

# ***Reliance Home Finance Limited ('RHFL')***

## ***Final Report – Forensic Review***

***2 January 2020***

*Private and confidential*  
*Not for circulation*

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# Overview

# 1. RHFL Overview

## Background about RHFL

- Reliance Home Finance Limited ('RHFL') is a Public Company incorporated on 05 June 2008. The Company is registered with National Housing Bank ('NHB') as a housing finance company under the National Housing Bank Act, 1987. It got listed on National Stock Exchange and Bombay Stock Exchange on 22 September 2017. RHFL primarily deals in Home Loans ('HL'), Loan against Property('LAP') and Construction Finance ('CF').
- As per annual report of RHFL for the financial year 2018-19, loans and advances stood at INR 16,251.09 crores as on 31 March 2019. It's Capital to Risk Assets Ratio (CRAR) was 15.45% as on 31 March 2019 against the minimum regulatory requirement of 12%. As on 31 March 2019, RHFL had 881 number of employees.
- The Company has a strong distribution network with more than 125 locations, through a "hub and spoke" model, across the country, serving over 45,000 client accounts.
- Key areas of the financial statement of RHFL is presented below.

(INR in crores)

Liabilities	Amount	Assets	Amount
Borrowings <sup>1</sup>	8,819.67	Loans & Advances	16251.09
Other Liabilities <sup>2</sup>	7,463.77	Other Assets <sup>3</sup>	794.46
Shareholder funds	1,842.00	Cash & Cash Equivalents	592.91
		Fixed Assets	393.52
		Investments	93.46
	<b>18,125.44</b>		<b>18125.44</b>

(INR in crores)

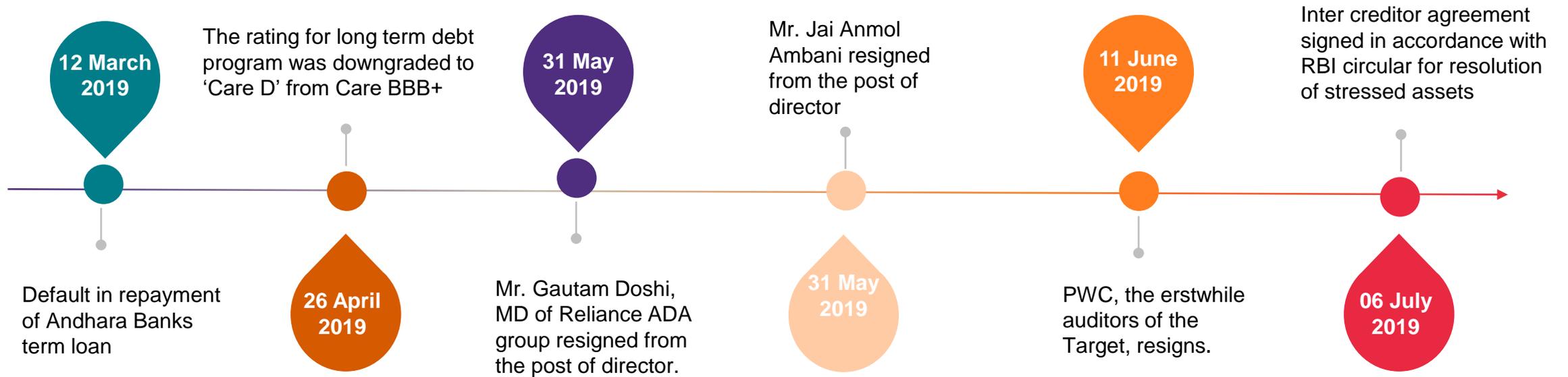
Statement of profit & loss	2018-2019	2017-2018	2016-2017
Operating Income	1986.03	1622.75	1078.57
Other Income <sup>4</sup>	16.56	60.59	66.11
Total Income	2002.59	1683.34	1144.68
Profit Before Tax	101.6	246.93	137.8

## Notes

- Borrowings other than debt Securities
- Other liabilities include trade payables, debt securities, subordinate liabilities, provisions and other financial liabilities
- Other assets include advance income tax, deferred tax assets(net) and other financial assets.
- Other income includes profit on sale of investments, interest on income tax refund and miscellaneous income

# 1. RHFL Overview – Sequence of events

## Sequence of events during our review period



**Note: only major events are highlighted in the above informatics.**

# 1. RHFL Overview

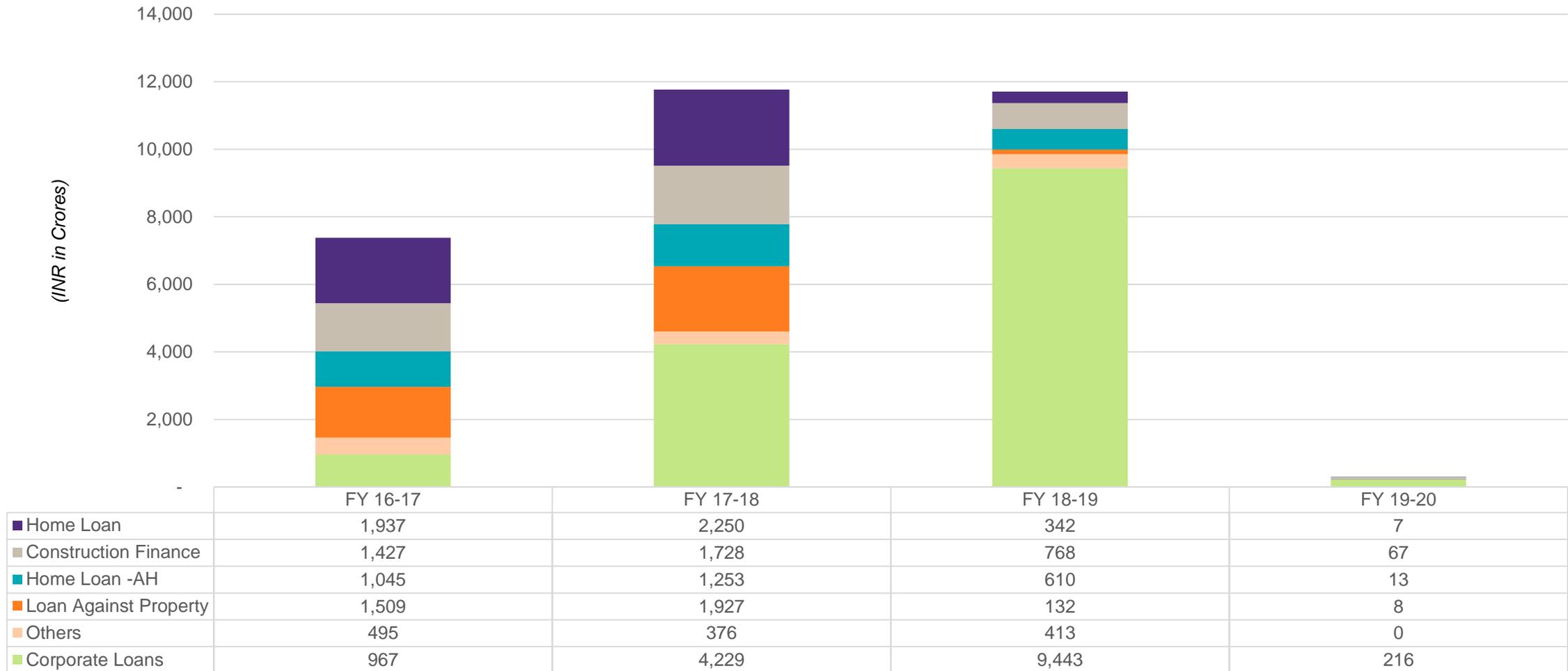
## Details of directors appointed and ceased during FY 16-17, FY 17-18 & FY 18-19

	Director	Status	2016-17	2017-18	2018-2019
C e a s e d	Mr. Soumen Ghosh (Ceased w.e.f. 31 March 2017)	Non-Independent	✓	✗	✗
	Mr. K. V. Srinivasan (Ceased w.e.f. 21 April 2017)	Non-Independent	✓	✓	✗
	Ms. Deena Mehta (Ceased w.e.f. 30 March 2019)	Independent	✓	✓	✗
	Mr. Padmanabh Vora (Ceased w.e.f. 29 April 2019)	Independent	✓	✓	✓
	Mr. Gautam Doshi (Ceased w.e.f. 2 May 2019)	Non-Independent	✓	✓	✓
	Mr. Jai Anmol Ambani (Ceased w.e.f. 31 May 2019)	Non-Independent	✗	✓	✓
A p p o i n t e d	Mr. Ashok Ramaswamy (Appointed w.e.f. 31 May 2019)	Independent	✗	✗	✗
	Mr. Ravindra Sudhalkar (Appointed w.e.f. 24 April 2017)	Executive Director	✗	✓	✓
	Mr. Amit Bapna (Appointed w.e.f. 24 April 2017)	Non-Independent	✗	✓	✓
	Lt Gen Syed Ata Hasnain (Retd)(Appointed w.e.f. 26 Feb 2018)	Independent	✗	✓	✓
	Ms. Chhaya Virani (Appointed w.e.f. 1 April 2019)	Independent	✗	✗	✗
	Ms. Rashna Khan (Appointed w.e.f. 2 May 2019)	Independent	✗	✗	✗

# 1. RHFL Overview

## Product wise disbursement of loan

Loan disbursement during the review period

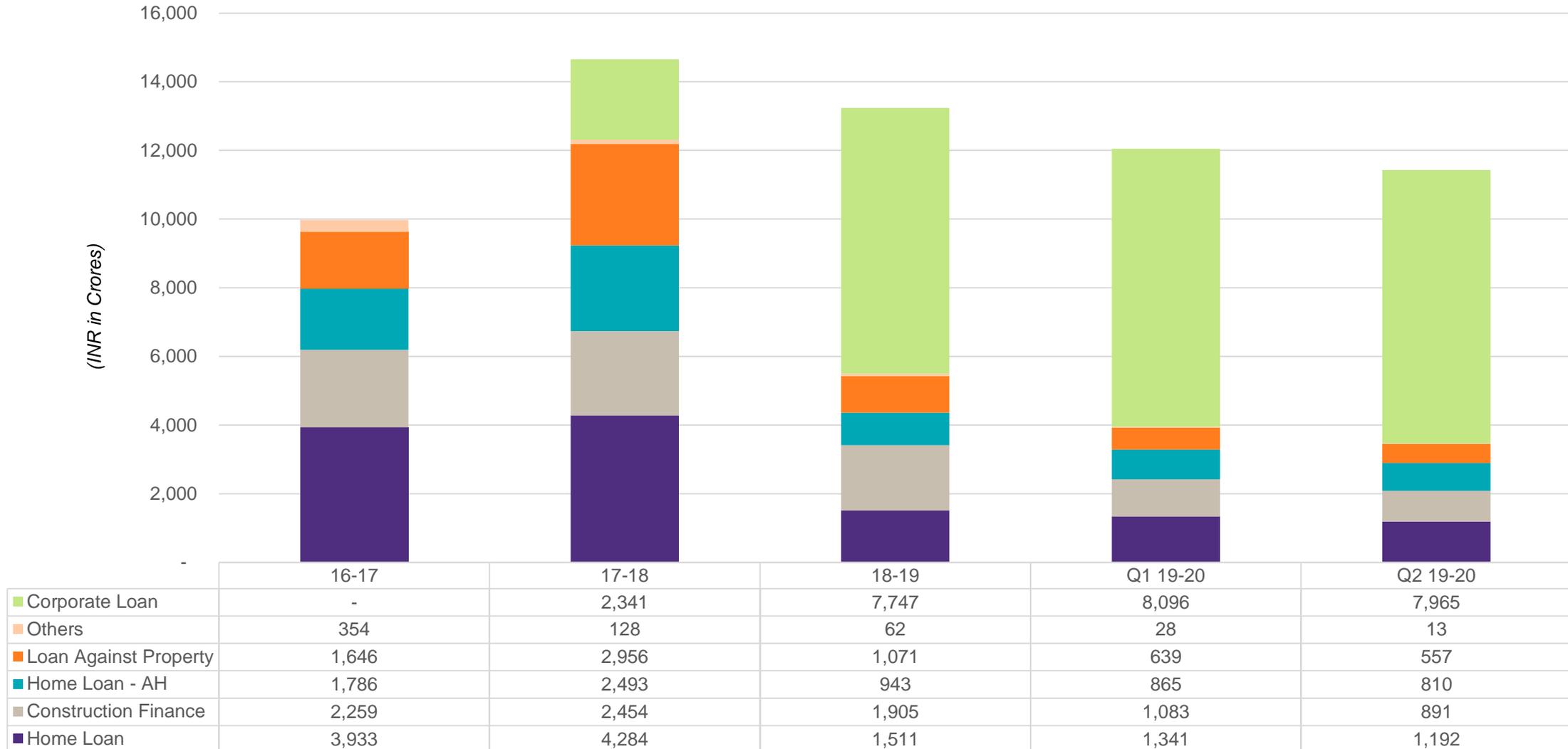


Note: FY19-20 in the above chart represents Q1 and Q2 numbers

# 1. RHFL Overview

## Product wise principal outstanding ('POS')

### Movement of POS during the review period

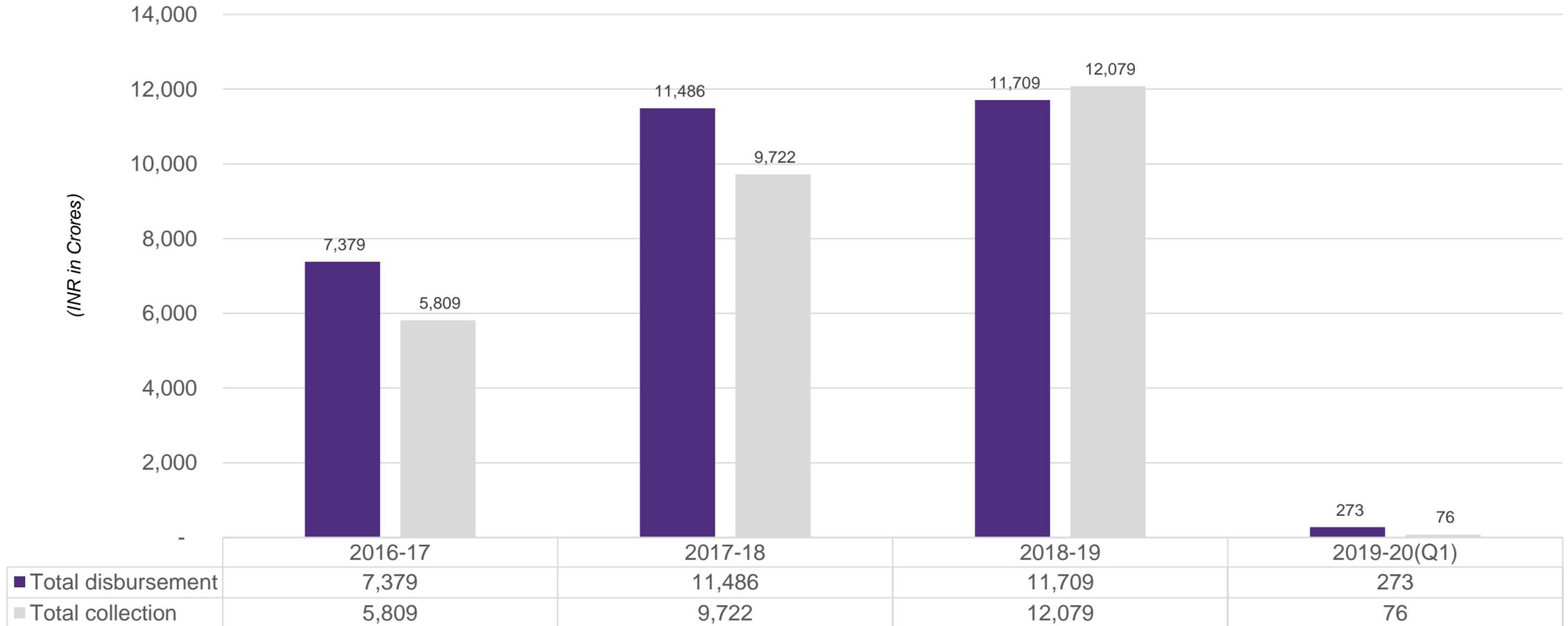


Note: Others represents Micro Finance, SME Structured Loans, Hotel Funding, etc..

# 1. RHFL Overview

## Summary of loans disbursed and repaid during the review period

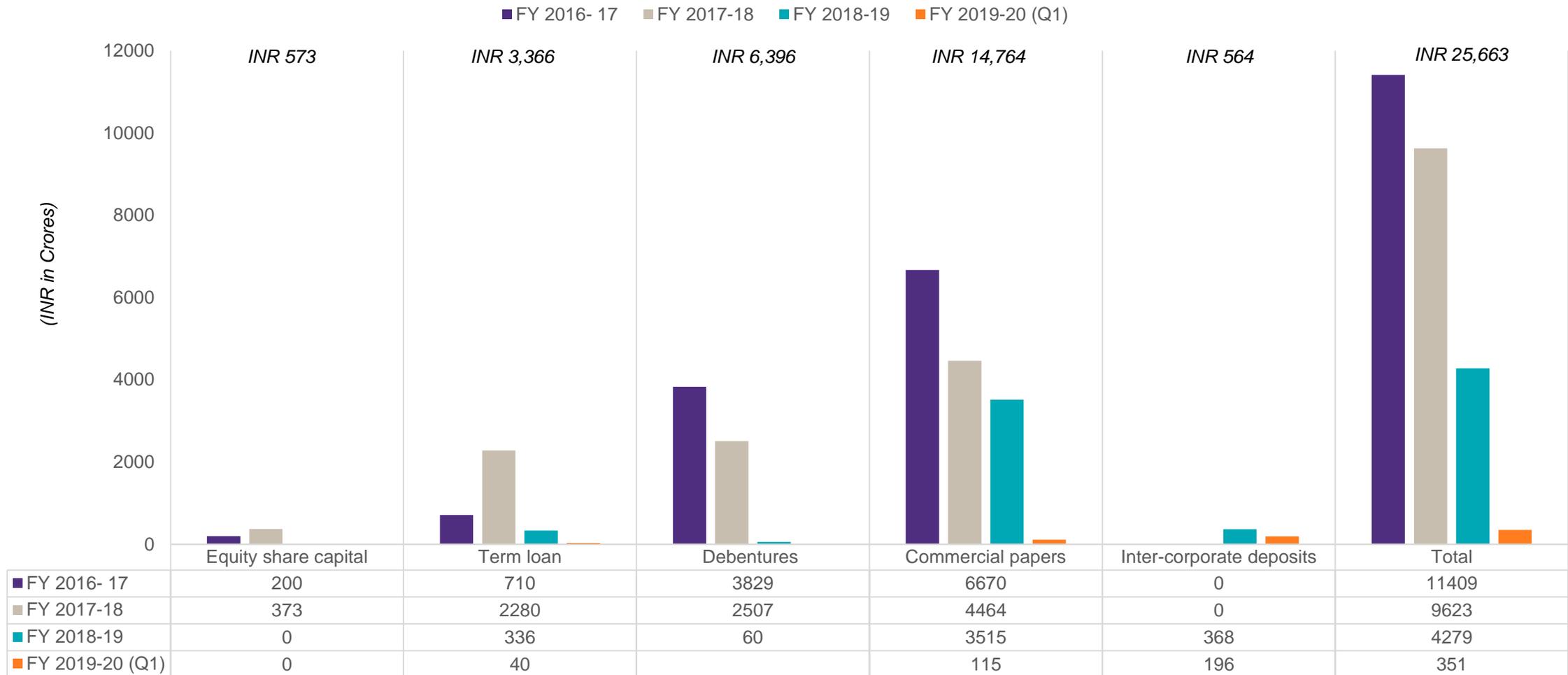
YoY disbursements and collections made during the review period



# 1. RHFL Overview

Overview of total infusion of funds during our review period

## INFUSION OF FUNDS



*Note: The above excludes debt securitized, which is separately covered.*

# Procedures performed

## 2. Procedures performed

### 1. Gathering information and discussions with the key representatives of the target entity



- We conducted in-depth discussions with the key representatives of target entity to understand and obtain details with regards to the group as well as its operations. Further, we understood in detail the context of the review and the key areas of concern in the target entry
- Based on the documentation and understanding obtained from the client and key representatives of target entity, we identified and obtained the information relevant to meet the overall objectives of the review

### 2. Transaction testing and forensic data analytical procedures



- We conducted forensic data analytical procedures on the information provided in order to identify the unusual trends and patterns and discrepancies /exceptions.
- Based on the identified parameters, patterns and discrepancies/exceptions, we requested for the information and other supporting documents and conducted a thorough review of the same.

### 3. Public domain searches



- Based on the information received and anomalies identified, we conducted a desktop and public domain searches in order to identify any adverse or conflicting information.
- Further, we also conducted social media and other checks to identify potentially related parties/potential linkages between the key entities/individuals identified and key managerial personnel.

### 4. Reporting



- Based on the observations noted from various procedures stated above, a report summarizing the findings as follows

# Executive summary

### 3. Executive summary

#	Observation	Report reference																								
1	<p><b>Transaction with Potential Indirectly Linked Entities (PILE)</b></p> <p><b>Loan extended to potential indirectly linked entities (PILE)</b></p> <ul style="list-style-type: none"> <li>For identifying potential indirectly linked entities, we have considered 6 parameters namely, entities having common registered addresses, common email ID / domain, common directors, annual report declaration and list of borrowers as provided by the Target Entity who have made onward lending of loans to related parties/group companies. On review of general purpose corporate loans ('GPCL') files, we identified 47 borrowers to be potential indirectly linked entities.</li> <li>During the review period, a total of INR 14,577.68 crores was disbursed as GPCL - out of which approx. 88.76% of loans were disbursed to PILE amounting to INR 12,487.56 crores.</li> <li>The total outstanding (including interest) as on 31 October 2019 against the loans disbursed to PILE was approx. INR 7,984.39 crores - out of which loans having total dues of INR 2,727.59 crores were declared as Non Performing Asset ('NPA') as on 31 October 2019.</li> </ul> <p><b>Entities cease to be related parties of group companies before disbursement of loans</b></p> <ul style="list-style-type: none"> <li>On our review of the GPCL portfolio, we observed 2 instances where entities (PILE) to whom the Target Entity had disbursed GPCL cease to be related parties of Reliance Power Limited and Reliance Infrastructure Limited prior to disbursement of the loans. A total of 8 such entities being PILE were disbursed loans aggregating to INR 1,323.43 crores during our review period.</li> </ul> <p><b>PILE related observations</b></p> <p>On reviewing the repayment pattern of GPCL borrowers, we observed the following</p> <p style="text-align: right;">(INR in crores)</p> <table border="1"> <thead> <tr> <th>Observations</th> <th>No of Instances</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>Potential evergreening of loans</td> <td>15</td> <td>785.80</td> </tr> <tr> <td>Potential circular transactions</td> <td>3</td> <td>412.89</td> </tr> <tr> <td><b>Total amount potentially received back to Target Entity as repayment of existing loans</b></td> <td></td> <td><b>1,198.69</b></td> </tr> <tr> <td>Proceeds of term loan indirectly transferred to related party through PILE</td> <td>1</td> <td>230.00</td> </tr> <tr> <td>Proceeds of commercial papers transferred to related parties/group companies through PILE</td> <td>5</td> <td>939.77</td> </tr> <tr> <td>Proceeds of securitisation transferred to related parties/group companies through PILE</td> <td>10</td> <td>2,161.09</td> </tr> <tr> <td><b>Total amount potentially transferred to related parties / group companies</b></td> <td></td> <td><b>3,330.86</b></td> </tr> </tbody> </table>	Observations	No of Instances	Amount	Potential evergreening of loans	15	785.80	Potential circular transactions	3	412.89	<b>Total amount potentially received back to Target Entity as repayment of existing loans</b>		<b>1,198.69</b>	Proceeds of term loan indirectly transferred to related party through PILE	1	230.00	Proceeds of commercial papers transferred to related parties/group companies through PILE	5	939.77	Proceeds of securitisation transferred to related parties/group companies through PILE	10	2,161.09	<b>Total amount potentially transferred to related parties / group companies</b>		<b>3,330.86</b>	Section 4.1 – 4.6
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Note: Executive summary to be read in conjunction with the detailed observations

### 3. Executive summary

#	Observation	Report reference
2	<p><b>Potential regulatory anomalies</b></p> <p><b>Potential violation of section 2(B) of National Housing Bank Act, 1987</b></p> <ul style="list-style-type: none"> <li>The Target Entity is a Housing Finance Company ('HFC') whose primary objective is to deal in the business of providing finance for housing purposes as per section 2(B) of The National Housing Bank Act, 1987. During the review, it was observed that the Target's non-housing disbursement was around 80% of total disbursements in FY 18-19.</li> <li>The corporate loans disbursed during the review period were in the nature of general purpose corporate loans ('GPCL') which were having bullet repayment of principal and interest at the end of loan tenor.</li> </ul> <p>Anomalies identified in calculation of CRAR (Capital Adequacy)</p> <ul style="list-style-type: none"> <li>As per note 57 of the annual report of Reliance Commercial Finance Limited ('RCFL') for FY 18-19, RCFL has advanced loans to 26 entities which have undertaken onward lending transactions to companies that are identified as group companies by Reliance Capital Limited ('RCL') as per the Core Investment Companies (Reserve Bank) Directions, 2016. RCL is the 100% holding company of RCFL and also the holding company of the target entity. Considering the end use of such loans, RCFL has considered these loans as 'exposure to group companies' as a result of which its CRAR as on 31 March 2019 stood at -49.03% compared to +18.39 % in previous financial year.</li> <li>On review, it was identified that the Target Entity has also advanced loans to 22 out of above mentioned 26 entities which are having POS of INR 3,668.35 crores as on 30 June 2019. These entities have also undertaken onward lending transaction to other companies. However, loans to these entities were not considered as 'exposure to group companies' for the calculation of CRAR by the Target Entity. Had the same been considered, the CRAR of the target entity may have been negative leading to violation of regulatory norms of 12% as mandated in the Master Circular - Housing Finance Companies (NHB) Directions, 2010.</li> <li>Basis the data provided by the Target Entity it was observed that the target has disbursed during our review period, GPCL to 44 borrowers, aggregating to INR 9,641.08 crores, who have undertaken onward lending transactions to other companies. These companies, in turn, advanced these loans to Reliance Capital Limited ('RCL'), Reliance Commercial Finance Limited ('RCFL'), Reliance Infrastructure Limited ('Rinfra'), Reliance Home Finance Limited ('RHFL'), entities belonging to ADAG group.</li> </ul>	Section 4.9
3	<p><b>Loan disbursement to Valuecorp Securities and Finance Limited ('Valuecorp') written off</b></p> <ul style="list-style-type: none"> <li>The loan given to Valuecorp has been written off in March 2019 i.e. within a period of 4 months from the date of disbursement.</li> <li>As per the latest available financial statements, it appears that the borrowing entity is not having any income from business operations, no fixed assets, minimal operating expenditure and was having accumulated losses. Most of the money borrowed appears to have been utilized towards short term loans and advances. The borrower has similar registered address and email ID as that of six other PILE</li> </ul>	Section 5

