial Liabilities	10,538	544	462	1,628	843	751	-	-	14,766
Total	11,123	1,024	906	2,376	4,263	1,567	-	-	32,13,699

\$ Amount in first bucket includes certain liabilities prior to initiation of CIRP, which are subject to reconciliation (Also Refer Note No. 61).

Repayments of Trade Payables admitted as claims pursuant to initiation of CIRP (Refer Note No. 1.2, 65 and 66) are not determinable.

* Repayments of collateralised borrowings have been considered as per the contractual obligations and for others, repayments are not determinable pursuant to initiation of CIRP (Refer Note No. 1.2, 65 and 66).

@ Amount receivable from holding Company, Srei Infrastructure Finance Limited (SIFL) amounting to ₹ 107 Lacs admitted as claims pursuant to initiation of CIRP (Refer Note No. 1.2 and 65) are not determinable.

% Receivables of security deposits from Srei Infrastructure Finance Limited (SIFL) amounting to ₹ 15,000 Lacs admitted as claims pursuant to initiation of CIRP (Refer Note No. 1.2 and 65) are not determinable.

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

50. Financial Instruments and Related Disclosures (contd.)

(₹ in Lacs)

Particulars	As at March 31st, 2022								Total
	Upto 30/31 days	Over 1 month upto 2 Months	Over 2 months upto 3 Months	Over 3 months & upto 6 Months	Over 6 Months & upto 1 year	Over 1 year & upto 3 years	Over 3 years & upto 5 years	Over 5 years	
A: Financial Assets									
i) Cash and Cash Equivalents	1,27,881	-	-	-	-	-	-	-	1,27,881
ii) Bank Balance other than above	5,314	271	28	1,914	6,926	3,803	2	3	18,261
iii) Trade Receivables	3,239	-	-	-	-	-	-	-	3,239
iv) (a) Loans	96,651	8,228	6,287	20,930	34,939	1,95,827	4,71,532	22,66,162	31,00,556
(b) Liability towards Assignment \$	(2,05,934)	(6,693)	(6,397)	(14,365)	(13,426)	(6,995)	-	-	(2,53,810)
v) Investments	284	-	54	20,442	21,190	25,360	17,589	38,685	1,23,604
vi) Other Financial Assets #	11,619	499	633	4,303	15,247	59,781	34	25	99,641
Total	39,054	2,305	605	33,224	64,876	2,77,776	4,89,157	23,04,875	32,19,372
B: Financial Liabilities									
i) Trade Payables ##	187	187	187	562	-	-	-	-	6,418
ii) Debt Securities *	-	-	-	-	-	-	-	-	2,59,552
iii) Borrowings (Other than Debt Securities) *	2,727	948	720	2,770	3,825	3,212	112	-	26,77,184
iv) subordinated Liabilities *	-	-	-	-	-	-	-	-	2,61,581
v) Lease Liabilities	37	36	35	96	183	431	74	-	892
vi) Other Financial Liabilities	13,361	538	439	616	1,487	2,033	198	-	18,672
Total	16,312	1,709	1,381	4,044	5,495	5,676	384	-	32,24,299

\$ Amount in first bucket includes certain liabilities prior to initiation of CIRP, which are subject to reconciliation.

Receivables of security deposits from SIFL are not determinable pursuant to initiation of CIRP (Refer Note No. 1.2 and 65).

Repayments of Trade Payables admitted as claims pursuant to initiation of CIRP (Refer Note No. 1.2) are not determinable.

* Repayments of collateralised borrowings have been considered as per the contractual obligations and for others, repayments are not determinable pursuant to initiation of CIRP (Refer Note No. 1.2, 65 and 66).

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

50. Financial Instruments and Related Disclosures (contd.)

(III) Statement on Liquidity Coverage Ratio (LCR)

Disclosure on liquidity risk under RBI circular no. RBI/2019-20/88 DOR.NBFC (PD) CC. No.102/03.10.001/2019-20 dated November 4th, 2019 on Liquidity Risk Management Framework for Non-Banking Financial Companies and Core Investment Companies.

The Company had submitted a letter dated November 30, 2020, December 31, 2021 and August 31, 2022 to RBI seeking forbearance of compliance with Liquidity Coverage Ratio (LCR). Further the Company has not been able to meet the regulatory requirement of the LCR framework for the reason stated in Note No. 64 & 66 to the Financial Statements for the year ended March 31, 2023.

Pursuant to initiation of CIRP as on October 8th, 2021 (Refer Note No. 1.2) all the debts owed to financial Creditors/operational/other creditors have crystallized as on Insolvency Commencement date i.e. October 8th, 2021 and these debts would be payable as per the resolution plan to be approved by adjudicating authority, hence, the expected date of repayments of claims of financial/operational/other creditors and consequent total net cash outflows over the next 30 calendar days in respect of the quarters ended September 30, 2021, December 31, 2021, March 31, 2022, June 30, 2022, September 30, 2022, December 31, 2022 and March 31, 2023 is not determinable. Accordingly, it is not practicable to disclose the LCR in respect of such quarters.

c) Credit risk

The Company is currently undergoing CIRP (Refer Note No. 1.2) under the provisions of the Code. Accordingly, a moratorium has been declared under Section 14 of the Code.

The principal business of the Company is to provide financing in the form of loans to its clients primarily to acquire assets and infrastructure lending. Credit Risk is the risk of default of the counterparty to repay its obligations in a timely manner resulting in financial loss. The Company also provides Leasing services to its clients which result in accrual of Trade Receivables. The Company is exposed to credit risk to the extent of such Trade Receivables. Credit risk encompasses both the direct risk of default and the risk of deterioration of creditworthiness as well as concentration risks. The Company has credit policies approved by the Board which lays down the credit evaluation and approval process in compliance with regulatory guidelines. Post CIRP the Company has revised the Credit Policy. However, since the company is under CIRP, no further lending is envisaged till the implementation of resolution plan.

The Company uses the Expected Credit Loss (ECL) Methodology to assess the impairment on both loan assets and trade receivables as per accounting standards. In addition, the Company also assesses impairment on such assets as per RBI guidelines and accounted for in the books as per regulatory guidelines.

Any concentration breach as per prudential norms are reported as required by RBI. Currently, since the networth is negative, the entire exposure is under breach of such concentration norms.

d) Operational Risk

The Company is exposed to operational risk in view of the nature of its business. In the light of the evolving business scenario, the IT systems of the Company are being reviewed periodically to identify improvement areas and put in place enhanced controls to minimise operational risk.

The Operational Risk Framework has been strengthened post CIRP (Refer Note No. 1.2) to include risk control matrices and risk control self-assessment framework. The Policy framework within the organization has been strengthened within the organization with review of policies of the Company viz Credit Policy, Risk Policy and Stressed Asset Management Policy.

51. Transfers of Financial Assets

Transfers of financial assets that are not derecognised in their entirety.

The Company has not carried out securitisation transactions during the financial year 2022-23 and 2021-22. There is no carrying amounts and fair values of all financial assets transferred that are not derecognised in their entirety and associated liabilities as at March 31, 2023 and March 31, 2022.

52. Assets obtained by taking possession of collateral/assets

The Company has obtained certain non-financial assets during the year by taking possession of collaterals or underlying assets on default by the party. The Company's policy is to determine whether a repossessed asset can be released back to the customer or should be sold. Assets which are identified for sale are classified as Repossessed Assets and Assets acquired in satisfaction of debt at their fair value or carrying value, whichever is lower. The Company's policy is to realise collateral on a timely basis.

The table below outlines the nature and values of Repossessed Assets and Assets acquired in satisfaction of debt obtained during the year and where still lying with the Company as at the year end:

	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Land	-	-
Other	2,710	6,403
Total	2,710	6,403

(₹ in Lacs)

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

53. Maturity analysis of assets and liabilities

The table below shows an analysis of assets and liabilities analysed according to when they are expected to be recovered or settled:

(₹ in Lacs)

Assets	As at March 31st, 2023			As at March 31st, 2022		
	Within 12 Months	After 12 Months	Total	Within 12 Months	After 12 Months	Total
Cash and Cash Equivalents	2,52,639	-	2,52,639	1,27,881	-	1,27,881
Bank Balance other than above	12,396	5,773	18,169	14,453	3,808	18,261
Trade Receivables	146	-	146	3,168	-	3,168
Loans	1,29,978	10,30,610	11,60,588	1,31,955	21,68,980	23,00,935
Liability towards Assignment \$	(1,98,124)	(79)	(1,98,203)	(2,46,815)	(6,995)	(2,53,810)
Investments	4,533	59,207	63,740	41,970	81,634	1,23,604
Other Financial Assets # *	48,543	17,079	65,697	23,191	59,840	90,531
Current Tax Assets (Net)	-	14,630	14,630	-	24,501	24,501
Property, Plant and Equipment	-	1,22,338	1,22,338	-	1,83,412	1,83,412
Right-of-use Assets	70	436	506	48	664	712
Other Intangible Assets	-	541	541	-	838	838
Other Non-Financial Assets	22,597	912	23,509	37,411	946	38,357
Total	2,72,778	12,51,447	15,24,300	1,33,262	25,17,628	26,58,390

Receivables of security deposits from Srei Infrastructure Finance Limited (SIFL) amounting to ₹ 15,000 Lacs (net of impairment loss allowance of ₹ 15,000 Lacs) (March 31st, 2022 ₹ 15,000 Lacs (net of impairment loss allowance of ₹ 7,500 Lacs)) admitted as claims pursuant to initiation of CIRP (Refer Note No. 1.2 and 65) are not determinable.

\$ For the current and previous year amount within 12 months includes certain liabilities prior to initiation of CIRP, which are subject to reconciliation (Also Refer Note No. 61).

*Amount receivable from holding Company, Srei Infrastructure Finance Limited (SIFL) amounting to ₹ 75 Lacs (net of impairment loss allowance of ₹ 32 Lacs) admitted as claims pursuant to initiation of CIRP (Refer Note No. 1.2 and 65) are not determinable.

(₹ in Lacs)

Assets	As at March 31st, 2023			As at March 31st, 2022		
	Within 12 Months	After 12 Months	Total	Within 12 Months	After 12 Months	Total
Trade Payables ##	2,464	-	6,414	1,125	-	6,418
Debt Securities *	-	-	2,59,944	-	-	2,59,552
Borrowings (Other than Debt Securities) *	2,726	525	26,69,340	10,803	3,190	26,76,863
Subordinated Liabilities *	-	-	2,62,458	-	-	2,61,581
Lease Liabilities	90	546	636	70	758	828
Other Financial Liabilities	14,015	751	14,766	16,440	2,232	18,672
Current Tax Liabilities (Net)	-	13,635	13,635	-	13,652	13,652
Provisions	62	15,267	15,329	77	15,700	15,777
Other Non-Financial Liabilities	1,880	1,948	3,828	2,525	1,743	4,268
Total	21,237	32,672	32,46,350	31,040	37,275	32,57,611

Repayments of Trade Payables admitted as claims pursuant to initiation of CIRP (Refer Note No. 1.2, 65 and 66) are not determinable.

* Repayments of collateralised borrowings have been considered as per the contractual obligations and for others, repayments are not determinable pursuant to initiation of CIRP (Refer Note No. 1.2, 65 and 66).

NOTES TO THE FINANCIAL STATEMENT AS AT AND

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54. Disclosure of Joint Controlled Operation as on March 31st, 2023

During the year ended March 31st, 2017, the Company had entered into agreements with PL Solar Renewable Limited, PL Sunrays Power Limited and PL Surya Vidyut Limited ("SPVs"), respectively, for joint use and operation of certain assets in relation to Solar Power Generation project. These SPVs have already entered into a purchase power agreement (PPA) with Uttarakhand Power Corporation Limited (UPCL). Pursuant to the agreement, the revenue generated from the sale of power to UPCL will be shared among the Company and SPVs in the ratio of 80:20. Subsequently this revenue sharing ratio had been revised to 65:35 wef October 1st, 2018.

Accordingly, an amount of ₹ 1,928 Lacs (March 31st, 2022 : ₹ 1,913 Lacs) has been recognized as "Income from joint controlled operation" under the head Revenue from Operations. None of the Company's assets has been transferred to the Joint Venture and there is no liability incurred in this respect. There are no Contingent Liabilities or Capital Commitments in this respect.

55. Segment Reporting

The Company is primarily engaged in financial services to its customers across India. Consequently, there are no separate reportable segments as per 'Ind AS 108'.

56. (i) Information as required by terms of Master Direction - Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time (the "Master Directions") is furnished vide Annexure – I attached herewith.

56. (ii) Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22, 2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework' and in terms of circular DOR.ACC.REC.No.20/21.04.018/2022-23 dated April 19, 2022 on disclosures in Financial Statements- Notes to Accounts for NBFCs is furnished vide Annexure – II and Annexure – III attached herewith.

56. (iii) Disclosure as per Master Direction – Reserve Bank of India (Securitisation of Standard Assets) Directions, 2021 dated September 24, 2021.

56. (iii)(a) Disclosure relating to securitisation pursuant to Reserve Bank of India notification RBI/DOR/2021-22/85 DOR.STR.REC.53/21.04.177/2021-22 dated September 24, 2021 for Non-STC (Simple, transparent and comparable) Securitisation Transaction *

Sl. No	Particulars	As at March 31st, 2023	As at March 31st, 2022
		# No. / (₹ in Lacs)	# No. / (₹ in Lacs)
1	No of SPEs holding assets for securitisation transactions originated by the originator (only the SPVs relating to outstanding securitization exposures to be reported here)	-	-
2	Total amount of securitised assets as per books of the SPEs	-	-
3	Total amount of exposures retained by the originator to comply with MRR as on the date of balance sheet		
	a) Off-balance sheet exposures		
	First loss	-	-
	Others	-	-
	b) On-balance sheet exposures		
	First loss	-	-
	Others	-	-
4	Amount of exposures to securitisation transactions other than MRR		
	a) Off-balance sheet exposures		
	i) Exposure to own securitisations		
	First loss	-	-
	Others	-	-
	ii) Exposure to third party securitisations		
	First loss	-	-
	Others	-	-
	b) On-balance sheet exposures		
	i) Exposure to own securitisations		
	First loss	-	-
	Others	-	-
	ii) Exposure to third party securitisations		
	First loss	-	-
	Others	-	-

NOTES TO THE FINANCIAL STATEMENT AS AT AND

for the year ended March 31st, 2023

Sl. No	Particulars	As at March 31st, 2023	As at March 31st, 2022
		#	#
		No. / (₹ in Lacs)	No. / (₹ in Lacs)
5	Sale consideration received for the securitised assets	-	-
	Gain/loss on sale on account of securitisation	-	-
6	Form and quantum (outstanding value) of services provided by way of, liquidity support, post-securitisation asset servicing, etc.		
7	Performance of facility provided. Credit enhancement, liquidity support, servicing agent etc. Mention percent in bracket as of total value of facility provided. Credit enhancement (Nil as at March 31st, 2023 and Nil as at March 31st, 2022)		
	Fixed Deposit in favour of SPE		
	a) Amount paid	-	-
	b) Repayment received	-	815
	c) Outstanding amount	-	-
	Credit enhancement with SPE		
	a) Amount paid/Repayment received (net)**	-	-
	b) Outstanding amount	-	-
8	Average default rate of portfolios observed in the past ##	Not Applicable	Not Applicable
9	Amount and number of additional/top up loan given on same underlying asset		
	(a) Amount	-	-
	(b) Number	-	-
10	Investor complaints		
	(a) Directly/Indirectly received	-	-
	(b) Complaints outstanding	-	-

* The Company has not entered into Non-STC Securitisation transactions subsequent to the applicability of this Master Direction.

** Amount represents Net of Addition and Repayment received towards Credit enhancement with SPE.

The above figures are based on the information obtained from the SPEs, which is duly certified by the SPEs' auditor.

The Company is primarily engaged in financial services to its customer across India. The portfolio has been bifurcated into assets finance/infrastructure loans in various Infrastructure sectors which includes IT, construction, mining, irrigation, earthmoving, railway projects, road projects, etc.

56. (iii)(b) Disclosure relating to securitisation pursuant to Reserve Bank of India notification RBI/DOR/2021-22/85 DOR.STR.REC.53/21.04.177/2021-22 dated September 24, 2021 for STC (Simple, transparent and comparable) Securitisation Transactions are not applicable.

