



Status Report of Ballarpur Industries Limited (“BIL”/ “Company”)

Ballarpur Industries Limited has issued 32625, Listed, Secured, Redeemable, Non-Convertible Debentures (‘Debentures’) under ISIN INE294A07133 aggregating to 326,25,00,000/- (Indian Rupees Three Hundred and Twenty-Six Crores Twenty-Five Lakhs only) by way of private placement issue, under the DTD dated 13th October 2023 as per the NLCT order dated 31st March 2023.

Further Securities and Exchange Board of India (SEBI) vide its letter dated 01st September 2023 (“SEBI Order”) has provided various extension/waivers to the Company:

- 1) As per clause 2.2 of the SEBI Order - Exempted from the requirement of obtaining a credit rating as per Regulation 10 of the NCS Regulations, subject to the condition that the credit rating shall be obtained on or before March 31, 2024.

Action Taken by the Debenture Trustee:

The Company has not taken the credit rating as per regulation 10 of the NCS regulation till date in this regard, please find below action taken by the debenture trustee:

- The Debenture Trustee by various reminders dated 18th March 2024, 19th March 2024 and 27th March 2024 has informed/requested Company to get the credit rating as per the said SEBI order, however the Company has failed to get the credit rating till date.
- In reference to above, the Debenture trustee has conducted the meeting on 15th April 2024 of the debenture holders for informing the non-compliance and taken the instruction from the Debenture holder for the further action.
- Further the Debenture Trustee also informed the said non-compliance to the SEBI and stock exchange vide its email dated 28th March 2024.

Current Status:

Despite multiple follow-ups, the Company has not obtained the credit rating as on date. The Company has informed the Debenture holders and the trustee in the meeting that credit rating agency has raised certain requirements which includes NOC from the existing lenders as per the NCLT order and latest Financials (i.e. from FY 2017-18 onwards) which the Company was unable to fulfill.



- 2) As per clause 2.3 of the SEBI Order - Exemption from obtaining Due Diligence Certificate from the Debenture Trustee under Regulation 44(3) and Regulation 44(4), subject to the condition that the issuer shall obtain the Due Diligence Certificate from the Debenture Trustee, on or before December 31, 2023.

Action Taken by the Debenture Trustee:

This to inform you that Debenture trustee has conducted the Due Diligence on the Assets offered security and provided Due Diligence Certificate within the timeline as specified in SEBI order.

- 3) As per clause 2.4 of the SEBI order - Exemption from submitting/ disclosing the audited financial statements and related disclosures for FY2020-2021, FY2021-2022 and FY2022-2023 under Regulation 44(2), Regulation 45 and Schedule I of NCS Regulations. This is subject to the condition that BIL shall submit/ disclose the provisional/ unaudited financial statements for FY2020-2021 and FY2021-2022, in the placement memorandum and at the in-principle approval and listing stage, to the stock exchange(s). There shall be appropriate disclosure that the said figures are subject to audit. Further, BIL shall submit/ disclose the audited financial statements for FY2020-2021, FY2021-2022 and FY2022-2023, to the stock exchange(s) and the debenture holders on or before March 31, 2024, along with the differences, if any, in the unaudited figures with suitable explanations. Additionally, emphasis to be placed on the deviations where difference between audited and provisional numbers are more than 10%.

Action Taken By Debenture Trustee:

- The Debenture Trustee by Various reminders dated 18th March 2024, 19th March 2024 and 27th March 2024 has informed/requested Company to share the audited financial statements and related disclosures for FY2020-2021, FY2021-2022 and FY2022-2023 however same has not yet been shared by the Company.
- In reference to above the Debenture trustee has conducted the meeting on 15th April 2024 of the debenture holders for informing the non-compliance and taken the instruction from the Debenture holder for the further action.
- The same has been informed to the SEBI and Stock Exchange.



Default in creation of security:

As per the relevant provision of the SEBI circulars read with SEBI order the Company was required to create the security within the specified timeline.

This is to inform you that the Company has failed to create the security as mentioned in the Information Memorandum despite of multiple follow ups with the issuer Company.

Action Taken by the Trustee:

- 1) The debenture Trustee has sent various reminders to the Company for creation of the Security and the same is also informed to the debenture holders.
- 2) Further the debenture trustee has conducted various meetings of the debenture holders last being on 15th April 2024 for informing the various Non-compliances stipulated above including non-creation of the security. We are yet to get any instruction from the debenture holder for the action to be taken for the said non-compliance.
- 3) Further, the debenture trustee has informed the same to the Stock Exchange and the SEBI vide email dated 30th January 2024 and 28th March 2024.