Note: Executive summary to be read in conjunction with the detailed observations

### 3. Executive summary

#	Observation	Report reference
4	<p><b>Anomalies in the credit appraisal process</b></p> <p><b>Loan disbursed prior to the loan sanction date</b></p> <ul style="list-style-type: none"> <li>On review of 170 loan files belonging to the category of GPCL, it appears that in 16 instances aggregating to INR 1,362.65 crores, the actual loan disbursement date as per bank statement was prior to the date of issuance of sanction letter. Dates range from 01 day to 28 days.</li> <li>Further, it was observed that the loan approval memo does not contain the date on which the approval of the credit committee was taken.</li> </ul> <p><b>Loan disbursed to parties with weak financials</b></p> <ul style="list-style-type: none"> <li>On review of GPCL disbursed during the review period, it was noted that the Target Entity has extended various loan facilities to borrowers which were having weak financial metrics i.e. negative or minimal net worth and nominal paid up share capital ranging from INR 0.001 crores to INR 0.12 crores. The total loan disbursed to these entities during our review period aggregates to INR 7,908.49 crores with total outstanding dues as on 31 October 2019 of INR 5,454.03 crores</li> </ul> <p><b>Loan disbursed to entities which were recently incorporated</b></p> <ul style="list-style-type: none"> <li>We noted 24 instances where loans were disbursed to entities which were incorporated within 0.5 to 7 months period preceding the sanction of the loan i.e. FY 18-19 &amp; Q1 of FY 19-20 aggregating to INR 1,910.69 crores.</li> </ul> <p><b>Potential anomalies in creation of charge on the security provided to RHFL</b></p> <ul style="list-style-type: none"> <li>On review of loans disbursed during the review period, we noted 30 instances where charge on the assets of the respective borrowers was not registered by the Target Entity. Out of these, in 13 active instances the total loans due as on 31 October 2019 was INR 658.92 crores.</li> <li>In various instances, the charge on current assets of the borrowers was created and registered against GPCL given. However, on review of the financial statements as available in the public domain, we noted that the value of the current assets, was less than the amount of total dues as on 31 October 2019. Further, it was observed that the amount of charge created and registered covers only the principal component of the loans.</li> </ul>	Section 6

Note: Executive summary to be read in conjunction with the detailed observations

### 3. Executive summary

#	Observation	Report Reference																																																
5	<p><b>Loan advanced to other entities</b></p> <p><b>Disbursement made to other entities with inadequate repayment capacity</b></p> <ul style="list-style-type: none"> <li>It was observed that the Target Entity has disbursed GPCL to other entities which appears to have inadequate repayment capacity as per their financial records</li> <li>Four loans aggregating to INR 324.95 crores were disbursed during our review period against which total dues as on 31 Oct 2019 were INR 310.02 crores. It is pertinent to note that all the four cases have been classified as a NPA as on 31 October 2019.</li> </ul> <p style="text-align: right;">(INR in crores)</p> <table border="1"> <thead> <tr> <th>#</th> <th>LAN</th> <th>Name of the borrower</th> <th>Loan Amount</th> <th>Total dues</th> <th>Net worth</th> <th>Revenue</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>RHWCCOR000057491</td> <td>Creatoz Builders Private Limited</td> <td>120.00</td> <td>114.94</td> <td>(43.10)</td> <td>5.90</td> <td>NPA</td> </tr> <tr> <td>2</td> <td>RHWCCOR000050577</td> <td>Golden Beach Infracon Private Limited</td> <td>90.00</td> <td>85.47</td> <td>(1.93)</td> <td>-</td> <td>NPA</td> </tr> <tr> <td>3</td> <td>RHWCCOR000049507</td> <td>Wadhawan Holdings Private Limited</td> <td>90.00</td> <td>85.87</td> <td>(422.40)</td> <td>16.56</td> <td>NPA</td> </tr> <tr> <td>4</td> <td>RHWCCOR000051860</td> <td>Golden Beach Infracon Private Limited</td> <td>24.95</td> <td>23.74</td> <td>(1.93)</td> <td>-</td> <td>NPA</td> </tr> <tr> <td></td> <td></td> <td><b>Total</b></td> <td><b>324.95</b></td> <td><b>310.02</b></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	#	LAN	Name of the borrower	Loan Amount	Total dues	Net worth	Revenue	Status	1	RHWCCOR000057491	Creatoz Builders Private Limited	120.00	114.94	(43.10)	5.90	NPA	2	RHWCCOR000050577	Golden Beach Infracon Private Limited	90.00	85.47	(1.93)	-	NPA	3	RHWCCOR000049507	Wadhawan Holdings Private Limited	90.00	85.87	(422.40)	16.56	NPA	4	RHWCCOR000051860	Golden Beach Infracon Private Limited	24.95	23.74	(1.93)	-	NPA			<b>Total</b>	<b>324.95</b>	<b>310.02</b>				Section 8
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		<b>Total</b>	<b>324.95</b>	<b>310.02</b>																																														

Note: Executive summary to be read in conjunction with the detailed observations

### 3. Executive summary

#	Observation	Report Reference
6	<p><b>Anomalies Identified During Loan File Review</b></p> <p><b>On review of GPCL loan files we noted the followings;</b></p> <ol style="list-style-type: none"> <li>In 50 instances where financial statements were not found in the loan file aggregating to INR 3,897.41 crores</li> <li>In 47 instances where Income Tax Returns (ITR) were not found aggregating to INR 3,698.65 crores.</li> <li>In 8 instances (84 loan files) contact details of the borrowers of GPCL appears to be similar. Aggregating to INR 7,965.15 crores</li> <li>In 22 instances (39 loan files) contact details of the borrowers of GPCL appears to be invalid, aggregating to INR 3,500.51 crores.</li> <li>In 9 instances (72 loan files) e-mail address of the borrowers of GPCL appears to be similar.</li> <li>In 144 instances the quarterly chartered accountant certified end utilization status report was not available. The total dues as on 31 October 2019 against these borrower aggregated to 7,632.91 crores.</li> <li>In 91% of total disbursement made to GPCL borrowers deviation from credit policy was observed.</li> </ol> <p><b>Method of obtaining confirmation from holding company not defined</b></p> <ul style="list-style-type: none"> <li>On discussion with the representative of the Target Entity, it was informed that on 1 November 2018, there was a revision in Demand / Call loan policy which states that, 'loans booked under GPCL Product Code in 'Corporate Branch' shall have a portfolio cap of INR 6,750 crores. Any deviation or any transaction beyond this threshold shall require confirmation by the holding company.'</li> <li>The revision does not specify the method through which confirmation from holding company is to be obtained. Presently, from Feb 2019 onwards, all the GPCL loans disbursed were getting approved by the Chairman of the Reliance Group, who holds directorship in the holding company.</li> </ul>	Section 9
7	<p><b>Overall Assessment</b></p> <p>Based on the procedures performed by us, data and other limitations and our observations thereon, it appears that around ~86% of the Corporate loans / GPCL (~INR 12,574 crores) were disbursed to PILE – some of which were further lent to PILE / Related Parties / Group Entities. Further, it appears that a large portion of the loans to PILE and/or other entities were sanctioned/dispensed without giving due consideration to prudential lending norms related to the repayment capacity, adequacy of security/collateral and other key financial metrics of the borrower(s).</p> <p>Further, approximately 48 percentage* of the total amount of loans disbursed by the target entity (a housing finance company) during our review period (April 2016 to June 2019) pertain to Corporate loans / GPCL, which does not appear to align with the core objective of disbursing housing loans.</p> <p>*YoY percentage of Corporate loans/GPCL to total amount of loans disbursed. FY 2016-17 – ~13%   FY 2017-18 – ~35.95%   FY 2018-19 – ~80.65%</p>	

Note: Executive summary to be read in conjunction with the detailed observations

### 3. Executive summary

#### Management response

1. The observations of GT in its draft forensic report can be categorized as under:
  - a. Alleged breach of regulatory norms as regards group exposure;
  - b. Alleged breach of regulatory limit for non-housing loan portfolio;
  - c. Alleged deviation from certain policies & procedures.
  
2. Breach of regulatory norms – voluntarily disclosed by the Company
  - The alleged breach of group exposure norms is the main observation of GT and is referred to in its draft report as loans to Potentially Indirectly Linked Entities. While we do not agree with the observations on the alleged linkage of entities, we draw your kind attention that the said group exposure had already been disclosed by the Company voluntarily in its annual audited financial statements duly audited by the statutory auditors. Copy of the Annual Report for FY 2018-19 is provided in Annexure 3.
  - The Company has also disclosed transparently the end-use of such group exposure. The said loans were provided to enable the group entities to meet their debt servicing obligations and these loans were sanctioned under the extra-ordinary circumstances to avoid payment defaults to banks, which otherwise would have resulted in a systemic crisis. The end-use by group entities also included repayment of debt to banks who are also lenders to the Company.
  - The Company has also furnished to GT the full details of the group exposure including its end-use, evidencing that such end-use was for debt servicing to banks and lenders.

*Note: Management response is reproduced in full as provided by the company.*

### 3. Executive summary

#### Management response

The said details are summarized below:

#	Ultimate End Use of Loan Proceeds	Amount (INR Cr)
1	ICICI Bank	1,991.12
2	Yes Bank	980.01
3	Indusind Bank	557.70
4	Axis Bank	341.00
5	Punjab National Bank	305.96
6	Union Bank	301.00
7	SBI	250.60
8	Bank of Baroda	150.00
9	Canara Bank	104.53
10	Indian Overseas Bank	100.00
11	HDFC Limited	362.45
12	DHFL	58.00
13	Bank of Maharashtra	32.38
14	Karur Vysya Bank	10.00
15	IDBI Bank	7.00
16	Central Bank of India	3.69
17	NCD	1,506.07
18	Others	540.93
	<b>Total</b>	<b>7,602.44</b>

It may kindly be noted that there has been no adverse observation in this regard in the draft forensic report.

*Note: Management response is reproduced in full as provided by the company.*

## 3. Executive summary

### Management response

- In this connection, we draw your attention to page 72 of the Annual Report for 2018-19 (copy attached) as reproduced below:

*“During the Financial Year, the Company had advanced loans under the ‘General Purpose Corporate Loan’ product to certain bodies corporate including some of the group companies. All the lending transactions undertaken by the Company are in the ordinary course of business, the terms of which are at arms’ length basis and the same do not constitute transactions with related parties. However, the Company’s borrowers in some cases have undertaken onward lending transactions and it is noticed that the end use of the borrowings from the Company included borrowings by or repayment of financial obligations to some of the group companies.”*

- It is pertinent to mention that the said Group exposure is duly secured by way of corporate guarantee of Reliance Infrastructure Limited for an amount of INR 2,905 crore and the same forms part of the Resolution Plan submitted by the Company to Lenders on December 5, 2019.

### 3. Action taken by the Regulator, NHB for the alleged regulatory breach:

The Regulator, National Housing Bank (NHB) has taken the following action as regards the alleged violation of the regulatory norms:

- NHB vide its letter dated August 7, 2019 advised the Company to bring down its non-housing loan portfolio to below 50% of the total loans (housing plus non-housing). The Company vide its letter dated August 16, 2019 has sought time from the Regulator to be able to be in compliance with the same.
- NHB vide its letter dated October 22, 2019 Imposed a penalty of INR 45,000 (Rupees Forty Five Thousand) for the alleged breach of regulatory norms. The Company has duly paid the said penalty.

### 4. Findings of Statutory Auditors – no adverse observation in the report

- We draw your kind attention to the finding of the Company’s statutory auditors as reported in their Audit Report for the financial year 2018-19, the excerpts whereof are reproduced as under:

*“...The Company did not raise any money by way of initial public offer or further public offer (including debt instruments) during the year. In our opinion and according to the information and explanation provided to us, the money raised by way of term loans during the year generally have been applied for the purposes for which they were obtained”*

*Note: Management response is reproduced in full as provided by the company.*

### 3. Executive summary

#### Management response

*“During the course of our examination of the books and records of Company carried out in accordance with the generally accepted auditing practice in India, and according to the information and explanation given to us by the management we have neither come across any instance of fraud by the Company or any fraud on the Company by its officer or employee noticed or reported during the year nor have we been informed of any such instance by the management except in case of a fraud on the Company for commercial purchase loan for an identified property amounting to Rs 2.04 Crs which was identified by management and reported to the National Housing Bank (NHB). As at March 31, 2019 Rs 2.04 Crs was written off by the Company in the statement of profit and loss (Refer Note 53 of Ind AS Financial Statements). We also draw attention to Note No 54 of Ind AS Financial Statements...”*

- It may kindly be noted that there has been no adverse observation in the draft forensic report in this regard.

#### 5. GT Report does not justify ‘red flagging’

We draw your specific attention to the ‘overall assessment’ section of the GT draft report which makes no suggestion or conclusion to justify “red flagging” the Company’s account. Accordingly the apprehensions in this regard by few banks are now demonstrated to be misplaced and no further action is required in that direction.

#### 6. In view of the above, we submit that:

- The need to ‘Red Flag’ the account, as indicated by some Banks at the last lenders’ meeting, is misplaced and unfounded and the Banks are requested to remove such red flagging, if any.
- The lenders immediately consider and approve the draft Resolution Plan submitted by the Company on December 5, 2019.

We shall be pleased to make a presentation to the Banks at the all lenders meeting convened on December 30, 2019, to facilitate the fast-tracked approval of the Company’s Resolution Plan, submitted to lenders on December 5, 2019.

*Note: Management response is reproduced in full as provided by the company.*

# Detailed observations

# Transaction with potential indirectly linked entities

## 4.1 Loans extended to potential indirectly linked entities

For identifying potential indirectly linked entities (PILE), we have considered following parameters.

### Common Directors

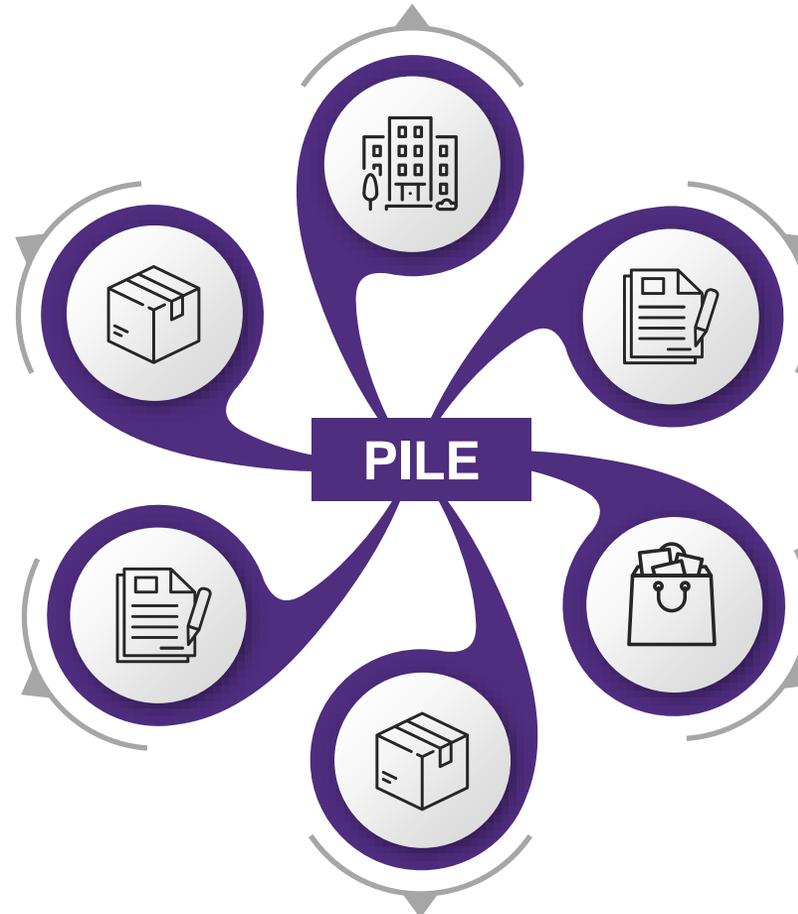
- The borrowers' and Target Entity have common present or past directors. Further, the borrowers and group companies of the Target Entity have common present or past directors.
- Past directors of the borrowers being current employee of the Target Entity, its related parties or group companies.

### List provided by Target entity

The name of the borrower appears in the list provided by Target Entity where the borrower has engaged in onward lending of loans which eventually is passed on to group companies of the Target Entity

### Common Address

The borrowers' current/past address are the same as the Target Entity or a group company of the Target entity.



### Common KMPs

The borrower, the Target Entity and its group companies have common Key Managerial Personnel ('KMP')

### Annual Report Declaration

As per note 57 of annual report for FY 18-19 of RCFL the borrower is considered as a group company for regulatory purposes

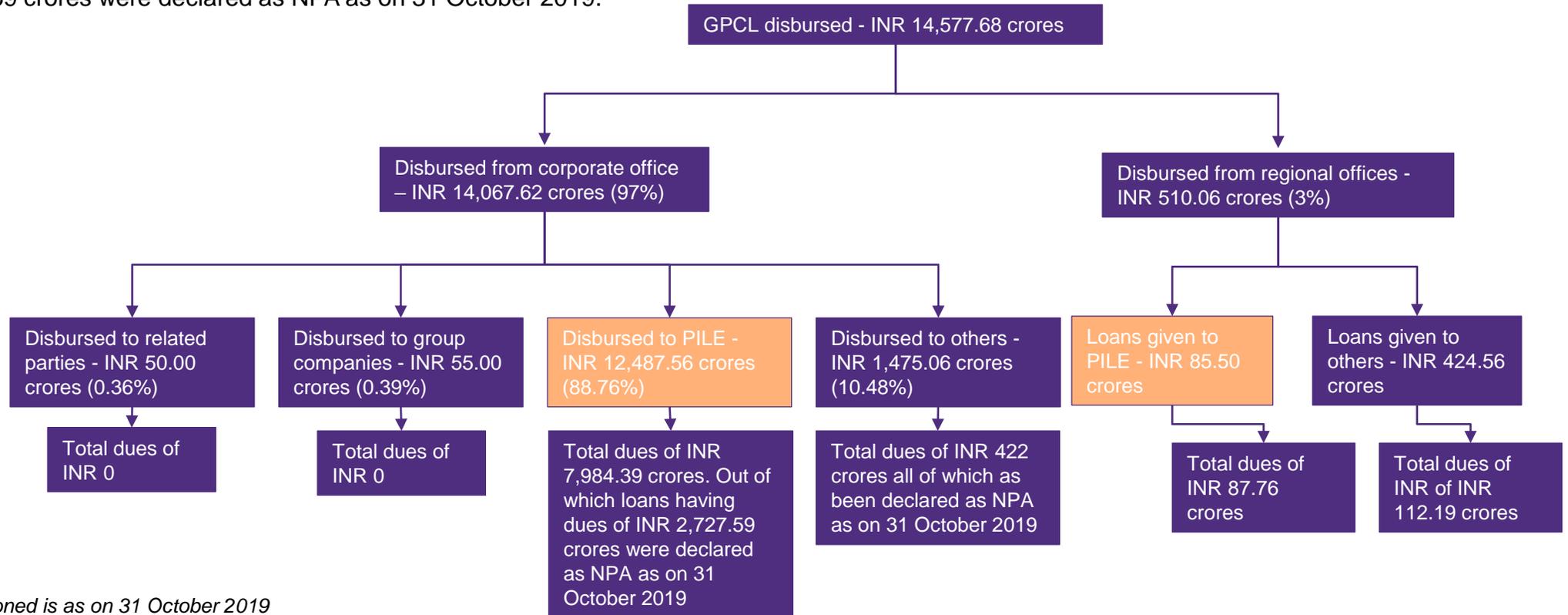
### Common email ID / domain

- The borrowers' registered email id on public domain is same as the Target Entity and/or its group companies.
- The domain name of email id used by the borrowers' is that of the Target Entity and/or its group companies.

## 4.1 Loans extended to potential indirectly linked entities

### GPCL disbursed during the review period

- During the review period, a total of INR 14,577.68 crores were disbursed as general purpose corporate loans ('GPCL') – out of which approx. 97% of loans were disbursed from corporate office and balance 3% from regional offices.
- Of INR 14,067.62 crores of loans disbursed from corporate office, approx. 88.76% of loans were disbursed to Potential Indirectly Linked Entities ('PILE') amounting to INR 12,487.56 crores. As on 30 June 2019, the principal outstanding against the loans disbursed to PILE was INR 7,529.94 crores.
- The total outstanding (including interest) as on 31 October 2019 against the loans disbursed to PILE was approx. INR 7,984.39 crores - Out of which loans having total dues of INR 2,727.59 crores were declared as NPA as on 31 October 2019.



Note - POS & NPA mentioned is as on 31 October 2019

## 4.1 Loans extended to potential indirectly linked entities (Contd.)

On our review of GPCL loan files, we noted 47 borrowers were potential indirectly linked to the Target Entity. List of these 47 borrowers along with their status as on 31 October 2019 and nature of business is provided below. For nature of relationship refer exhibit 1A & 1B  
(INR in crores)

#	Name of the borrower	Nature of business	Loan disbursed	No. of loans disbursed	Total dues as on 31 Oct 2019	No. of loans outstanding	Loan status
1	Adhar Property Consultancy Private Limited	*	189.2	1	189.2	1	Not due
2	Adhar Real Estate Consultancy Private Limited	Real estate activities	202.4	1	202.4	1	Not due
3	Adhar Project Management And Consultancy private Limited	Legal, accounting, book-keeping and auditing activities	650.59	10	223.44	3	NPA
4	Reliance Cleangen Limited	Production, collection and distribution of electricity	40.48	1	46.19	1	31-60 DPD
5	RPL Aditya Power Private Limited	Site preparation	139.5	1	158.61	1	61-90 DPD
6	RPL Star Power Private Limited	Steam and hot water supply	200	3	226.17	3	NPA
7	RPL Surya Power Private Limited	Production, collection and distribution of electricity	164	2	185.6	2	NPA
8	Skyline Global Trade Private Limited	Retail trading	260	5	103.23	2	NPA
9	Space Trade Enterprises Private Limited	Retail trading	396.72	5	145.34	1	NPA
10	Tulip Advisors Private Limited	Legal, accounting, book-keeping and auditing activities; tax consultancy; market research and public opinion polling; business and management consultancy	215	3	224.03	3	NPA
11	Species Commerce And Trade Private Limited	Other financial intermediation.	244	5	137.42	2	NPA
12	Worldcom Solutions Limited	Building of complete constructions or parts thereof; civil engineering	164.5	3	56.9	1	61-90 DPD
13	Hirma Power Limited	Production, collection and distribution of electricity	375	3	210.46	2	NPA

Note: Under column 'Loan Status' for the given PILE, status of the highest bucket is considered, in instances where multiple loans are outstanding from a given PILE.

\*The information was not available in public domain.

\*\*Entity is recently incorporated hence relevant information is not available in public domain.

\*\*\* Nature of business ascertained from latest available annual return on MCA – AOC4

## 4.1 Loans extended to potential indirectly linked entities (Contd.)

(INR in crores)

#	Name of the borrower	Nature of business	Loan disbursed	No. of loans disbursed	Total dues as on 31 Oct 2019	No. of loans outstanding	Loan status
14	Gamesa Investment Management Private Limited	Activities auxiliary to financial intermediation, except insurance and pension funding	614.21	8	185.97	4	NPA
15	Jayamkondam Power Limited	Production, collection and distribution of electricity	218.5	3	118.74	1	NPA
16	Kunjbihari Developers Private Limited	Real estate activities with own or leased property.	186.61	3	188.87	3	Not due
17	Medybiz Private Limited	Software publishing, consultancy and supply	435.90	4	220.71	3	31-60 DPD
18	Nationwide Communication Private Limited	Legal, accounting, book-keeping and auditing activities; tax consultancy; market research and public opinion polling; business and management consultancy	175.00	1	177.00	1	Not due
19	Aashish Power Plant Equipment Private Limited	Manufacture of special purpose machinery	109.75	2	112.05	1	NPA
20	Accura Productions Private Limited	Printing and service activities related to printing	186.74	5	186.74	5	Not due
21	Arion Movie Productions Private Limited	Legal, accounting, book-keeping and auditing activities	402.39	2	187.50	2	Not due
22	Azalia Distribution Private Limited	*	386.50	3	180.47	2	NPA
23	Sahishnota Advisory Services Private Limited	**	150.00	1	150.00	1	Not due
24	Crest Logistics And Engineers Private Limited	Building of complete constructions or parts thereof; civil engineering	329.50	7	182.62	4	NPA
25	Neptune Steel Strips Limited	Manufacture of basic iron & steel	209.64	2	102.50	1	Not due
26	Netizen Engineering Private Limited	Legal, accounting, book-keeping and auditing activities; tax consultancy; market research and public opinion polling; business and management consultancy	214.54	4	214.54	4	Not due
27	Pearl Housing Finance India Limited	Financial advisory, brokerage and consultancy services	200.00	1	200.00	1	Not due

Note: Under column 'Loan Status' for the given PILE, status of the highest bucket is considered, in instances where multiple loans are outstanding from a given PILE.

\*The information was not available in public domain.

\*\*Entity is recently incorporated hence relevant information is not available in public domain.

\*\*\* Nature of business ascertained from latest available annual return on MCA – AOC4

## 4.1 Loans extended to potential indirectly linked entities (Contd.)

(INR in crores)

#	Name of the borrower	Nature of business	Loan disbursed	No. of loans disbursed	Total dues as on 31 Oct 2019	No. of loans outstanding	Loan status
28	PHI Management Solutions Pvt Ltd	Legal, accounting, book-keeping and auditing activities; tax consultancy; market research and public opinion polling; business and management consultancy	540.00	4	232.05	3	31-60 DPD
29	Pifiniti Movies Private Limited	Reproduction of recorded media	188.66	2	188.66	2	Not due
30	Reliance Media Works Financial Services Private Limited	Other financial activities	80.00	1	0.00	-	Closed
31	Reliance Unicorn Enterprises Private Limited	Manufacture of basic chemicals	285.00	3	0.00	-	Closed
32	Traitrya Construction Finance Limited	Financial advisory, brokerage and consultancy services	185.00	2	185.00	2	Not due
33	Vinayak Ventures Private Limited	*	221.13	2	221.13	2	Not due
34	Vishvakarma Equipment Finance India Limited	Other financial intermediation	200.00	1	200.00	1	Not due
35	Wallace Movies And Entertainment Private Limited	Legal, accounting, book-keeping and auditing activities; tax consultancy; market research and public opinion polling; business and management consultancy	178.40	3	160.49	3	Not due
36	Deep Industrial Finance Limited	Financial advisory, brokerage and consultancy services	220.00	1	220.00	1	Not due
37	Edrishti Movies Private Limited	Reproduction of recorded media	200.96	2	200.96	2	Not due
38	Thwink Big Content Private Limited	**	207.44	2	207.44	2	Not due
39	Celebrita Mediahouse Private Limited	Reproduction of recorded media	210.00	2	210.00	2	Not due
40	Citi Securities And Financial Services Private Limited	Other financial intermediation	220.80	1	220.80	1	Not due
41	RPL Solar Power Private Limited	Production , collection and distribution of electricity	185.00	3	200.26	3	NPA
42	Ippy Entertainment Private Limited	Reproduction of recorded media	196.32	5	196.32	5	Not due
43	RPL Sunlight Power Private Limited	Production , collection and distribution of electricity	147.00	2	165.91	2	NPA
44	Summit Ceminfra Private Limited	Building of complete constructions or parts thereof; civil engineering	269.00	4	125.81	3	NPA

Note: Under column 'Loan Status' for the given PILE, status of the highest bucket is considered, in instances where multiple loans are outstanding from a given PILE.

\*The information was not available in public domain.

\*\*Entity is recently incorporated hence relevant information is not available in public domain.