NOTES TO THE FINANCIAL STATEMENT AS AT AND for the year ended March 31st, 2023

56. (iv) In terms of Master Direction - Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time.
Disclosure of Restructured Accounts

Sl.No.	Type of Restructuring Asset Classifications Details	Under CDR Mechanism						Others						Total					
		Standard		Sub-Standard		Doubtful		Standard		Sub-Standard		Doubtful		Standard		Sub-Standard		Doubtful	
		No. of Borrowers	Amount	No. of Borrowers	Amount	No. of Borrowers	Amount	No. of Borrowers	Amount	No. of Borrowers	Amount	No. of Borrowers	Amount	No. of Borrowers	Amount	No. of Borrowers	Amount	No. of Borrowers	Amount
1	No. of Borrowers	-	-	1	-	1	22	20	1	-	21	-	-	-	-	-	-	-	-
	Amount Outstanding	(1)	-	(1)	-	(8)	(45)	(3)	(9)	(45)	(3)	(9)	(45)	(3)	(9)	(45)	(3)	(9)	(45)
	Provision thereon	-	-	2,307	(2,321)	119	(4,178)	66,433	(4,297)	119	(4,297)	66,433	(4,297)	119	(4,297)	66,433	(4,297)	119	(4,297)
2	No. of Borrowers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Amount Outstanding	(119)	-	(2,321)	-	(4,178)	(1,12,085)	(16,903)	(4,297)	(1,12,085)	(16,903)	(4,297)	(1,12,085)	(16,903)	(4,297)	(1,12,085)	(16,903)	(4,297)	(1,12,085)
	Provision thereon	-	-	1,153	-	21	19,246	26,754	(62)	21	19,246	26,754	(62)	21	19,246	26,754	(62)	21	19,246
3	No. of Borrowers	*	-	(1,160)	-	(61)	(31,880)	(6,690)	(62)	(31,880)	(6,690)	(62)	(31,880)	(6,690)	(62)	(31,880)	(6,690)	(62)	(31,880)
	Amount Outstanding	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Provision thereon	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	No. of Borrowers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Amount Outstanding	(-)	(-)	(-)	(-)	(8)	(-8)	(-)	(8)	(-8)	(-)	(8)	(-8)	(-)	(8)	(-8)	(-)	(8)	(-8)
	Provision thereon	-	-	-	-	(32,185)	(-39,329)	(-)	(32,185)	(-39,329)	(-)	(32,185)	(-39,329)	(-)	(32,185)	(-39,329)	(-)	(32,185)	(-39,329)
5	No. of Borrowers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Amount Outstanding	(-)	(-)	(-)	(-)	(-8)	(-)	(-)	(-8)	(-)	(-)	(-)	(-)	(-)	(-8)	(-)	(-)	(-)	(-)
	Provision thereon	-	-	-	-	(-32,185)	(-)	(-)	(-32,185)	(-)	(-)	(-)	(-)	(-)	(-32,185)	(-)	(-)	(-)	(-)
6	No. of Borrowers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Amount Outstanding	(-)	(-)	(-)	(-)	(-2376)	(-)	(-)	(-2376)	(-)	(-)	(-)	(-)	(-)	(-2376)	(-)	(-)	(-)	(-)
	Provision thereon	-	-	-	-	(-2376)	(-8725)	(-)	(-2376)	(-8725)	(-)	(-2376)	(-8725)	(-)	(-2376)	(-8725)	(-)	(-2376)	(-8725)
7	No. of Borrowers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Amount Outstanding	(-)	(-)	(-)	(-)	(-4)	(-14)	(18)	(-4)	(-14)	(18)	(-4)	(-14)	(18)	(-4)	(-14)	(18)	(-4)	(-14)
	Provision thereon	-	-	-	-	(-84)	(-53,684)	(56,770)	(-84)	(-53,684)	(56,770)	(-84)	(-53,684)	(56,770)	(-84)	(-53,684)	(56,770)	(-84)	(-53,684)
8	No. of Borrowers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	Amount Outstanding	(-)	(-)	(-)	(-)	(-21)	(-18,808)	(78,017)	(-21)	(-18,808)	(78,017)	(-21)	(-18,808)	(78,017)	(-21)	(-18,808)	(78,017)	(-21)	(-18,808)
	Provision thereon	-	-	-	-	(-7)	(-17,946)	(21,528)	(-7)	(-17,946)	(21,528)	(-7)	(-17,946)	(21,528)	(-7)	(-17,946)	(21,528)	(-7)	(-17,946)

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56. (iv) In terms of Master Direction - Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time. Disclosure of Restructured Accounts

Sl.No.	Type of Restructuring Asset Classifications Details	Under CDR Mechanism						Others			Total												
		Standard		Sub-Standard		Doubtful		Standard		Sub-Standard		Doubtful											
6	No. of Borrowers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
	Amount Outstanding	(-1)	(-)	(-)	(-)	(-3)	(-7)	(-)	(-4)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	
	Write-Offs of restructured accounts during the year	-	-	-	-9	-	-288	-	-	1,257	-	-288	-	-	-	-	-	-	-	-	-	-	1,248
7	Provision thereon	(-119)	(-)	(-)	(-14)	(-3976)	(-2018)	(-)	(-4095)	(-7240)	(-2018)	(-2018)	(-)	(-2018)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-7254)
	No. of Borrowers	*	(-)	(-)	(-7)	(-33)	(-365)	(-)	(-34)	10,815	(87)	(-365)	(-)	(-365)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	(-)	11,759
	Amount Outstanding	-	(-)	(-)	1	(1)	(22)	(1)	(1)	31	11	(22)	(20)	(22)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	32
7	Provision thereon	(-)	(-)	(-)	2,298	(119)	(95,662)	(119)	(119)	1,62,397	810	(95,662)	(66,433)	(95,662)	(119)	(119)	(119)	(119)	(119)	(119)	(119)	(119)	1,64,695
	Amount Outstanding	-	(-)	(-)	2,097	(21)	(19,246)	(21)	(21)	1,15,586	351	(19,246)	(26,754)	(19,246)	(21)	(21)	(21)	(21)	(21)	(21)	(21)	(21)	(68,740)
	Provision thereon	-	(-)	(-)	(1,153)	(21)	(19,246)	(21)	(21)	26,754	351	(19,246)	(26,754)	(19,246)	(21)	(21)	(21)	(21)	(21)	(21)	(21)	(21)	1,17,683
																							(27,907)

Figures in the bracket indicates figures for the previous year.

* ₹ 47,678

Note:

i) Additional facilities (if any) availed by borrowers or addition in outstanding balance in existing restructured accounts and partial repayments in existing restructured accounts are adjusted and disclosed under "Write-offs of restructured accounts".
ii) For the purpose of arithmetical accuracy, movement in provisions in the existing restructured account as compared to balance of provision as disclosed in opening balance and fresh restructuring on account sale/recovery/settlement (for any change in provision) is adjusted and disclosed under "Write-offs of restructured accounts" during the year.

56. (v) Disclosures on The Scheme for Sustainable Structuring of Stressed Assets (S4A), as at March 31st, 2023.

No. of accounts where S4A has been applied	Aggregate amount outstanding		Provision held
	Amount outstanding		
	In part A	In part B *	
One number of account classified as Standard	1,309	-	-
One number of account classified as Doubtful #	(9,194)	(5,335)	(1,082)
One number of account classified as Standard	(1,119)	-	-

Figures in the bracket indicates figures for the previous year.

* Note: Part B represents the Optionally Convertible Debentures received as per the S4A scheme.

Note: Current Year to be read with Refer Note No. 60.

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57. Details of loan transferred / acquired during the year ended March 31, 2023 pursuant to RBI Master Direction RBI/DOR/2021-22/86 DOR.STR.REC.51/21.04.048/2021-22 dated September 24, 2021 on Transfer of Loan Exposures are given below #:

- The Company has not transferred or acquired any loans not in default during the year ended March 31st, 2023 and March 31st, 2022.
- The Company has not transferred or acquired any stressed loan during the year ended March 31st, 2023 and March 31st, 2022.
- Details on recovery ratings assigned for Security Receipts as on March 31st, 2023 and March 31st, 2022.

Recovery Ratings	Anticipated recovery as per recovery rating	(₹ in Lacs)	
		As at March 31st, 2023	As at March 31st, 2022
RR1	100%-150%	16,854	19,456
RR2	75%- 100%	19,125	35,583
RR5*	0%- 25%	-	-

* The last available recovery rating is as at August 28th, 2020.

Disclosures are provided for the year ended March 31st, 2023 as the Master Direction is effective from September 24th, 2021.

58. Disclosures under RBI Resolution Framework 2.0 for Resolution of Covid-19 related stress of Micro, Small and Medium Enterprises (MSMEs) (RBI/2021-22/32 DOR.STR.REC.12/21.04.048/2021-22) dated May 5th, 2021 and consequent to circular dated August 6th, 2020 on restructuring of advances to the MSME borrowers

As at March 31st, 2023		As at March 31st, 2022	
No. of accounts restructured	Amount outstanding	No. of accounts restructured	Amount outstanding
128	1,062	130	1,285

59. Disclosures as required by RBI circular dated August 6th, 2020 'Resolution Framework for Covid-19 - related Stress' (RBI/2020-21/16 DOR.No.BP.BC/3/21.04.048/2020-21) are as below for the period ended March 31st, 2023

Type of borrower	Exposure to accounts classified as Standard consequent to implementation of resolution plan - Pollution as at the end of the previous half-year(A)	OF(A), aggregate debt that slipped into NPA during the half-year	OF(A), amount written off during the half-year	OF(A), amount paid by the borrowers during the half-year	Exposure to accounts classified a Standard consequent to implementation of resolution plan - Pollution as at the end of the this half-year
Personal Loans	-	-	-	-	-
Corporate persons*	8,056	5,467	-	847	2,002
Of which, MSMEs	-	-	-	-	-
Others	-	-	-	-	-
Total	8,056	5,467	-	847	2,002

*As defined in Section 3(7) of the Insolvency and Bankruptcy Code, 2016.

60. Disclosures as required by RBI/2018-19/203 DBR.No.BP.BC.45/21.04.048/2018-19 dated June 7, 2019 on Prudential Framework for Resolution of Stressed Assets and RBI Circular dated April 17, 2020 on "COVID-19 Regulatory Package – Review of Resolution Timelines under the Prudential Framework on Resolution of Stressed Assets

As per RBI circular no. RBI/2018-19/203 DBR.No.BP.BC.45/21.04.048/2018-19 dated June 7, 2019 on Prudential Framework for Resolution of Stressed Assets, the Company has implemented Resolution Plan for its 1 borrower resulting in Debt Instruments (including securities issued earlier in lieu restructuring at the time of CDR and subsequently under S4A) amounting to ₹ 10,637 Lacs on the date of implementation. The outstanding Fair Value amount of those debt instruments as on March 31, 2023 after provisioning applicable to such instruments in terms of the aforesaid circular is ₹ 6,794 Lacs.

Further, the accounts where the resolution period was extended in terms of RBI Circular dated April 17, 2020 on "COVID-19 Regulatory Package – Review of Resolution Timelines under the Prudential Framework on Resolution of Stressed Assets" is 'Nil'.

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for the year ended March 31st, 2023

61. The audited financial statements of the Company for the year ended March 31, 2023 have been taken on record by the Administrator on May 9, 2023 while discharging the powers of the Board of Directors of the Company which were conferred upon him by the RBI press release dated October 4, 2021 and subsequently, powers conferred upon him in accordance with Hon'ble NCLT order dated October 8, 2021. Since the Administrator has taken charge of the affairs of the Company on October 4, 2021, the Administrator is not liable or responsible for any actions and has no personal knowledge of any such actions of the Company prior to his appointment and has relied on the position of the financial statements of the Company as they existed on October 4, 2021. Regarding information pertaining to period prior to October 4, 2021 the Administrator has relied upon the explanations, clarifications, certifications, representations and statements made by the Chief Financial Officer, Company Secretary, Chief Business Officer, Chief Risk Officer, Chief Compliance Officer and Legal Head ('the existing officials of the Company'), who were also part of the Company prior to the appointment of the Administrator. It is also incumbent upon the Resolution Professional, under Section 20 of the Code, to manage the operations of the Company as a going concern. As a part of the CIRP, the Administrator got conducted audits/reviews relating to the processes and compliances of the Company and has also appointed professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code. The Administrator of the Company received account wise transaction audit reports from the professional agency appointed as the transaction auditor indicating that there are transactions amounting to ₹ 18,37,502 Lacs which are fraudulent in nature under Section 66 of the Code including transactions amounting to ₹ 1,22,962 Lacs determined as undervalued transactions. Accordingly, the Administrator has filed applications under Section 60(5) and Section 66 of the Code before the Kolkata bench of the Hon'ble National Company Law Tribunal (NCLT) on various dates till May 05, 2023 for adjudication. In addition to the above, basis the transaction audit reports from the professional agency appointed as the transaction auditor, the Administrator has filed an application under Section 60(5) and Section 66 of the Code before the Kolkata bench of the Hon'ble National Company Law Tribunal (NCLT) on November 18, 2022 for an amount of ₹ 84,787 Lacs, being the net shortfall in payments to the Company's lenders who were assigned the Pool Loans as on September 30, 2021 for adjudication.

In terms of paragraph 2 (b) of Annex to the guidelines DOR (NBFC).CC.PD.No.109/22.10.106/2019-20 dated March 13, 2020 issued by RBI on Implementation of Indian Accounting Standards for Non-Banking Finance Companies and Asset Reconstruction Companies, the Company had created Impairment Reserve amounting to ₹ 5,24,931 Lacs on such accounts, wherever applicable in the earlier periods. Since no withdrawal from such reserve is permitted without the prior permission of RBI as per the notification/circular referred above, an amount of ₹ 9,29,163 Lacs has been provided towards loans loss provisioning, ₹ 78,493 Lacs has been provided towards loss on fair valuation and ₹ 7,938 Lacs towards impairment loss allowance on security deposits given for lease premises for the year ended March 31, 2023 after considering the impact of impairment reserve as stated above and provisions made earlier, thereby making impairment to the extent of 100% of gross exposure, despite having some underlying securities as a matter of abundance prudence. If the loan loss provisioning and loss on fair valuation would have been provided without considering the impairment reserve as mentioned above the loss before tax for the year ended March 31, 2023 would have increased by ₹ 5,24,931 Lacs and correspondingly impairment reserve of ₹ 5,24,931 Lacs would have been transferred to retained earnings, thereby having no impact on shareholders fund.

The transaction audit has been completed and the necessary impact of the same have been incorporated in these financial statements.

62. Non recognition of Interest Income on transactions reported under Section 60(5) and Section 66 of the Code

During the quarter ended September 30, 2022, as a matter of prudence, the Company has adopted a policy in respect of the borrowers whose transactions with the Company are determined as fraudulent basis transaction audit reports, not to recognise the income on such accounts from the start of the quarter in which such transactions are reported as fraudulent by the Company. Further, in case of transactions determined as fraudulent in previous periods prior to the adoption of this policy, no income is being recognised w.e.f. July 1, 2022 in all such cases. Had the policy not changed, the interest income would have been higher by ₹ 59,237 Lacs for the year ended March 31, 2023. Subsequently, the ECL provision would also have been higher by ₹ 59,237 Lacs for the year ended March 31, 2023, resulting in no change in the loss for the year ended March 31, 2023.

63. (i) Loan loss provisioning

The Company on the basis of abundant prudence, has decided to make provision to the extent of interest income recognised during the respective quarter on Net Stage - III accounts. Accordingly, the Company has made a total provision of ₹ 23,826 Lacs on such accounts for the year ended March 31, 2023. This includes an additional provision of ₹ 7,631 Lacs as management overlay in the quarter ended September 30, 2022. This has resulted in increase in Impairment on Financial Instruments (Net) by ₹ 23,826 Lacs and thereby increase in loss by ₹ 23,826 Lacs for the year ended March 31, 2023. Based on the ECL policy, the Company has made ECL provision aggregating to ₹ 9,92,254 Lacs for the year ended March 31, 2023 respectively which includes provision of ₹ 9,29,163 Lacs as stated in Note No. 61 above.

Further, in terms of paragraph 2 (b) of Annex to the guidelines DOR (NBFC).CC.PD.No.109/22.10.106/2019-20 dated March 13, 2020 issued by RBI on Implementation of Indian Accounting Standards for Non-Banking Finance Companies and Asset Reconstruction Companies, the Company has also considered provision amounting to ₹ 43,708 Lacs for the year ended March 31, 2023 under Income Recognition, Asset Classification and Provisioning Norms. Such provision is also over and above ECL provision as stated above and has been accounted as 'Impairment Reserve'. With effect from quarter ended December 31, 2022, the Company has revised the ECL model basis audited financial statement as on March 31, 2022, and given the effect for the same. In cases where the ECL provision basis such revised rate and the impairment reserve made in earlier periods was more than the gross exposure, the Company made a lesser provision under the ECL, so as to restrict the net exposure at Nil, since no withdrawal from such impairment reserve is permitted. If the loan loss provisioning would have been provided without considering the impairment reserve as mentioned above the loss before tax for the year ended March 31, 2023 would have increased by ₹ 31,575 Lacs, and correspondingly impairment reserve of ₹ 31,575 Lacs would have been transferred to retained earnings, thereby having no impact on shareholders fund.

As a part of the ongoing CIRP process the Administrator has appointed, two (2) independent valuers to conduct the valuation of the assets of the Company and assets/collateral held as securities as required under the provisions of the Code. Accordingly, the financial statements, disclosures, categorisation and classification of assets are subject to the outcome of such valuation and CIRP process.

Notes to the Consolidated Financial Statements

for the year ended March 31st, 2023

63. (ii) Fair Valuation for transactions reported under Section 60(5) and Section 66 of the Code

In case of transactions measured at fair value which are determined as fraudulent under Section 66 of the Code, the Company has not taken fair valuation of such aforesaid accounts as of March 31, 2023, since on a prudence basis the Company would have made provision in case of fair value gain, thereby net impact would have been ₹ Nil on the Statement of Profit and Loss.

64. Business Transfer Agreement and Scheme of Arrangement

During the year 2019-20, the Company and its holding Company, Srei Infrastructure Finance Limited (SIFL) entered into an agreement ('Business Transfer Agreement') to transfer the Lending Business, Interest Earning Business & Lease Business of SIFL together with associated employees, assets & liabilities (including liabilities towards issued & outstanding non - convertible debentures) (Transferred Undertaking), as a going concern by way of slump exchange to the Company pursuant to the Business Transfer Agreement, subject to all necessary approvals. Accordingly, the Company and SIFL passed the relevant accounting entries in their respective books of account to reflect the slump exchange w.e.f. October 1, 2019 while allotment of shares by SEFL was made on December 31, 2019. The superseded board of directors and erstwhile management of the Company, as existed prior to the Appointment of the Administrator, had obtained external expert legal and accounting opinions in relation to the accounting of BTA which confirmed that the accounting treatment so given is in accordance with the relevant Ind AS and the underlying guidance and framework.

During the year 2020-2021, the Company had filed two separate applications under Section 230 of the Companies Act, 2013 ('the Act') before the Hon'ble NCLT (CA 1106/KB/2020 and CA 1492/KB/2020 at the Hon'ble NCLT Kolkata) proposing Schemes of Arrangement (the Schemes) with all its secured and unsecured lenders (Creditors). Business Transfer Agreement, constituted an integral part of the Schemes.

The first scheme (i.e. CA 1106/KB/2020) sought for amongst other things "formal consent to be obtained from the required majority of the creditors of SEFL to the completed acquisition by way of slump exchange of the Transferred Undertaking from SIFL in terms of the BTA and consequential formal novation of the loans and securities already forming part of SEFL liabilities and outstanding to the creditor" (as set out in the Scheme filed CA 1106/KB/2020).

The second scheme (i.e. CA 1492/KB/2020) sought for amongst other things restructuring of the debt due to certain creditors of the Company including secured debenture holders, unsecured debenture holders, perpetual debt instrument holders, secured ECB lenders and unsecured ECB lenders and individual debenture holders.

Pursuant to the directions of Hon'ble NCLT vide order dated October 21, 2020, the superseded board of directors and erstwhile management had maintained status quo on the Scheme including accounting of BTA. The final order/s in connection with the Schemes was awaited from Hon'ble NCLT/NCLAT at that time.

Both the schemes of arrangement were rejected by the majority of the creditors during the meetings held pursuant to Hon'ble NCLT's directions (dated 21/10/2020 and 30/12/2020 respectively). Further, certain appeals were filed by rating agencies in the matter relating to the second scheme of arrangement (i.e. CA 1492/KB/2020). An application of withdrawal was filed by the Administrator in this matter which has been allowed by the Tribunal by an order dated February 11, 2022. As stated in Note 65 below, the Company is in the process of consolidated resolution of SEFL and SIFL and hence no further action is being contemplated regarding establishing the validity of BTA or otherwise, consequent upon the withdrawal of Schemes as stated above. Accordingly, the status quo regarding BTA, as it existed on the date of commencement of CIRP, has been maintained.

65. Consolidated Resolution under CIRP

In view of the impracticability for preparing the resolution plan on individual basis in the case of the Company and its Holding Company, the Administrator, after adopting proper procedure, had filed applications before the Hon'ble National Company Law Tribunal- Kolkata Bench (Hon'ble NCLT) in the insolvency resolution processed of SIFL and SEFL (IA No. 1099 of 2021 under CP.294/KB/2021 and IA No. 1100 of 2021 under CP.295/KB/2021) seeking the following prayers:

- Directing the consolidation of the corporate insolvency resolution processes of SIFL and SEFL;
- Directing formation of a consolidated committee of creditors for the consolidated corporate insolvency resolution processes of SIFL and SEFL;
- Directing and permitting the conduct of the corporate insolvency resolution processes of SIFL and SEFL in terms of the provisions of the Code in a consolidated manner including audit of transactions in relation to Section 43, Section 45, Section 50 and Section 66 of the Code, issuance of single request for submission of resolution plans by the Administrator and the submission and consideration of single resolution plan, for the consolidated resolution of SEFL and SIFL in terms of the provisions of the Code; and
- Directing and permitting the submission and approval of one consolidated resolution plan for the resolution of SEFL and SIFL in terms of the provisions of the Code.

The application in this matter was admitted and the final order received on February 14, 2022 wherein the Hon'ble NCLT approved the consolidation of the corporate insolvency of SIFL and SEFL. The Consolidated Committee of Creditors (CoC) took on record three Resolution Plans received from Prospective Resolution Applicants (PRAs) on January 18, 2023. The three Resolution Plans received by the Consolidated CoC were put to e-voting. The Consolidated CoC took on record the results of the e-voting in CoC meeting held on February 15, 2023, and the resolution plan submitted by National Asset Reconstruction Company Limited (NARCL) was duly approved by CoC by majority voting under Section 30(4) of the IBC read with Regulation 39(3) of CIRP Regulations, 2016, thereby, declaring NARCL as Successful Resolution Applicant (SRA). The approved resolution plan of NARCL was filed before Adjudicating Authority on February 18, 2023 for its approval. The Administrator has also filed all the necessary legal and regulatory approvals before the Adjudicating Authority. The approval of the resolution plan is awaited from the Adjudicating Authority pending certain litigations.

66. Payment to lenders/others and claims under CIRP

CIRP has been initiated against the Company, as stated in Note No. 1.2 and accordingly, as per the Code, the Administrator has invited the financial/operational/other creditors to file their respective claims as on October 8, 2021 (i.e. date of commencement of CIRP). As per the Code, the Administrator has to receive, collate and verify all the claims submitted by the creditors of the Company.

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Admission of claims of the financial/operational/other creditors received by the Administrator is completed and the effect of the same has been given in the books of accounts. However, the figures of the claims admitted in the books of accounts might undergo change in the subsequent periods before the resolution plan is approved by Adjudicating Authority in case the Administrator comes across any additional information warranting such revision of claim amounts of the financial/operational/ other creditors.

Further, the foreign currency debt of the Company has been converted into INR as per the Code on the date of commencement of CIRP and accordingly, the Company has not translated its foreign currency exposure as on March 31, 2023 as per the requirements of Ind AS 21 'The effects of changes in foreign exchange rates'.

67. Pursuant to the admission of the Company under the CIRP, the Company has not provided for interest amount of ₹ 4,66,134 Lacs approx. for the year ended March 31st, 2023 respectively, on Borrowings since insolvency commencement date i.e. October 8th, 2021 in respect of the Company's obligation for interest and principal amount for all the borrowings. Under the Code, the treatment of creditors under the resolution plan is as per debts due as on insolvency commencement date and therefore no interest is accrued and payable after this date. If the interest was accrued on borrowings, as aforesaid, the loss before tax for the year ended March 31st, 2023 would have resulted in a loss before tax of ₹ 15,88,062 Lacs.

68. Unhedged Foreign Currency Exposure

As per the requirements of RBI notification RBI/FED/2018-19/67 FED Master Direction No.5/2018-19 dated March 26, 2019 entities raising External Commercial Borrowings ('ECB') are required to mandatorily hedge 70 per cent of their ECB exposure in case the average maturity of ECB is less than 5 years, which the Company complied on an ongoing basis till the nine months ended December 31, 2020. Thereafter, the Company was not able to meet the requirements of the aforesaid RBI notification due to procedural issues. The Company was not able to make payment of the hedging premium/cost to the concerned banks for keeping the ECB exposures hedged, as aforesaid. Therefore, the concerned banks unwound the currency risk hedges, which resulted in ECB exposures amounting to ₹ 27,272 Lacs as per contractual terms being not hedged as on March 31, 2023, in terms of the aforesaid RBI notification. The Company has reported the above fact to RBI and reply from the same is still awaited.

69. Going Concern

The Company had reported losses during the year ended March 31, 2023 and earlier year/periods as well. Hence, the net worth of the Company has fully eroded.

There is persistent severe strain on the working capital and operations of the Company and it is undergoing significant financial stress. As stated in Note No. 1.2, CIRP was initiated in respect of the Company w.e.f. October 8, 2021. The Company has assessed that the use of the going concern assumption is appropriate in the circumstances and hence, these financial statements has been prepared on a going concern assumption basis as per below:

- a) The Code requires the Administrator to, among other things, run the Company as a going concern during CIRP.
- b) The Administrator, in consultation with the Committee of Creditors ('CoC') of the Company, in accordance with the provisions of the IBC, is making all endeavours to run the Company as a going concern. Considering the future business outlook and with time bound recovery of its due from borrowers/ lessees and monetization of assets/securities, the Company is hopeful of improvement in its cash flows in due course of time.
- c) Reduction in overhead expenditure.
- d) The Company also formed dedicated focused collection team to increase the collection and is also exploring all possibilities to start new business with the launch of various schemes.

CIRP is undergoing and as per the process, the Consolidated Committee of Creditors (CoC) took on record three Resolution Plans received from Prospective Resolution Applicants (PRAs) on January 18, 2023. The three Resolution Plans received by the Consolidated CoC were put to e-voting. The Consolidated CoC took on record the results of the e-voting in CoC meeting held on February 15, 2023, and the resolution plan submitted by National Asset Reconstruction Company Limited (NARCL) was duly approved by CoC by majority voting under Section 30(4) of the IBC read with Regulation 39(3) of CIRP Regulations, 2016, thereby, declaring NARCL as Successful Resolution Applicant (SRA).

The approved resolution plan of NARCL was filed before Adjudicating Authority i.e., Hon'ble NCLT, Kolkata on February 18, 2023 for its approval. The Administrator has also filed all the necessary legal and regulatory approvals before the Adjudicating Authority.

The approval of the resolution plan is awaited from the Adjudicating Authority pending certain litigations. Pending the completion of the said process under CIRP, these financial statements have been prepared on a going concern basis.

70. Probable Connected/Related Companies

The Reserve Bank of India (RBI) in its inspection report and risk assessment report (the directions) for the year ended March 31st, 2020 had identified 'certain borrowers' as probable connected/related companies. In the directions, the Company has been advised to re-assess and re-evaluate the relationship with the said borrowers to assess whether they are related parties to the Company or to Srei Infrastructure Finance Limited ('SIFL' or 'Holding Company') and also whether these are on arm's length basis.

It has been brought to the Administrator's notice that the erstwhile management of the Company had taken legal view to determine whether such borrowers are related parties to the Company or SIFL. Based on the legal view, the erstwhile management was advised and had therefore come to the conclusion that the Company or its Holding Company have no direct or indirect control or significant influence (as per Companies Act, 2013, Ind AS) over such borrowers and are not under common control and accordingly, are not a related party of the Company or its Holding Company. The erstwhile management had also obtained an assessment report on the review & verification of the transactions with the aforesaid probable connected/related companies from an independent Chartered Accountant firm, which states that the transactions of the Company/SIFL with probable connected parties were done at arm's length principles and are in the ordinary course of business and that such parties are not related parties of the Company/SIFL under the Companies Act, 2013 or Ind AS 24.

Further, in view of the RBI directions, in line with arm's length principles, the erstwhile management was in the process of re-assessing & re-negotiating terms and conditions with the aforesaid borrowers and all other borrowers, who have been granted loans with moratorium period and at interest rate

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which is linked with the cash flows of the project while ensuring that the overall yield is maintained. However, the same was not concluded and meanwhile the Company has gone into CIRP.

The total gross exposure towards such borrowers is ₹ 11,14,958 Lacs and ₹ 11,59,090 Lacs as on March 31st, 2023 and as on March 31st, 2022 respectively and the total exposure (net of impairment) towards such borrowers is ₹ 53,157 Lacs and ₹ 7,08,800 Lacs as on March 31st, 2023 and as on March 31st, 2022 respectively.

However, the Administrator is not in a position to comment on the views adopted by the erstwhile management of the Company in relation to the findings of the directions since these pertain to the period prior to the Administrator's appointment. As a part of the CIRP, the Administrator got conducted transaction audits/reviews relating to the process and compliances of the Company and has also appointed professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code.

Out of Accounts referred by the RBI in the directions, the Administrator has received account wise transaction audit reports, which has identified certain transactions as fraudulent in nature under Section 66 of the Code, including undervalued transactions, the gross exposure of such borrowers amounts to ₹ 10,45,251 Lacs and ₹ 10,82,356 Lacs as on March 31st, 2023 and as on March 31st, 2022 respectively and the total exposure (net of impairment) towards such borrowers is ₹ Nil and ₹ 6,47,681 Lacs as on March 31st, 2023 and as on March 31st, 2022 respectively. In respect of such accounts, the Administrator has filed applications under Section 60(5) and Section 66 of the Code before the Kolkata bench of the Hon'ble National Company Law Tribunal (NCLT) on various dates till May 5, 2023 for adjudication. The Company has also made 100% impairment on such accounts. The transaction audit has been completed and the necessary impact of the same have been incorporated in these financial statements.

The total exposure (net of impairment) towards such borrowers is ₹ 53,157 Lacs and ₹ 7,08,800 Lacs as on March 31st, 2023 and as on March 31st, 2022 respectively. The details of the same are as follows:

Categories	(₹ in Lacs)	
	As at March 31st, 2023	As at March 31st, 2022
Borrowers who are Investee Companies of the Alternative Investment Fund (AIF)	47,868	3,42,329
Borrowers where investment is done by investee companies of AIF	5,289	2,50,807
Power Trust and its Investee Companies	-	79,253
Shristi and its Investee Companies	-	36,411
Total	53,157	7,08,800

71. Based on the directions of RBI, during the year ended March 31, 2022 the Company has made provision amounting to ₹ 9,807 Lacs and ₹ 4,991 Lacs in respect of direct tax cases and indirect tax cases respectively where the Company was under various stages of appeal with the relevant tax authorities. These amounts which have been provided for were appearing under 'Contingent Liabilities' earlier. Since, the provision, as aforesaid, has been done on the directions of RBI, the Company has not assessed whether the outflow of resource embodying economic benefits is probable or not as per the requirements of Ind AS 37- 'Provisions, Contingent Liabilities and Contingent Assets'.

72. As at March 31, 2021 the Company was having funds amounting to ₹ 523 Lacs in relation to the Corporate Social Responsibility ('CSR') which were unspent. These unspent amounts as per the requirements of Section 135 of the Companies Act, 2013 ('Act') were to be transferred to funds specified under Schedule VII to the Act within a period of 6 months. However, the domestic lenders of the Company had stipulated Trust and Retention Account (TRA) mechanism effective November 24, 2020, pursuant to which all the payments being made by the Company were being approved/released based on the TRA mechanism. The Company was not able to transfer the aforesaid unspent CSR amount as per the requirements of Section 135 of the Act. The Company has written letter to the Ministry of Corporate Affairs ('MCA') seeking exemptions from the obligations of the Company under portions of Section 135(5) and Section 135(7) of the Act. The reply from MCA in this regard is still awaited.

73. As per Regulation 54(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations'), the secured redeemable non-convertible debentures as on March 31st, 2023 are secured by first pari-passu charge by mortgage of immovable property(s) at West Bengal/Tamil Nadu. The Company had filed necessary e-forms for Debenture Trust Deed (DTD) novated from SIFL with ROC but the same have not been approved as stated in Note No. 74 (except for one ISIN wherein principal outstanding is ₹ 70 Lacs only, which was secured by immovable properties located at West Bengal and Delhi being in the books of Controlla Electrotech Pvt Limited and SIFL respectively for which necessary e-form post novation is not filed with ROC as stated in Note No. 74) and exclusive and/or specific charge on the specific & identified receivables of the Company. Security cover available as on March 31, 2023, net of provisions as per Ind AS norms excluding provisions made under IRACP is 42.81% of the principal and interest amount of its secured redeemable non-convertible debentures. The Company has not been able to maintain the security cover as stated in the Information Memorandum/Debenture Trust Deeds etc. As stated in Note No. 63 above, as part of the ongoing CIRP process the Administrator has appointed two (2) independent valuers to conduct the valuation of the assets of the Company as required under the provisions of the Code. Accordingly, the percentage of security cover given above is subject to the outcome of such valuation and CIRP process.

74. As stated in Note No.64, the Company had acquired borrowings (including secured borrowings and NCDs) from SIFL and charges created with ROC in relation to such borrowings were to be transferred in the name of the Company.

In relation to the above, cases where the novation agreements are signed by the lenders /trustees pursuant to Slump Exchange Transaction between SIFL to SEFL, necessary e-forms w.r.t. charges were filed by SEFL with the Registrar of Companies, Kolkata (ROC) except for one ISIN whereby principal outstanding is ₹ 70 Lacs only.

However, above charges filed by SEFL have not been approved by the ROC. Hence, the charges which were originally created in the name of SIFL for such secured borrowings are still continuing so in the records of ROC.

Further, with respect to certain borrowings where, though borrowed facilities have been repaid in full, charge satisfactions are still pending. These pendencies are mainly on account of non-receipt of NOC from lenders etc./completion of satisfaction formalities.

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for the year ended March 31st, 2023

75. As per Section 125 of the Companies Act, 2013 a Company is required to transfer certain amount lying unpaid, for 7 years, to Investor Education Protection Fund ("IEPF"). Prior to the date of commencement of CIRP i.e. October 8, 2021 (CIRP commencement date) an amount of ₹ 18,574/- and post commencement of CIRP an amount of ₹ 12,60,435/- was transferable by SEFL to IEPF in terms of Section 125 of the Companies Act, 2013 pertaining to the interest on application money on different dates till the March 31, 2023.

The Company was unable to comply with the provision of Section 125 of the Companies Act, 2013 as the Company needs to comply with the General Circular No. 08/2020 issued by the Ministry of Corporate Affairs (MCA) dated 6th March, 2020 captioned "Filing of forms in the Registry (MCA-21) by the Insolvency Professional (Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator) appointed under Insolvency Bankruptcy Code, 2016 (IBC, 2016)" which states that in respect of companies which are marked under CIRP in the Registry, Annual Return (e-form No.MGT-7) and Financial Statement (e-form AOC-4) and other documents under the provisions of the Companies Act, 2013, in accordance with directions issued by the NCLT/ NCLAT/Courts, shall be filed as attachments with e-form GNL-2 against the payment of one time normal fee only, till such time the company remains under CIRP. Separate GNL-2 forms shall be filed for each such document, by the IRP/ RP. However since the GNL-2 form is not linked with IEPF-1 the Company is unable to generate SRN for payment to IEPF authorities. Due to said technical difficulty the Company could not comply with the provisions of Sec 125 & other applicable provisions of the Companies Act, 2013. The Company has requested for guidance from IEPF authorities and also requested them to file claim for pre CIRP amount. The revert on the same is awaited.

76. During the quarter ended March 31, 2022, the Company has invoked 49% equity shares of Sanjvik Terminals Private Limited ('STPL'), which were pledged with the Company as security against the loan availed by one of the borrowers of the Company. As at March 31, 2023, these shares appear in the demat statement of SIFL, whereas the loan was transferred to the Company pursuant to BTA, as stated in Note No. 64 above. Further the entire shares has been sold on April 11, 2023 and the same has been transferred to the demat account of purchaser on April 26, 2023.

The Company has no intention to exercise any control/significant influence over STPL in terms of Ind AS 110/Ind AS 28.

The Company has taken an expert opinion, which confirms that since the Company is not exercising any significant influence/control over STPL, hence, STPL is not a subsidiary/associate in terms of Ind AS 110/Ind AS 28 and accordingly is not required to prepare consolidated financial statements with respect to its holding of 49% of the equity shares of STPL.