\*\*\* Nature of business ascertained from latest available annual return on MCA – AOC4

## 4.1 Loans extended to potential indirectly linked entities (Contd.)

(INR in crores)

#	Name of the borrower	Nature of business	Loan disbursed	No. of loans disbursed	Total dues as on 31 Oct 2019	No. of loans outstanding	Loan status
45	Indian Agri Services Pvt Ltd	Agricultural and animal husbandry service activities, except veterinary activities	948.15	11	314.10	6	61-90 DPD
46	Mohanbir Hi Tech Build Private Limited	Real estate activities with own or leased property.	465.00	6	267.91	4	31-60 DPD
47	Sistema Shyam Teleservices Limited	**	315.00	3	0.00	-	Closed
	<b>Total</b>		<b>12,523.53</b>	<b>149</b>	<b>8,033.54</b>	<b>100</b>	

Note: Under column 'Loan Status' for the given PILE, status of the highest bucket is considered, in instances where multiple loans are outstanding from a given PILE.

\*The information was not available in public domain.

\*\*Entity is recently incorporated hence relevant information is not available in public domain.

\*\*\* Nature of business ascertained from latest available annual return on MCA – AOC4

## 4.1 Loans extended to potential indirectly linked entities (Contd.)

### Management response

a. We do not agree on the basis of classification of the entities as potential indirectly linked entities. Having said that, we confirm that RHFL has been and is in compliance with regulatory guidelines with respect to related party transactions as applicable to Housing Finance Companies (HFCs) and has made all the requisite and adequate disclosures with respect to the same from time to time.

b. As per Explanations to section 29B of The National Housing Bank Act, 1987

*“subsidiaries” and “companies in the same group” shall have the same meanings assigned to them in the Companies Act, 1956.*

c. As per Para 2(da) of Master Circular – The Housing Finance Companies (NHB) Directions, 2010 as updated in July 2018, the term “companies in the same group” was notified in July 2018 as under:

*“companies in the same group” shall mean an arrangement involving two or more entities related to each other through any of the following relationships:*

*Subsidiary - Parent, Joint Venture, Associate, A Related Party as defined under the Companies Act, 2013, Indian Accounting Standards (Ind AS),*

*Promoter – Promotee (as provided in the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011) for listed companies, Common Brand Name, and investment in equity shares of 20% and above;“*

d. Pursuant to the above and also in compliance with the applicable Accounting Standards, the transactions with companies in the same group have been duly disclosed in the Annual Report of the respective financial years ended 31 March 2017, 31 March 2018 and 31 March 2019. The same have been duly audited by the Company’s statutory Auditors. The details are furnished as under:

FY 2016-17	Annual Report page No. 61 (Annexure 1)
FY 2017-18	Annual Report page No. 101 (Annexure 2)
FY 2018-19	Annual Report page No. 119 (Annexure 3)

*Note: Management response is reproduced in full as provided by the company.*

## 4.1 Loans extended to potential indirectly linked entities (Contd.)

### Management response

e. In addition to the above, the Company has voluntarily disclosed in its Annual Report for 2018-19 the following note as reproduced below:

“During the Financial Year, the Company had advanced loans under the ‘General Purpose Corporate Loan’ product to certain bodies corporate including some of the group companies. All the lending transactions undertaken by the Company are in the ordinary course of business, the terms of which are at arms’ length basis and the same do not constitute transactions with related parties. However, the Company’s borrowers in some cases have undertaken onward lending transactions and it is noticed that the end use of the borrowings from the Company included borrowings by or repayment of financial obligations to some of the group companies.”

f. The Company has also disclosed transparently that the end-use of such group exposure was for their debt servicing.

g. The Company has also furnished to GT the full details of the group exposure of INR 7,602.44 Crore (only Principal) including its end-use, evidencing that such end-use was for debt servicing to banks and lenders. The said details are summarized below:

#	Ultimate End Use of Loan Proceeds	Amount (INR Cr)
1	ICICI Bank	1,991.12
2	Yes Bank	980.01
3	Indusind Bank	557.70
4	Axis Bank	341.00
5	Punjab National Bank	305.96
6	Union Bank	301.00
7	SBI	250.60
8	Bank of Baroda	150.00
9	Canara Bank	104.53
10	Indian Overseas Bank	100.00
11	HDFC Limited	362.45
12	DHFL	58.00
13	Bank of Maharashtra	32.38
14	Karur Vysya Bank	10.00
15	IDBI Bank	7.00
16	Central Bank of India	3.69

Note: Management response is reproduced in full as provided by the company.

## 4.1 Loans extended to potential indirectly linked entities (Contd.)

### Management response

#	Ultimate End Use of Loan Proceeds	Amount (INR Cr)
17	NCD	1,506.07
18	Others	540.93
	<b>Total</b>	<b>7,602.44</b>

It may kindly be noted that there has been no adverse observation in this regard in the draft forensic report.

Accordingly, the observations of GT are not commensurate with the applicable legal provisions and statutory norms, which have been duly complied with by the Company.

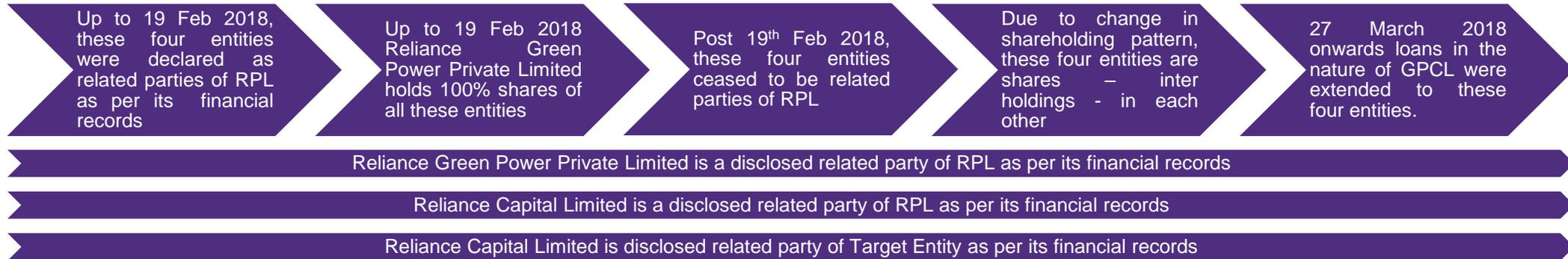
*Note: Management response is reproduced in full as provided by the company.*

## 4.1 Entities ceases to be related party of group company before disbursal of loans

### Observation: Case 1

On our review of the General Purpose Corporate Loans ('GPCL'), we observed that 4 entities (PILE) to whom the Target Entity had disbursed GPCL ceased to be a related party of Reliance Power limited ('RPL') prior to the disbursal of loan. It is pertinent to note that Reliance Capital Limited is a disclosed related party of RPL as per the financials records of RPL. Further, Reliance Capital Limited is a related party of the Target Entity.

- Up to 19 Feb 2018, the following four entities were disclosed as related parties of RPL as per its financial records.
  - a. RPL Surya Power Private Limited
  - b. RPL Solar Power Private Limited
  - c. RPL Star Power Private Limited
  - d. RPL Sunlight Power Private Limited
- Post 19 Feb 2018, these entities ceased to be a related party of RPL by virtue of the change in ownership.
- The sequence of events is explained below.

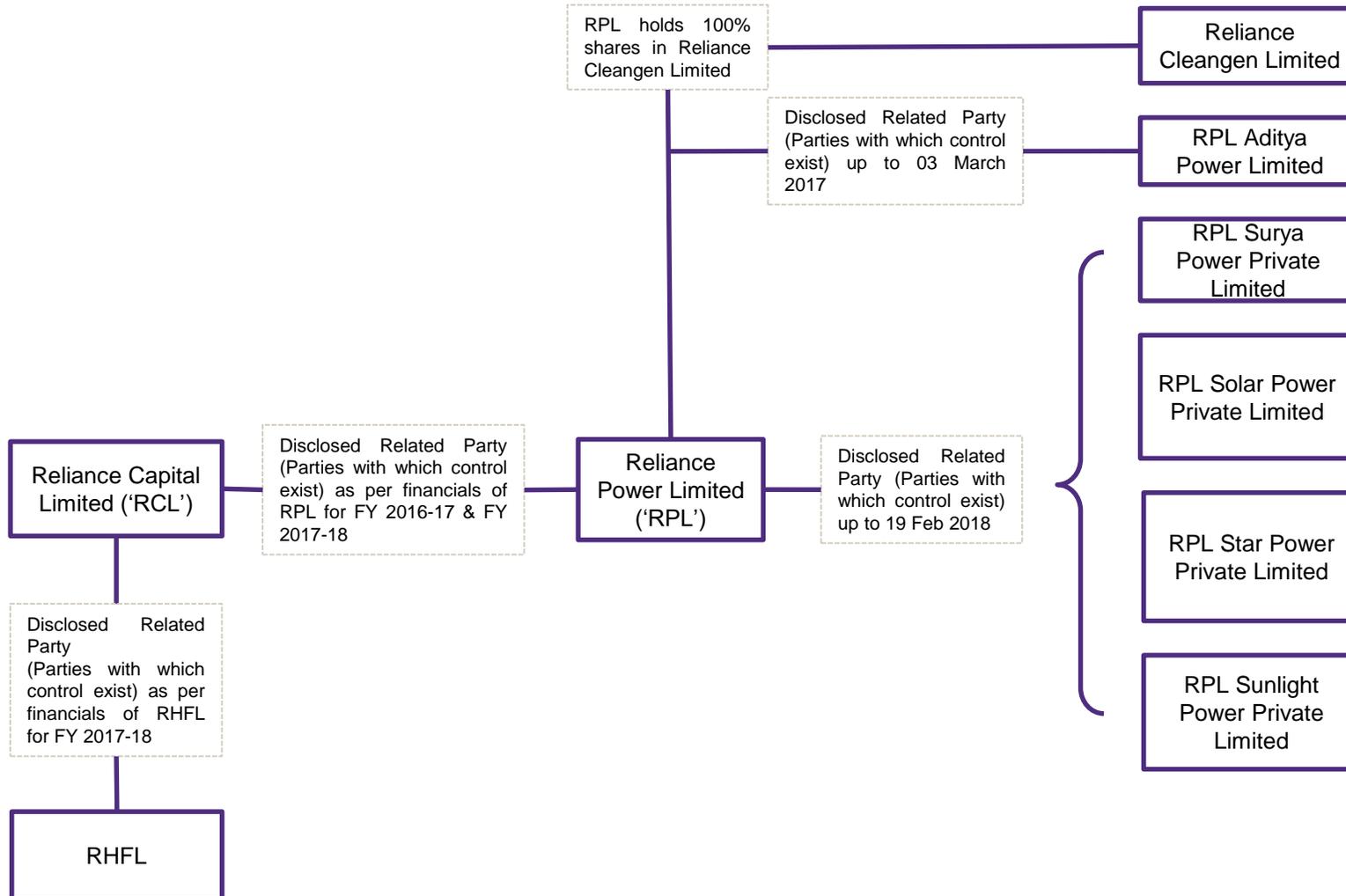


- Similarly, in the case of RPL Aditiya Power Limited, the company ceased to be a related entity of RPL on 03 March 2017.
- Further, in one instance, we noted that the loan was extended to a subsidiary of the RPL (Reliance Cleangen Limited)
- Total loans disbursed during our review period to above mentioned 4 entities aggregate to INR 692.26 crores.
- For details of the shareholding pattern and nature of the relationship , please refer next slide.

# 4.1 Entities ceases to be related party of group company before disbursement of loans (Contd.)

## Observation: Case 1 (Contd.)

(INR in crores)



Loan Account No.	Date of loan	Amount of Loan
RHWCCOR000073156	12 September 2018	40.00
RHWCCOR000072661	24 August 2018	137.84
RHWCCOR000068156	27 March 2018	99.95
RHWCCOR000072378	9 August 2018	63.24
RHWCCOR000068147	27 March 2018	99.95
RHWCCOR000072660	24 August 2018	34.58
RHWCCOR000072590	22 August 2018	49.40
RHWCCOR000068204	28 March 2018	99.95
RHWCCOR000072659	24 August 2018	49.40
RHWCCOR000072588	22 August 2018	49.40
RHWCCOR000068206	28 March 2018	99.95
RHWCCOR000072607	23 August 2018	46.44

Loan disbursed during review period INR 870.10 crores (as per loan disbursement report provided by the Target)

## 4.1 Entities ceases to be related party of group company before disbursal of loans (Contd.)

### Observation: Case 1 (Contd.)

Shareholding pattern (%) as per Financials available for FY 2016-17 and FY 2017-18

Date of Incorporation	Customer\Shareholder	Nature of Relationship	Reliance Green Power Private Limited*	Reliance Power Limited
23-Sep-97	Reliance Cleangen Limited	Common Director, Same Address, Same Email Id Domain(Note 1)	-	100
26-Aug-15	RPL Aditya Power Private Limited	Common Director, Same Address, Same Email Id Domain(Note 2)	100	-
31-Jul-15	RPL Surya Power Private Limited	Common Director, Same Address, Same Email Id Domain(Note 3)	100	-
26-Aug-15	RPL Solar Power Private Limited	Common Director, Same Address, Same Email Id Domain(Note 4)	100	-
07-Aug-15	RPL Star Power Private Limited	Common Director, Same Address, Same Email Id Domain(Note 5)	100	-
19-Aug-15	RPL Sunlight Power Private Limited	Common Director, Same Address, Same Email Id Domain(Note 6)	100	-

Note \* Reliance Green Power Private Limited is a subsidiary of Reliance Power Limited.

Shareholding pattern (%) for potential indirectly linked entities on / before loan disbursal.

Customer\Shareholder	RPL Surya Power Private Limited	RPL Solar Power Private Limited	RPL Star Power Private Limited	RPL Sunlight Power Private Limited	RPL Solaris Power Private Limited	RPL Sunshine Power Private Limited	Kunjbihari Developers Private Limited	Reliance Power Limited	Total	Total Disbursement (INR in crores)
Reliance Cleangen Limited	-	-	-	-	-	-	-	100	100	
RPL Aditya Power Private Limited	-	-	-	-	-	-	100	-	100	139.5
RPL Surya Power Pvt. Ltd.	-	50	-	-	-	50	-	-	100	164
RPL Solar Power Private Limited	50	-	-	-	-	50	-	-	100	185
RPL Star Power Private Limited	-	-	-	50	50	-	-	-	100	200
RPL Sunlight Power Private Limited	-	-	50	-	50	-	-	-	100	147

## 4.1 Entities ceases to be related party of group company before disbursal of loans (Contd.)

### Observation: Case 1 (Contd.)

Notes indicating potentially indirectly linked entities mentioned in the above slide.

Note No.	Borrower	Nature of relation		
		Common Director	Same Address of other related party	Registered Email ID of Directors
1	Reliance Cleangen Limited	Sameer Gupta was the common Director	The registered Address of Reliance Cleangen Limited is similar to Reliance Power Limited {H Block, 1 <sup>st</sup> Floor, Dhirubhai Ambani, Knowledge City, Koparkhairna, Navi Mumbai 400710}	Domain name of The email Id of directors of the respective Companies is reliancecda.com
2	RPL Aditya Power Private Limited			
3	RPL Surya Power Private Limited	Anurag Sharma is the common Director	The registered Address{502, Plot no. 91/94, Prabhat Colony Santa Cruz (East) Mumbai Mumbai City MH 400055 IN} is similar.	
4	RPL Solar Power Private Limited			
5	RPL Star Power Private Limited			
6	RPL Sunlight Power Private Limited			

## 4.1 Entities ceases to be related party of group company before disbursal of loans (Contd.)

### Observation: Case 2

Similarly, we observed that five entities that were disclosed as related parties of Reliance Infrastructure Limited ('Rinfra'), ceased to be related parties before the disbursal of GPCL loans to these 5 entities by the Target Entity. It is pertinent to note that Reliance Capital Limited is a disclosed related party of Rinfra as per the financials records of Rinfra. Further, Reliance Capital Limited is a related party of the Target Entity.

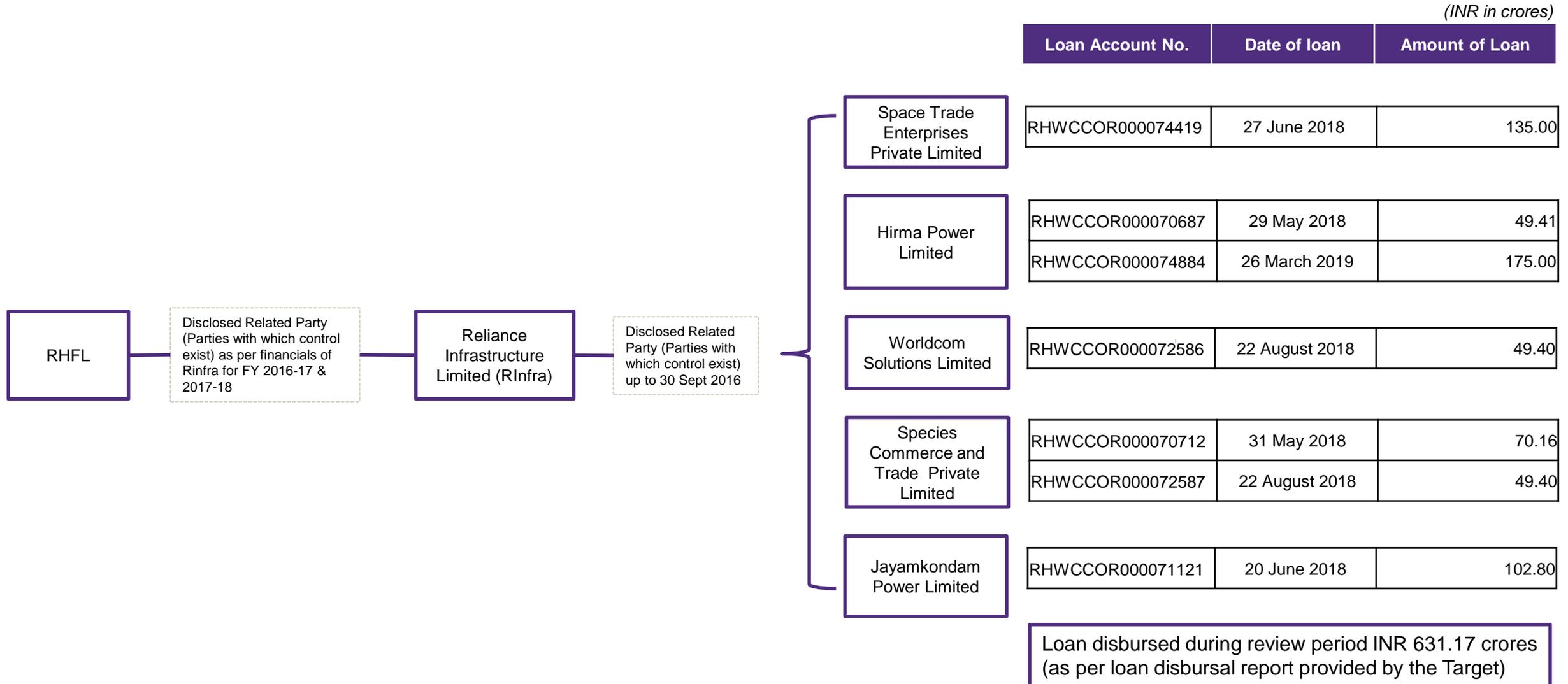
- Up to 30 Sept 2016, the following five entities were disclosed as related parties of Rinfra as per its financial records.
  - a. Space Trade Enterprises Private Limited
  - b. Hirma Power Limited
  - c. Worldcom Solutions Limited
  - d. Species Commerce and Trade Private Limited
  - e. Jayamkondam Power Limited
- Post 30 Sept 2016, these entities ceased to be a related party of Rinfra.
- The sequence of events is explained below.



- Total loan disbursed to these five entities during our review period aggregates to INR 631.17 crores.

# 4.1 Entities ceases to be related party of group company before disbursal of loans (Contd.)

## Observation: Case 2 (Contd.)



## 4.1 Entities ceases to be related party of group company before disbursal of loans (Contd.)

### Management response

We do not agree to the basis of classification of the entities as potential indirectly linked entities. We confirm that the above referred loans have been extended strictly on the basis of individual merits of the respective case and in compliance with the applicable regulatory guidelines with respect to related parties. It is clarified that the said borrowers were not related parties when the loans were sanctioned.

*Note: Management response is reproduced in full as provided by the company.*

# PILE - Potential evergreening of loans

## 4.2 PILE - Potential Evergreening of loans

### Observation:

- On reviewing the repayment pattern of GPCL borrowers, it appears that new loans were disbursed to potential indirectly linked entities which appear to be utilized for repayment of the existing outstanding loan facility taken by other potential indirectly linked entities.
- Such instances were identified by comparing the date of disbursement of new loan viz-a-viz the date of repayment of existing loan in the central disbursement, collection account and bank statements respectively. Transaction wise details are presented in the following slides.

(INR in crores)

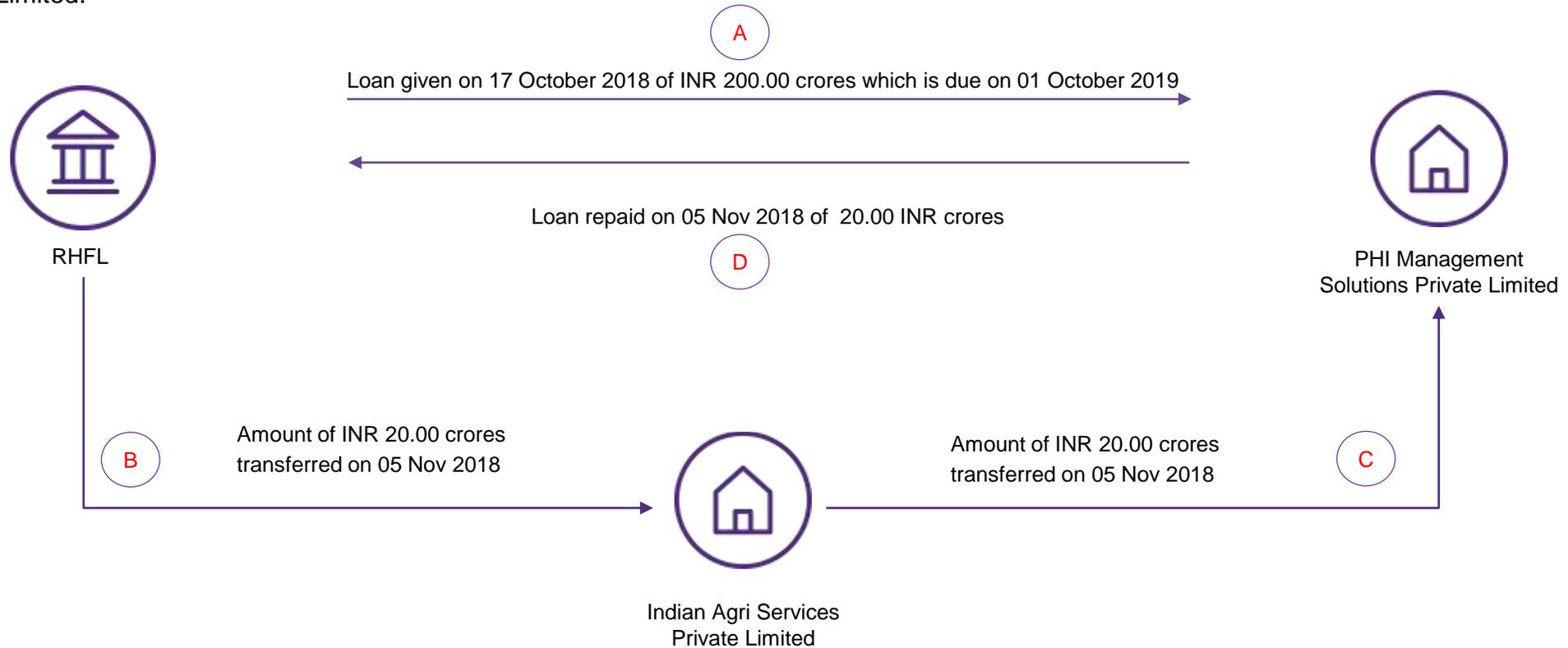
#	Fresh loans borrowers	No of Loans	Amount
1	Azalia Distribution Private Limited	1	175.00
2	Hirma Power Limited	2	224.41
3	Indian Agri Services Private Limited	1	20.00
4	Mohanbir HI Tech Build Private Limited	1	25.00
5	Skyline Global Trade Private Limited	1	70.16
6	Species Commerce and Trade Private Limited	1	70.16
7	Summit Ceminfra Private Limited	2	82.40
8	Thwink Big Content Private Limited	1	140.00
9	Tulip Advisors Private Limited	1	98.82
	<b>Total</b>	<b>11</b>	<b>905.95</b>

#	Existing loan borrowers	No of Loans	Amount
1	Crest Logistics and Engineers Private Limited	1	26.35
2	Gamesa Investment Management Private Limited	1	25.00
3	Hirma Power Limited	2	189.66
4	Jayamkondam Power Limited	1	69.59
5	Medybiz Private Limited	1	40.00
6	PHI Management Solutions Private Limited	1	20.00
7	RPL Solar Power Private Limited	1	4.00
8	Skyline Global Trade Private Limited	2	78.00
9	Species Commerce and Trade Private Limited	2	78.07
10	Summit Ceminfra Private Limited	1	172.54
11	Tulip Advisors Private Limited	1	13.00
13	Worldcom Solutions Limited	1	69.58
	<b>Total</b>	<b>16</b>	<b>785.79</b>

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 1

On 05 November 2018, Target Entity extended a GPCL to Indian Agri Services Private Limited which was potentially used to repay the existing loan of PHI Management Solutions Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

**C** Information pertaining to this transaction was provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 1 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
17-Oct-2018	RHWCCOR000073998	PHI MANAGEMENT SOLUTIONS PRIVATE LIMITED	200.00	RHF -GENERAL PURPOSE CORPORATE LOAN
06-Nov-2018	RHWCCOR000074169	INDIAN AGRI SERVICES PRIVATE LIMITED	20.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
961443	36682353	RHWCCOR000073998	PHI MANAGEMENT SOLUTIONS PRIVATE LIMITED	20.00	05-Nov-18