77. Analytical Ratios

Particulars	As at March 31st, 2023			As at March 31st, 2022	% Variance	Reasons for variance (if above 25%)
	Numerator	Denominator	Ratio			
Capital to risk-weighted assets ratio (CRAR) #	(23,52,073)	6,09,021	(386.21)%	(64.77)%	(321.44)%	*
Tier I CRAR #	(23,52,073)	6,09,021	(386.21)%	(64.77)%	(321.44)%	
Tier II CRAR #	7,613	6,09,021	1.25%	1.25%	(0.00)%	
Liquidity Coverage Ratio	Refer Note No. 50			3%	Not Applicable	

* Reasons for variances are not determinable pursuant to initiation of CIRP (Refer Note No. 1.2).

Refer Note No. 49 and Note No. 1 of Annexure-I to Notes to the Financial Statements.

78. Based on the information available in the public domain, some of the lenders have declared the bank account of the Company as fraud. However, in case of one of the lender, on the basis of petition filed by the ex-promoter before the Hon'ble High Court of Delhi, the Hon'ble Court has passed interim relief to the petitioner vide order dated April 22, 2022, restraining the said lender from taking any further steps or action prejudicial to the petitioner on the basis of the order declaring the bank account as fraud. The interim order dated April 22, 2022 shall continue till the next date of hearing i.e. May 15, 2023.

79. Previous year figures have been regrouped/rearranged, wherever considered necessary, to conform to the classification of the current year.

Signatories to Notes 1 to 79.

For J Kala & Associates
Chartered Accountants
ICAI Firm Registration No. 118769W

Jayesh Kala
Partner
Membership no. 101686

Place: Kolkata
Date : May 9, 2023

For Dass Gupta & Associates
Chartered Accountants
ICAI Firm Registration No. 000112N

Pankaj Mangal
Partner
Membership no. 097890

Place: Kolkata
Date : May 9, 2023

For and on behalf of Srei Equipment Finance Limited
(a Company under Corporate Insolvency Resolution Process by an order dated October 8th, 2021 passed by Hon'ble NCLT, Kolkata)

Rajneesh Sharma
Administrator Appointed Under IBC

Place: Kolkata
Date : May 9, 2023

The Administrator has been appointed under Rule 5(a)(iii) of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 under the Insolvency and Bankruptcy Code, 2016 (IBC or 'the Code'). The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Mr. Rajneesh Sharma, who acts as agent of the Company only and without any personal liability.

Address for Correspondence - 'Vishwakarma', 86C, Topsia Road (South), Kolkata, West Bengal, 700046
Email ID for Correspondence - sreiaadministrator@srei.com

Annexure-I to Notes to the Financial Statements

Disclosure of details as required in terms of Master Direction - Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time (the “Master Directions”)

1. Capital to Risk Asset Ratio (CRAR)

(₹ in Lacs unless otherwise stated)

Sl. No.	Items	As at March 31st, 2023	As at March 31st, 2022
(i)	CRAR (%) **	(386.21)	(64.77)
(ii)	CRAR - Tier I Capital (%)	(386.21)	(64.77)
(iii)	CRAR - Tier II Capital (%)	1.25	1.25
(iv)	Amount of subordinated debt raised as Tier-II capital	-	-
(v)	Amount raised by issue of Perpetual Debt Instruments*	-	-

* As at March 31st, 2023, the amount of principal outstanding in respect of unsecured subordinated perpetual debentures is ₹ 13,750 Lacs (March 31st, 2022 : ₹ 13,750 Lacs) which is (0.58)% (March 31st, 2022 : (1.15)%) of total Tier I Capital.

** Does not include off-balance sheet items as considering the same under the scenario of negative CRAR-Tier I capital will have a favourable impact on CRAR-Tier I Ratio.

2. Exposure to Real Estate Sector

(₹ in Lacs)

Sl. No.	Category	As at March 31st, 2023	As at March 31st, 2022
a)	Direct Exposure		
(i)	Residential Mortgages Lending fully secured by mortgages on residential property that is or will be occupied by the borrower or that is rented;	-	-
(ii)	Commercial Real Estate # Lending secured by mortgages on commercial real estates (office buildings, retail space, multi-purpose commercial premises, multi-family residential buildings, multi-tenanted commercial premises, industrial or warehouse space, hotels, land acquisition, development and construction, etc.). Exposure would also include non- fund based (NFB) limits;	7,27,213	7,24,069
(iii)	Investments in Mortgage Backed Securities and other securitised exposures		
a.	Residential	-	-
b.	Commercial Real Estate	-	-
b)	Indirect exposure	-	-
	Total Exposure to Real Estate Sector	7,27,213	7,24,069

Includes lending in Special Economic Zones/Industrial parks amounting to ₹ 2,62,982 Lacs (March 31st, 2022 ₹ 2,57,503 Lacs) that would have the characteristics of Commercial Real Estate (CRE) and these would simultaneously be classified as “Infrastructure Lending” in terms of RBI Circular on classification of exposures as CRE exposures.

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Disclosure of details as required in terms of Master Direction - Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time (the “Master Directions”)

3. Exposure to Capital Market

(₹ in Lacs)

Sl. No.	Category	As at March 31st, 2023	As at March 31st, 2022
(i)	Direct investment in equity shares, convertible bonds, convertible debentures and units of equity-oriented mutual funds the corpus of which is not exclusively invested in corporate debt;*	13,140	15,249
(ii)	Advances against shares/bonds/debentures or other securities or on clean basis to individuals for investment in shares (including IPOs/ESOPs), convertible bonds, convertible debentures, and units of equity-oriented mutual funds;	-	-
(iii)	Advances for any other purposes where shares or convertible bonds or convertible debentures or units of equity oriented mutual funds are taken as primary security;	2,190	1,964
(iv)	Advances for any other purposes to the extent secured by the collateral security of shares or convertible bonds or convertible debentures or units of equity oriented mutual funds i.e. where the primary security other than shares / convertible bonds/convertible debentures/units of equity oriented mutual funds does not fully cover the advances;	-	-
(v)	Secured and unsecured advances to stockbrokers and guarantees issued on behalf of stockbrokers and market makers;	-	-
(vi)	Loans sanctioned to corporates against the security of shares/bonds/ debentures or other securities or on clean basis for meeting promoter's contribution to the equity of new companies in anticipation of raising resources;	-	-
(vii)	Bridge loans to companies against expected equity flows/issues;	-	-
(viii)	All exposures to Venture Capital Funds (both registered and unregistered)	1,090	908
Total Exposure to Capital Market		16,420	18,121

* Includes equity shares, optionally convertible debentures and compulsorily convertible preference shares acquired in satisfaction of debts.

4. Details of Assignment transactions undertaken by Non-Banking Financial Company (NBFC)

(₹ in Lakhs unless otherwise stated)

Sl. No.	Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
(i)	No. of accounts (Nos.)	-	-
(ii)	Aggregate value (net of provisions) of accounts sold	-	-
(iii)	Aggregate consideration	-	-
(iv)	Additional consideration realised in respect of accounts transferred in earlier years	-	-
(v)	Aggregate gain/(loss) over net book value	-	-

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Disclosure of details as required in terms of Master Direction - Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time (the “Master Directions”)

5. Asset Liability Management

Maturity pattern of certain items of assets and liabilities as at March 31st, 2023 are as follows:

Particulars	(₹ in Lacs)										Total	
	1 day to 7 days	8 days to 14 days	15 days to 30/31 days	Over 1 month upto 2 months	Over 2 months upto 3 months	Over 3 months upto 6 months	Over 6 months upto 1 year	Over 1 year upto 3 years	Over 3 years upto 8 years	Over 5 years		
Deposits	-	-	-	-	-	-	-	-	-	-	-	-
Advances (refer note - 1 & 2 below)	1,31,961	68	2,562	3,457	2,916	12,904	25,007	46,149	1,14,702	26,53,157	29,92,883	
Liability towards Assignment*	(1,91,191)	(947)	(720)	(862)	(1,226)	(1,869)	(1,309)	(79)	-	-	(1,98,203)	
Investments (refer note - 2 below)	-	-	2,476	-	1,155	152	750	37,379	3,327	18,501	63,740	
Borrowings (refer note - 3 below)	156	(3)	382	431	397	615	749	525	-	-	31,91,742	
Foreign Currency Assets	-	-	-	-	-	-	-	-	-	-	-	
Foreign Currency Liabilities	-	-	-	-	-	-	-	-	-	-	-	

* Amount in first bucket includes certain liabilities prior to initiation of CIRP, which are subject to reconciliation (Also Refer Note No. 61).

Note:

- Advances represent the maturity pattern of gross loan assets and receivables for operating lease assets.
- The maturity pattern of Investments, Loan Assets measured at FVTOCI and overdue amounts on Loans have been considered on the basis of Management's best estimates.
- Repayments of collateralised borrowings have been considered as per the contractual obligations and for others, repayments are not determinable pursuant to initiation of CIRP (Refer Note No. 1.2, 65 and 66).

Maturity pattern of certain items of assets and liabilities as at March 31st, 2022 are as follows:

Particulars	(₹ in Lacs)										Total
	1 day to 7 days	8 days to 14 days	15 days to 30/31 days	Over 1 month upto 2 months	Over 2 months upto 3 months	Over 3 months upto 6 months	Over 6 months upto 1 year	Over 1 year upto 3 years	Over 3 years upto 8 years	Over 5 years	
Deposits	-	-	-	-	-	-	-	-	-	-	-
Advances (refer note - 1 & 2 below)	1,12,454	88	10,722	9,778	7,631	24,724	39,134	2,00,336	4,80,755	22,84,589	31,70,211
Liability towards Assignment*	(1,97,837)	(2,861)	(5,236)	(6,693)	(6,397)	(14,365)	(13,426)	(6,995)	-	-	(2,53,810)
Investments (refer note - 2 below)	-	-	284	-	54	20,442	21,190	25,360	17,589	38,685	1,23,604
Borrowings (refer note - 3, 4 & 5 below)	880	-	1,830	931	704	2,721	3,737	3,078	112	-	31,97,996
Foreign Currency Assets	-	-	-	-	-	-	-	-	-	-	-
Foreign Currency Liabilities	-	-	-	-	-	-	-	-	-	-	-

* Amount in first bucket includes certain liabilities prior to initiation of CIRP, which are subject to reconciliation.

Note:

- Advances represent the maturity pattern of gross loan assets and receivables for operating lease assets.
- The maturity pattern of Investments, Loan Assets measured at FVTOCI and overdue amounts on Loans have been considered on the basis of Management's best estimates.
- Repayments of collateralised borrowings have been considered as per the contractual obligations and for others, repayments are not determinable pursuant to initiation of CIRP (Refer Note No. 1.2, 64 and 65 of the Financial Statements for the year ended March 31st, 2022).

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(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023		As at March 31st, 2022	
		Amount outstanding *	Amount overdue*	Amount outstanding *	Amount overdue*
6.	Liabilities side:				
	Loans and advances availed by the NBFC inclusive of interest accrued thereon but not paid:				
	a) Debentures				
	- Secured	2,59,944	2,59,944	2,59,552	2,59,552
	- Unsecured	2,45,633	2,45,633	2,44,756	2,44,756
	(Other than falling within the meaning of public deposits)				
	b) Deferred credits	9,123	9,123	9,123	9,123
	c) Term loans	6,54,429	6,54,429	6,54,263	6,54,263
	d) Inter- corporate loans and borrowings	106	106	106	106
	e) Commercial paper	-	-	-	-
	f) Other Loans (Tier II Loan, Buyers Credit, Working Capital Demand Loan etc)	20,22,509	20,19,304	20,30,196	20,16,954

* Refer Note No. 1.2, 64, 65, 66 and 67.

** Refer Note No. 1.2, 63, 64, 65 and 66 of the Financial Statements for the year ended March 31st, 2022.

(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
		Amount outstanding	Amount outstanding
	Assets side:		
7.	Break-up of Loans and Advances including bills receivables [other than those included in (8) below]:		
	(a) Secured	25,90,666	26,47,14
	(b) Unsecured	1,66,053	1,99,591
	Total (a) + (b) (Refer Note No. 6 of the Financial Statements)	27,56,719	28,46,736
8.	Break-up of Leased Assets and Stock on Hire and other assets counting towards AFC activities		
	(i) Lease assets including lease rentals under sundry debtors :		
	(a) Financial Lease	Refer note 1	Refer note 1
	(b) Operating Lease	Refer note 1	Refer note 1
	(ii) Stock on hire including hire charges under sundry debtors:		
	(a) Assets on hire	Refer note 1	Refer note 1
	(b) Repossessed Assets	Refer note 1	Refer note 1
	(iii) Other loans counting towards AFC activities		
	(a) Loans where Assets have been repossessed	Refer note 1	Refer note 1
	(b) Loans other than (a) above	Refer note 1	Refer note 1

Note 1: The Company has not disclosed amount outstanding under assets financing activities as the RBI has merged Asset Financing Companies (AFC's), Loan Companies and Investment companies into a new category “NBFC - Investment and Credit Company” vide its circular no. DN BR (PD) CC. No. 097/03.10.001/2018-19 dated February 22nd, 2019.

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		(₹ in Lacs)	
Sl. No.	Particulars	As at March 31st, 2023 Amount outstanding	As at March 31st, 2022 Amount outstanding
9.	Break-up of Investments		
	Current Investments :		
	1. Quoted :		
	(i) Shares : (a) Equity		-
	(b) Preference		-
	(ii) Debentures and Bonds		-
	(iii) Units of mutual funds		-
	(iv) Government Securities		-
	(v) Others		-
	2. Unquoted :		
	(i) Shares : (a) Equity	2,476	1,850
	(b) Preference		-
	(ii) Debentures and Bonds		-
	(iii) Units of mutual funds		-
	(iv) Government Securities		-
	(v) Others (Pass Through Certificates etc)		-
	Long term Investments		
	1. Quoted :		
	(i) Shares : (a) Equity	277	421
	(b) Preference		-
	(ii) Debentures and Bonds	11,468	6,984
	(iii) Units of mutual funds		-
	(iv) Government Securities		-
	(v) Others		-
	2. Unquoted :		
	(i) Shares : (a) Equity	5,811	59
	(b) Preference	65	51,946
	(ii) Debentures and Bonds	6,574	5,866
	(iii) Units of mutual funds		-
	(iv) Government Securities		-
	(v) Others*	37,069	55,947

* Includes Security Receipts and units of Trust and Schemes of Venture Fund.

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(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023 Amount outstanding	As at March 31st, 2022 Amount outstanding
10.	Value of Investments		
	(i) Gross Value of Investments	73,330	1,33,194
	(a) In India	73,330	1,33,194
	(b) Outside India	-	-
	(ii) Provisions for Depreciation	9,590	9,590
	(a) In India	9,590	9,590
	(b) Outside India	-	-
	(iii) Net Value of Investments	63,740	1,23,604
	(a) In India	63,740	1,23,604
	(b) Outside India	-	-
11.	Movement of provisions held towards depreciation on investments		
	(i) Opening balance	9,590	9,590
	(ii) Add : Provisions made during the year	-	-
	(iii) Less : Write-off/write-back of excess provisions during the year	-	-
	(iv) Closing balance	9,590	9,590

(₹ in Lacs)

Sl. No.	Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
12.	Break up of 'Provisions and Contingencies' shown under the head Expenditure in Statement of Profit and Loss Account		
	(i) Provision for depreciation on Investment	-	-
	(ii) Provisions towards NPA/Write-offs and Other Financial assets #	12,50,470	3,10,640
	(iii) Provision made towards Income tax (Refer Note No. 71)	-	9,807
	(iv) Other Provision and Contingencies		
	- Provision for Employee Benefits	308	355
	- Provision for Standard Assets ##	(97,398)	43,510
		11,53,380	3,64,312

Includes Impairment Reserve created for Non performing Loans and Assets acquired in satisfaction of debt amounting to ₹ 1,14,635 Lacs (March 31st, 2022 : ₹ 72,116 Lacs) pursuant to the RBI regulatory guidance on 'Implementation of Indian Accounting Standards' (Refer Note No. 20 of Annexure - I to notes to the financial statements).

Includes Impairment Reserve created for Standard Assets amounting to ₹ 70,926 Lacs (March 31st, 2022 : ₹ 44,237 Lacs) pursuant to the RBI regulatory guidance on 'Implementation of Indian Accounting Standards' (Refer Note No. 20 of Annexure - I to notes to the financial statements).

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13. Borrower Group-wise Classification of assets financed as in (7) and (8) above

(₹ in Lacs)

Sl. No.	Category	Amount (Net of provisions) #					
		As at March 31st, 2023			As at March 31st, 2022		
		Secured	Unsecured	Total	Secured	Unsecured	Total
(i)	Related parties*						
	a) Subsidiaries	-	-	-	-	-	-
	b) Companies in the same group	85	12,836	12,921	1,997	12,408	14,405
	c) Other related parties	-	-	-	-	-	-
(ii)	Other than related parties	9,12,336	37,128	9,49,464	19,61,240	71,480	20,32,720
	Total	9,12,421	49,964	9,62,385	19,63,237	83,888	20,47,125

* As per Ind AS 24: Related Party Disclosures.

Refer Note No. 63

14. Investor Group wise Classification of all Investments in Shares and Securities

(₹ in Lacs)

Sl. No.	Category	As at March 31st, 2023		As at March 31st, 2022	
		Market Value/Break	Book value (net of provision)	Market Value/Break	Book value (net of provision)
(i)	Related parties *				
	a) Subsidiaries	-	-	-	-
	b) Companies in the same group	-	-	-	-
	c) Other related parties	-	-	-	-
(ii)	Other than related parties	63,740	63,740	1,23,604	1,23,604

* As per Ind AS 24: Related Party Disclosures

15. Concentration of Advances

(₹ in Lacs unless otherwise stated)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	Total Advances to twenty largest borrowers	11,14,504	10,94,432
(ii)	Percentage of Advances to twenty largest borrowers to Total Advances of the NBFC	40.43%	38.45%

16. Concentration of Exposures

(₹ in Lacs unless otherwise stated)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	Total Exposure to twenty largest borrowers / customers	11,14,504	11,04,908
(ii)	Percentage of Exposures to twenty largest borrowers / customers to Total Exposure of the NBFC on borrowers / customers	38.94%	36.48%

17. Concentration of NPAs

(₹ in Lacs unless otherwise stated)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	Total Exposure to top four NPA accounts	3,77,227	3,15,738

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18. Sector-wise NPAs

Sl. No.	Sector	Percentage of NPAs to Total Advances in that sector
(i)	Agriculture & allied activities	*
(ii)	MSME	
(iii)	Corporate borrowers	
(iv)	Services	
(v)	Unsecured personal loans	
(vi)	Auto loans	
(vii)	Other personal loans	

* The Company is primarily engaged in financial services to its customer across India. The portfolio has been bifurcated into assets finance/infrastructure loans in various Infrastructure sectors which includes IT, construction, mining, irrigation, earthmoving, railway projects, road projects, etc.

19. Movement of Non Performing Assets (NPAs)

(₹ in Lacs unless otherwise stated)

Sl. No.	Particulars	As at March 31st, 2023		As at March 31st, 2022	
		Excluding Impairment Reserve	Including Impairment Reserve #	Excluding Impairment Reserve	Including Impairment Reserve #
(i)	Net NPAs to Net Advances (%) @	91.80%	83.48%	61.88%	52.97%
(ii)	Movement of NPAs (Gross)				
	(a) Opening balance	21,50,430	21,50,430	18,51,525	18,51,525
	(b) Additions during the year	7,57,828	7,57,828	6,00,687	6,00,687
	(c) Reductions during the year *	1,41,658	1,41,658	3,01,782	3,01,782
	(d) Closing balance	27,66,600	27,66,600	21,50,430	21,50,430
(iii)	Movement of Net NPAs				
	(a) Opening balance	13,89,913	9,64,199	12,67,927	9,14,600
	(b) Additions during the year	1,57,903	64,046	4,17,960	3,39,921
	(c) Reductions during the year *	5,62,334	5,83,112	2,95,974	2,90,322
	(d) Closing balance	9,85,482	4,45,133	13,89,913	9,64,199
(iv)	Movement of provisions for NPAs (excluding provisions on standard assets)				
	(a) Opening balance	7,60,517	11,86,231	5,83,598	9,36,925
	(b) Provisions made during the year	11,04,488	12,23,971	2,37,873	3,51,966
	(c) Write-off/write-back of excess provisions	83,887	88,735	60,954	1,02,660
	(d) Closing balance	17,81,118	23,21,467	7,60,517	11,86,231

* It includes write - off during the year.

@ Net Advances represents Loans, Trade Receivables and Net Block of Assets for Operating Lease.

Includes Impairment Reserve created for Non performing Loans amounting to ₹ 5,40,349 Lacs (March 31st, 2022 : ₹ 4,25,714 Lacs) pursuant to the RBI regulatory guidance on 'Implementation of Indian Accounting Standards' (Refer Note No. 20 of Annexure - I to notes to the financial statements).

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20. A comparison between provisions required under Income Recognition, Asset Classification and Provisioning (“IRACP”) Norms and impairment allowances made under Ind AS 109 as on March 31st, 2023 is given below:

	(1)	(2)	(3)	(4)	(5)=(3)-(4)	(6)	(7) = (4)-(6)
		Asset classification as per Ind AS 109	Gross Carrying Amount as per Ind AS	Loss Allowances (Provisions) as required under Ind AS 109	Net Carrying Amount	Provisions required as per Income Recognition, Asset Classification and Provisioning (IRACP) norms	Difference between Ind AS 109 provisions and IRACP norms
(₹ in Lacs)							
Performing Assets							
Standard	Stage 1	69,140	12,818	56,322	8,300	4,518	
Standard	Stage 2	3,598	455	3,143	187	268	
Subtotal for Standard		72,738	13,273	59,465	8,487	4,786	
Non-Performing Assets (NPA)							
Substandard	Stage 3	1,13,377	38,115	75,262	27,240	10,875	
Subtotal for Substandard		1,13,377	38,115	75,262	27,240	10,875	
Doubtful - up to 1 year	Stage 3	10,54,366	8,30,756	2,23,610	9,76,712	(1,45,956)	
1 to 3 years	Stage 3	12,48,509	7,19,537	5,28,972	9,73,807	(2,54,270)	
More than 3 years	Stage 3	3,50,348	1,85,342	1,65,006	3,36,735	(1,51,393)	
Subtotal for doubtful		26,53,223	17,35,635	9,17,588	22,87,254	(5,51,619)	
Loss@	Stage 3	80,606	-	80,606	80,606	(80,606)	
Subtotal for NPA		28,47,206	17,73,750	10,73,456	23,95,100	(6,21,350)	
Additional impairment reserve	Stage 3	-	-	-	6,973	(6,973)	
Subtotal						(6,973)	
Other items such as guarantees, loan commitments etc. which are in the scope of IND AS 109 but not covered under current Income Recognition, Asset Classification and Provisioning (IRACP) norms.	Stage 1	-	173	(173)	-	173	
	Stage 2	-	-	-	-	-	
	Stage 3	-	7,368	(7,368)	-	7,368	
Subtotal			7,541	(7,541)		7,541	
Total		69,140	12,991	56,149	8,300	4,691	
	Stage 2	3,598	455	3,143	187	268	
	Stage 3 (Loans)	27,66,600	17,81,118	9,85,482	23,21,467	(5,40,349)	
	Stage 3 (Others)	80,606	-	80,606	80,606	(80,606)	
	Total (Refer Note below)	29,19,944	17,94,564	11,25,380	24,10,560	(6,15,996)	
@ Loss includes :							
Claims Receivable (measured at fair value through profit or loss)	Stage 3	62,196	-	62,196	62,196	(62,196)	
Assets acquired in satisfaction of debt	Stage 3	18,410	-	18,410	18,410	(18,410)	

Note: The gross carrying amount in above table includes shortfall in payment to Company lenders who were assigned the pool loans (Refer Note No.6(i) and 61). The above table excludes Loss Allowances (Provisions) towards Trade Receivables (Refer Note No. 5) , Rental accrued but not due (Refer Note No. 8) , Interest retained on Pool Assigned (Refer Note No. 8) and Other Financial assets (Refer Note No. 8).Its also excludes Repossessed Assets (Refer Note No. 13).

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20. A comparison between provisions required under Income Recognition, Asset Classification and Provisioning (“IRACP”) Norms and impairment allowances made under Ind AS 109 as on March 31st, 2022 is given below :

	(1)	(2)	(3)	(4)	(5)=(3)-(4)	(6)	(7) = (4)-(6)
		Asset classification as per Ind AS 109	Gross Carrying Amount as per Ind AS 109	Loss Allowances (Provisions) as required under Ind AS 109	Net Carrying Amount	Provisions required as per Income Recognition, Asset Classification and Provisioning (IRACP) norms	Difference between Ind As 109 provisions and IRACP norms
(₹ in Lacs)							
Performing Assets							
Standard	Stage 1	5,96,161	5,96,880	35,281	5,60,880	74,778	(39,497)
Standard	Stage 2	1,00,145	95,971	4,174	95,971	30,937	(26,763)
Subtotal for Standard		6,96,306	6,56,851	39,455	6,56,851	1,05,715	(66,260)
Non-Performing Assets (NPA)							
Substandard	Stage 3	5,08,480	3,72,627	1,35,853	3,72,627	1,70,751	(34,898)
Subtotal for Substandard		5,08,480	3,72,627	1,35,853	3,72,627	1,70,751	(34,898)
Doubtful - up to 1 year	Stage 3	8,85,946	6,03,808	2,82,138	6,03,808	4,39,974	(1,57,836)
1 to 3 years	Stage 3	6,37,598	3,36,813	3,00,785	3,36,813	4,83,621	(1,82,836)
More than 3 years #	Stage 3	1,46,939	1,11,278	35,661	1,11,278	1,08,247	(72,586)
Subtotal for doubtful		16,70,483	10,51,899	6,18,584	10,51,899	10,31,842	(4,13,258)
Loss @	Stage 3	62,419	62,419	-	62,419	62,419	(62,419)
Subtotal for NPA		22,41,382	14,86,945	7,54,437	14,86,945	12,65,012	(5,10,575)
Other items such as guarantees, loan commitments etc. which are in the scope of Ind AS 109 but not covered under current Income Recognition, Asset Classification and Provisioning (IRACP) norms.	Stage 1	-	(292)	292	(292)	-	292
	Stage 2	-	-	-	-	-	-
	Stage 3	-	(6,080)	6,080	(6,080)	-	6,080
Subtotal		-	(6,372)	-	(6,372)	-	6,372
Total		5,96,161	5,60,588	35,573	5,60,588	74,778	(39,205)
	Stage 2	1,00,145	95,971	4,174	95,971	30,937	(26,763)
	Stage 3 (Loan)	21,50,430	13,89,913	7,60,517	13,89,913	11,86,231	(4,25,714)
	Stage 3 (Others)	90,952	90,952	-	90,952	78,781	(78,781)
Total		29,37,688	21,37,424	8,00,264	21,37,424	13,70,727	(5,70,463)
# Doubtful - More than 3 years includes :							
Claims Receivable (measured at fair value through profit or loss)	Stage 3	28,533	28,533	-	28,533	16,362	(16,362)
@ Loss includes :							
Claims Receivable (measured at fair value through profit or loss)	Stage 3	44,009	44,009	-	44,009	44,009	(44,009)
Assets acquired in satisfaction of debt	Stage 3	18,410	18,410	-	18,410	18,410	(18,410)

The above table excludes Loss Allowances (Provisions) towards Trade Receivables (Refer Note No. 5), Rental accrued but not due (Refer Note No. 8), Interest retained on Pool Assigned (Refer Note No. 8) and Other Financial assets (Refer Note No. 8)

Annexure-I to Notes to the Financial Statements

Disclosure of details as required in terms of Master Direction - Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time (the “Master Directions”)

21. Details of non-performing financial assets purchased from other NBFCs:

(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	(a) No. of accounts purchased during the year	-	-
	(b) Aggregate outstanding	-	-
(ii)	(a) Of these, number of accounts restructured during the year	-	-
	(b) Aggregate outstanding	-	-

22. Details of Non-performing Financial Assets sold to other NBFCs:

(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	No. of accounts sold	-	-
(ii)	Aggregate outstanding	-	-
(iii)	Aggregate consideration received	-	-

23. Other Information:

(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023		As at March 31st, 2022	
		Excluding Impairment Reserve	Including Impairment Reserve #	Excluding Impairment Reserve	Including Impairment Reserve #
i.	Gross Non-Performing Assets				
	(a) Related Parties	28,833	28,833	25,723	25,723
	(b) Other than related Parties	27,37,767	27,37,767	21,24,707	21,24,707
ii.	Net Non-Performing Assets #				
	(a) Related Parties	12,921	12,921	12,408	12,862
	(b) Other than related Parties	9,72,561	4,32,212	13,77,505	9,51,337
iii.	Assets/Receivables acquired in satisfaction of debt (net) #	80,606	-	90,952	12,171

Includes Impairment Reserve created for Non performing Loans amounting to ₹ 5,40,349 Lacs (March 31st, 2022 : ₹ 4,25,714 Lacs) and Assets/Receivables acquired in satisfaction of debt amounting to ₹ 80,606 Lacs (March 31st, 2022 : ₹ 78,781 Lacs) pursuant to the RBI regulatory guidance on 'Implementation of Indian Accounting Standards' (Refer Note No. 20 of Annexure - I to notes to the financial statements).

24. Derivatives

(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	The notional principal of swap agreements	-	-
(ii)	Losses which would be incurred if counterparties failed to fulfil their obligations under the agreements	-	-
(iii)	Collateral required by the NBFC upon entering into swaps	-	-
(iv)	Concentration of credit risk arising from the swaps	-	-
(v)	The fair value of the swap book	-	-

The nature and terms of FRA/IRS as on March 31st, 2023 are set out below:

(₹ in Lacs)

Sl. No.	Nature	As at March 31st, 2023	As at March 31st, 2022	Benchmark	Terms
		Notional Principal			
(i)	Hedging (Refer Note No. 68)	-	-	USD LIBOR	Fixed Payable Vs Floating Receivable

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Disclosure of details as required in terms of Master Direction - Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time (the “Master Directions”)

25. Exchange Traded Interest Rate (IR) Derivatives

(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	No. of accounts sold	-	-
(i)	Notional principal amount of exchange traded IR derivatives undertaken during the year	-	-
(ii)	Notional principal amount of exchange traded IR derivatives outstanding as at year end	-	-
(iii)	Notional principal amount of exchange traded IR derivatives outstanding and not "highly effective"	-	-
(iv)	Mark-to-market value of exchange traded IR derivatives outstanding and not "highly effective"	-	-

26. Disclosures on Risk Exposure in Derivatives

(i) Qualitative Disclosure

The Company's Financial Instruments are exposed to market changes due to which the Company is exposed to the following significant market risks:

- i. Foreign Currency Risk
- ii. Interest Rate Risk

The Company undertakes transactions denominated in foreign currency which results in exchange rate fluctuations. Such exchange rate risk primarily arises from transactions made in foreign exchange and reinstatement risks arising from recognised assets and liabilities, which are not in the Company's functional currency (Indian Rupees). The Company is exposed to interest rate risk as the Company borrows foreign currency funds at fixed plus floating interest rate benchmarks. The Company manages this risk by maintaining an appropriate mix between fixed and floating rate borrowings, and by use of derivative hedging products like interest rate swaps and cross currency interest rate swaps. The Company had managed both these risks as per regulatory requirements.

The Company is currently undergoing CIRP (Refer Note No. 1.2) under the provisions of the Code. Accordingly, a moratorium has been declared under Section 14 of the Code. Post CIRP, the Company has reconstituted ALCO which manages the foreign currency and interest rate risks, besides other market risks/core functions. The ALCO includes the Company's senior management. It defines the strategy for managing foreign currency and interest rate risks in the business.

In view of CIRP, the foreign currency liabilities have been crystallised into INR as on October 8th, 2021 (Insolvency Commencement Date or 'ICD'). Hence, there is no foreign currency risk as at March 31st, 2023. Further all the borrowings have been crystallised as on ICD. Hence, there is no interest rate risk as at March 31st, 2023.

(ii) Quantitative Disclosures

(₹ in Lacs)

Sl. No.	Particulars	As at March 31st, 2023		As at March 31st, 2022	
		Currency Deviations	Interest Rate Deviations	Currency Deviations	Interest Rate Deviations
(i)	Derivatives (Notional Principal Amount)				
	For hedging	-	-	-	-
(ii)	Marked to Market Positions	-	-	-	-
	a) Asset (+)	-	-	-	-
	b) Liability (-)	-	-	-	-
(iii)	Credit Exposure	-	-	-	-
(iv)	Unhedged Exposures	-	-	-	-

Annexure-I to Notes to the Financial Statements

Disclosure of details as required in terms of Master Direction - Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time (the “Master Directions”)

27. Details of Single Borrower Limit (SGL)/Group Borrower Limit (GBL) exceeded by the NBFC

The Company has exceeded the prudential exposure limits during the year ended March 31st, 2023 and March 31st, 2022 with respect to Single Borrower Limit (SBL) and Group Borrower Limit (GBL).

28. Unsecured Advances

Unsecured advance represents unsecured Loans as at March 31st, 2023 is ₹ 1,66,053 Lacs (March 31st, 2022 ₹ 1,99,591 Lacs) and it includes advances amounting to ₹ Nil (March 31st, 2022 ₹ Nil) for which intangible securities such as charge over rights, licences, authority, etc., has been taken as collateral.

29. Registration obtained from other financial sector regulators: None

30. Penalties have been imposed by RBI or any other Regulators during the financial year ended March 31st, 2023 and March 31st, 2022 as below:

(₹ in Lacs)				
Sl. No.	Regulatory Body	Reason	For the year ended March 31st, 2023	For the year ended March 31st, 2022
(i)	Bombay Stock Exchange	Non compliance of regulation 52(1) of SEBI Listing Obligations and Disclosure Requirements, 2015	-	1 @
(ii)	The Calcutta High Court Advocates Clerks Philanthropic	Trust Filing Affidavit as per NCLT Kolkata bench Order, dt 20 12 22 deposited with "Calcutta High Court Advocates Clerks Philanthropic Trust" for Maa Chandi Durga Ispat Pvt Ltd/C P (IB) No 83/KB/2022, Citadel Law Chambers	*	-
(iii)	The Calcutta High Court Advocates Clerks Philanthropic Trust	Filing Affidavit as per NCLT Kolkata bench Order, dt 20 12 22 deposited with "Calcutta High Court Advocates Clerks Philanthropic Trust" for Maa Chandi Durga Ispat Pvt Ltd/C P (IB) No 83/KB/2022, Citadel Law Chambers	**	-
(iv)	PAO (Pay and Accounts Office), Chennai	Paid to PAO, Chennai through the non - tax receipt portal (Bharat Kosh), Anant Merathia	5	-
(v)	P M Relief Fund	Penalty paid to PM Relief Fund as per order of NCLT Indore Bench, Ahmedabad	-	***
(vi)	Bihar GST Authorities	Penalty for delay in filling of GSTR 9C for the FY:2018-19 u/s 125 of CGST Act,2017 for Bihar against Order dated 5-Aug-21, ICICI Tax A/c	-	****
(vii)	Durgapur Municipal Corporation	Late fine for Trade Licence of Durgapur Branch renewal	*****	-
(viii)	Securities and Exchange Board of India	Securities and Exchange Board of India (SEBI) had passed Order No Order/BRK/JS/2022-23/16719 dated 31.05.2022 where it had Imposed a penalty of Rs 5,00,000/- (SEBI Vs Dewan Housing Finance Corporation Ltd.	5	-
(ix)	National Stock Exchange	Email received from NSE for Penalty Imposed for Non Compliance under regulation 50(1) of SEBI LODR	*****	-
(x)	Bombay Stock Exchange	Email received from BSE for Penalty Imposed for Non Compliance under regulation 50(1) of SEBI LODR	*****	-
(xi)	Bombay Stock Exchange	BSE vide Letter dated 21st October 2022 One day Fines arising due to Non compliance of SEBI (LODR) Regulation, 2015	*****	-
(xii)	National Stock Exchange	Non compliance of regulation 52(1), 52(4), 54(2) of SEBI Listing Obligations and Disclosure Requirements, 2015	-	2

* ₹ 25,000 /-

** ₹ 15,000/- for the year ended March 31st, 2023

*** ₹ 15,000 /- for the year ended March 31st, 2022

**** ₹ 32,000 /- for the year ended March 31st, 2022

***** ₹ 8,952 /- for the year ended March 31st, 2023

***** ₹ 5,900 /- for the year ended March 31st, 2023

***** ₹ 5,900 /- for the year ended March 31st, 2023

***** ₹ 7,080 /- for the year ended March 31st, 2023

@ During the financial year ended March 31st, 2023, penalty paid to BSE of ₹ 2,30,000/- against penalty imposed by BSE.