#### Bank account entries HDFC Bank00600310022347

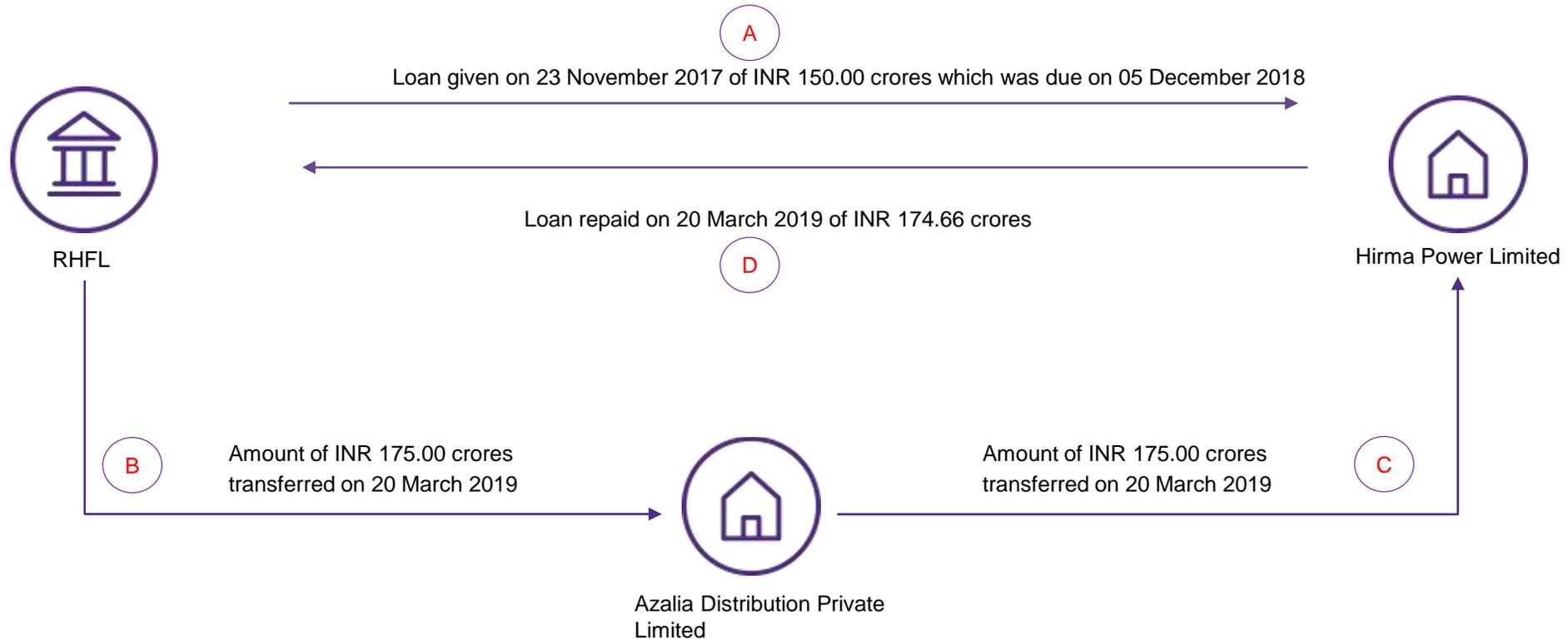
Transaction Date	Description	Debit	Credit
12-Oct-18	TRF AMOUNT*	100.00	
12-Oct-18	TRF AMOUNT*	100.00	
05-Nov-18	FT-57500000149668-INDIAN AGRI SERVICESPVT LTD	20.00	
05-Nov-18	FT-00600310016649-PHI MANagementsOLUTIONS PRIVA		20.00

\*Note: Information pertaining to these transactions (TRF AMOUNT) were provided by the Target Entity as we were unable to trace the same in the bank statements

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 2

On 20 March 2019, Target Entity extended a GPCL to Azalia Distribution Private Limited which was potentially used to repay the existing loan of Hirma Power Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

**C** Information pertaining to this transaction was provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 2 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
24-Nov-2017	RHWCCOR000061195	HIRMA POWER LIMITED	150.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22-Mar-2019	RHWCCOR000074884	AZALIA DISTRIBUTION PRIVATE LIMITED	175.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
928795	37189888	RHWCCOR000061195	HIRMA POWER LIMITED	174.66	20-Mar-19

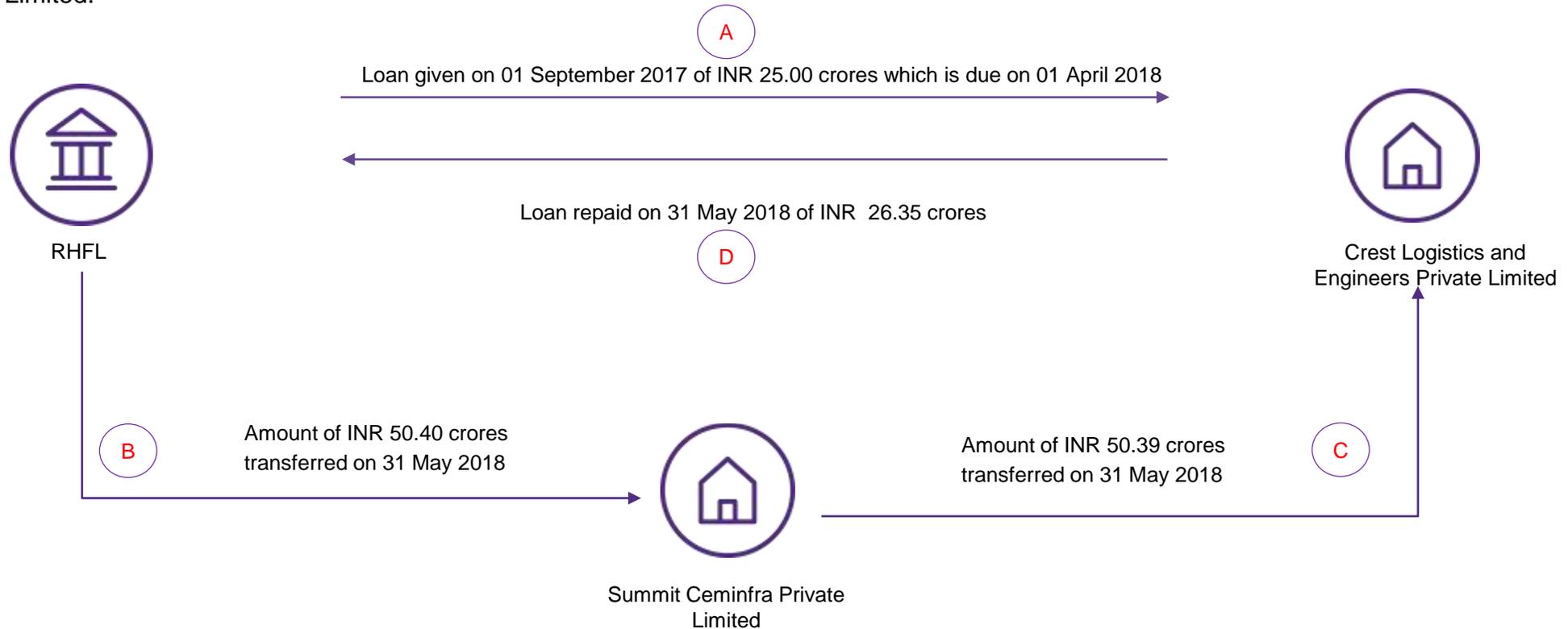
#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
23-Nov-17	RTGS DR-ICIC0000004-HIRMA POWERLTD-SONAWALA,MUM-HDFCR52017112358732419	150.00	
20-Mar-19	FT-00600310027252-AZALIA DISTRIBUTIONPRIVATE LI	175.00	
20-Mar-19	RTGS CR-ICIC0000393-HIRMA POWERLIMITED-RELIANCE HOME FINANCELTD-ICICR52019032000224334		174.66

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 3

On 31 May 2018, Target Entity extended a GPCL to Summit Ceminfra Private Limited which was potentially used to repay the existing loan of Crest Logistics and Engineers Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347 and 006310022433

**C** Information pertaining to this transaction was provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 3 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
31-Aug-2017	RHWCCOR000058876	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	25.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22-Mar-2019	RHWCCOR000070719	SUMMIT CEMINFRA PRIVATE LIMITED	50.40	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
922062	35311408	RHWCCOR000058876	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	26.35	31-May-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
01-Sept-2017	NEFT DR-ICIC0000004-CREST LOGISTICS ANDENGINEERS PRIVATESONAWALA,MUM-N244170359923327	25.00	
31-May-18	RTGS DR-ICIC0000004-SUMMIT CEMINFRA PVT LTD-SONAWALA,MUM-HDFCR52018053180298765	50.40	

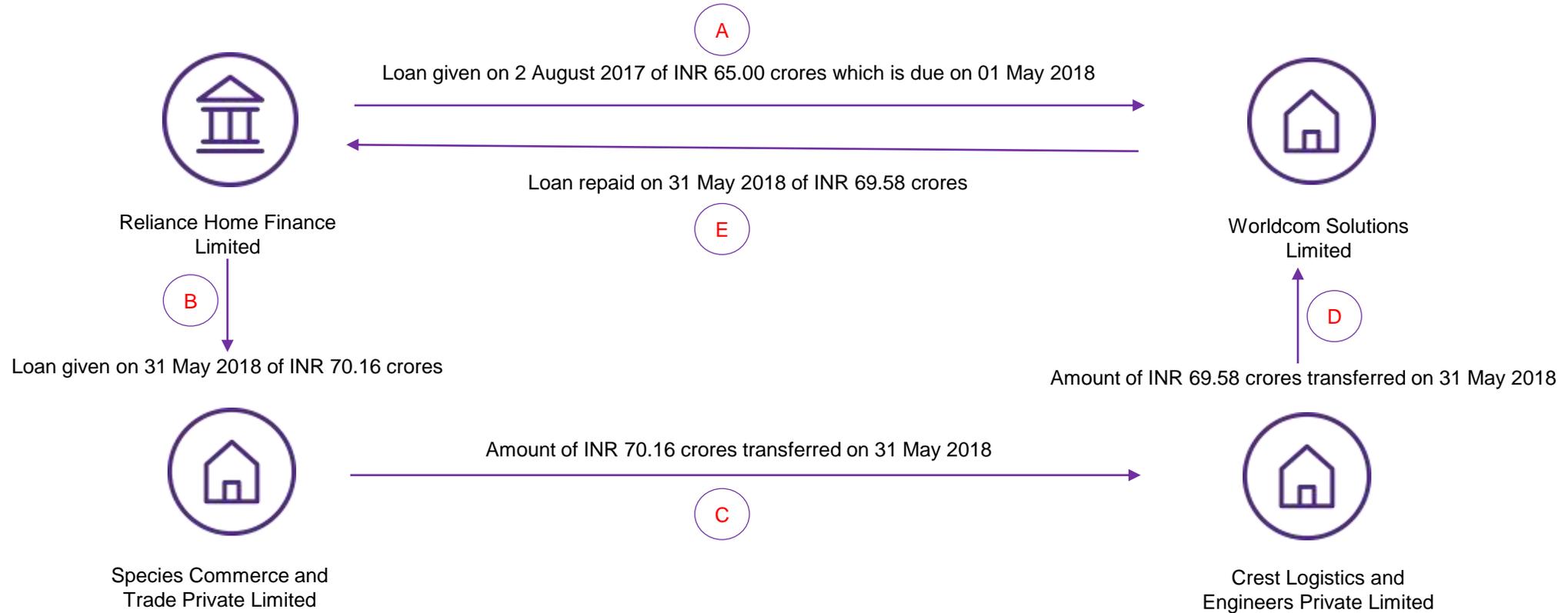
#### Bank Account entries HDFC Bank 00600310022433

Transaction Date	Description	Debit	Credit
31-May-18	RTGS CR-ICIC0000393-CREST LOGISTICS ANDENGINEERS PVT L-RELIANCE HOMEFINANCE-ICICR52018053100745381		26.35

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 4

On 31 May 2018, Target Entity extended a GPCL to Species Commerce and Trade Private Limited which was potentially used to repay the existing loan of Worldcom Solutions Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347 and 006310022433

**C** **D** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 4 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
30-Nov-2017	RHWCCOR000061879	WORLDCOM SOLUTIONS LIMITED	65.00	RHF -GENERAL PURPOSE CORPORATE LOAN
31-Ma6-2018	RHWCCOR000070712	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	70.16	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
929582	35311405	RHWCCOR000061879	WORLDCOM SOLUTIONS LIMITED	69.58	31-May-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
02-Aug-17	RTGS DR-ICIC0000004-WORLDCOM SOLUTIONS LTD-SONAWALA,MUM-HDFCR52017080250983342	50.00	
02-Aug-17	RTGS DR-ICIC0000004-WORLDCOM SOLUTIONS LTD-SONAWALA,MUM-HDFCR52017080251011476	15.00	
31-May-18	RTGS Dr-ICIC0000004-SPIECIES COMMERCE AND TRAD	70.16	

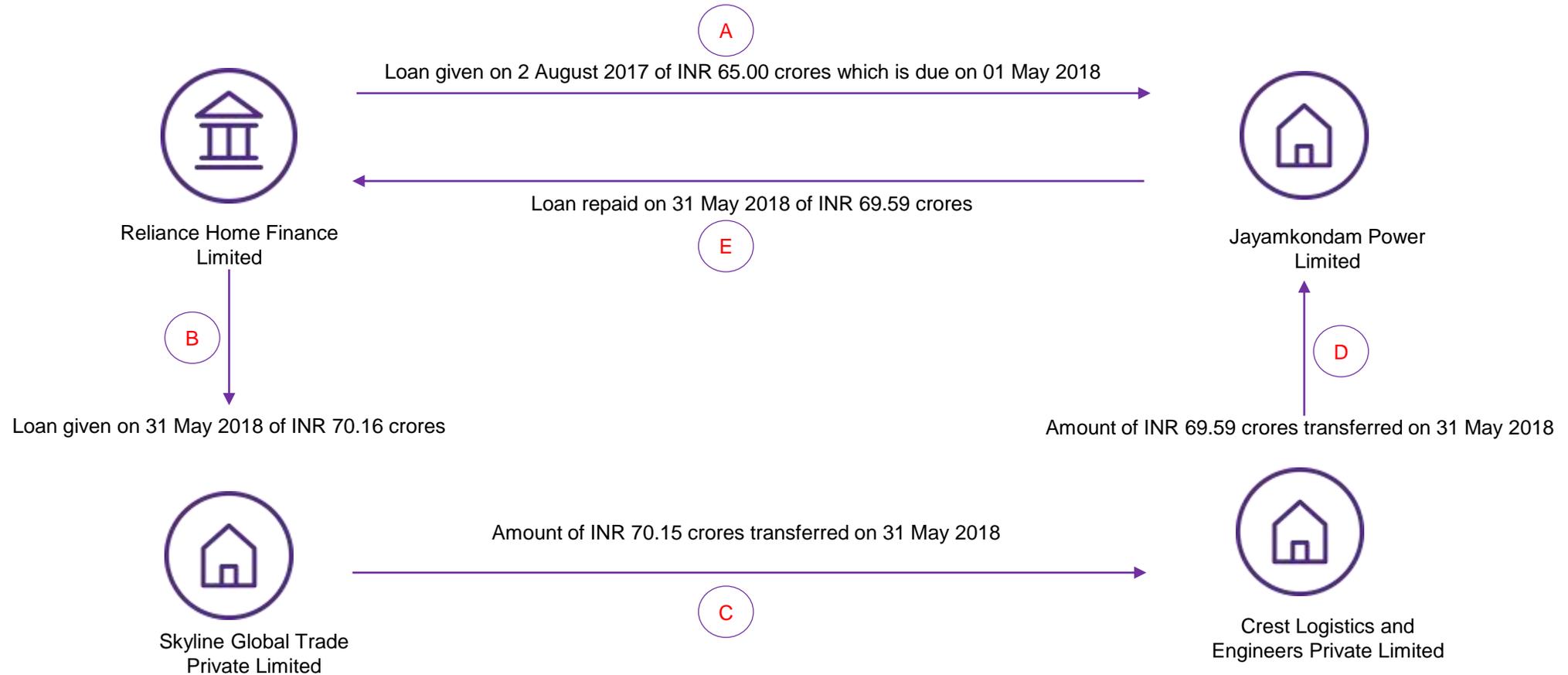
#### Bank Account entries HDFC Bank 00600310022433

Transaction Date	Description	Debit	Credit
31-May-18	RTGS Cr-ICIC0000393-WORLDCOM SOLUTIONS LIMITED		69.58

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 5

On 31 May 2018, Target Entity extended a GPCL to Skyline Global Trade Private Limited which was potentially used to repay the existing loan of Jayamkondam Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347 and 006310022433

**(C)** **(D)** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 5 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
30-Nov-2017	RHWCCOR000061871	JAYAMKONDAM POWER LIMITED	65.00	RHF -GENERAL PURPOSE CORPORATE LOAN
31-May-2018	RHWCCOR000070709	SKYLINE GLOBAL TRADE PRIVATE LIMITED	70.16	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
929580	35311412	RHWCCOR000061871	JAYAMKONDAM POWER LIMITED	69.59	31-May-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
02-Aug-17	RTGS DR-ICIC0000004-JAYAMKONDAM POWER LTD-SONAWALA,MUM-HDFCR52017080251014923	65.00	
31-May-18	RTGS Dr-ICIC0000004-SKYLINE GLOBAL TRADE PRIVA	70.16	

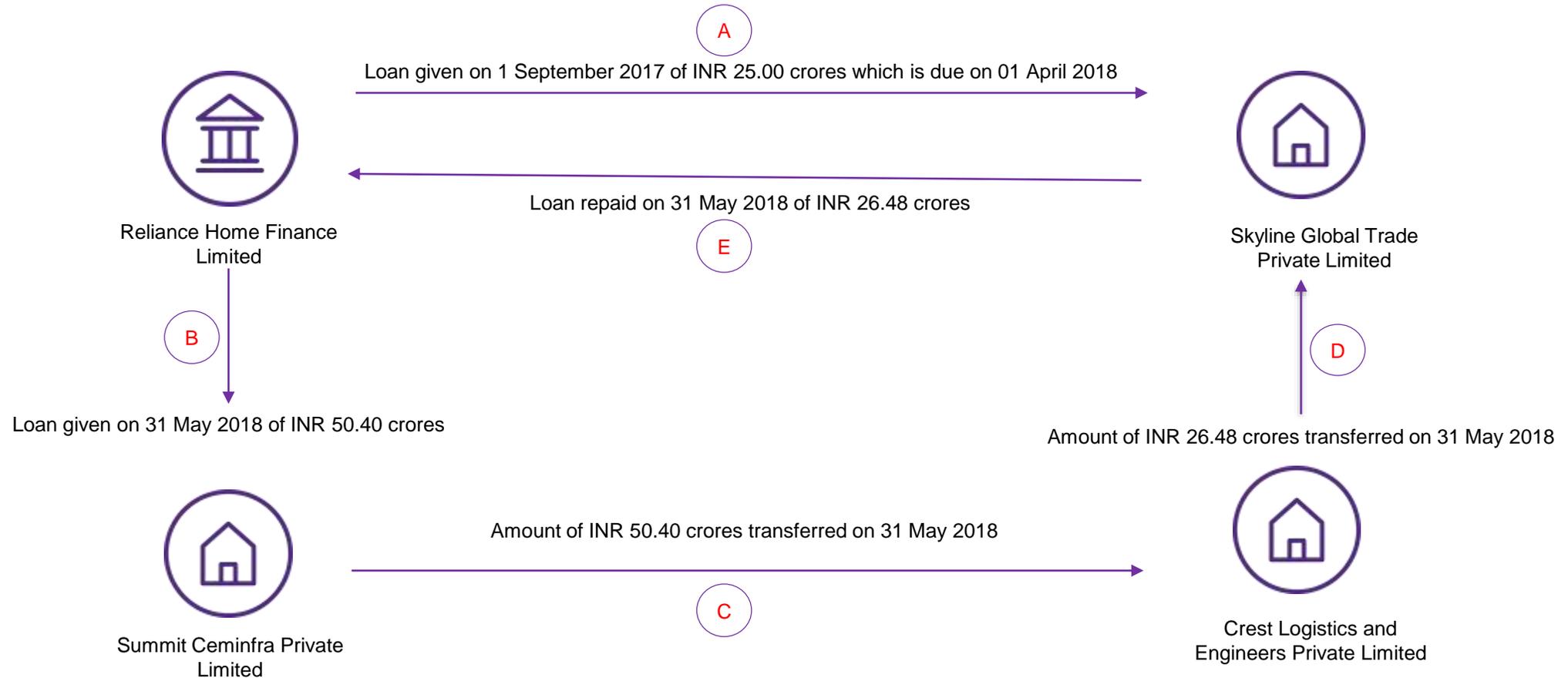
#### Bank Account entries HDFC Bank 00600310022433

Transaction Date	Description	Debit	Credit
31-May-18	RTGS Cr-ICIC0000393-JAYAMKONDAM POWER LIMITED		69.59

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 6

On 31 May 2018, Target Entity extended a GPCL to Summit Ceminfra Private Limited which was potentially used to repay the existing loan of Skyline Global Trade Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347 and 006310022433

**C** **D** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 6 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
31-Aug-2017	RHWCCOR000058872	SKYLINE GLOBAL TRADE PRIVATE LIMITED	25.00	RHF -GENERAL PURPOSE CORPORATE LOAN
31-May-2018	RHWCCOR000070719	SUMMIT CEMINFRA PRIVATE LIMITED	50.40	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
922073	35311394	RHWCCOR000058872	SKYLINE GLOBAL TRADE PRIVATE LIMITED	26.48	31-May-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
01-Sept-17	NEFT DR-ICIC0000004-SKYLINE GLOBAL TRADEPVT LTD-SONAWALA,MUM-N244170359900415	25.00	
31-May-18	RTGS DR-ICIC0000004-SUMMIT CEMINFRA PVT LTD-SONAWALA,MUM-HDFCR52018053180298765	50.39	

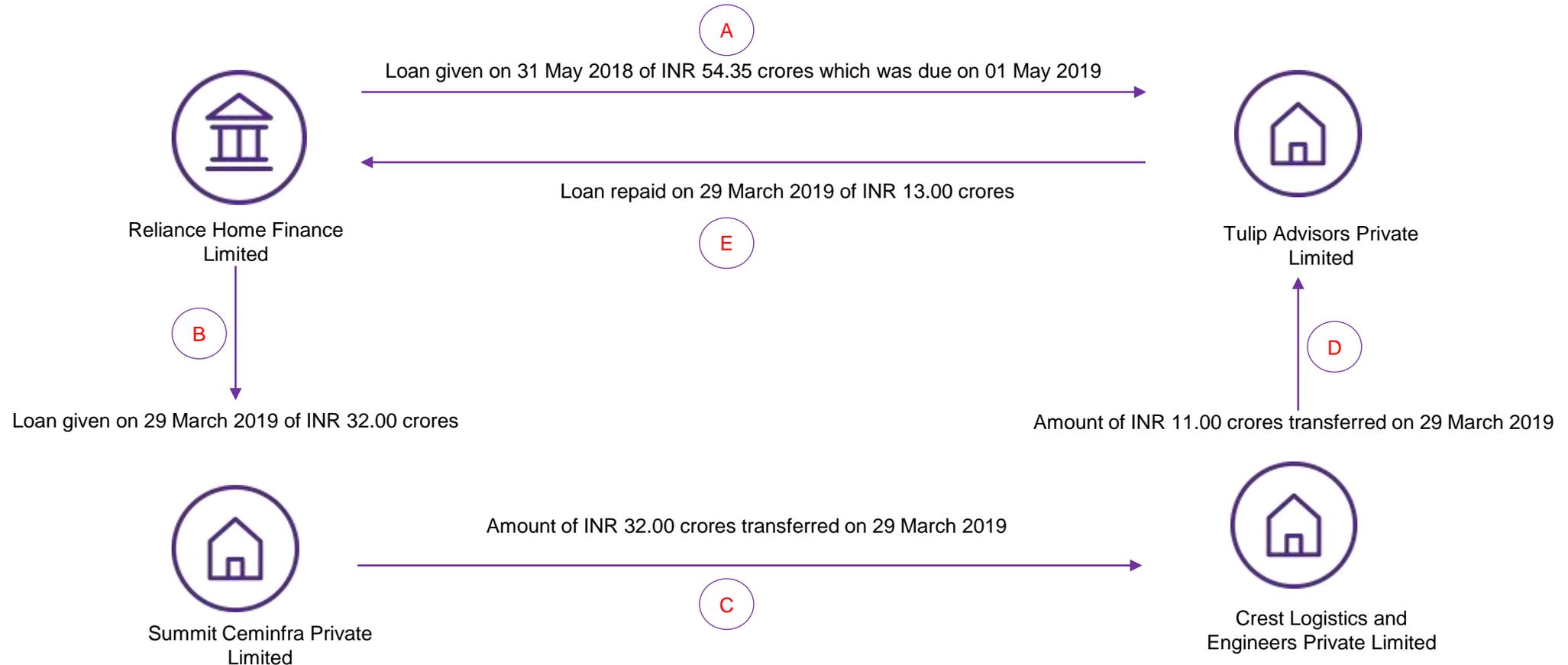
#### Bank Account entries HDFC Bank 00600310022433

Transaction Date	Description	Debit	Credit
31-May-18	RTGS CR-ICIC0000393-SKYLINE GLOBAL TRADEPRIVATE LIMITE-RELIANCE HOMEFINANCE-ICICR52018053100744665		26.48

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 7

On 29 March 2019, Target Entity extended a GPCL to Summit Ceminfra Private Limited which was potentially used to repay the existing loan of Tulip Advisors Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

**C** **D** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 7 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
31-May-2018	RHWCCOR000070715	TULIP ADVISORS PRIVATE LIMITED	54.35	RHF -GENERAL PURPOSE CORPORATE LOAN
29-Mar-2019	RHWCCOR000074905	SUMMIT CEMINFRA PRIVATE LIMITED	32.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
952579	37227870	RHWCCOR000070715	TULIP ADVISORS PRIVATE LIMITED	2.00	29-Mar-19
952579	37227867	RHWCCOR000070715	TULIP ADVISORS PRIVATE LIMITED	11.00	29-Mar-19

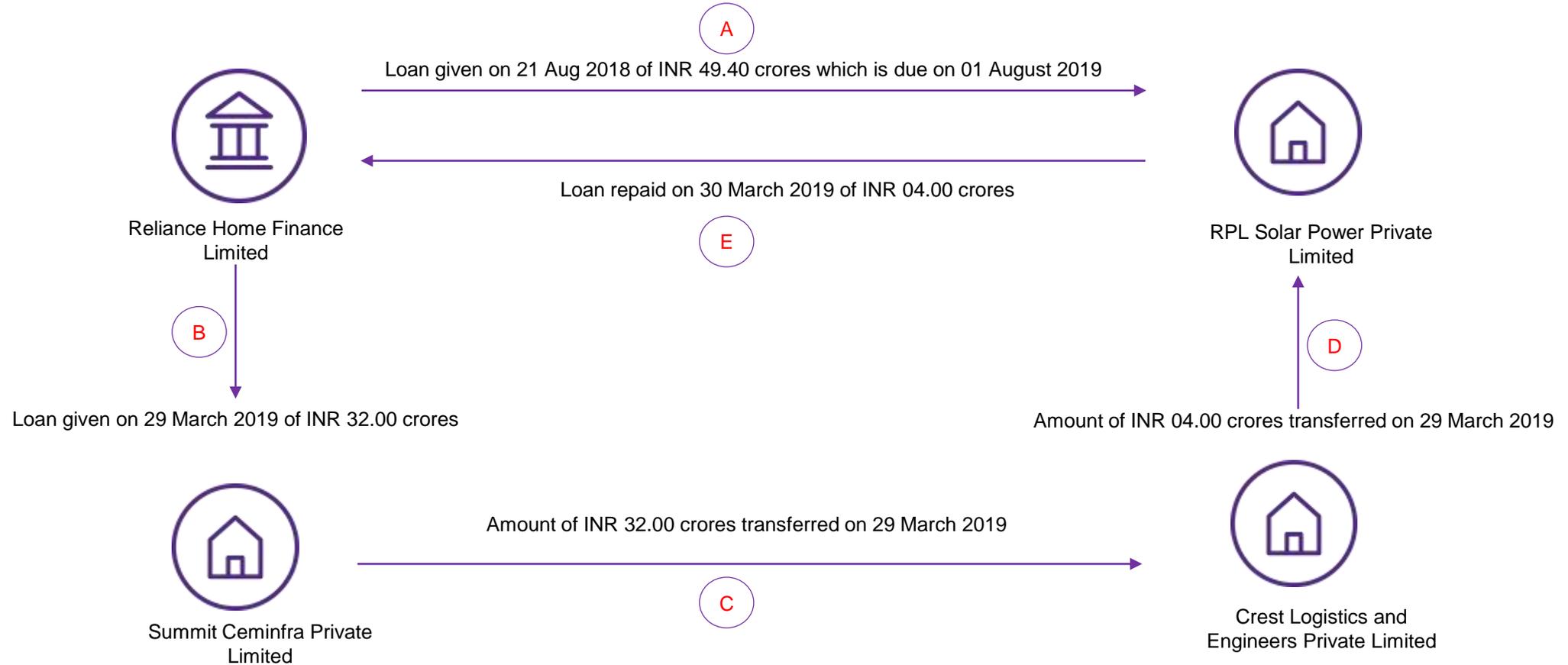
#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
31-May-2018	RTGS DR-ICIC0000004-TULIP ADVISROS PVT LTD-SONAWALA,MUM-HDFCR52018053180299758	54.35	
29-Mar-2019	RTGS DR-ICIC0000004-SUMMIT CEMINFRA PVT LTD-SONAWALA MUM-HDFCR52019032971423192	17.00	
29-Mar-2019	RTGS DR-ICIC0000004-SUMMIT CEMINFRA PRIVATE LIMITED-SONAWALAMUM-HDFCR52019032971583176	15.00	
29-Mar-2019	RTGS CR-ICIC0000393-TULIP ADVISORS PRIVATE LIMITED-RELIANCE HOME FINANCE LTD-ICICR52019032900520998		2.00
29-Mar-2019	NEFT CR-ICIC0000393-TULIP ADVISORS PRIVATE LIMITED-RELIANCE HOME FINANCE LTD-000063576315		11.00