Annexure-I to Notes to the Financial Statements

Disclosure of details as required in terms of Master Direction - Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time (the “Master Directions”)

31. Draw Down from Reserves

Details of draw down from Reserves is disclosed in Note No. 23 of the Notes to the Financial Statements.

32. Ratings assigned by credit rating agencies and migration of ratings during the year

Sl. No.	Particulars	As at March 31st, 2023			As at March 31st, 2022		
		CARE	BRICKWORK **	ACUITE	CARE	BRICKWORK **	ACUITE
(i)	Long-Term Banking facilities	CARE D	-	-	CARE D	-	-
(ii)	Short-Term Banking Facilities	CARE D	-	-	CARE D	-	-
(iii)	Short-Term Debt Instruments	-	BWR D	-	-	BWR D	-
(iv)	NCDs/Bonds	CARE D	BWR D	ACUITE D	CARE D	BWR D	ACUITE D
(v)	Unsecured Subordinated/Tier-II Debentures/Bonds	CARE D	BWR D	ACUITE D	CARE D	BWR D	ACUITE D
(vi)	Perpetual Debentures	CARE D	BWR D	-	CARE D	BWR D	-

* ‘Issuer Not Cooperating (INC)’ category

Vide order dated 6th Oct 2022, SEBI had cancelled Certificate of Registration (COR) of Brickwork Ratings India Private Limited as a Credit Rating Agency (CRA). The CRA has been directed to wind down its operations within a period of six months from the date of the aforesaid Order and not to take any new clients/fresh mandates from the date of Order. RBI has also vide press release dated 12th Oct 2022 communicated the same to all Regulated Entities and advised that the instructions regarding the prudential treatment of the existing ratings issued by the rating agency shall be advised separately, which is still awaited. Further, pursuant to initiation of CIRP, all the debts owed to financial Creditors have crystallized as on Insolvency Commencement Date i.e. October 8, 2021 and these debts would be payable as per the Resolution Plan to be approved by Adjudicating Authority. In view of the above, at this juncture, the Company has not approached other CRAs for getting fresh ratings for the instruments rated by the Brickwork Ratings.

Sl. No.	Particulars	As at March 31st, 2023		As at March 31st, 2022	
		CARE	BRICKWORK	CARE	BRICKWORK
(i)	Long Term Banking facilities @	CARE D	-	CARE D	-
(ii)	Short Term Banking Facilities @	CARE D	-	CARE D	-
(iii)	NCDs/Bonds @	CARE D	-	CARE D	-
(iv)	Unsecured Subordinated/Tier-II Debentures/Bonds @	CARE D	-	CARE D	-

@ This represents rating assigned for outstanding borrowings which was transferred from SIFL pursuant to slump exchange.(Refer Note No.64).

33. Details of Financial Assets sold to Securitisation/Reconstruction Company for Asset Reconstruction

(₹ in Lacs unless otherwise stated)

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	No. of Accounts	-	-
(ii)	Aggregate value (net of provisions) of Accounts sold to SC/RC	-	-
(iii)	Aggregate consideration	-	-
(iv)	"Additional Consideration realized in respect of accounts transferred in earlier years"	-	-
(v)	Aggregate gain/loss over net book Value	-	-

34. Overseas Assets (for those with Joint Ventures and Subsidiaries abroad) : Nil

35. Off Balance Sheet SPV's sponsored : Nil

36. Details of Financing of Parent Company Products :

Financing of Parent Company products during the financial year ended March 31st, 2023 is ₹ Nil (March 31st, 2022 ₹ Nil).

37. Disclosure of Complaints

Sl. No.	Particulars	As at March 31st, 2023	As at March 31st, 2022
(i)	No. of complaints pending at the beginning of the year	2	-
(ii)	No. of complaints received during the year	124	77
(iii)	No. of complaints redressed during the year	126	75
(iv)	No. of complaints pending at the end of the year	-	2

38. Disclosure of Fraud

Disclosures Relating to Fraud In Terms of the Notification Issued by Reserve Bank of India vide DNBS/2016-17/49 Master Direction DNBS. PPD.01/66.15.001/2016-17

During the year ended March 31st, 2023, there are 70 number of cases of Fraud amounting to ₹ 18,11,965 Lacs has been reported to RBI on various dates by the Company. (During the year ended March 31st, 2022, there are 2 number of cases of Fraud amounting to ₹ 207 Lacs has been reported to RBI on various dates by the Company).

Annexure-II to Notes to the Financial Statements

Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22,2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework' and in terms of circular DOR.ACC.REC.No.20/21.04.018/2022-23 on disclosures in Financial Statements- Notes to Accounts for NBFCs

1. Exposure to real estate sector

(₹ in Lacs)

Sl. No.	Category	As at March 31st, 2023	As at March 31st, 2022
(i)	Direct exposure		
(a)	"Residential Mortgages – Lending fully secured by mortgages on residential property that is or will be occupied by the borrower or that is rented. Exposure would also include non-fund based (NFB) limits."	-	-
(b)	"Commercial Real Estate # Lending secured by mortgages on commercial real estate (office buildings, retail space, multipurpose commercial premises, multifamily residential buildings, multi tenanted commercial premises, industrial or warehouse space, hotels, land acquisition, development and construction, etc.). Exposure would also include non-fund based (NFB) limits."	7,27,213	7,24,069
(c)	Investments in Mortgage-Backed Securities (MBS) and other securitized exposures – i. Residential ii. Commercial Real Estate iii. Indirect Exposure Fund based and non-fund-based exposures on National Housing Bank and Housing Finance Companies.		
Total Exposure to Real Estate Sector		7,27,213	7,24,069

Includes lending in Special Economic Zones/Industrial parks amounting to ₹ 2,62,982 Lacs (March 31st, 2022 ₹ 2,57,503 Lacs) that would have the characteristics of Commercial Real Estate (CRE) and these would simultaneously be classified as "Infrastructure Lending" in terms of RBI Circular on classification of exposures as CRE exposures.

2. Exposure to capital market

(₹ in Lacs)

Sl. No.	Category	As at March 31st, 2023	As at March 31st, 2022
(i)	Direct investment in equity shares, convertible bonds, convertible debentures and units of equity oriented mutual funds the corpus of which is not exclusively invested in corporate debt.	13,140	15,249
(ii)	Advances against shares/bonds/debentures or other securities or on clean basis to individuals for investment in shares (including IPOs/ESOPs), convertible bonds, convertible debentures, and units of equity oriented mutual funds.	-	-
(iii)	Advances for any other purposes where shares or convertible bonds or convertible debentures or units of equity oriented mutual funds are taken as primary security.	2,190	1,964
(iv)	Advances for any other purposes to the extent secured by the collateral security of shares or convertible bonds or convertible debentures or units of equity oriented mutual funds i.e. where the primary security other than shares/convertible bonds/convertible debentures/units of equity oriented mutual funds does not fully cover the advances.	-	-
(v)	Secured and unsecured advances to stockbrokers and guarantees issued on behalf of stockbrokers and market makers.	-	-
(vi)	Loans sanctioned to corporates against the security of shares/bonds/debentures or other securities or on clean basis for meeting promoter's contribution to the equity of new companies in anticipation of raising resources.	-	-
(vii)	Bridge loans to companies against expected equity flows/issues.		
(viii)	Underwriting commitments taken up by the NBFCs in respect of primary issue of shares or convertible bonds or convertible debentures or units of equity oriented mutual funds.	-	-
(ix)	Financing to stockbrokers for margin trading.	-	-
(x)	All exposures to Alternative Investment Funds:		
	(i) Category I	-	-
	(ii) Category II	-	-
	(iii) Category III		
Total Exposure to Capital Market		15,330	17,213

Annexure-II to Notes to the Financial Statements

Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22,2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework' and in terms of circular DOR.ACC.REC.No.20/21.04.018/2022-23 on disclosures in Financial Statements- Notes to Accounts for NBFCs (Contd.)

3. Sectoral exposure

(₹ in Lacs unless otherwise stated)

Sectors	As at March 31st, 2023			As at March 31st, 2022		
	Total Exposure (includes on balance sheet and off-balance sheet exposure)	Gross NPAs	Percentage of Gross NPAs to total exposure in that sector	Total Exposure (includes on balance sheet and off-balance sheet exposure)	Gross NPAs	Percentage of Gross NPAs to total exposure in that sector
1. Agriculture and Allied Activities	10,070	10,070	100%	9,219	9,219	100%
2. Industry	20,71,290	19,01,365	92%	22,72,981	14,88,479	65%
2.1 Mining & Quarrying (incl. Coal)	2,64,380	2,52,233	12%	2,76,098	2,15,424	9%
2.2 Food Processing	73	73	0%	69	69	0%
2.3 Textiles	22	22	0%	22	22	0%
2.4 Wood & Wood Products	24,285	24,285	1%	23,776	23,776	1%
2.5 Paper & Paper Products	273	-	0%	419	-	0%
2.6 Basic Metal & Metal Product	37,451	29,410	1%	37,621	25,638	1%
2.7 All Engineering	2,819	2,819	0%	2,850	2,850	0%
2.8 Construction	5,68,508	4,79,606	23%	6,22,829	4,96,955	22%
2.9 Infrastructure	11,67,451	11,06,889	53%	13,03,262	7,17,710	32%
2.9.1 Power	2,27,756	2,27,604	11%	2,24,166	88,506	4%
2.9.2 Roads	1,94,059	1,93,446	9%	2,54,938	1,11,691	5%
2.9.3 Water Treatment Plants	22,811	22,811	1%	22,931	-	0%
2.9.4 Electricity Generation	1,22,973	1,18,403	6%	1,33,600	38,316	2%
2.9.5 Electricity Distribution	96,175	96,175	5%	93,387	93,387	4%
2.9.6 Solar Renewal Energy	-	-	0%	583	-	0%
2.9.7 Other Infrastructure	5,03,677	4,48,450	22%	5,73,657	3,85,810	17%
2.10 Other Industries	6,028	6,028	0%	6,035	6,035	0%
3. Services	9,64,078	8,49,496	88%	9,81,480	6,46,720	66%
3.1 Transport Operators	33,437	29,292	3%	33,806	25,934	3%
3.2 Computer Software	625	625	0%	625	625	0%
3.3 Tourism, Hotel and Restaurants	2,341	11	0%	2,377	11	0%
3.4 Professional Services	24,770	22,570	2%	24,413	21,953	2%
3.5 Commercial Real Estate	6,11,720	5,90,087	61%	5,92,999	3,89,413	40%
3.6 NBFCs	53,431	53,431	6%	53,483	53,483	5%
3.7 Aviation	3,202	3,202	0%	3,210	-	0%
3.8 Other Services	2,34,552	1,50,278	16%	2,70,567	1,55,301	16%
4. Personal Loans	15,028	5,669	38%	18,920	6,012	32%
4.1 Vehicle/Auto Loans	15,028	5,669	38%	18,920	6,012	32%

i. The sectoral exposure includes liability towards assignment amounting to ₹ 1,98,203 Lacs (March 31st, 2022 : ₹ 2,53,810 Lacs).

ii. Since the Tier I capital of the Company is negative, the exposure to specific sub-sector/industry is disclosed separately.

Annexure-II to Notes to the Financial Statements

Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22, 2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework' and in terms of circular DOR.ACC.REC.No.20/21.04.018/2022-23 on disclosures in Financial Statements- Notes to Accounts for NBFC (Contd.)

4. Intra-group exposures

- (i) Total amount of intra-group gross exposures : ₹ 29,241 Lacs as at March 31st, 2023 (March 31st, 2022 : ₹ 29,347 Lacs).
- (ii) Total amount of top 20 intra-group gross exposures : ₹ 29,241 Lacs as at March 31st, 2023 (March 31st, 2022 : ₹ 29,347 Lacs).
- (iii) Percentage of intra-group gross exposures to total gross exposure of the NBFC on borrowers/customers : 1.02% as at March 31st, 2023 (March 31st, 2022 is 0.97%).

5. Unhedged foreign currency exposure as at March 31st, 2023 and March 31st, 2022

NBFCs shall disclose details of its unhedged foreign currency exposures. Further, it shall also disclose their policies to manage currency induced risk.

As per the requirements of RBI notification RBI/FED/2018-19/67 FED Master Direction No.5/2018-19 dated March 26, 2019 entities raising External Commercial Borrowings ('ECB') are required to mandatorily hedge 70 per cent of their ECB exposure in case the average maturity of ECB is less than 5 years, which the Company complied on an ongoing basis till the nine months ended December 31st, 2020. Thereafter, the Company was not able to meet the requirements of the aforesaid RBI notification due to procedural issues. The Company was not able to make payment of the hedging premium/cost to the concerned banks for keeping the ECB exposures hedged, as aforesaid. Therefore, the concerned banks unwound the currency risk hedges, which resulted in ECB exposures amounting to ₹ 27,272 Lacs as per contractual terms being not hedged as on March 31st, 2023, in terms of the aforesaid RBI notification. The Company has reported the above fact to RBI and reply from the same is still awaited.

The Company's Financial Instruments are exposed to market changes due to which the Company is exposed to the following significant market risks:

- i. Foreign Currency Risk
- ii. Interest Rate Risk

The Company undertakes transactions denominated in foreign currency which results in exchange rate fluctuations. Such exchange rate risk primarily arises from transactions made in foreign exchange and reinstatement risks arising from recognised assets and liabilities, which are not in the Company's functional currency (Indian Rupees). The Company is exposed to interest rate risk as the Company borrows foreign currency funds at fixed plus floating interest rate benchmarks. The Company manages this risk by maintaining an appropriate mix between fixed and floating rate borrowings, and by use of derivative hedging products like interest rate swaps and cross currency interest rate swaps. The Company had managed both these risks as per regulatory requirements.

The Company is currently undergoing CIRP (Refer Note No. 1.2) under the provisions of the Code. Accordingly, a moratorium has been declared under Section 14 of the Code. Post CIRP, the Company has reconstituted ALCO which manages the foreign currency and interest rate risks, besides other market risks/core functions. The ALCO includes the Company's senior management. It defines the strategy for managing foreign currency and interest rate risks in the business.

In view of CIRP, the foreign currency liabilities have been crystallised into INR as on October 8th, 2021 (Insolvency Commencement Date or 'ICD'). Hence, there is no foreign currency risk as at March 31st, 2023. Further all the borrowings have been crystallised as on ICD. Hence, there is no interest rate risk as at March 31st, 2023 and March 31st, 2022.

6. Related Party Disclosure

	Ultimate Holding		Parent Company		Fellow Subsidiaries		Associates/Joint ventures		Chairman/Vice chairman & Independent directors		Key Management Personnel		Relatives of Key Management Personnel		Others		Total	
	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	
Rent paid for Leased Premises during the year	-	-	79	20	312	156	-	-	-	-	-	-	-	-	-	-	391	176
Rent paid for Leased Premises outstanding as at Security Deposit paid for Leased Premises-	-	-	229	229	156	156	-	-	-	-	-	-	-	-	-	-	385	385
Excluding impairment loss allowance of ₹ 15,705 Lacs as at March 31st, 2023	-	-	15,000	15,000	2,350	2,350	-	-	-	-	-	-	-	-	-	-	17,350	17,350
(₹ 7,500 as at March 31st, 2022) outstanding as at	-	-	14	3	17	4	-	-	-	-	-	-	-	-	-	-	31	7
Rent received for Leased Premises during the year	-	-	-	-	1	1	-	-	-	-	-	-	-	-	-	-	1	4
Rent received for Leased Premises outstanding as at	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(₹ in Lacs)

Annexure-II to Notes to the Financial Statements

Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22, 2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework' and in terms of circular DOR.ACC.REC.No.20/21.04.018/2022-23 on disclosures in Financial Statements- Notes to Accounts for NBFC (Contd.)

6. Related Party Disclosure (Contd.) (₹ in Lacs)

	Ultimate Holding		Parent Company		Fellow Subsidiaries		Associates/Joint ventures		Chairman/Vice chairman & Independent directors		Key Management Personnel		Relatives of Key Management Personnel		Others		Total	
	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022
Intercompany Deposit Given (on maximum outstanding basis) during the year	-	-	31	19	-	-	-	-	-	-	-	-	-	-	31	-	-	19
Intercompany Deposit Given (on maximum outstanding basis) - Excluding impairment loss allowance of ₹ 12,836 Lacs as at March 31st, 2023 (₹ 13,316 Lacs as at March 31st, 2022) outstanding as at	-	-	25,671	25,723	-	-	-	-	-	-	-	-	-	-	25,671	-	-	25,723
Refund of Intercompany Deposit Given during the year	-	-	84	2,350	-	-	-	-	-	-	-	-	-	-	84	-	-	2,350
Reimbursement Cost Received	-	-	-	4	-	-	-	-	-	-	-	-	-	-	-	-	-	4
Reimbursement of IT Expense during the year	-	-	20	-	-	-	-	-	-	-	-	-	-	-	20	-	-	-
Other Receivables - Amount received during the year	-	-	208	-	-	-	-	-	-	-	-	-	-	-	208	-	-	-
Other Receivables - Amount paid during the year	-	-	208	-	-	-	-	-	-	-	-	-	-	-	208	-	-	-
Other Receivables - Advance Given during the year #	-	-	-	1,559	-	-	-	-	-	-	-	-	-	-	-	-	-	1,559
Other Receivables - Refund of Advance Given during the year #	-	-	-	3,315	-	-	-	-	-	-	-	-	-	-	-	-	-	3,315
Bank Guarantee released (Refer Note No. 64) during the year	-	-	-	88	-	-	-	-	-	-	-	-	-	-	-	-	-	88
Bank Guarantee Issued (Refer Note No. 64) outstanding as at	-	-	301	416	-	-	-	-	-	-	-	-	-	-	301	-	-	416
Pre-CIRP Claim Receivable during the year	-	-	107	-	-	-	-	-	-	-	-	-	-	-	107	-	-	-
Pre-CIRP Claim Receivable - Excluding impairment loss allowance of ₹ 32 Lacs as at March 31st, 2023 (₹ Nil as at March 31st, 2022) outstanding as at	-	-	107	-	-	-	-	-	-	-	-	-	-	-	107	-	-	-
Closure of Bank Guarantee during the year	-	-	116	-	-	-	-	-	-	-	-	-	-	-	116	-	-	-
Loan Given (Secured) (Refer Note No. 64) - Excluding impairment loss allowance of ₹ 3,076 Lacs as at March 31st, 2023 (₹ 1,211 Lacs as at March 31st, 2022) outstanding as at	-	-	-	-	3,162	3,207	-	-	-	-	-	-	-	-	3,162	-	-	3,207
Interest Income on Loan Given during the year	-	-	-	-	130	323	-	-	-	-	-	-	-	-	130	-	-	323
Interest Received on Security Deposit during the year	-	-	-	-	235	117	-	-	-	-	-	-	-	-	235	-	-	117
Interest Received on Security Deposit - Excluding impairment loss allowance of ₹ 34 Lacs as at March 31st 2023 (₹ Nil as at March 31st, 2022) outstanding as at	-	-	-	-	113	113	-	-	-	-	-	-	-	-	113	-	-	113
Consultancy Fees during the year	-	-	-	-	-	-	-	-	-	-	54	27	-	-	-	-	-	81
Sitting Fees during the year	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sitting Fees outstanding as at	-	-	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-	5
Car Hire Charges during the year	-	-	-	-	-	-	-	-	-	-	-	-	30	11	-	-	-	41
Car Hire Charges outstanding as at	-	-	-	-	-	-	-	-	-	-	-	-	7	7	-	-	-	14
Short term employee benefit during the year	-	-	-	-	-	-	-	-	-	184	462	146	-	-	-	-	-	792
Short term employee benefit outstanding as at	-	-	-	-	-	-	-	-	74	155	118	45	-	-	-	-	-	387
Post employment benefit during the year	-	-	-	-	-	-	-	-	-	10	30	8	-	-	-	-	-	48
Post employment benefit outstanding as at	-	-	-	-	-	-	-	-	5	5	-	-	-	-	-	-	-	10

*Related Parties are considered as per the above circular Note 1. Settlement of outstanding balances as at year end generally occurs in cash.
 Note 2. Income or expenses are presented excluding GST.
 Note 3. The Outstanding balances are before ECL Provisions if any, wherever applicable.
 Note 4. All the related party transactions have been made in the ordinary course of business and the same are generally at arm's length price.
 # This represents amount receivable from Parent Company, SIFL in TRA.

Annexure-II to Notes to the Financial Statements

Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22,2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework' and in terms of circular DOR.ACC.REC.No.20/21.04.018/2022-23 on disclosures in Financial Statements- Notes to Accounts for NBFCs (Contd.)

7. Disclosure of complaints

(i) Summary information on complaints received by the NBFCs from customers and from the Offices of Ombudsman

Sl. No.	Category	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022
Complaints received by the NBFC from its customers			
1	Number of complaints pending at beginning of the year	20	46
2	Number of complaints received during the year	768	555
3	Number of complaints disposed during the year	751	581
3.1	Of which, number of complaints rejected by the NBFC	-	-
4	Number of complaints pending at the end of the year	37	20
Maintainable complaints received by the NBFC from Office of Ombudsman			
	Number of maintainable complaints received by the NBFC from Office of Ombudsman pending at the beginning of the year	2	-
5	Number of maintainable complaints received by the NBFC from Office of Ombudsman	124	77
5.1	Of 5, number of complaints resolved in favour of the NBFC by Office of Ombudsman	126	75
5.2	Of 5, number of complaints resolved through conciliation/mediation/advisories issued by Office of Ombudsman	-	-
5.3	Of 5, number of complaints resolved after passing of Awards by Office of Ombudsman against the NBFC	-	-
6	Number of Awards unimplemented within the stipulated time (other than those appealed)	-	-

(ii) Top five grounds of complaints received by the NBFC from customers

Grounds of complaints (i.e. complaints relating to)	Number of complaints pending at the beginning of the year	Number of complaints during the year	% increase/decrease in the number of complaints received over the previous year	Number of complaints pending at the end of the year	Of 5, number of complaints pending beyond 30 days
As at and for the year ended March 31st, 2023					
Repayment & Collection	3	344	40%	21	13
NCD	-	155	2114%	3	2
CIBIL	3	100	20%	6	2
Closure	2	68	74%	4	3
Loan & Advances	7	48	(26%)	1	-
Others *	5	53	(56%)	2	1
Total	20	768	38%	37	21
As at and for the year ended March 31st, 2022					
Repayment & Collection	33	246	189%	3	1
NCD	-	7	#	-	-
CIBIL	4	83	43%	3	-
Closure	1	39	(11%)	2	1
Loan & Advances	4	108	414%	7	6
Others *	4	72	80%	5	-
Total	46	555	113%	20	8

*Others - Complaints related to customer asked to provide original Invoice, agreement documents, TDS credit, GST related issues, moratorium reversal etc.
Previous year amount is ₹ Nil.

8. Corporate Governance

The Company is incorporating the Corporate Governance Report in the Annual Report of the Company for the Financial Year ended March 31, 2023.

9. Disclosure on modified opinion, if any, expressed by auditors, its impact on various financial items and views of management on audit qualifications.

Statement on Impact of Audit Qualifications (for audit report with modified opinion) submitted along with views of management on audit qualifications for the financial year ended and as at March 31st, 2023 is given in **Annexure III**.

10. Items of income and expenditure of exceptional nature

Items of Income of Exceptional nature

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Income of Exceptional nature	-	-

Annexure-II to Notes to the Financial Statements

Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22,2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework' and in terms of circular DOR.ACC.REC.No.20/21.04.018/2022-23 on disclosures in Financial Statements Notes to Accounts for NBFCs (Contd.)

Items of Expenditure of Exceptional nature

(₹ in Lacs)

Particulars	For the year ended March 31st, 2023	For the year ended March 31st, 2022
Impairment on Financial Instruments (Net) (A)	9,37,100	-
Net gain/ (loss) on financial instruments at fair value through profit or loss - Unrealised		
- Investments	44,173	-
- Loan	22,149	-
- Claims Receivable	12,171	-
Total Net gain/(loss) on fair value changes - Unrealised (B)	78,493	-
Total (A+B)	10,15,593	-

11. Breach of covenant as at March 31st, 2023 and March 31st, 2022

For the financial year ended as at March 31st, 2023 and March 31st, 2022, the Company has not complied with all the covenants in respect of loan availed or debt securities issued. Some of the major financial covenants are w.r.t. Capital Adequacy Ratio, NPA ratios, Debt Equity ratio, Interest coverage ratio, Security/Asset coverage ratios, Net worth related ratios, Profitability related ratios and minimum required ratings etc. (Also Refer Note No.1.2).

12. Divergence in Asset Classification and Provisioning

(₹ in Lacs)

Sl. No.	Particulars	Amount
1	Gross NPAs as on March 31, 2020* as reported by the NBFC	3,32,46
2	Gross NPAs as on March 31, 2020 as assessed by the Reserve Bank of India	12,14,772
3	Divergence in Gross NPAs (2-1)	8,82,306
4	Net NPAs as on March 31, 2020 as reported by the NBFC	2,19,217
5	Net NPAs as on March 31, 2020 as assessed by Reserve Bank of India	6,13,596
6	Divergence in Net NPAs (5-4)	3,94,379
7	Provisions for NPAs as on March 31, 2020 as reported by the NBFC	1,13,249
8	Provisions for NPAs as on March 31, 2020 as assessed by Reserve Bank of India	6,01,176
9	Divergence in provisioning (8-7)	4,87,927
10	Reported Profit before tax and impairment loss on financial instruments for the year ended March 31, 2020	43,605
11	Reported Net Profit after Tax (PAT) for the year ended March 31, 2020	5,591
12	Adjusted (notional) Net Profit after Tax (PAT) for the year ended March 31, 2020 after considering the divergence in provisioning [11 - (a+b) Refer Note below]	(4,94,909)

* March 31, 2020 is the close of the reference period in respect of which divergences were assessed

Note:	(a) Divergence in provisioning (refer point no. 9 of above table)	4,87,927
	(b) Provisions required for likely losses in off – balance sheet items	12,573

13. Disclosure of details as required in terms of circular DOR.CRE.REC.No.25/03.10.001/2022-23 dated April 19, 2022 on 'Loans and Advances – Regulatory Restrictions - NBFCs'

Loans to Directors, Senior Officers and relatives of Directors

(₹ in Lacs)

Particulars	As at and for the year ended March 31st, 2023	As at and for the year ended March 31st, 2022
Directors and their relatives	Nil	Nil
Entities associated with directors and their relatives	Nil	Nil
Senior Officers and their relatives	Nil	Nil

ANNEXURE -III TO NOTES TO THE FINANCIAL STATEMENTS

Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22, 2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework'.

Statement on Impact of Audit Qualifications for the Financial Year ended 31st March, 2023

I. Sl.No.	Particulars	Audited Figure (as reported before adjusting for qualifications) ₹ in Lacs	Audited Figure (as reported after adjusting for qualifications) ₹ in Lacs*
1	Total Income	1,55,757	2,14,994
2	Total Expenses (including tax expense)	12,77,685	23,60,581
3	Net Profit/(Loss)	(11,21,928)	(21,45,587)
4	Earnings Per Share		
	- Basic	(1419.87)	(2,715.37)
	- Diluted	(1419.87)	(2,715.37)
5	Total Assets	15,24,300	9,66,775
6	Total Liabilities	32,46,350	39,12,453
7	Net Worth	(23,40,940)	(28,08,093)
8	Any Other financial item (s) (as felt appropriate by the management)	None	None

* Refer comment given by Management in item No.II (d) herein below

II. Audit Qualification (each audit qualification separately):

- Details of Audit Qualification: Refer Annexure - A
- Type of Audit Qualification: Disclaimer of Opinion
- Frequency of qualification: Repeated for Sl. No. (a) to (r) except first time Sl. No. (b) and (p)
- For audit Qualification (s) where the impact is quantified by the auditor, Management's views:

The impact of the quantification has been given in (I) above. The said Audit qualifications are reproduced in Sl no (a), (b), (f) and (p) of Annexure-A. Refer comment given by management in Sl no. (a), (b), (f) and (p) under 'Management's view' of Annexure-A in this regards.

e. For Audit Qualification (s) where the impact is not quantified by the auditor:

- Management's estimation on the impact of audit qualification:** Except as mentioned in Annexure A at SL No. (a), (b), (f) and (p), the financial impact is not ascertainable.
- If management is unable to estimate the impact, reasons for the same:** Please refer management's views in Annexure A Sl. No. (a) to (r) except (a), (b), (f) and (p).
- Auditors' Comments on (i) or (ii) above:** Our views remains unchanged considering the matter referred in basis for disclaimer of opinion from paragraph (a) to (r) of our Independent Auditors Report dated May 9, 2023 on the Audited Ind AS Financial Statements of the Company for the year ended March 31, 2023.

ANNEXURE -III TO NOTES TO THE FINANCIAL STATEMENTS

Disclosure of details as required in terms of circular DOR.CRE.REC.No.60/03.10.001/2021-22 dated October 22, 2021 on 'Scale Based Regulation (SBR): A Revised Regulatory Framework' (Contd.)

SL. NO	Details of Audit Qualification(s)	Management's Views*
	Basis for Disclaimer of Opinion	(a) Management's View:
(a)	<p>Note No. 61 to the Ind AS financial statements explains that since the Administrator has taken charge of the affairs of the Company on October 4, 2021, the Administrator is not liable or responsible for any actions and regarding the information pertaining to the period prior to October 4, 2021 has relied upon the explanations, clarifications, certifications, representations and statements made by the Chief Financial Officer, Company Secretary, Chief Business Officer, Chief Risk Officer, Chief Compliance Officer and Legal Head ('the existing officials of the Company'), who were also part of the Company prior to the appointment of the Administrator. Note No. 61 to the Ind AS financial statements explains that the Administrator got conducted audits/reviews relating to the processes and compliances of the Company and has also appointed professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code. Further, as stated in Note No. 61, the Administrator of the Company received certain account wise transaction audit reports from the professional agency appointed as the transaction auditor indicating that there are certain transactions which are fraudulent in nature as per Section 66 of the Code. Accordingly, the Administrator has filed applications under Section 60(5) and Section 66 of the Code before the Kolkata bench of the Hon'ble National Company Law Tribunal (NCLT) on various dates till May 05, 2023 for adjudication. Further, as mentioned in the said note, the transaction audit has been completed and the impact of the same has been incorporated in the Ind AS financial statements. However, the said transaction audit reports have not been made available to us and accordingly, we are unable to comment whether or not all impact of the same has been incorporated in the Ind AS financial statements. As per Ind AS 109, for a financial asset that is credit-impaired at the reporting date, an entity shall measure the expected credit losses as the difference between the asset's gross carrying amount and the present value of estimated future cash flows discounted at the financial asset's original effective interest rate. Any adjustment is recognised in profit or loss as an impairment gain or loss. Note No. 61 to the Ind AS financial statements explains that the Company has considered impairment reserve of ₹ 5,24,931 Lacs created in earlier periods as per RBI guidelines while calculating the impairment on such accounts which is not in accordance with Ind AS 109. Further, Note No. 63 to the Ind AS financial statements explains that basis revised ECL rates and the impairment reserve made in earlier periods in cases where they exceed gross exposure, the Company made a lesser provision under the ECL, so as to restrict the net exposure at Nil, since no withdrawal from impairment reserve is permitted which is also not in accordance with Ind AS 109.</p>	<p>The CIRP of the Company has been initiated on 8th October, 2021. As a part of the CIRP, the Administrator conducted audits/reviews relating to the processes and compliances of the Company and had also appointed professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code. The Transaction Audit has been completed and the impact of the same has been taken in these Ind AS financial statements. Since the report is of a confidential nature, the same cannot be shared with the Auditors. The Company had created Impairment Reserve amounting to ₹ 5,24,931 Lacs on such accounts, wherever applicable in the earlier periods. Since no withdrawal from such reserve is permitted without the prior permission of RBI as per the notification/circular, the Company has not made provision under the ECL to the extent of impairment reserve amounting to ₹ 5,24,931 Lacs, so as to restrict the net exposure at Nil.</p>
(b)	<p>Note No. 62 to the Ind AS financial statements which states that the Company adopted a policy, to not to recognise interest income on accounts in which transactions are determined as fraudulent by the Company. Had the Company recognised the interest income, as aforesaid, interest income would have been higher by ₹ 59,237 Lacs for the year ended March 31, 2023, and consequently the ECL provision would also have been higher by ₹ 59,237 Lacs for the year ended March 31, 2023, resulting in no change in the loss for the year ended March 31, 2023.</p>	<p>(b) Management's View: During the quarter ended September 30, 2022, as a matter of prudence, the Company has adopted a policy in respect of the borrowers whose transactions with the Company are determined as fraudulent basis transaction audit reports, not to recognise the income on such accounts from the start of the quarter in which such transactions are reported as fraudulent by the Company. Further, in case of transactions determined as fraudulent in previous periods prior to the adoption of this policy, no income is being recognised w.e.f. July 1, 2022 in all such cases.</p>
(c)	<p>Note No. 63 to the Ind AS financial statements which explains that the Administrator as part of the CIRP process had appointed independent valuers to conduct valuation of the assets of the company and assets/collaterals held as securities. Since the Ind AS financial statements, disclosures, categorisation and classification of assets are subject to the outcome of such valuation and CIRP process, we are unable to comment on the impact, if any, of the Ind AS financial statements.</p>	<p>(c) Management's View: Valuation of the Company (including Assets) has been completed under the provisions of the Code by two (2) independent IBBI registered valuers. However, the Ind AS financial statements, disclosures, categorisation and classification of assets are subject to the outcome of such CIRP process.</p>
(d)	<p>Note No. 64 to the Ind AS financial statements which explains that during the financial year 2019-20, the Company accounted for the slump exchange transaction and consequently recognized the relevant assets and liabilities in its books of account,</p>	<p>(d) Management's View: The Company in the past gave effect to the BTA based on expert legal and accounting opinions in relation to the accounting of BTA which confirmed that the</p>