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 8

On 29 March 2019, Target Entity extended a GPCL to Summit Ceminfra Private Limited which was potentially used to repay the existing loan of RPL Solar Power Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

**C** **D** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 8 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
22-Aug2018	RHWCCOR000072590	RPL SOLAR POWER PRIVATE LIMITED	49.40	RHF -GENERAL PURPOSE CORPORATE LOAN
29-Mar-2019	RHWCCOR000074905	SUMMIT CEMINFRA PRIVATE LIMITED	32.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
957169	37227887	RHWCCOR000072590	RPL SOLAR POWER PRIVATE LIMITED	4.00	30-Mar-19

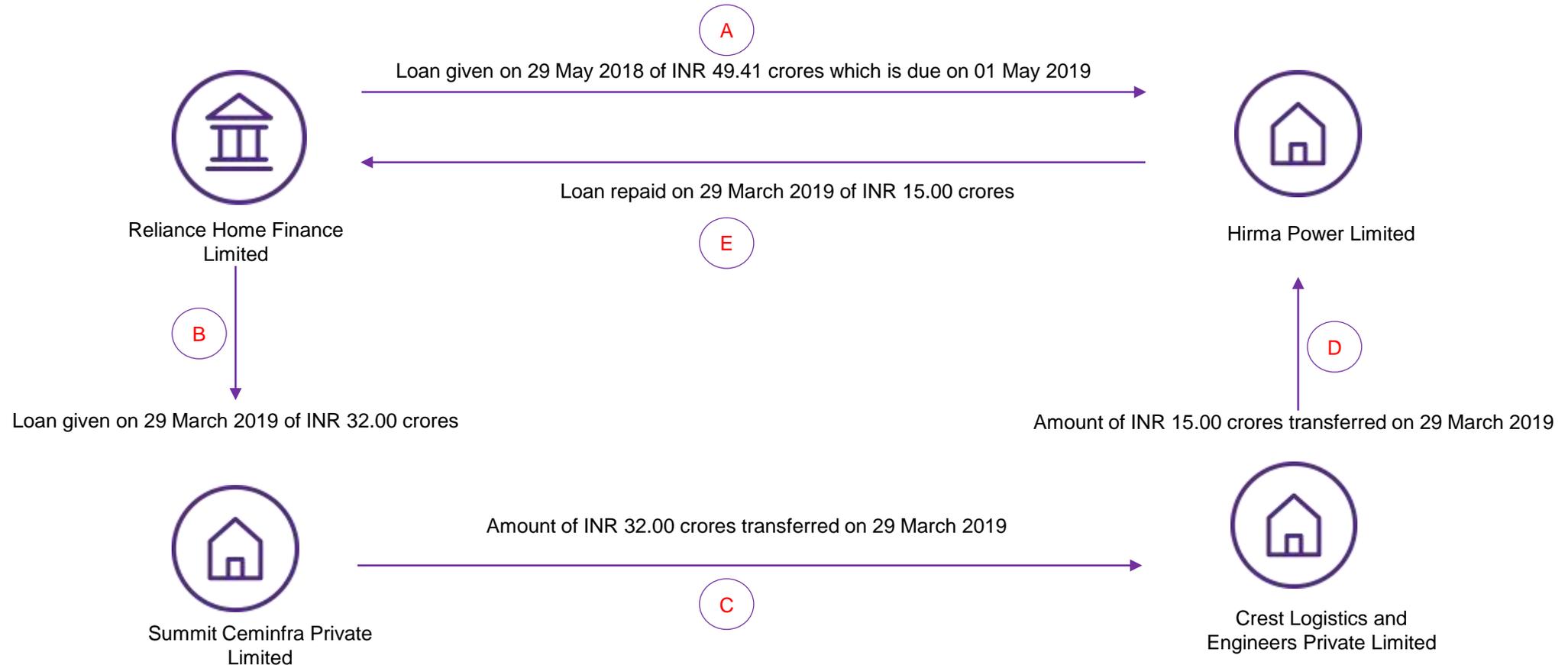
#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
21-Aug-2018	NEFT DR-ICIC0000151-RPL SOLAR POWER PVTLTD-SONAWALA,MUM-N233180614173957	49.40	
29-Mar-2019	RTGS DR-ICIC0000004-SUMMIT CEMINFRA PVTLTD-SONAWALA MUM-HDFCR52019032971423192	17.00	
29-Mar-2019	RTGS DR-ICIC0000004-SUMMIT CEMINFRA PRIVATE LIMITED-SONAWALAMUM-HDFCR52019032971583176	15.00	
30-Mar-2019	RTGS CR-ICIC0000151-RPL SOLAR POWER PRIVATE LIMITED-RELIANCE HOME FINANCE LTD-ICICR52019033000644790		4.00

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 9

On 29 March 2019, Target Entity extended a GPCL to Summit Ceminfra Private Limited which was potentially used to repay the existing loan of Hirma Power Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

**C** **D** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 9 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
29-May-2018	RHWCCOR000070687	HIRMA POWER LIMITED	49.41	RHF -GENERAL PURPOSE CORPORATE LOAN
29-Mar-2019	RHWCCOR000074905	SUMMIT CEMINFRA PRIVATE LIMITED	32.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
952512	37227880	RHWCCOR000070687	HIRMA POWER LIMITED	15.00	29-Mar-19

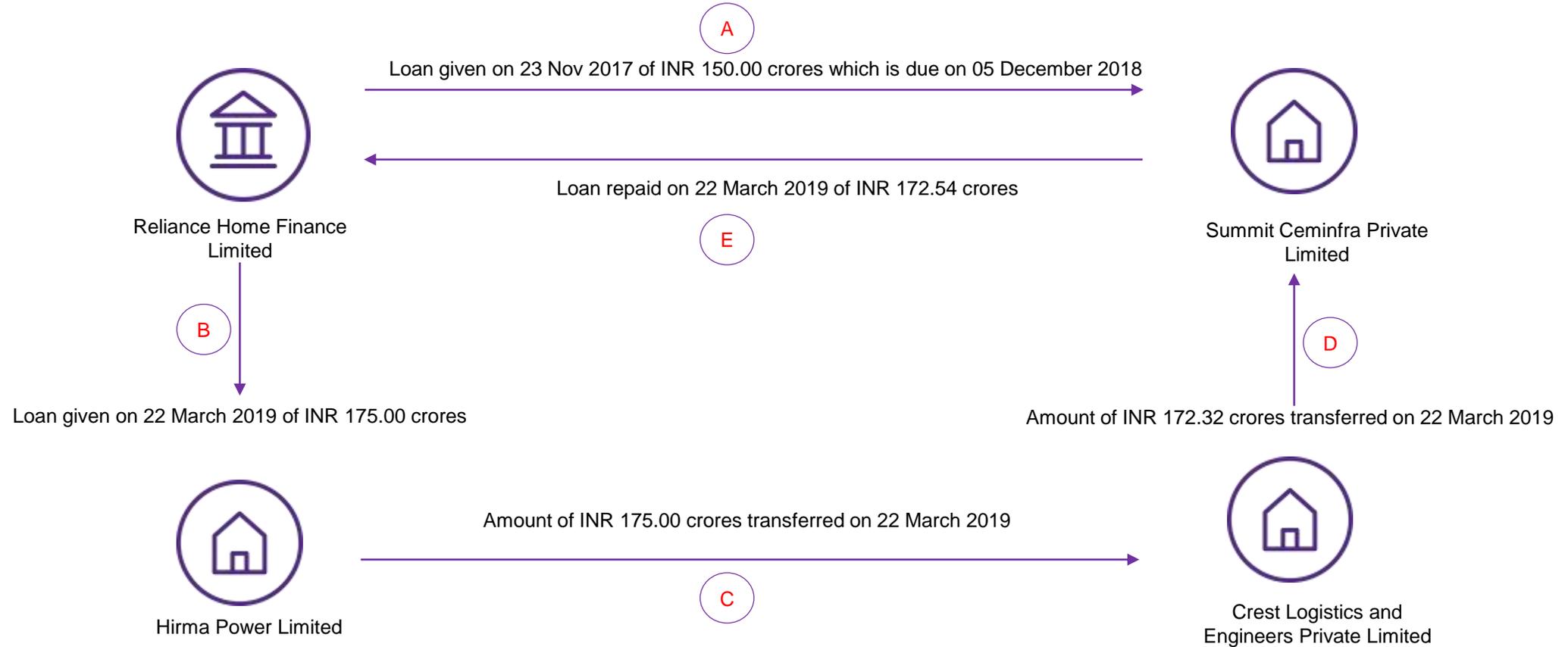
#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
29-May-2018	RTGS DR-ICIC0000004-HIRMA POWERLIMITED-SONAWALA,MUM-HDFCR52018052980088	49.41	
29-Mar-2019	RTGS DR-ICIC0000004-SUMMIT CEMINFRA PVTLTD-SONAWALA MUM-HDFCR52019032971423192	17.00	
29-Mar-2019	RTGS DR-ICIC0000004-SUMMIT CEMINFRAPRIVATE LIMITED-SONAWALAMUM-HDFCR52019032971583176	15.00	
29-Mar-2019	RTGS CR-ICIC0000393-HIRMA POWERLIMITED-RELIANCE HOME FINANCELTD-ICICR52019032900520746		15.00

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 10

On 22 March 2019, Target Entity extended a GPCL to Hirma Power Limited which was potentially used to repay the existing loan of Summit Ceminfra Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

**(C) (D)** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 10 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
24-Nov-2017	RHWCCOR000061196	SUMMIT CEMINFRA PRIVATE LIMITED	150.00	RHF -GENERAL PURPOSE CORPORATE LOAN
26-Mar-2019	RHWCCOR000074884	HIRMA POWER LIMITED	175.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
928793	37193907	RHWCCOR000061196	SUMMIT CEMINFRA PRIVATE LIMITED	172.54	22-Mar-19

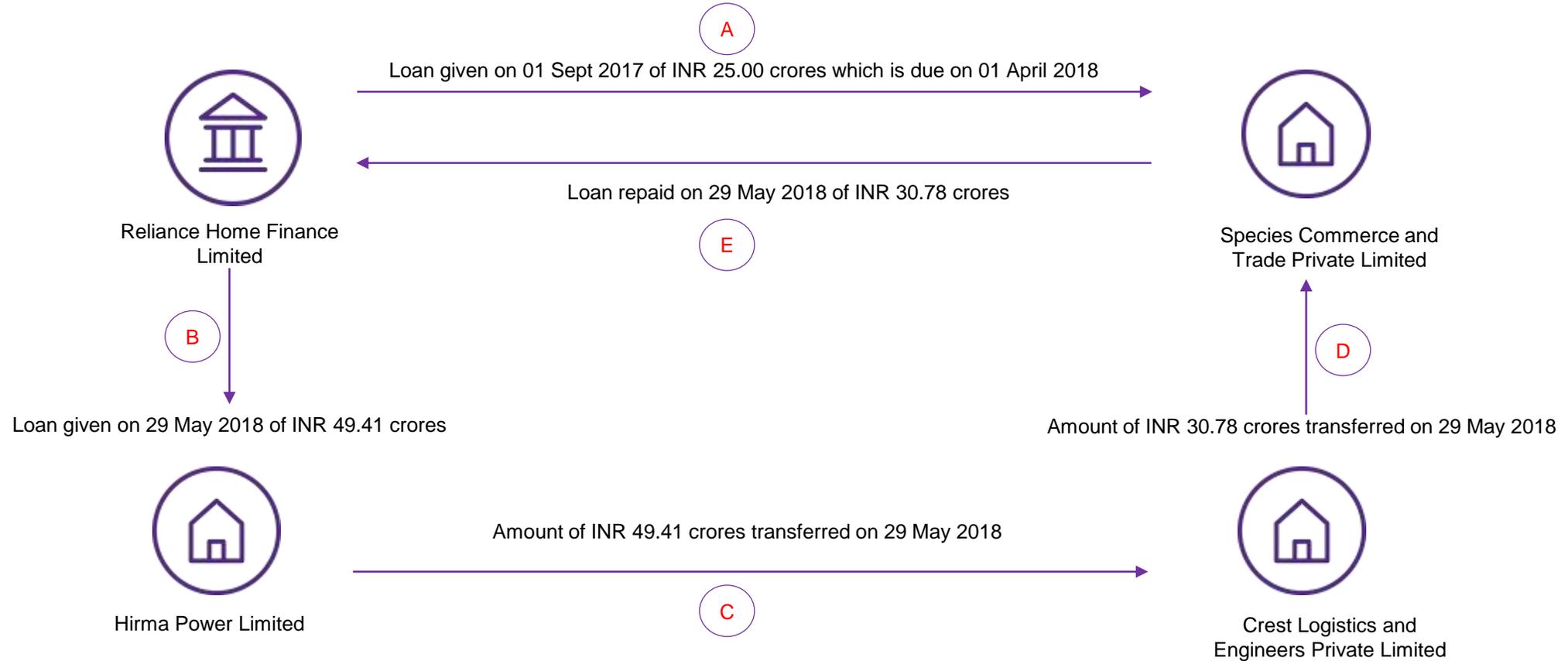
#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
23-Nov-2017	RTGS DR-ICIC0000004-SUMMIT CEMINFRA PVTLTD-SONAWALA,MUM-HDFCR52017112358732247	150.00	
22-Mar-2019	RTGS DR-ICIC0000393-HIRMA POWERLTD-SONAWALA MUM-HDFCR52019032270143103	175.00	
22-Mar-2019	RTGS CR-ICIC0000393-SUMMIT CEMINFRAPRIVATE LIMITED-RELIANCE HOME FINANCELTD-ICICR52019032200306262		172.54

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 11

On 29 May 2018, Target Entity extended a GPCL to Hirma Power Limited which was potentially used to repay the existing loan of Species Commerce and Trade Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – **00600310022347** and **00600310022398**

**(C) (D)** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 11 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
31-Aug-2017	RHWCCOR000058877	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	25.00	RHF -GENERAL PURPOSE CORPORATE LOAN
29-May-2018	RHWCCOR000070687	HIRMA POWER LIMITED	49.41	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
922068	35305849	RHWCCOR000058877	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	30.78	29-May-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
01-Sept-17	NEFT DR-ICIC0000004-SPIECIES COMMERCEAND TRADE PVT LTDNOIDA-SONAWALA,MUM-N244170359902761	25.00	
29-May-2018	RTGS DR-ICIC0000004-HIRMA POWERLIMITED-SONAWALA,MUM-HDFCR52018052980088	49.41	

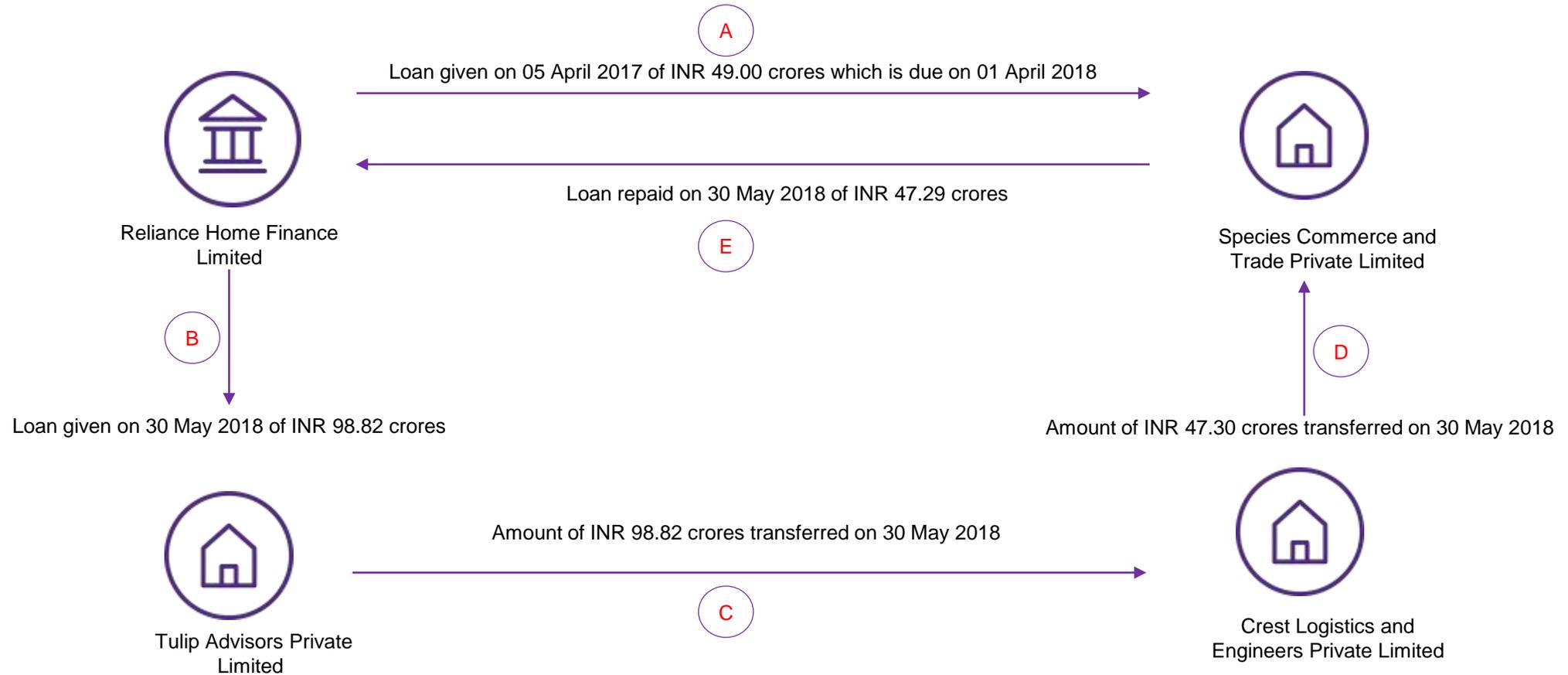
#### Bank Account entries HDFC Bank 00600310022398

Transaction Date	Description	Debit	Credit
29-May-18	NEFT Cr-ICIC0000393-SPECIES COMMERCE AND TRADE PRIVATE –RELIANCE HOME FINANCE LTD-000046334305		30.78

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 12

On 30 May 2018, Target Entity extended a GPCL to Tulip Advisors Private Limited which was potentially used to repay the existing loan of Species Commerce and Trade Private Limited



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347 and 00600310022398

**C** **D** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 12 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
31-Aug-2017	RHWCCOR000058873	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	49.00	RHF -GENERAL PURPOSE CORPORATE LOAN
30-May-2018	RHWCCOR000070698	TULIP ADVIOSRS PRIVATE LIMITED	98.82	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
921827	35305883	RHWCCOR000058873	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	47.29	30-May-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
05-Apr-17	RTGS DR-ICIC0000004-NOIDAGLOBAL30438	49.00	
30-May-18	RTGS DR-ICIC0000004-TULIP ADVISROSPRIVATELIMITED-SONAWALA,MUM-HDFCR52018053080219	98.92	

#### Bank Account entries HDFC Bank 00600310022398

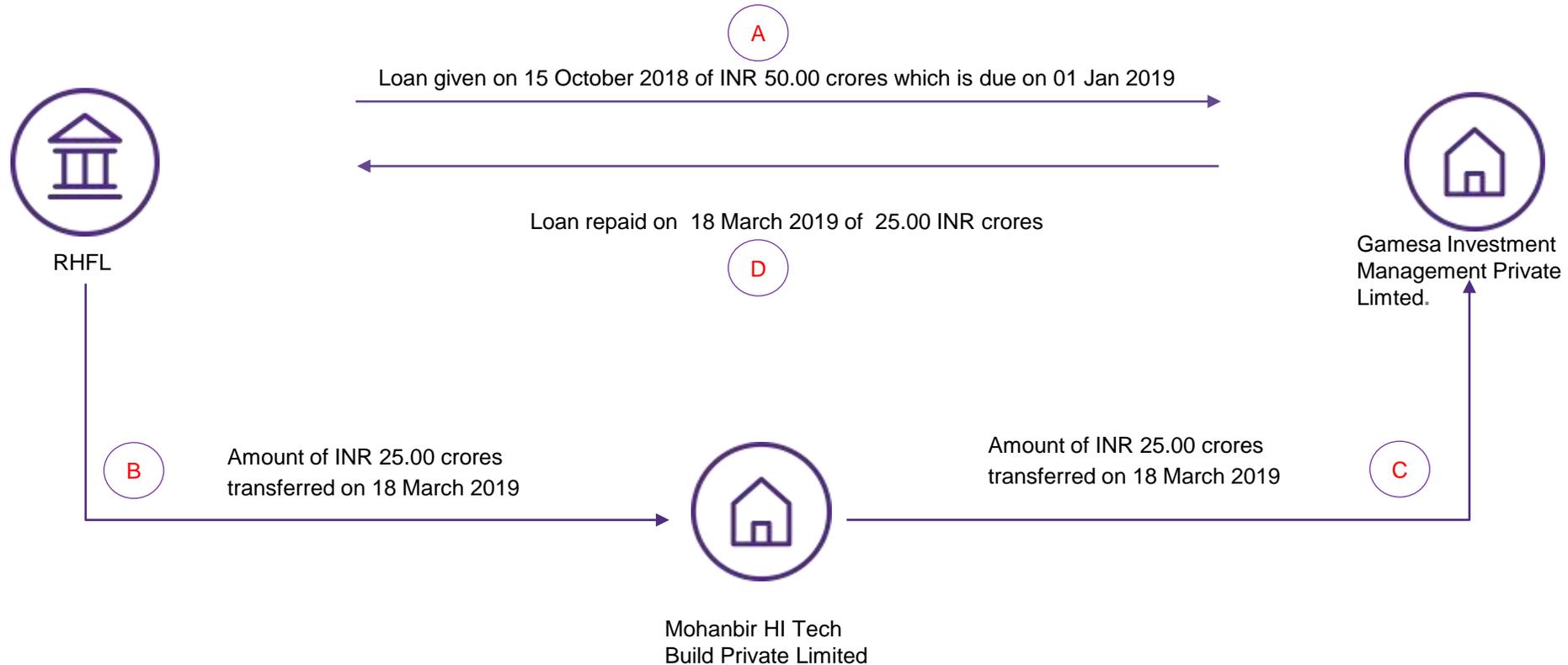
Transaction Date	Description	Debit	Credit
30-May-18	NEFT Cr-ICIC0000393-SPECIES COMMERCE AND TRADE PRIVATE-RELIANCW HOME FINANCE LTD-ICICR52018053000685791		47.29

\*Note: Information pertaining to this transaction ("RTGS DR-ICIC0000004-NOIDAGLOBAL30438") was provided by the Target Entity, as we were unable to trace the same in the bank statements

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 13

On 18 March 2019, Target Entity extended a GPCL to Mohanbir HI Tech Build Private Limited which was potentially used to repay the existing loan of Gamesa Investment Management Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

**C** Information pertaining to this transaction was provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 13 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer name	Disbursed Amount	Nature of Loan
18-Oct-18	RHWCCOR000074020	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	50.00	RHF -GENERAL PURPOSE CORPORATE LOAN
20-Mar-19	RHWCCOR000074826	MOHANBIR HI TECH BUILD PRIVATE LIMITED	25.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
961585	37150983	RHWCCOR000074020	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	25.00	18-Mar-19

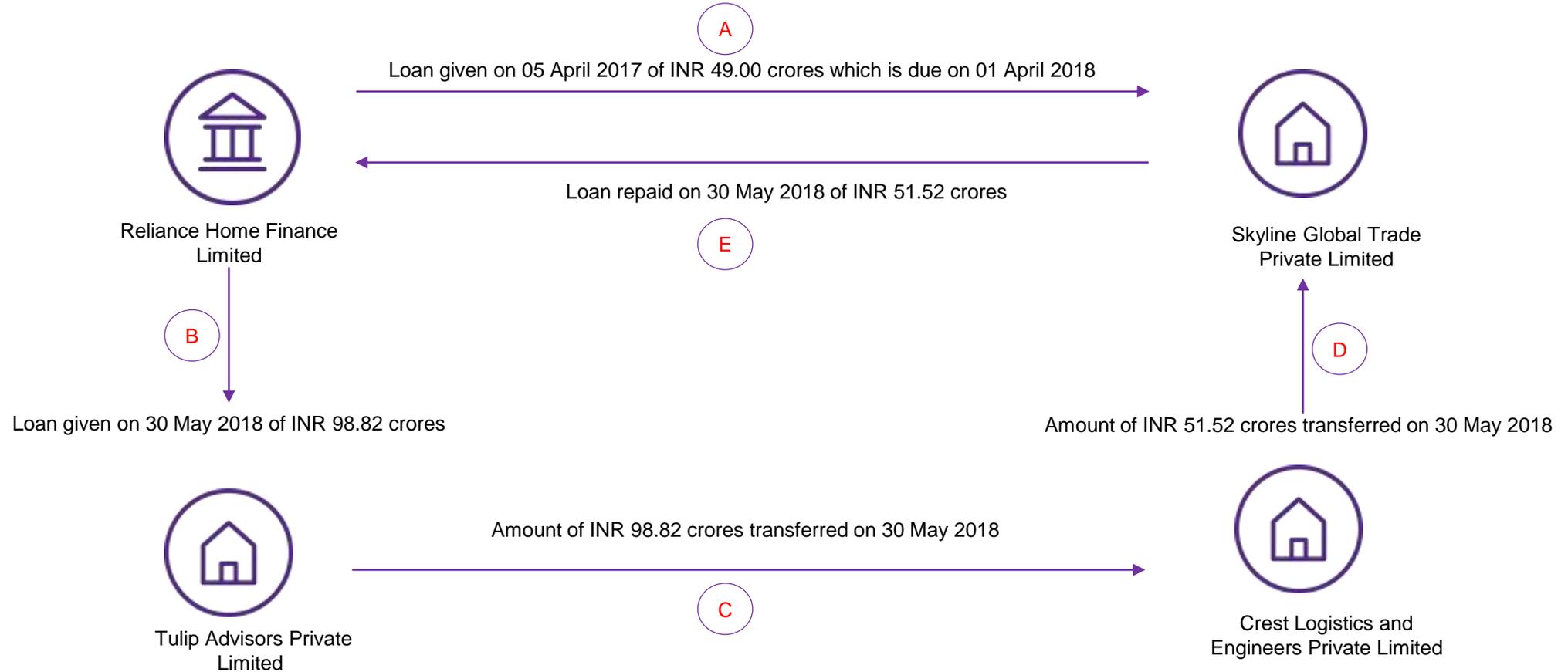
#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
15-Oct-2018	FT-00600310036526-GAMESA INVESTMENTMANAGEMENT P	50.00	
18-Mar-2019	12345 MOHANBIR	25.00	
18-Mar-2019	FT-00600310036526-GAMESA INVESTMENTMANAGEMENT P		25.00

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 14

On 30 May 2018, Target Entity extended a GPCL to Tulip Advisors Private Limited which was potentially used to repay the existing loan of Skyline Global Trade Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347 and 00600310022398

**(C) (D)** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 14 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
31-Aug-2017	RHWCCOR000058875	SKYLINE GLOBAL TRADE PRIVATE LIMITED	49.00	RHF -GENERAL PURPOSE CORPORATE LOAN
30-May-2018	RHWCCOR000070698	TULIP ADVIOSRS PRIVATE LIMITED	98.82	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
921823	35311470	RHWCCOR000058875	SKYLINE GLOBAL TRADE PRIVATE LIMITED	51.52	30-May-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
05-Apr-17	RTGS DR-ICIC0000004-SKYLINEGLOB27308	49.00	
30-May-18	RTGS DR-ICIC0000004-TULIP ADVISROSPRIVATELIMITED-SONAWALA,MUM-HDFCR52018053080219	98.82	

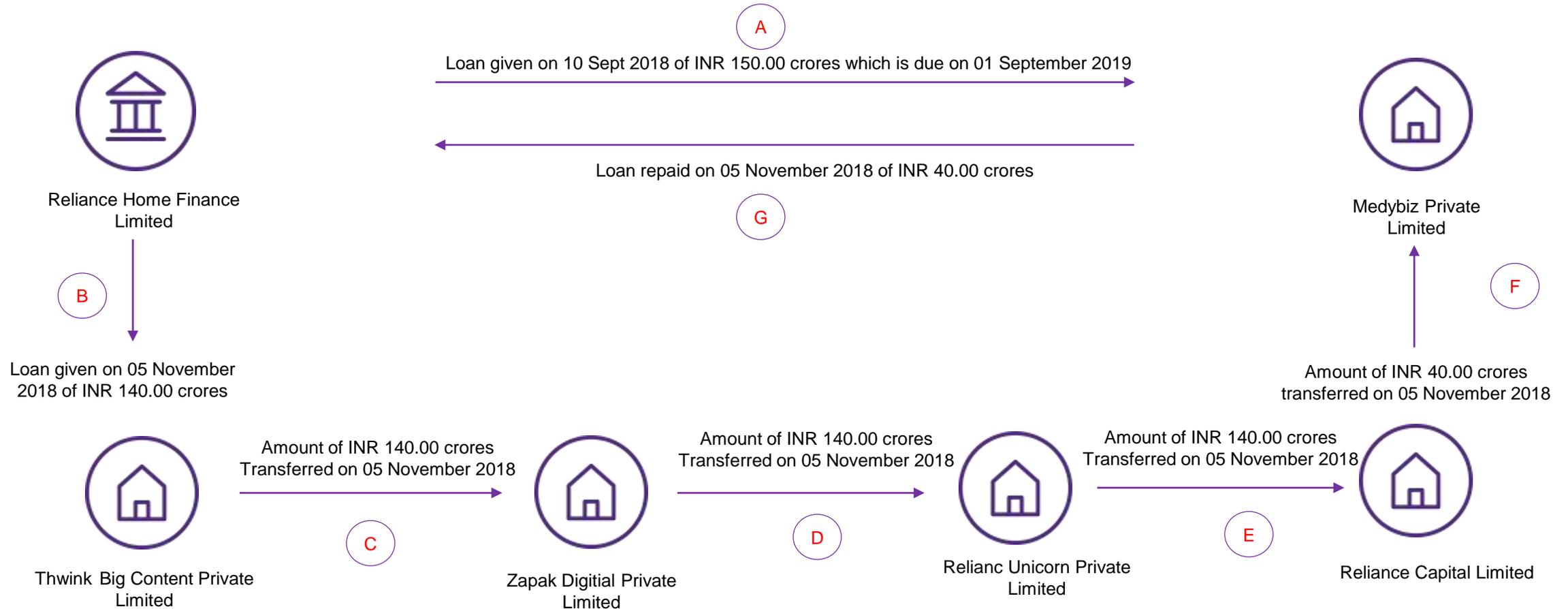
#### Bank Account entries HDFC Bank 00600310022398

Transaction Date	Description	Debit	Credit
30-May-18	RTGS Cr-ICIC0000393-SKYLINE GLOBAL TRADE PRIVATE LIMITED-RELIANCE HOME FINANCE LTD-ICICR52018053000685714		51.52

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 15

On 05 November 2018, Target Entity extended a GPCL to Thwink Big Content Private Limited which was potentially used to repay the existing loan of Medybiz Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B

2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

**C D E F** Information pertaining to these transactions were provided by the Target Entity

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Observation: Case 15 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
11-Sep-2018	RHWCCOR000073122	MEDYBIZ PRIVATE LIMITED	150.00	RHF -GENERAL PURPOSE CORPORATE LOAN
13-Nov-2018	RHWCCOR000074178	THWINK BIG CONTENT PRIVATE LIMITED	140.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
958373	36659706	RHWCCOR000073122	MEDYBIZ PRIVATE LIMITED	40.00	05-Nov-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
10-Sept-18	FT-00600310009648-MEDYBIZ PRIVATELIMITED	150.00	
05-Nov-18	RTGS DR-YESB000010-THWINK BIG CONTENTPVTLTD-SONAWALA,MUM-HDFCR52018110551176160	140.00	
05-Nov-18	FT-00600310009648-MEDYBIZ PRIVATELIMITED		40.00

## 4.2 PILE - Potential Evergreening of loans (Contd.)

### Management response:

- a. We do not agree with the observation alleging 'evergreening' of loans. The loans sanctioned to the said borrowers referred to in the draft report are misinterpreted as evergreening.
- b. As is evident from the above table referred in the report:
  - (i) The new loans have been extended to distinctly separate borrowers based on the merits of each case, with distinct terms and conditions
  - (ii) It may also be noted that the security considered for the new loans is relatively better for most of the cases; with additional security by way of subservient charge on receivables of Reliance Infrastructure Limited ('RInfra') along with corporate guarantee of RInfra in most of the cases

There has been no violation of any regulatory norms in relation to the said loans.

*Note: Management response is reproduced in full as provided by the company.*

# PILE - Potential circular transactions

## 4.3 PILE - Potential Circular Transactions

### Observation:

- On reviewing the repayment pattern of GPCL borrowers, it appears that loans were disbursed to new borrowers by the Target Entity which were potentially utilized for repayment of the outstanding loan facility taken by the existing borrowers.
- Such instances were identified by comparing the date of disbursement of new loan viz-a-viz the date of repayment of existing loan in the central disbursement, collection account and bank statements respectively. Transaction wise details are presented in the following slides.

Instances of potential circular transactions of loans disbursed to PILE;

For details of such instances please refer next slides.

#	Fresh loans borrowers	No of Loans	Amount
1	Citi Securities and financial services Private Limited	1	220.80
2	Vinayak Ventures Private Limited	1	210.00
	<b>Total</b>	<b>2</b>	<b>430.80</b>

#	Existing loan borrowers	No of Loans	Amount
1	Azalia Distribution Private Limited	2	211.00
2	Arion Movie Productions Private Limited	1	201.89
	<b>Total</b>	<b>3</b>	<b>412.89</b>

Instances of potential circular transactions of loans disbursed to entities other than PILE (For details refer section 6.1 of the report)

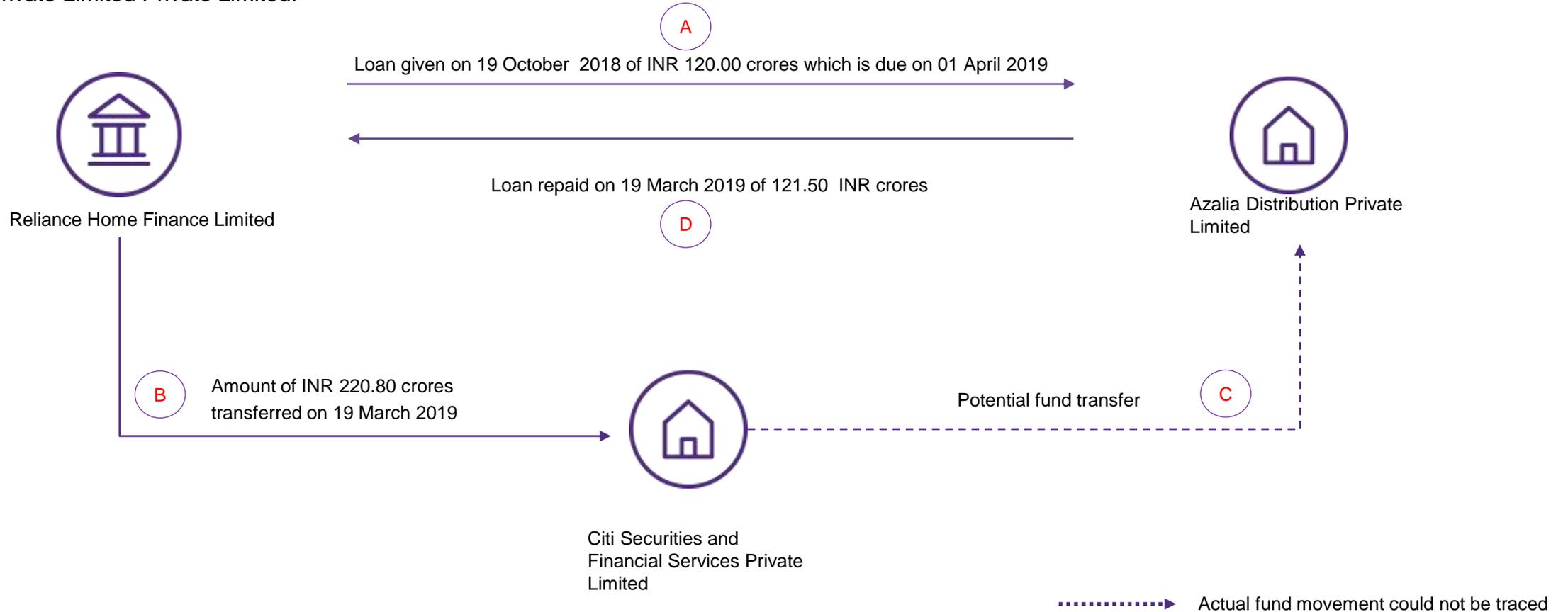
#	Fresh loans borrowers	No of Loans	Amount
1	Bliss Enterprise Private Limited	1	60.00
2	Visa Capital Partners	1	20.00
	<b>Total</b>	<b>2</b>	<b>80.00</b>

#	Existing loan borrowers	No of Loans	Amount
1	RAB Enterprises India Private Limited	1	60.00
2	Woodstock Realities Private Limited	1	20.00
	<b>Total</b>	<b>5</b>	<b>80.00</b>

## 4.3 PILE - Potential Circular Transactions (Contd.)

### Observation: Case 1

On 19 March 2019, Target Entity extended a GPCL to Citi Securities and Financial Services Limited which was potentially used to repay the existing loan of Azalia Distribution Private Limited Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347 and 006310022433

## 4.3 PILE - Potential Circular Transactions (Contd.)

### Observation: Case 1 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
29-Oct-2018	RHWCCOR000074082	AZALIA DISTRIBUTION PRIVATE LIMITED	120.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22-Mar-2019	RHWCCOR000074843	CITI SECURITIES AND FINANCIAL SERVICES PRIVATE LIMITED	220.80	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
962640	37227672	RHWCCOR000074082	AZALIA DISTRIBUTION PRIVATE LIMITED	121.50	19-Mar-19

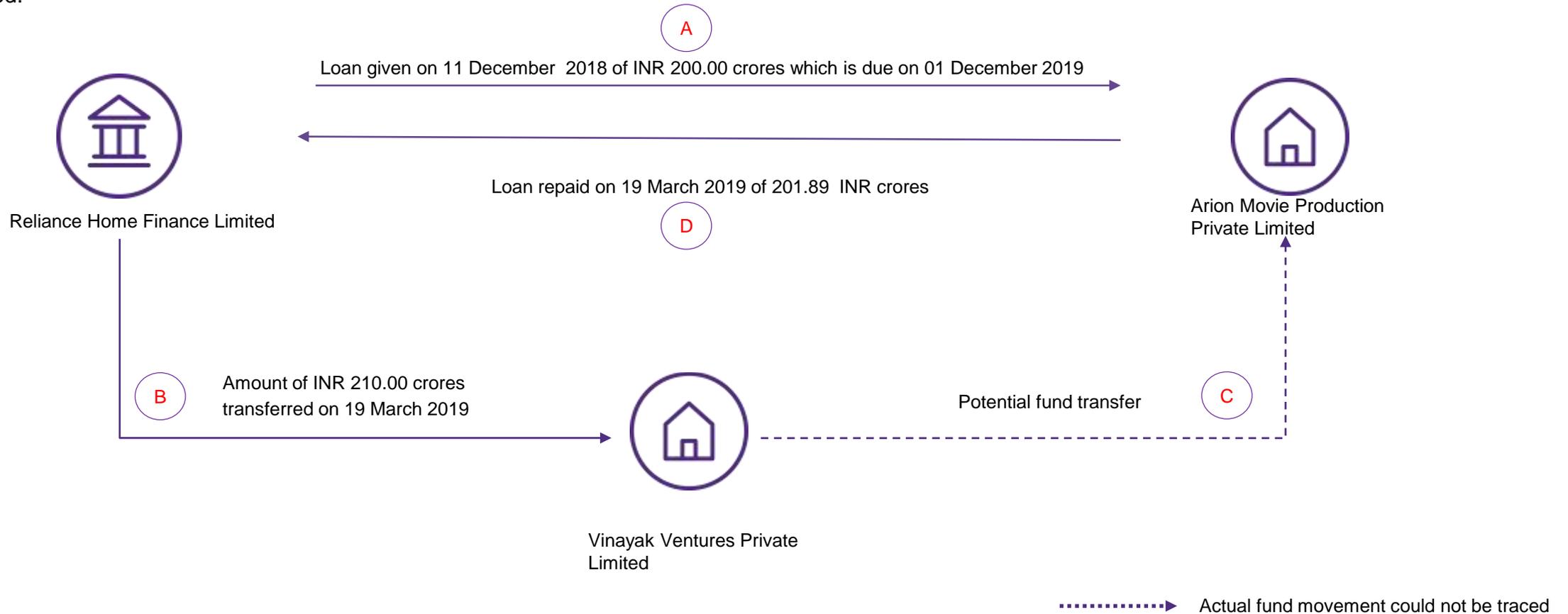
#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
05-Nov-18	FT-00600310027252-AZALIA DISTRIBUTIONPRIVATE LI	90.00	
19-Mar-19	FT-00602020002105-CITI SECURITIES ANDFINANCIAL	220.00	
19-Mar-19	FT-00602020002105-CITI SECURITIES ANDFINANCIAL	0.80	
19-March-19	FT-00600310027252-AZALIA DISTRIBUTIONPRIVATE LI		211.00

## 4.3 PILE - Potential Circular Transactions (Contd.)

### Observation: Case 2

On 19 March 2019, Target Entity extended a GPCL to Vinayak Ventures Private Limited which was potentially used to repay the existing loan of Arion Movie Production Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347 and 006310022433

## 4.3 PILE - Potential Circular Transactions (Contd.)

### Observation: Case 2 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
12-Dec-2018	RHWCCOR000074354	ARION MOVIE PRODUCTIONS PRIVATE LIMITED	200.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22-Mar-2019	RHWCCOR000074842	VINAYAK VENTURES PRIVATE LIMITED	210.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
963928	37227682	RHWCCOR000074354	ARION MOVIE PRODUCTIONS PRIVATE LIMITED	201.89	19-Mar-19

#### Bank account entries Bank-911020038138411

Transaction Date	Description	Debit	Credit
11-Dec-18	RTGS/SK/UTIBR52018121100352899/124/ARION MOVIE PR	200.00	

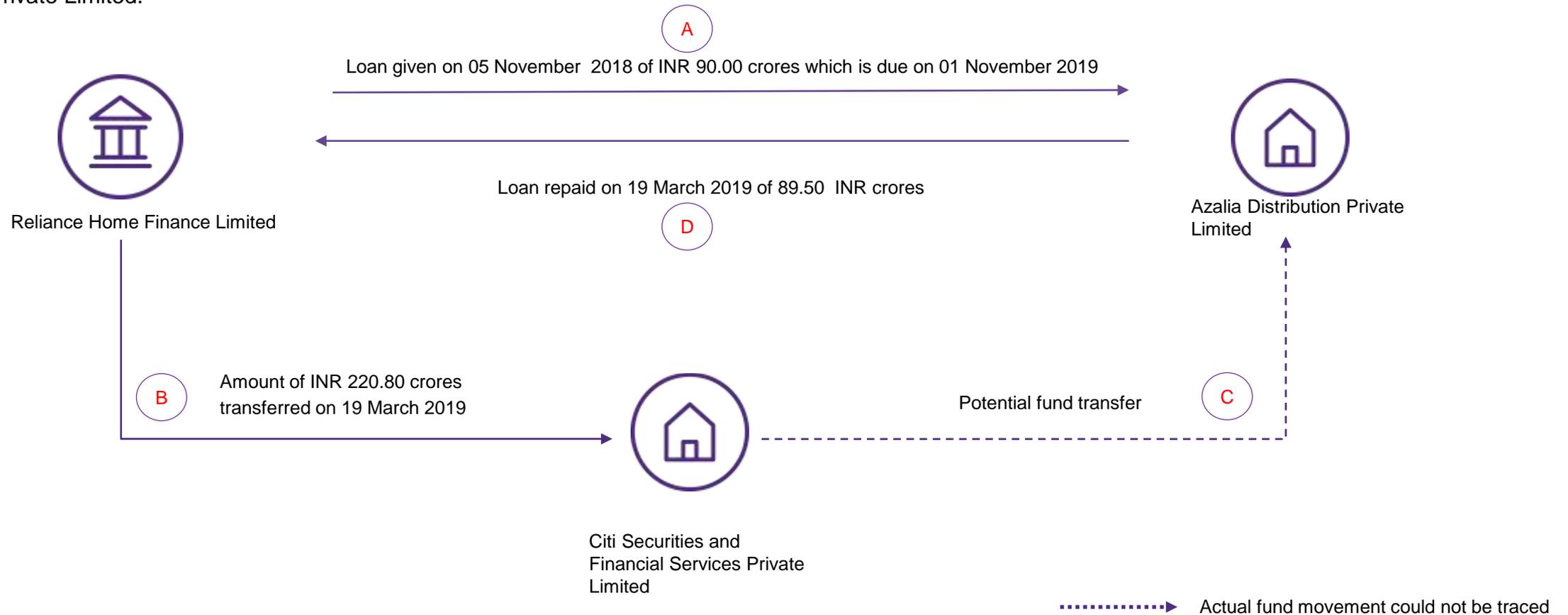
#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
19-Mar-19	NEFT DR-ICIC0000393-VINAYAK VENTURES PVT LTD-SONAWALA MUM-N078190779504368	210.00	
19-Mar-19	FT-57500000309130-ARION MOVIEPRODUCTIONS PVT LT		201.89

## 4.3 PILE - Potential Circular Transactions (Contd.)

### Observation: Case 3

On 19 March 2019, Target Entity extended a GPCL to Citi Securities and Financial Services Limited which was potentially used to repay the existing loan of Azalia Distribution Private Limited.



Note: 1. For nature of relationship for potentially indirectly linked entities, please refer exhibit 1A & 1B  
 2. The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – 00600310022347

## 4.3 PILE - Potential Circular Transactions (Contd.)

### Observation: Case 3 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
06-Nov-2018	RHWCCOR000074172	AZALIA DISTRIBUTION PRIVATE LIMITED	90.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22-Mar-2019	RHWCCOR000074843	CITI SECURITIES AND FINANCIAL SERVICES PRIVATE LIMITED	220.80	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
962920	37227679	RHWCCOR000074172	AZALIA DISTRIBUTION PRIVATE LIMITED	89.50	19-Mar-19

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
05-Nov-18	FT-00600310027252-AZALIA DISTRIBUTIONPRIVATE LI	90.00	
19-Mar-19	FT-00602020002105-CITI SECURITIES ANDFINANCIAL	220.00	
19-Mar-19	FT-00602020002105-CITI SECURITIES ANDFINANCIAL	0.80	
19-Mar-19	FT-00600310027252-AZALIA DISTRIBUTIONPRIVATE LI		211.00

## 4.3 PILE - Potential Circular Transactions (Contd.)

### Management response:

- a. The construct of PILE as mentioned in the report is misconstrued as we have represented in the earlier replies.
- b. With respect to the observation herein on circular transaction, we reiterate the following;
  - (i) The new loans have been extended to distinctly separate borrowers based on the merits of each case, with distinct terms and conditions.
  - (ii) It may also be noted that the security considered for the new loans is relatively better for most of the cases; with additional security by way of subservient charge on receivables of Reliance Infrastructure Limited ("R'Infra) along with corporate guarantee of RInfra in most of the cases

Accordingly, there has been no violation of any regulatory norms in relation to the said loans.

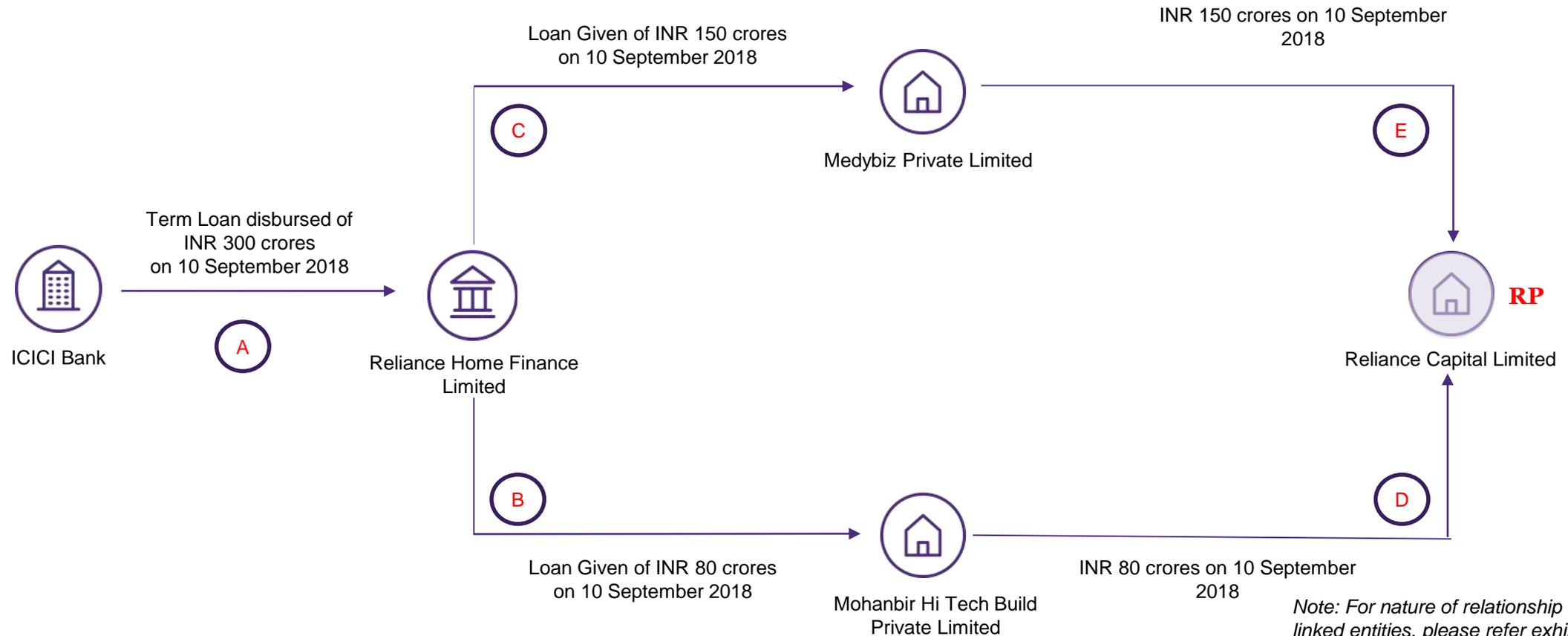
*Note: Management response is reproduced in full as provided by the company.*

# Proceeds of term loan indirectly transferred to related party through PILE

## 4.4 Proceeds of term loan indirectly transferred to related party through PILE

### Observation:

- On review of the Term Loan obtained by the Target Entity on 10 September 2018 from ICICI Bank of INR 300 crores towards 'onward lending business of the company', it appears that an amount aggregating to INR 230 crores was transferred to potential indirectly linked entities ('Medybiz Private Limited' and 'Mohanbir Hi Tech Build Private Limited') as general purpose corporate loans which was then further transferred to 'Reliance Capital Limited' on the same day. Pictorial representation of these transactions are provided below:



**(D) (E)** Information pertaining to these transactions were provided by the Target Entity

**RP** - Related Party

## 4.4 Proceeds of term loan indirectly transferred to related party through PILE (Contd.)

### Observation:

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
11 Sept 2018	11 Sept 2018	RHWCCOR000073124	Mohanbir Hi Tech Private Limited	80.00	80.00	RHF -GENERAL PURPOSE CORPORATE LOAN
11 Sept 2018	11 Sept 2018	RHWCCOR000073122	Medybiz Private Limited	150.00	150.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

(INR in crores)

Transaction Date	Description	Debit	Credit
10-Sep-2018	RTGS Cr-ICIC0000393-RELIANCE HOME FINANCE LIM		300.00
10-Sep-2018	FT-00600310037908-MOHANBIR HI-TECH BUILD PRIVA	80.00	
10-Sep-2018	FT-00600310009648-MEDYBIZ PRIVATE LIMITED	150.00	

## 4.4 Proceeds of term loan indirectly transferred to related party through PILE (Contd.)

### Management response:

While we do not agree with the conclusion on the alleged linkage of entities and the basis of classification of the entities as potential indirectly linked entities, the GT draft report has not taken into account the finding of the Company's statutory auditors as reported in their Audit Report for the financial year 2018-19, the excerpts whereof are reproduced as under:

*"...The Company did not raise any money by way of initial public offer or further public offer (including debt instruments) during the year. In our opinion and according to the information and explanation provided to us, the money raised by way of term loans during the year generally have been applied for the purposes for which they were obtained"*

**Proceeds of commercial paper indirectly transferred to group entities/related party through PILE**

## 4.5 Proceeds of commercial paper indirectly transferred to group entities through PILE

On review of commercial paper issued by Target Entity during our review period it appears that INR 1055.40 crores were transferred to Potential Indirectly Linked Entities ('PILE') as general purpose corporate loans which were eventually transferred to group companies or related parties of the Target. Details of each such instances is provide in subsequent slides.