SL. NO	Details of Audit Qualification(s)	Management's Views*
	<p>pursuant to the Business Transfer Agreement ('BTA') with SIFL, with effect from October 1, 2019, subject to necessary approvals. The superseded Board of Directors and erstwhile management of the Company obtained expert legal and accounting opinions in relation to the accounting of BTA which confirmed that the accounting treatment so given is in accordance with the relevant Ind AS and the underlying guidance and framework. The Note further explains that during the financial year 2020-21, the Company had filed two separate applications under Section 230 of the Companies Act, 2013 ('the Act') before the Hon'ble NCLT proposing Schemes of Arrangement (the Schemes) with all its secured and unsecured lenders. Since applications/appeals in connection with the Scheme were pending before Hon'ble NCLT/NCLAT, the superseded Board of Directors and erstwhile management had maintained status quo on the Scheme including accounting of BTA. Both the schemes of arrangement were rejected by majority of the creditors and an application of withdrawal was filed by the Administrator in this matter which has been allowed by the Tribunal vide order dated February 11, 2022.</p> <p>As stated in the said Note, the Company is in the process of consolidated resolution of SEFL and SIFL and hence no further action is being contemplated regarding establishing the validity of BTA or otherwise, consequent upon the withdrawal of Schemes. Accordingly, the status quo regarding BTA, as it existed on the date of commencement of CIRP, has been maintained. In view of the uncertainties that exists in the matter of BTA, we are unable to comment on the accounting of BTA, as aforesaid, done by the Company and accordingly on the impact of the same, if any, on the Ind AS financial statements.</p>	<p>accounting treatment is in accordance with the relevant Ind AS and the underlying guidance and framework.</p> <p>The accounts for the year ended March 31, 2023 have been taken on record in the manner and form in which it existed on the insolvency commencement date in view of the initiation of the CIRP in accordance with the obligations imposed on the Administrator under Section 18(f) of the Code and this fact has also been informed by the Administrator to the lenders and other stakeholders</p> <p>The Company is in the process of consolidated resolution of SEFL and SIFL and hence no further action is being contemplated regarding establishing the validity of BTA or otherwise, consequent upon the withdrawal of the Schemes.</p>
(e)	<p>Note No. 66 to the Ind AS financial statements which explains that the Administrator has invited the financial/operational/other creditors to file their respective claims. As per the said note, admission of claims of the financial/operational/ other creditor received by the Administrator is completed and the effect of the same has been given in the books of accounts. However, the figures of the claims admitted in the books of accounts might undergo change in the subsequent periods before the resolution plan is approved by Adjudicating Authority in case the Administrator comes across any additional information warranting such revision of claim amounts of the financial/operational/ other creditors. Hence, adjustments, if any, arising out of such additional information, will be given effect in subsequent periods. We are unable to comment on the impact of the same, if any, on the Ind AS financial statements.</p> <p>Further, Note No. 66 to the Ind AS financial statements explains that the Company as per the Code on the date of commencement of CIRP i.e. October 8, 2021 has converted foreign currency debt into INR and accordingly has not translated its foreign currency exposure as on March 31, 2023, as per requirements of Ind AS 21. We are unable to comment on the impact of the same, if any, on the Ind AS financial statements.</p>	<p>(e) Management's View:</p> <p>As per provisions of the Code, Admission of claims of the financial/operational/other creditors received by the Administrator is completed and the effect of the same has been given in the books of accounts. However, the figures of the claims admitted in the books of accounts might undergo change in the subsequent periods before the resolution plan is approved by Adjudicating Authority in case the Administrator comes across any additional information warranting such revision of claim amounts of the financial/operational/other creditors.</p> <p>Further, the foreign currency debt of the Company has been converted into INR as per the Code on the date of commencement of CIRP and accordingly, the Company has not translated its foreign currency exposure as on March 31, 2023 as per the requirements of Ind AS 21 'The effects of changes in foreign exchange rates'.</p>
(f)	<p>Note No. 67 to the Ind AS financial statements which states that the Company has not provided for ₹ 4,66,134 Lacs for the year ended March 31, 2023 pursuant to its admission under the CIRP, in respect of its obligation for interest on all the borrowings since insolvency commencement date i.e. October 8, 2021. Had the Company provided its obligation for interest, as aforesaid, loss before tax for the year ended March 31, 2023 would have been increased by ₹ 4,66,134 Lacs.</p>	<p>(f) Management's View:</p> <p>Pursuant to the admission of the Company under the CIRP and the consequent moratorium u/s 14 of the Code, the claims of the creditors of the Company have been admitted which shall be settled in terms of the Resolution Plan to be approved by the Hon'ble NCLT.</p>
(g)	<p>Note No. 68 to the Ind AS financial statements which explains the reasons owing to which the Company has not been able to comply with guidelines of RBI in relation to mandatory hedging of exposure in External Commercial Borrowings amounting to ₹ 27,272 Lacs as at March 31, 2023, as per contractual terms.. As stated, in the said note, the Company has reported the above fact to RBI and reply of the same is awaited from RBI. We are unable to comment on the impact of the same or any other consequences arising out of such non-compliance, if any, on the Ind AS financial statements.</p>	<p>(g) Management's View:</p> <p>The domestic lenders of the Company had stipulated Trust and Retention Account (TRA) mechanism effective November 24, 2020, pursuant to which all the payments being made by the Company were being approved/released based on the TRA mechanism and as such the Company was not able to make payment of the hedging premium/cost to the concerned banks for keeping the ECB exposures hedged and hence was not able to meet the requirements of the RBI notification. The Company has reported the said fact to RBI and reply from the same is awaited. Further, In view of CIRP, the foreign currency liabilities have been crystallised into INR as on October 8th, 2021 (Insolvency Commencement Date or 'ICD') and the foreign currency debt of the Company has been converted into INR as per the Code.</p>

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(h)	<p>Note No. 70 to the Ind AS financial statements which explains that the erstwhile management, as per the specific directions from Reserve Bank of India (RBI) in relation to certain borrowers referred to as 'probable connected parties/related parties', in line with arm's length principles, was in the process of re-assessing & re-negotiating terms and conditions with such borrowers and all other borrowers, who have been granted loans with moratorium period and at interest rate which is linked with the cash flows of the project. However, the said process was not concluded and meanwhile the Company has gone into CIRP. As stated in the said Note, the Administrator is not in a position to comment on the views adopted by the erstwhile management in relation to the RBI's direction since these pertain to the period prior to the Administrator's appointment. As stated in paragraph (a) above, the Administrator got conducted transaction audit/review relating to the process and compliance of the Company and has also appointed professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code. Out of Accounts referred by the RBI in the directions, the Administrator has received certain account wise transaction audit reports, which has identified some of such accounts as fraudulent in nature under Section 66 of the Code. In respect of such accounts, the Administrator has filed applications under Section 60(5) and Section 66 of the Code before the Kolkata bench of the Hon'ble National Company Law Tribunal (NCLT) on various dates till May 05, 2023 for adjudication. Further, as mentioned in the said note, the transaction audit has been completed and the impact of the same has been incorporated in the Ind AS financial statements. However, the said transaction audit reports have not been made available to us and accordingly, we are unable to comment whether or not all impact of the same has been incorporated in the Ind AS financial statements. Accordingly, the Ind AS financial statements is subject to such impact, if any.</p>	<p>(h) Management's View: The Reserve Bank of India (RBI) in its inspection report and risk assessment report (the directions) for the year ended March 31, 2020 had identified 'certain borrowers' as probable connected/related companies. In the directions, the Company has been advised to reassess and re-evaluate the relationship with the said borrowers to assess whether they are related parties to the Company or to Srei Infrastructure Finance Limited ('SIFL' or 'Holding Company') and also whether these are on arm's length basis. In view of the directions, the previous management had taken legal view to determine whether such borrowers are related parties to the Company or SIFL. Based on the legal view, the previous management was advised and had therefore come to conclusion that the Company or its Holding Company have no direct or indirect control or significant influence (as per Companies Act, 2013, Ind AS) over such borrowers and are not under common control and accordingly, are not a related party of the Company or its Holding Company. The previous management had obtained an assessment report on the review & verification of the transactions with the aforesaid probable connected/related companies from an independent Chartered Accountant firm, which stated that the transactions of the Company/SIFL with probable connected parties were done at arm's length principles and are in the ordinary course of business and that such parties are not related parties of the Company/SIFL under the Companies Act, 2013 or Ind AS 24.</p> <p>In accordance with above, erstwhile management was in the process of re-assessing & re-negotiating terms and conditions with such borrowers and all other borrowers, who have been granted loans with moratorium period and at interest rate which is linked with the cash flows of the project. However, the said process was not concluded and meanwhile the Company has gone into CIRP.</p> <p>As such, Administrator is not in a position to comment about the actions taken by the Company pursuant to RBI's inspection report as mentioned above since the same pertain to period prior to his appointment. As a part of the CIRP, the Administrator got conducted an audit/reviews relating to the process and compliances of the Company and had also appointed professionals for conducting transaction audit as per Section 43, 45, 50 and 66 of the Code. The transaction audit has been completed and the report is of a confidential nature, the same cannot be shared with the Auditors.</p>
(i)	<p>Note No. 71 to the Ind AS financial statements which explains that, during the quarter ended September 30, 2021, based on the directions of RBI the Company has made provisions amounting to ₹ 9,807 Lacs and ₹ 4,991 Lacs in respect of direct tax cases and indirect tax cases respectively where the Company was under various stages of appeal with the relevant tax authorities. However, the Company has not assessed whether the outflow of resource embodying economic benefits is probable or not as per the requirements of Ind AS 37- 'Provisions, Contingent Liabilities and Contingent Assets'. Hence, in absence of such assessment, we are unable to comment on any non-compliance with Ind AS and the corresponding impact of the same, if any, on the Ind AS financial statements.</p>	<p>(i) Management's View: The Company has made provisions in respect of direct tax cases and indirect tax cases where the Company was under various stages of appeal with the relevant tax authorities, based on directions from RBI. Hence, we are not in a position to do assessment as per the requirements of Ind AS 37- 'Provisions, Contingent Liabilities and Contingent Assets'.</p>
(j)	<p>Note No. 72 to the Ind AS financial statements which explains the reasons owing to which the Company was not able to comply with the requirements of Section 135 of the Companies Act, 2013 in relation to depositing unspent amount of CSR. As stated, in the said note, the Company has written to MCA seeking exemption from the obligations of the Company under portions of Section 135(5) and Section 135(7) of the Companies Act, 2013. We are unable to comment on the impact of the same or any other consequences arising out of such non-compliance, if any, on the Ind AS financial statements.</p>	<p>(j) Management's View: The domestic lenders of the Company had stipulated Trust and Retention Account (TRA) mechanism effective November 24, 2020, pursuant to which all the payments being made by the Company were being approved/released based on the TRA mechanism. The Company was not able to transfer the aforesaid unspent CSR amount as per the</p>

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		requirements of Section 135 of the Act. The Company has written letter to the Ministry of Corporate Affairs ('MCA') seeking exemptions from the obligations of the Company under portions of Section 135(5) and Section 135(7) of the Act. The reply from MCA in this regards is awaited.
(k)	Note No. 73 to the Ind AS financial statements which states that the Company has not been able to maintain the security cover as stated in the information memorandum/debenture trust deeds etc. which is sufficient to discharge the principal and interest amount at all times for the secured non-convertible debentures issued by the Company. Further, as stated in the said Note and paragraph (c) above, latest valuations from independent valuers in respect of assets of the Company is in progress, accordingly, the percentage of security cover given in the said Note No. 63 to the Ind AS financial statements is subject to the outcome of such valuation and CIRP process. Hence, we are unable to comment on impact of the same, if any on the Ind AS financial statements.	<p>(k) Management's View: Valuation of the Company has been completed under the provisions of the Code by two (2) independent IBBI registered valuers. Accordingly, the percentage of security cover given above is subject to the outcome of such valuation and CIRP process.</p>
(l)	Note No. 74 to the Ind AS financial statements which explains that in relation to certain borrowings (including secured borrowings and NCDs) acquired by the Company from SIFL pursuant to BTA as stated in Note No. 64 to the Ind AS financial statements, charges created on such borrowings are yet to be transferred in the name of the Company and are still appearing in the name of SIFL for the reasons stated in the said Note. We are unable to comment on the impact of the same or any other consequences arising out of it, if any, on the Ind AS financial statements.	<p>(l) Management's view: In certain cases of borrowings wherein the novation agreements are signed by the lenders/trustees, the Company has filed the e-forms, except for one ISIN, with ROC, Kolkata, which have not been approved. In some other cases, the novation agreements are yet to be signed by the lenders. Hence, the charges which were originally created in the name of SIFL for such secured borrowings are still continuing so in the records of ROC.</p> <p>Further, with respect to certain borrowings where, though borrowed facilities have been repaid in full, charge satisfactions are still pending. These pendencies are mainly on account of non-receipt of NOC from lenders etc./completion of satisfaction formalities.</p>
(m)	Note No. 75 to the Ind AS financial statements which explains the reasons owing to which the Company was not able to comply with the requirements of Section 125 of the Act in relation to transfer of certain amounts lying unpaid for 7 years to Investor Education Protection Fund ('IEPF'). As stated, in the said note, the Company has written to IEPF authorities and requested guidance in the matter. We are unable to comment on the impact of the same or any other consequences arising out of such non-compliance, if any, on the Ind AS financial statements.	<p>(m) Management's View: The Company was unable to comply with the provision of Section 125 of the Companies Act, 2013 as its compliance will accord to breach of the moratorium in terms of Section 14 of the IBC. To the extent that the provision of the Companies Act is inconsistent with Section 14 of the IBC, the provisions of the IBC will prevail, in light of Section 238 of the IBC. However, the Company has written to IEPF authorities and requested guidance in this regard/ submission of their claim and await their response.</p>
(n)	We had carried out independent balance confirmation process with respect to various parties/lenders, responses for which are pending to be received in majority of the case as on the date of signing this report. Further, the project progress report and the necessary documents for review from various parties are yet to be received. Hence, we are unable to comment on such balances and status and impact of the same on the Ind AS financial statements, if any.	<p>(n) Management's View: Since the confirmation is an independent process carried out by the Statutory Auditors, we have no comments to make on the same. The company had undertaken the review of the large exposures as part of the Annual Client Review (ACR) /appointed Agency for Specialised Monitoring (ASM) auditors and undertook various actions including the project progress of the borrowers during the financial year 2022-23. In order to operationalise, strengthen and improve coverage of the review basis latest financials, the company has also formulated a process of Annual Credit Review which will ensure improvement in coverage by the end of financial year 23-24.</p>
(o)	We have been informed that certain information including the minutes of meetings of the Committee of Creditors and transaction audit reports are confidential in nature and accordingly has not been shared with us. We are therefore unable to comment on the possible financial effects on the Ind AS financial statements, including on presentation and disclosures, if any, that may have arisen if we had been provided access to that information.	<p>(o) Management's View: The proceedings of the CoC are in relation to the CIRP of the Company and include confidential information in relation to the CIRP of SEFL.</p>

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(p)	Property, Plant and Equipment includes assets having gross book value of ₹ 5,018 Lacs and written down value of ₹ 1,018 Lacs as on March 31, 2023 are either not traceable or are not in possession of the company. No provision for the same has been made in accounts. As informed by the company, the management has initiated legal proceedings for recovery of the same. Since legal proceedings for recovery are pending, we are unable to comment on the impact of the same, if any, on the Ind AS financial statement.	(p) Management's View: The said assets were there at leasehold properties for which the tenancies have been terminated during CIRP process. The Company had sent reminders for return of the said assets. Since these reminders did not yield results, the Company has initiated various legal proceedings for recovery of the same.
(q)	In view of the possible effects of the matters described in paragraph (a) to (p) above, we are also unable to comment on the Company's compliance of the covenants in respect of all borrowings (including creation of charges) and consequential implications including disclosures etc., if any.	(q) Management's View: Refer to views given in Point (a) to (p) above
(r)	In view of the possible effects of the matters described in paragraph (a) to (q) above, we are also unable to comment on the Company's compliance on various regulatory ratios/other ratios/limits and consequential implications including disclosures, if any.	(r) Management's View: Refer to views given in Point (a) to (q) above

Material Uncertainty Related to Going Concern

Note No. 69 to the Ind AS financial statements which states that the Company has been admitted to CIRP and that the Company has reported net loss during the year ended March 31, 2023 and earlier year/periods as well. As a result, the Company's net worth has fully eroded and it has not been able to comply with various regulatory ratios/limits etc. All this has impacted the Company's ability to continue its operations in normal course in future. These events or conditions, along with other matters as set forth in the aforesaid Note, indicate that there is a material uncertainty which casts significant doubt about the Company's ability to continue as a 'going concern' in the foreseeable future. However, for the reasons stated in the said note, the Company has considered it appropriate to prepare the Ind AS financial statements on a going concern basis.

Management's View

The Company had reported losses during the year ended March 31, 2023 and earlier year/periods as well. Hence, the net worth of the Company has fully eroded.

There is persistent severe strain on the working capital and operations of the Company and it is undergoing significant financial stress. As stated in Note No. 1.2 to the audited Ind AS financial statements for the year ended March 31, 2023, CIRP was initiated in respect of the Company w.e.f. October 8, 2021. The Company has assessed that the use of the going concern assumption is appropriate in the circumstances and hence, these Ind AS financial statements has been prepared on a going concern assumption basis as per below:

- a) The Code requires the Administrator to, among other things, run the Company as a going concern during CIRP.
- b) The Administrator, in consultation with the Committee of Creditors ('CoC') of the Company, in accordance with the provisions of the IBC, is making all endeavours to run the Company as a going concern. Considering the future business outlook and with time bound recovery of its due from borrowers/lessees and monetization of assets/securities, the Company is hopeful of improvement in its cash flows in due course of time.
- c) Reduction in overhead expenditure.
- d) The Company also formed dedicated focused collection team to increase the collection and is also exploring all possibilities to start new business with the launch of various schemes. CIRP is undergoing and as per the process, the Consolidated Committee of Creditors (CoC) took on record three Resolution Plans received from Prospective Resolution Applicants (PRAs) on January 18, 2023. The three Resolution Plans received by the Consolidated CoC were put to e-voting. The Consolidated CoC took on record the results of the e-voting in CoC meeting held on February 15, 2023, and the resolution plan submitted by National Asset Reconstruction Company Limited (NARCL) was duly approved by CoC by majority voting under Section 30(4) of the IBC read with Regulation 39(3) of CIRP Regulations, 2016, thereby, declaring NARCL as Successful Resolution Applicant (SRA).

The approved resolution plan of NARCL was filed before Adjudicating Authority i.e., Hon'ble NCLT, Kolkata on February 18, 2023 for its approval. The Administrator has also filed all the necessary legal and regulatory approvals before the Adjudicating Authority. The approval of the resolution plan is awaited from the Adjudicating Authority pending certain litigations. Pending the completion of the said process under CIRP, these Ind AS financial statements have been prepared on a going concern basis.





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