(INR in crores)

Funds received from issuance of commercial papers

#	Investor	Amount
1	Invesco Mutual Fund	198.95
2	Union Bank Of India	439.93
3	Yes Bank	493.26
	<b>Grand Total</b>	<b>1,132.14</b>



Loans disbursed to PILE

#	Loans to PILE	Amount
1	Adhar Project Management and Consultancy	95.00
2	Crest Logistics and Engineers Private Limited	41.50
3	Indian Agri Services Private Limited	198.00
4	Pifinity Movies Private Limited	175.00
5	Reliance Big Entertainment Private Limited	43.48
6	RPL Aditya Power Private Limited	19.76
7	RPL Solar Power Private Limited	83.98
8	RPL Star Power Private Limited	98.80
9	RPL Surya Power Private Limited	63.24
10	Skyline Global Trade Private Limited	137.84
11	Species Commerce and Trade Private Limited	49.40
12	Worldcom Solutions Limited	49.40
	<b>Grand Total</b>	<b>1,055.40</b>

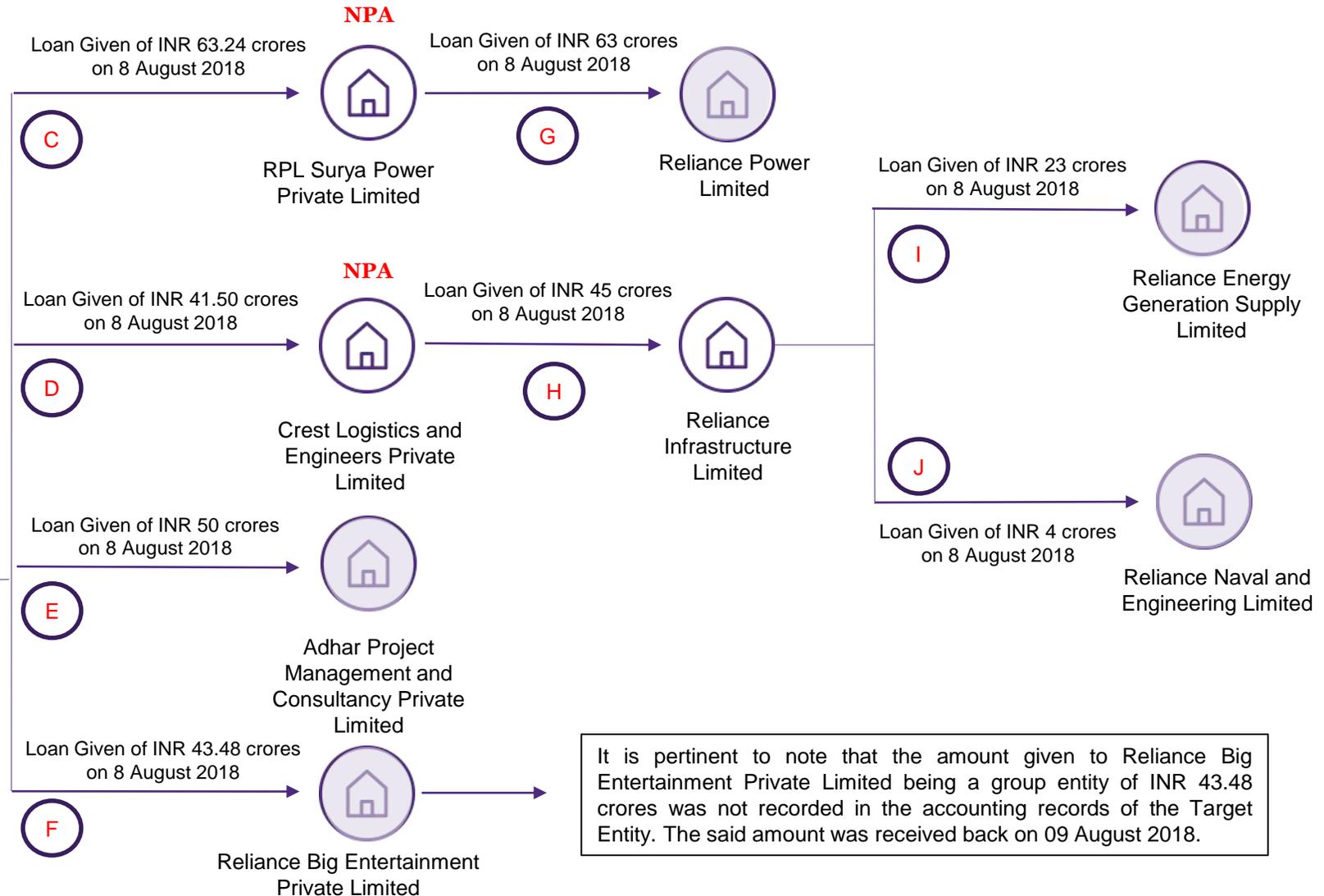
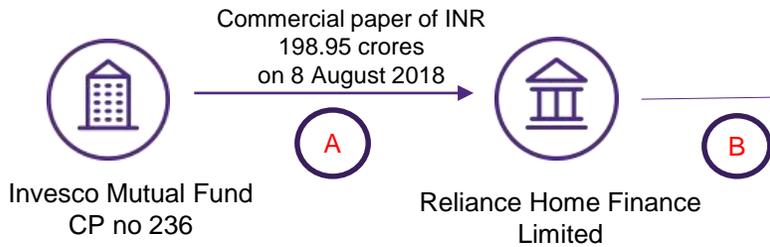
Onward lending to group companies / related party

#	Name	Nature	Amount
1	Reliance Big Entertainment Private Limited	Group Co.	43.48
2	Reliance Business Broadcast News Holding Limited	Group Co.	198.00
3	Reliance Commercial Finance Limited	Related Party	175.00
4	Reliance Energy Generation and Supply Limited	Group Co.	23.00
5	Reliance Infrastructure Limited	Group Co.	433.29
6	Reliance Navel and Engineering Private Limited	Group Co.	4.00
7	Reliance Power Limited	Group Co.	63.00
	<b>Grand Total</b>		<b>939.77</b>

# 4.5 Proceeds of commercial paper indirectly transferred to group entities through PILE (Contd.)

## Observation: Case 1

On review of Commercial Paper issued by the Target Entity on 8 Aug 2018 to Invesco Mutual Funds of INR 198.95 crores, it appears that amount aggregating to INR 198.22 crores was transferred to potentially indirectly linked entities ('RPL Surya Power Private Limited', 'Crest Logistics and Engineers Private Limited', 'Adhar Project Management and Consultancy Private Limited' and 'Reliance Big Entertainment Private Limited') as general purpose corporate loans. Further, loans aggregating to INR 90 crores was transferred from these entities to 'Reliance Power Limited', Reliance Energy Generation Supply Limited and Reliance Naval and Engineering Limited. Pictorial representation of these transactions is provided below:



It is pertinent to note that the amount given to Reliance Big Entertainment Private Limited being a group entity of INR 43.48 crores was not recorded in the accounting records of the Target Entity. The said amount was received back on 09 August 2018.

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**G H I J** Information pertaining to these transactions were provided by the Target Entity | **NPA** – Non-Performing Asset as on 31 October 2019

## 4.5 Proceeds of commercial paper indirectly transferred to group entities through PILE (Contd.)

### Observation: Case 1 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
9 August 2018	9 August 2018	RHWCCOR000072378	RPL Surya Power Private Limited	63.24	64.00	RHF -GENERAL PURPOSE CORPORATE LOAN
8 August 2018	8 August 2018	RHWCCOR000072374	Crest Logistics and Engineers Private Limited	41.50	42.00	RHF -GENERAL PURPOSE CORPORATE LOAN
8 August 2018	8 August 2018	RHWCCOR000072373	Adhar Project Management and Consultancy Private Limited	50.00	50.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

(INR in crores)

Transaction Date	Description	Debit	Credit
8 August 2018	RTGS CR-ICIC0000393-RELIANCE HOMEFIN-RELIANCE HOME FINANCELTD-ICICR52018080800333809		198.95
8 August 2018	NEFT DR-ICIC0000151-RPL SURYA POWER PVTLTD-SONAWALA,MUM-N220180605229331	63.24	
8 August 2018	NEFT DR-ICIC0000004-CREST LOGISTICS ANDENGINEERS PVT	41.50	
8 August 2018	FT-00600310017296-ADHAR PROJECTMANAGEMENT AND C	50.00	
8 August 2018	NEFT DR-YESB0000010-RELIANCE BIGENTERTAINMENT PVTLTD-SONAWALA,MUM-N220180605201519	43.48	

## 4.5 Proceeds of commercial paper indirectly transferred to group entities through PILE (Contd.)

### Observation: Case 1 (Contd.)

#### Bank Account entries HDFC Bank 00600310022347 for Reliance Big Entertainment Private Limited

Transaction Date	Description	Debit	Credit
08-Aug-18	NEFT DR-YESB0000010-RELIANCE BIGENTERTAINMENT PVT LTD-SONAWALA,MUM-N220180605201519	43.48	

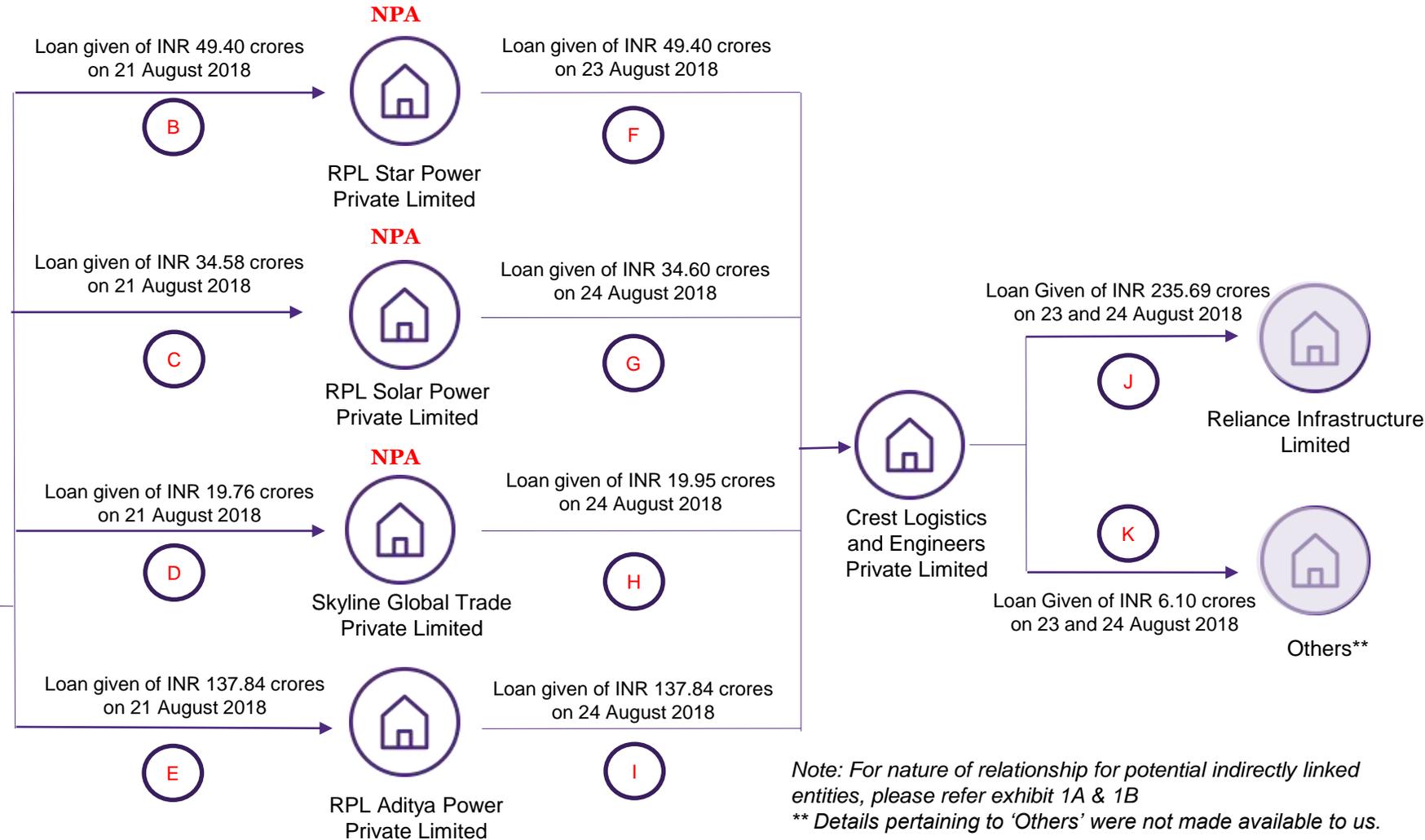
#### Bank Account entries HDFC Bank 00600310022433 for Reliance Big Entertainment Private Limited

Transaction Date	Description	Debit	Credit
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		5.00
09-Aug-18	FT-00600310013080-RELIANCE BIGENTERTAINMENT PVT		3.48

# 4.5 Proceeds of commercial paper indirectly transferred to group entity through PILE (Contd.)

## Observation: Case 2

On review of Commercial Paper issued by the Target Entity on 21 Aug 2018 to Union Bank of India of INR 244.85 crores, it appears that amount aggregating to INR 241.58 crores was transferred to potential indirectly linked entities ('RPL Star Power Private Limited', 'RPL Solar Power Private Limited', 'Skyline Global Trade Private Limited' and 'RPL Aditya Power Private Limited') as general purpose corporate loans which further was transferred to 'Crest Logistics and Engineers Private Limited, which is also a potential indirectly linked entity. Further, it appears that an amount aggregating to INR 241.79 crores was transferred from Crest Logistics and Engineers Private Limited to Reliance Infrastructure Limited. Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B  
 \*\* Details pertaining to 'Others' were not made available to us.

(F) (G) (H) (I) (J) (K) Information pertaining to these transactions were provided by the Target Entity | NPA – Non Performing Asset as on 31 October 2019

## 4.5 Proceeds of commercial paper indirectly transferred to group entity through PILE (Contd.)

### Observation: Case 2 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
24 August 2018	24 August 2018	RHWCCOR000072659	RPL Star Power Private Limited	49.40	50.00	RHF -GENERAL PURPOSE CORPORATE LOAN
24 August 2018	24 August 2018	RHWCCOR000072660	RPL Solar Power Private Limited	34.58	35.00	RHF -GENERAL PURPOSE CORPORATE LOAN
24 August 2018	24 August 2018	RHWCCOR000072658	Skyline Global Trade Private Limited	19.76	20.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22 August 2018	22 August 2018	RHWCCOR000072661	RPL Aditya Power Private Limited	137.84	139.5	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

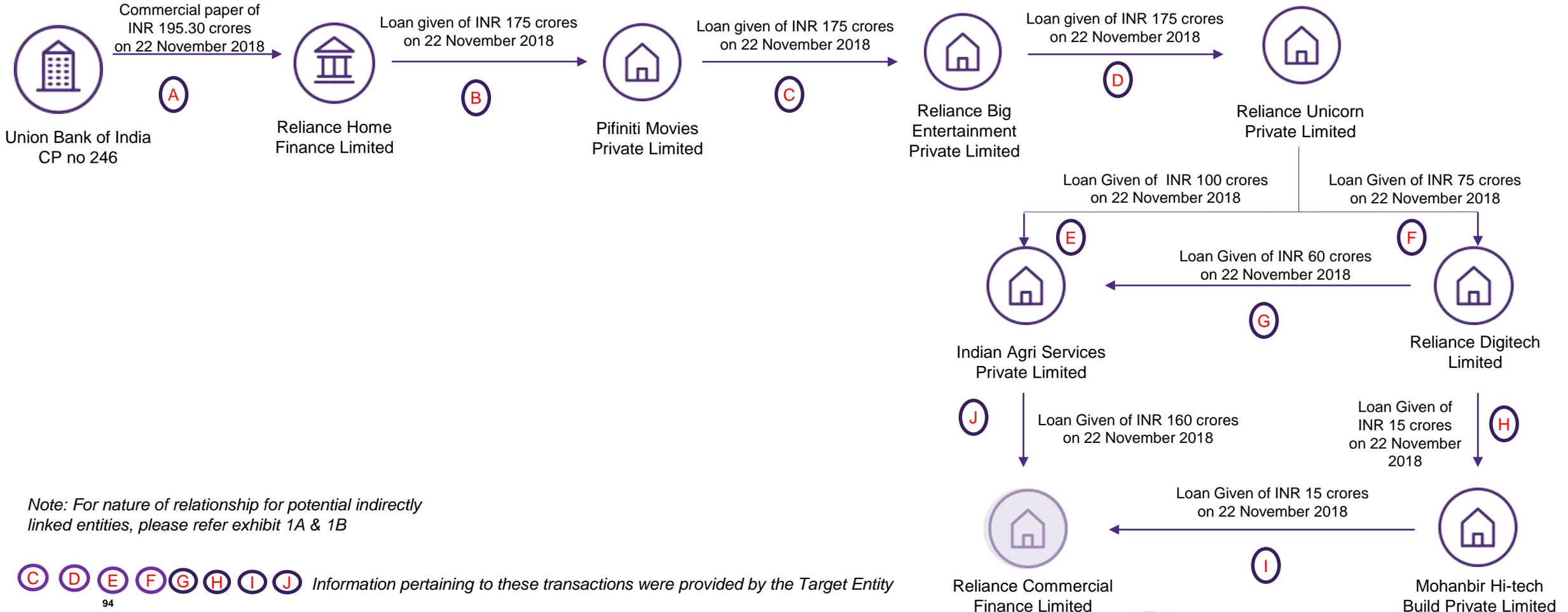
(INR in crores)

Transaction Date	Description	Debit	Credit
24 August 2018	RTGS CR-ICIC0000393-RELIANCE HOME FINLTD COMM PAPER A-RELIANCE HOME FINANCELTD-ICICR52018082400325887		244.63
24 August 2018	RTGS DR-ICIC0000151-RPL STAR POWER PVTLTD-SONAWALA,MUM-HDFCR52018082491305274	49.40	
24 August 2018	RTGS DR-ICIC0000151-RPL SOLAR POWER PVTLTD-SONAWALA,MUM-HDFCR52018082491305670	34.58	
24 August 2018	RTGS DR-ICIC0000004-SKYLINE GLOBAL TRADEPVTLTD-SONAWALA,MUM-HDFCR52018082491306036	19.76	
24 August 2018	RTGSDR-YESB0000267-RPLADITYAPOWERPVTLTD-NETBANK, MUM-HDFCR52018082491421520	137.84	

# 4.5 Proceeds of commercial paper indirectly transferred to related party through PILE (Contd.)

## Observation: Case 3

On review of Commercial Paper issued by the Target Entity on 22 November 2018 to Union Bank of India of INR 196.30 crores, it appears that INR 175 crores was transferred through potentially indirectly linked entities as general purpose corporate loans to Reliance Unicorn Private Limited, also a potential indirectly linked entity. It appears that this amount was further transferred through other potential indirectly linked entities to Reliance Commercial Finance Limited. Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**C D E F G H I J** Information pertaining to these transactions were provided by the Target Entity

## 4.5 Proceeds of commercial paper indirectly transferred to related party through PILE (Contd.)

### Observation: Case 3 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
27 November 2018	27 November 2018	RHWCCOR000074283	Pifiniti Movies Private Limited	175.00	175.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

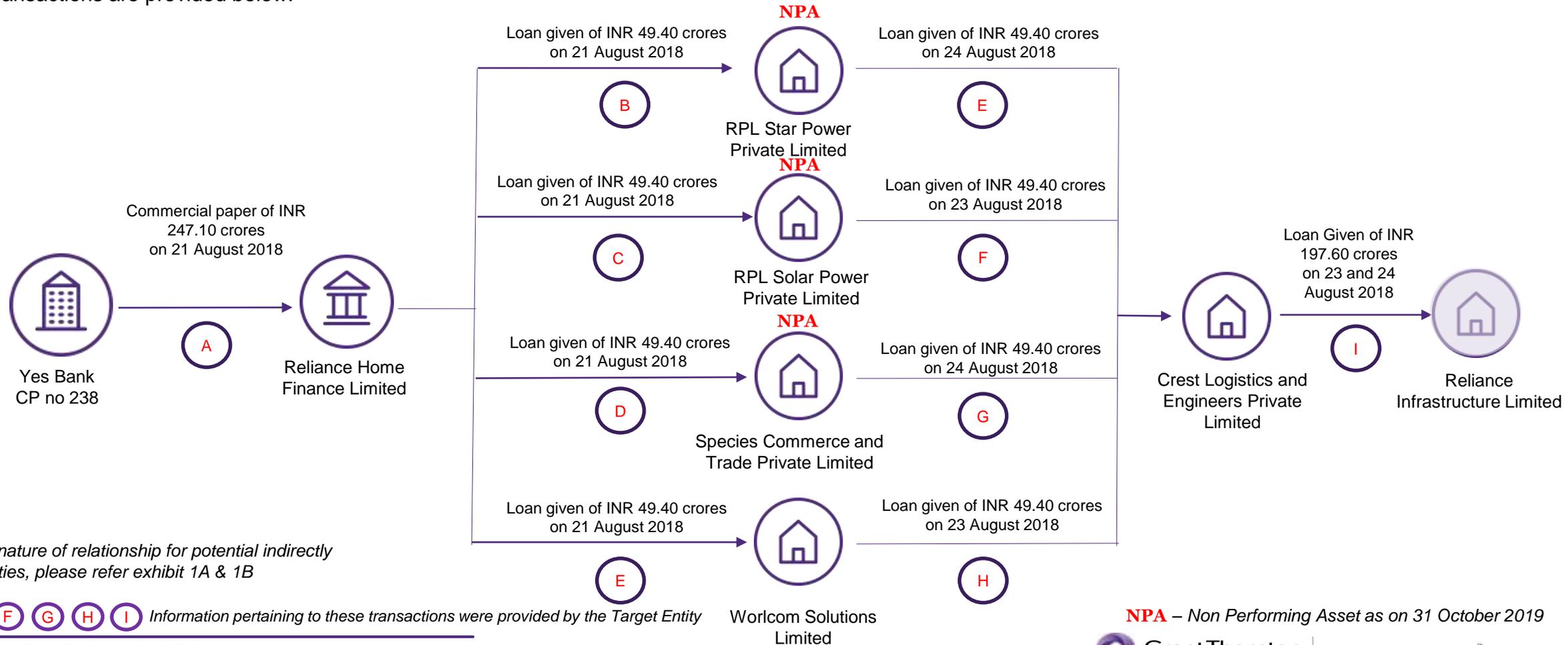
(INR in crores)

Transaction Date	Description	Debit	Credit
22 November 2018	RTGS CR-ICIC0000393-RELIANCE HOMEFIN-RELIANCE HOME FINANCELTD-ICICR52018112200573000		195.30
22 November 2018	FT-50200034873339-PIFINITI MOVIESPRIVATE LIMITE	145.00	
22 November 2018	FT-50200034873339-PIFINITI MOVIESPRIVATE LIMITE	23.00	
22 November 2018	FT-50200034873339-PIFINITI MOVIESPRIVATE LIMITE	7.00	

## 4.5 Proceeds of commercial paper indirectly transferred to group entity through PILE (Contd.)

### Observation: Case 4

On review of Commercial Paper issued by the Target Entity on 21 August 2018 to Yes Bank of INR 247.10 crores, it appears that amount aggregating to INR 197.60 crores was transferred to potential indirectly linked entities ('RPL Star Power Private Limited', 'RPL Solar Power Private Limited', 'Species Trade and Commerce Private Limited' and 'Worldcom Solutions Limited') as general purpose corporate loans, which further was transferred to 'Crest Logistics and Engineers Private Limited (potential indirectly linked entity)'. Further, the same amount was transferred from Crest Logistics and Engineers Private Limited to Reliance Infrastructure Limited. Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**E F G H I** Information pertaining to these transactions were provided by the Target Entity

Worldcom Solutions Limited

**NPA** – Non Performing Asset as on 31 October 2019

## 4.5 Proceeds of commercial paper indirectly transferred to group entity through PILE (Contd.)

### Observation: Case 4 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
22 August 2018	22 August 2018	RHWCCOR000072588	RPL Star Power Private Limited	49.40	50.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22 August 2018	22 August 2018	RHWCCOR000072590	RPL Solar Power Private Limited	49.40	50.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22 August 2018	22 August 2018	RHWCCOR000072587	Species Commerce and Trade Private Limited	49.40	50.00	RHF -GENERAL PURPOSE CORPORATE LOAN
22 August 2018	22 August 2018	RHWCCOR000072586	Worldcom Solutions Limited	49.40	50.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

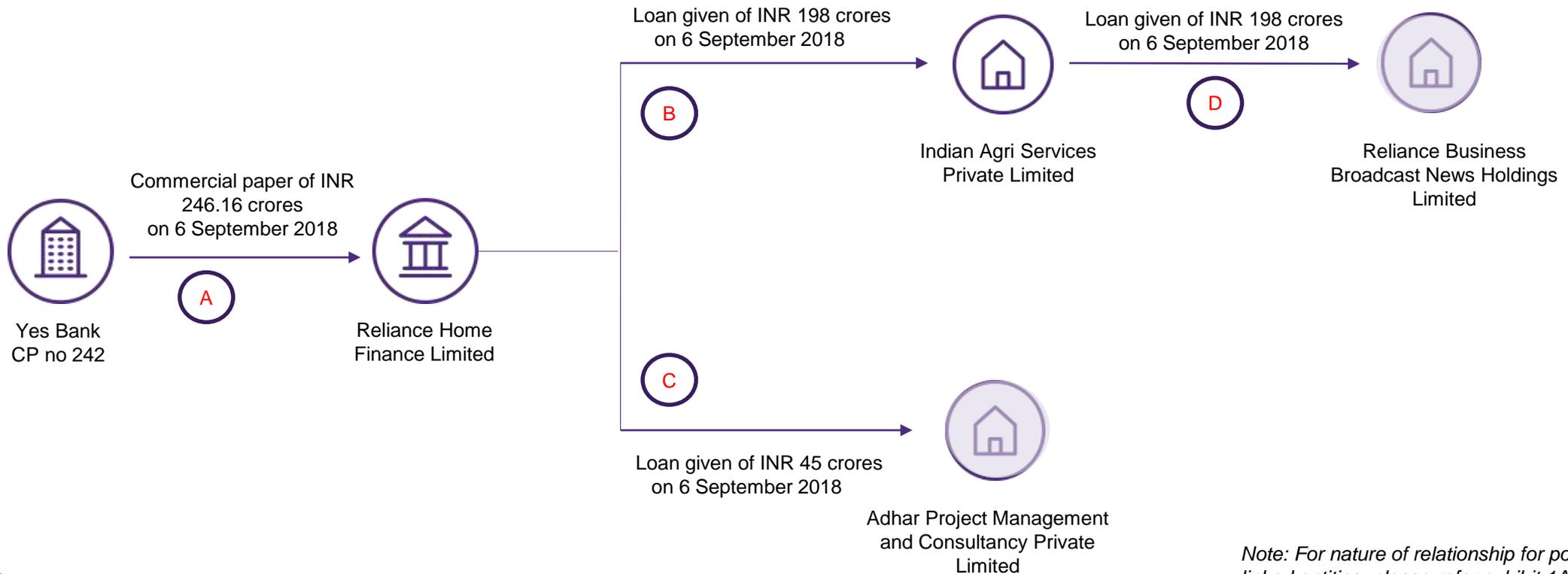
(INR in crores)

Transaction Date	Description	Debit	Credit
21 August 2018	RTGS CR-ICIC0000393-RELIANCE HOMEFIN-RELIANCE HOME FINANCELTD-ICICR52018062500260549		247.10
21 August 2018	NEFT DR-ICIC0000004-SPIECIES COMMERCEAND TRADE PVTLTD-SONAWALA,MUM-N233180614176606	49.40	
21 August 2018	NEFT DR-ICIC0000151-RPL STAR POWER PVTLTD-SONAWALA,MUM-N233180614173990	49.40	
21 August 2018	NEFT DR-ICIC0000151-RPL SOLAR POWER PVTLTD-SONAWALA,MUM-N233180614173957	49.40	
21 August 2018	NEFT DR-ICIC0000004-WORLDCOM SOLUTIONSLTD-SONAWALA,MUM-N233180614176586	49.40	

## 4.5 Proceeds of commercial paper indirectly transferred to group entity through PILE

### Observation: Case 5

On review of Commercial Paper issued by the Target Entity on 06 September 2018 to Yes Bank of INR 246.16 crores, it appears that an amount aggregating to INR 243 crores was transferred to potential indirectly linked entities ('Indian Agri Services Private Limited' and 'Adhar Project Management Consultancy Private Limited') as general purpose corporate loans. Further, it appears that INR 198 crores was transferred from Indian Agri Services Private Limited to Reliance Business Broadcast News Holding Limited'. Pictorial representation of these transactions are provided below:



**(D)** Information pertaining to this transaction was provided by the Target Entity

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

## 4.5 Proceeds of commercial paper indirectly transferred to group entity through PILE (Contd.)

### Observation: Case 5 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
10 September 2018	10 September 2018	RHWCCOR000073109	Indian Agri Services Private Limited	198.00	198.00	RHF -GENERAL PURPOSE CORPORATE LOAN
10 September 2018	10 September 2018	RHWCCOR000073111	Adhar Project Management and Consultancy Private Limited	45.00	45.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

(INR in crores)

Transaction Date	Description	Debit	Credit
6 September 2018	RTGS CR-ICIC0000393-RELIANCE HOMEFIN-RELIANCE HOME FINANCELTD-ICICR52018090600871403		246.16
6 September 2018	FT-57500000149668-INDIAN AGRI SERVICESPVT LTD	198.00	
6 September 2018	FT-00600310017296-ADHAR PROJECTMANAGEMENT AND C	45.00	

## 4.5 Proceeds of commercial paper indirectly transferred to group entity through PILE (Contd.)

### Management response:

- a. The transfer of proceeds from Commercial Papers listed above to alleged potentially related entities has been utilized for debt servicing of exposures to various lenders within Reliance group.
- b. The details of the same are provided below for your reference:

Sl. No	Ultimate End Use of CP proceeds	Amount (INR Crore)
1	Union Bank of India	301.32
2	UTI Mutual Fund	198.00
3	Yes Bank	164.74
4	ICICI Bank	146.97
5	Indian Overseas Bank	100.00
6	Opex	28.74
	Total	<b>939.77</b>

As can be noted from the table above, around 97% of the alleged transfer to related parties/ group entities has been utilized only for servicing of debt including banks who are also lenders to the Company.

*Note: Management response is reproduced in full as provided by the company.*

# Proceeds of securitisation indirectly transferred to group entities/related parties through PILE

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities

On review of debt securitised by Target Entity during our review period it appears that INR 2,168.69 crores were transferred to Potential Indirectly Linked Entities ('PILE') as general purpose corporate loans which were eventually transferred to group companies or related parties of the Target. Details of each such instances is provide in subsequent slides. (INR in crores)

Funds received from securitisation of assets

#	Securitisation	Amount
1	ICICI Bank	470.82
2	Indiabulls Housing Finance Limited	236.09
3	IndusInd Bank	831.83
4	Reliance Mutual Fund	930.61
5	State Bank of India	446.62
6	Yes Bank	868.44
	<b>Total</b>	<b>3,784.41</b>



Loans disbursed to PILE

#	Loans to PILE	Amount
1	Adhar Project Management Private Limited	100.00
2	Adhar Property Consultancy Private Limited	200.00
3	Adhar Real Estate Consultancy Private Limited	187.00
4	Arion Movies Productions Private Limited	400.00
5	Celebrita Mediahouse Private Limited	210.00
6	Edrishti Movies Private Limited	120.00
7	Gamesa Investment Management Private Limited	20.00
8	Indian Agri Services Private Limited	90.00
9	Ippy Entertainment Private Limited	60.00
10	Neptune Steel Strips Limited	102.50
11	Pearl Housing Finance India Limited	200.00
12	Thwink Big Entertainment Private Limited	65.00
13	Traitrya Construction Private Limited	185.00
14	Vinayak Ventures Private Limited	11.00
15	Vishwakarma Equipment Finance Limited	200.00
16	Wallac Movies and Entertainment Private Limited	18.19
	<b>Total</b>	<b>2,168.69</b>

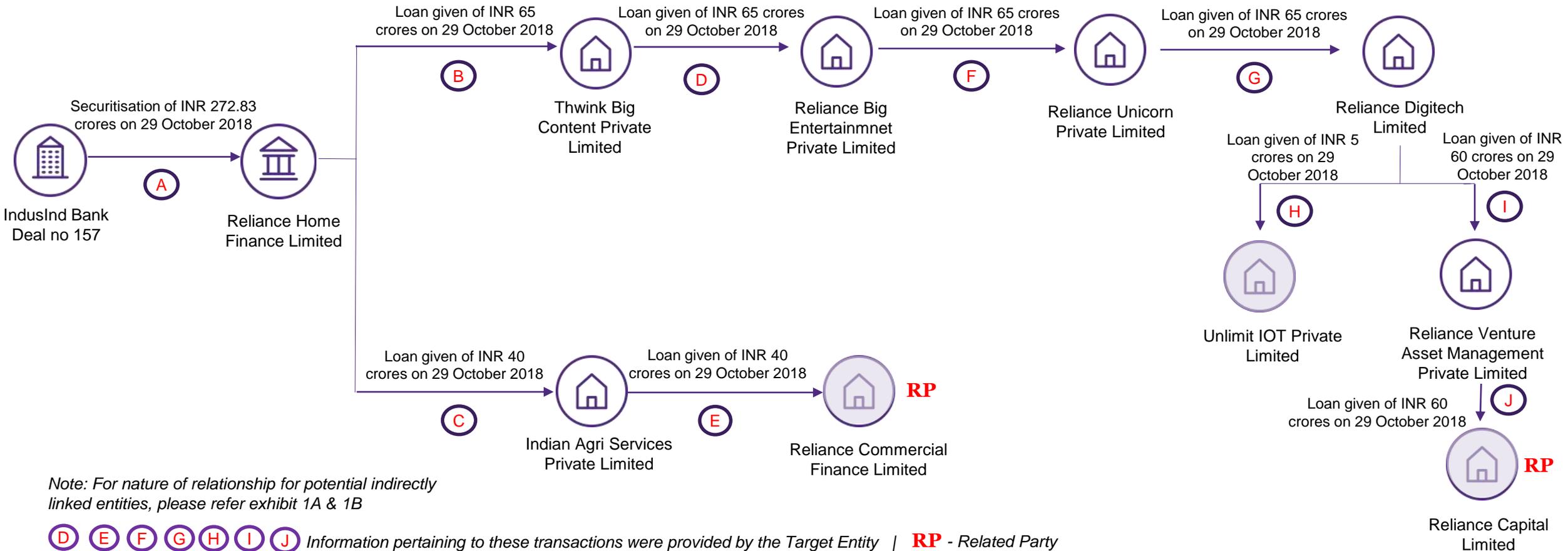
Onward lending to group companies / related parties

#	Name	Nature	Amount
1	Reliance Broadcast Network Limited	Group co.	225.19
2	Reliance Capital Limited	Related Party	512.50
3	Reliance Commercial Finance Limited	Related Party	1307.40
4	Reliance Infrastructure Limited	Group co.	100.00
5	Reliance Nippon Life Insurance Company Limited	Related Party	11.00
6	Unlimit IOT Private Limited	Group co.	5.00
	<b>Grand Total</b>		<b>2,161.09</b>

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 1

On review of debt securitised by the Target Entity on 29 October 2018 to IndusInd Bank of INR 272.83 crores, it appears that amount aggregating to INR 105 crores was transferred to “Reliance Capital Limited”, ‘Reliance Commercial Finance Limited’ and ‘Unlimit IOT private Limited’ through potential indirectly linked entities as general purpose corporate loans. Pictorial representation of these transactions are provided below:



## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 1

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
13 November 2018	13 November 2018	RHWCCOR000074180	Thwink Big Content Private Limited	65.00	65.00	RHF -GENERAL PURPOSE CORPORATE LOAN
31 October 2018	31 October 2018	RHWCCOR000074088	Indian Agri Services Private Limited	40.00	40.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347 and ICICI Bank 039305009784

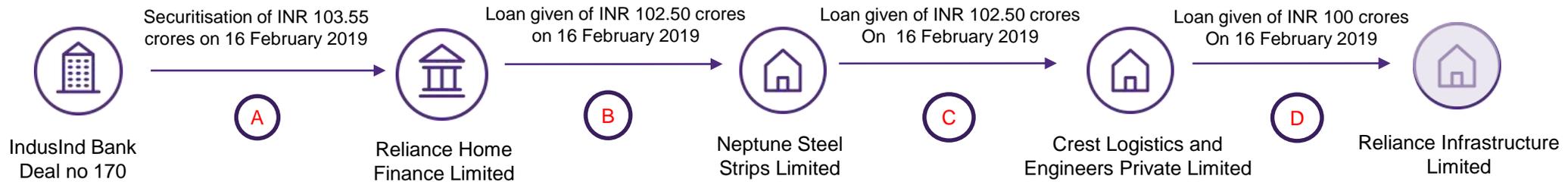
(INR in crores)

Transaction Date	Description	Debit	Credit
29 October 2019	RTGS CR-ICIC0000393-INDIAN RECEIVABLETRUST 2018 SERIES-RELIANCE HOME FINANCE PAGE		247.69
29 October 2019	TRF FROM : INDIAN RECEVIEBALE TRUST 2018 SERIRES 3IP		25.15
29 October 2019	FT-57500000149668-INDIAN AGRI SERVICESPVT LTD	45.00	
29 October 2019	RTGS DR-YESB0000010-THWINK BIG CONTENTPVTLTD-SONAWALA,MUM-HDFCR52018102950007388	30.00	
29 October 2019	RTGS DR-YESB0000010-THWINK BIG CONTENTPVTLTD-SONAWALA,MUM-HDFCR52018102950059480	35.00	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 2

On review of debt securitised by the Target Entity on 16 February 2019 to IndusInd Bank of INR 103.55 crores, it appears that amount aggregating to INR 100 crores was transferred to “Reliance Infrastructure Limited” through potential indirectly linked entities as general purpose corporate loans. Pictorial representation of these transactions are provided below;



**(C) (D)** Information pertaining to these transactions were provided by the Target Entity

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 2

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
25 February 2019	25 February 2019	RHWCCOR000074735	Neptune Steel Strips Limited	102.50	102.50	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

(INR in crores)

Transaction Date	Description	Debit	Credit
16 February 2019	RTGS CR-INDB0000006-INDUSIND BANKLTD-RELIANCE HOME FINANCE Page		103.55
16 February 2019	FT-50200004550423-NEPTUNE STEEL STRIPSLTD	102.50	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 3

- On our review of debt securitised by Target Entity to Indiabulls Housing Finance Limited of INR 187.25 crores, it appears that INR 160 crores was transferred to potential indirectly linked entity ('Traityra Construction Private Limited') as general purpose corporate loan which further was transferred to Reliance Commercial Finance Limited.
- Further on review of HDFC Bank statement account no 00600310011545 of Reliance Commercial Finance Limited, we noted that amount received from 'Traityra Construction Private Limited' was utilised to repay term loan of Canara Bank and State Bank of India.
- Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**(C)** Information pertaining to these transactions were provided by the Target Entity | **RP** - Related Party

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 3

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
29 January 2019	29 January 2019	RHWCCOR000074618	Traitrya Construction Finance Limited	160.00	160.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347 and Axis Bank 911020038138411

(INR in crores)

Transaction Date	Description	Debit	Credit
28 December 2018	RTGS:UTIBR5201812280085329 INDIBULL BULL HOUSING FINANACE		187.25
29 December 2018	RTGS/SK/UTIBR52018122900356608/124/TRAITRYA CONST	160.00	

#### Bank Account entries HDFC Bank 00600310011545 'RCFL'

(INR in crores)

Transaction Date	Description	Debit	Credit
29 December 2018	FT-50200004550334-TRAITRYA CONSTRUC TION 000075FINANCE		160.00
29 December 2018	NEFT DR-CNRB0001903-RELIANCE COMMERCIAL N363180713291569FINANCE LIMITED-SONAWALA,MUM-N3631807132915 69	100.00	
29 December 2018	NEFT DR-SBIN0004791-RELIANCE COMMERCIAL N363180713279029FINANCE LIMITED-SONAWALA,MUM-N3631807132790 29	60.00	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 4

- On our review of debt securitised by Target Entity to ICICI Bank Limited of INR 203.25 crores, it appears that INR 200 crores was transferred to potential directly linked entity ('Pearl Housing Finance India Limited') as general purpose corporate loan which further was transferred to Reliance Commercial Finance Limited.
- On further review of HDFC Bank statement account no. 00600310011545 of Reliance Commercial Finance Limited, we noted that amount received from 'Pearl Housing Finance India Limited' was utilised to repay commercial paper matured of Dewan Housing Finance Limited.
- Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**C** Information pertaining to these transactions were provided by the Target Entity | **RP** - Related Party

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 4 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
29 January 2019	29 January 2019	RHWCCOR000074622	Pearl Housing Finance India Limited	200	200	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

(INR in crores)

Transaction Date	Description	Debit	Credit
24 January 2019	RTGS CR-ICIC0000393-INDIAN RECEIVABLETRUST 2019 SERIES-RELIANCE HOME FINANCELTD-ICICR52019012400659893		139.94
24 January 2019	RTGS CR-ICIC0000393-INDIAN RECEIVABLETRUST 2019 SERIES-RELIANCE HOME FINANCELTD-ICICR52019012400660391		63.31
25 January 2019	FT-50200004618892-PEARL HOUSING FINANCEI LTD	200.00	

#### Bank Account entries HDFC Bank 00600310011545 'RCFL'

(INR in crores)

Transaction Date	Description	Debit	Credit
25 January 2019	FT - CR - 50200004618892 - PEARL HO USING 00000000083FINANCE I LTD		200.00
25 January 2019	RTGS DR-ICIC0000393-RELIANCE COMMER CIAL HDFCR52019012562FINANCE LTD-SONAWALA 176219MUM-HDFCR52019012562176219	200	63.31

#### Bank Account entries ICICI Bank 039305008528 'RCFL'

(INR in crores)

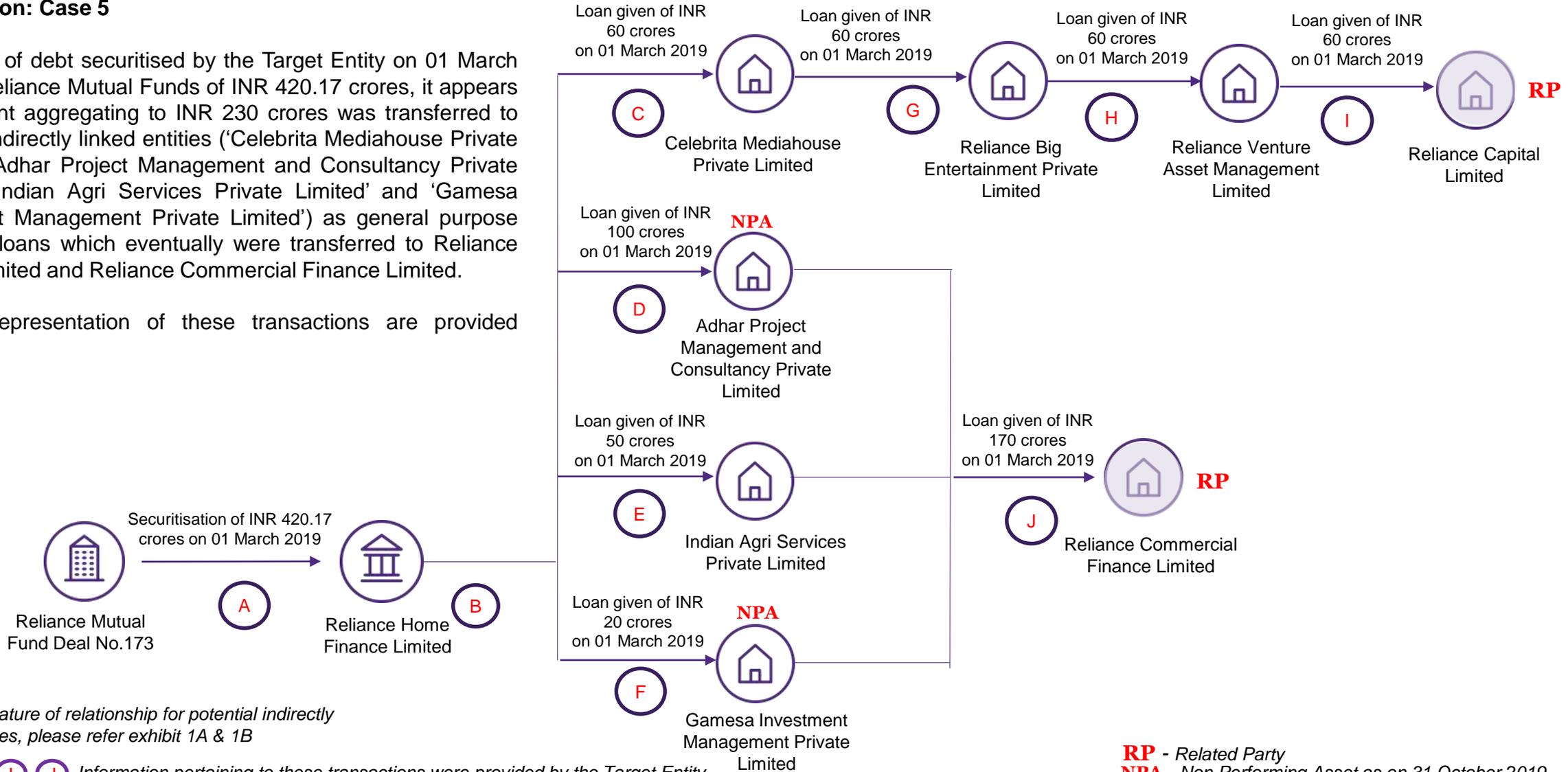
Transaction Date	Description	Debit	Credit
25 January 2019	FTRTGS-HDFCR52019012562176219-RELIANCE COMMERCIAL FINANCE LIMITED-00600310011545-		200.00
25 January 2019	RTGS:ICICR52019012500711552/UTI80000004/DEWAN HOUSING FINANCE CORPORATION	200	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 5

On review of debt securitised by the Target Entity on 01 March 2019 to Reliance Mutual Funds of INR 420.17 crores, it appears that amount aggregating to INR 230 crores was transferred to potential indirectly linked entities ('Celebrita Mediahouse Private Limited', 'Adhar Project Management and Consultancy Private Limited', 'Indian Agri Services Private Limited' and 'Gamesa Investment Management Private Limited') as general purpose corporate loans which eventually were transferred to Reliance Capital Limited and Reliance Commercial Finance Limited.

Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

(G) (H) (I) (J) Information pertaining to these transactions were provided by the Target Entity

**RP** - Related Party  
**NPA** - Non Performing Asset as on 31 October 2019

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 5 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
05 March 19	05 March 19	RHWCCOR000074761	Celebrita Mediahouse Private Limited	60.00	60.00	RHF -GENERAL PURPOSE CORPORATE LOAN
05 March 19	05 March 19	RHWCCOR000074762	Adhar Project Management and Consultancy Private Limited	100.00	100.00	RHF -GENERAL PURPOSE CORPORATE LOAN
05 March 19	05 March 19	RHWCCOR000074758	Indian Agri Services Private Limited	50.00	50.00	RHF -GENERAL PURPOSE CORPORATE LOAN
05 March 19	05 March 19	RHWCCOR000074759	Gamesa Investment Management Private Limited	20.00	20.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347 and Axis Bank 919020017068111

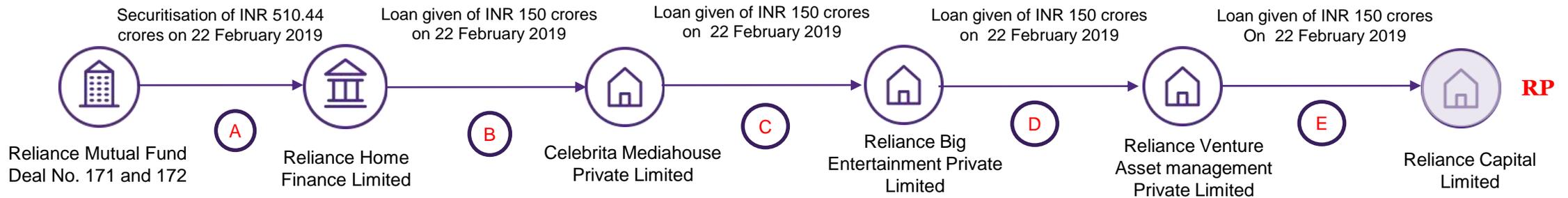
(INR in crores)

Transaction Date	Description	Debit	Credit
1 March 2019	RTGS CR-UTIB0000274-INDIAN RECEIVABLETRUST 2019 SERIES-RELIANCE HOME FINANCELTD-UTIBR52019030100074803		363.27
1 March 2019	INDIAN RECEIVABLE TRUST 2019 SERIES 5		56.90
1 March 2019	FT-57500000149668-INDIAN AGRICULTURE SERVICES PRIVATE LIMITED	50.00	
1 March 2019	FT-50200035945778-CELEBRITA MEDIAHOUSE PRIVATE LIMITED	60.00	
1 March 2019	FT-00600310017296-ADHAR PROJECTMANAGEMENT AND CONSULTANCY PRIVATE LIMITED	100.00	
1 March 2019	FT-00600310036526-GAMESA INVESTMENTMANAGEMENT PRIVATE LIMITED	20.00	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 6

- On our review of debt securitised by Target Entity to Reliance Mutual Fund of INR 510.44 crores, it appears that INR 150 crores was transferred to potential directly linked entity ('Celebrita Mediahouse Private Limited') as general purpose corporate loan which eventually was transferred to Reliance Capital Limited.
- Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**(C)** **(D)** **(E)** Information pertaining to these transactions were provided by the Target Entity | **RP** - Related Party

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 6 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
22 February 2019	22 February 2019	RHWCCOR000074736	Celebrita Mediahouse Private Limited	150	150	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

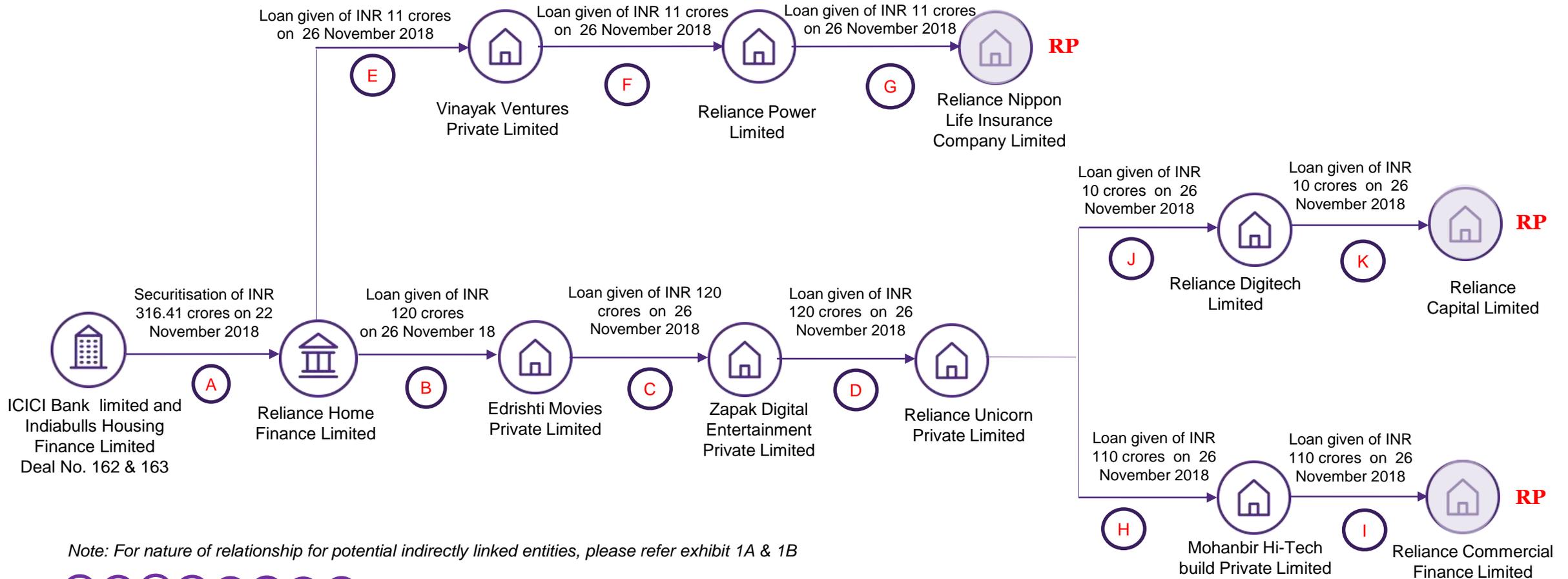
(INR in crores)

Transaction Date	Description	Debit	Credit
22 February 2019	RTGS CR-UTIB0000274-INDIAN RECEIVABLETRUST 2019 SERIES-RELIANCE HOME FINANCELTD-UTIBR52019022200039222		224.71
22 February 2019	RTGS CR-UTIB0000274-INDIAN RECEIVABLETRUST 2019 SERIES-RELIANCE HOME FINANCELTD-UTIBR52019022200041924		233.05
22 February 2019	INDIAN RECEIVABLE TRUST 2019 SERIES 4		27.11
22 February 2019	INDIAN RECEIVABLE TRUST 2019 SERIES 3		25.57
22 February 2019	FT-50200035945778-CELE BRITA MEDIAHOUSEPRIVATE	150.00	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 7

On our review of debt securitised by Target Entity to ICICI Bank and Indiabulls Housing Finance Limited aggregating to INR 316.41 crores, it appears that INR 131 crores was transferred to potential indirectly linked entities ('Edrishti Movies Private Limited' and 'Vinayak Ventures Private Limited') as general purpose corporate loans which eventually was transferred to 'Reliance Nippon Life Insurance Company Limited', 'Reliance Capital Limited' and 'Reliance Commercial Finance Limited'. Pictorial representation of these transactions are provided below;



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**C D F G H I J K** Information pertaining to these transactions were provided by the Target Entity | **RP** - Related Party

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 7 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
30 November 2018	30 November 2018	RHWCCOR000074314	Edrishti Movie Private Limited	120	120	RHF -GENERAL PURPOSE CORPORATE LOAN
30 November 2018	30 November 2018	RHWCCOR000074313	Vinayak Ventures Private Limited	11.03	11.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347 ICICI Bank 039305009784 and Axis Bank 911020038138411

(INR in crores)

Transaction Date	Description	Debit	Credit
22 November 2018	RTGS CR-ICIC0000393-INDIAN RECEIVABLETRUST 2018 SERIES-RELIANCE HOME FINANCELTD-ICICR52018112200661666		167.57
22 November 2018	TRF FROM : INDIAN RECEVIEBALE TRUST 2018 SERIRES 4IP		100.00
22 November 2018	TRF/INDIABULLS HOUSING FINANCE LIMITED/IHFL2598		48.85
26 November 2018	RTGS/SK/UTIBR52018112600354789/124/EDRISHTI MOVIE	120.00	
26 November 2018	NEFT DR-ICIC0000393-VINAYAK VENTURESPRIVATELIMITED-SONAWALA,MUM-N330180687177645	11.00	



## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 8 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
26 March 2019	26 March 2019	RHWCCOR000074883	Arion Movie Productions Private Limited	200	200	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347

(INR in crores)

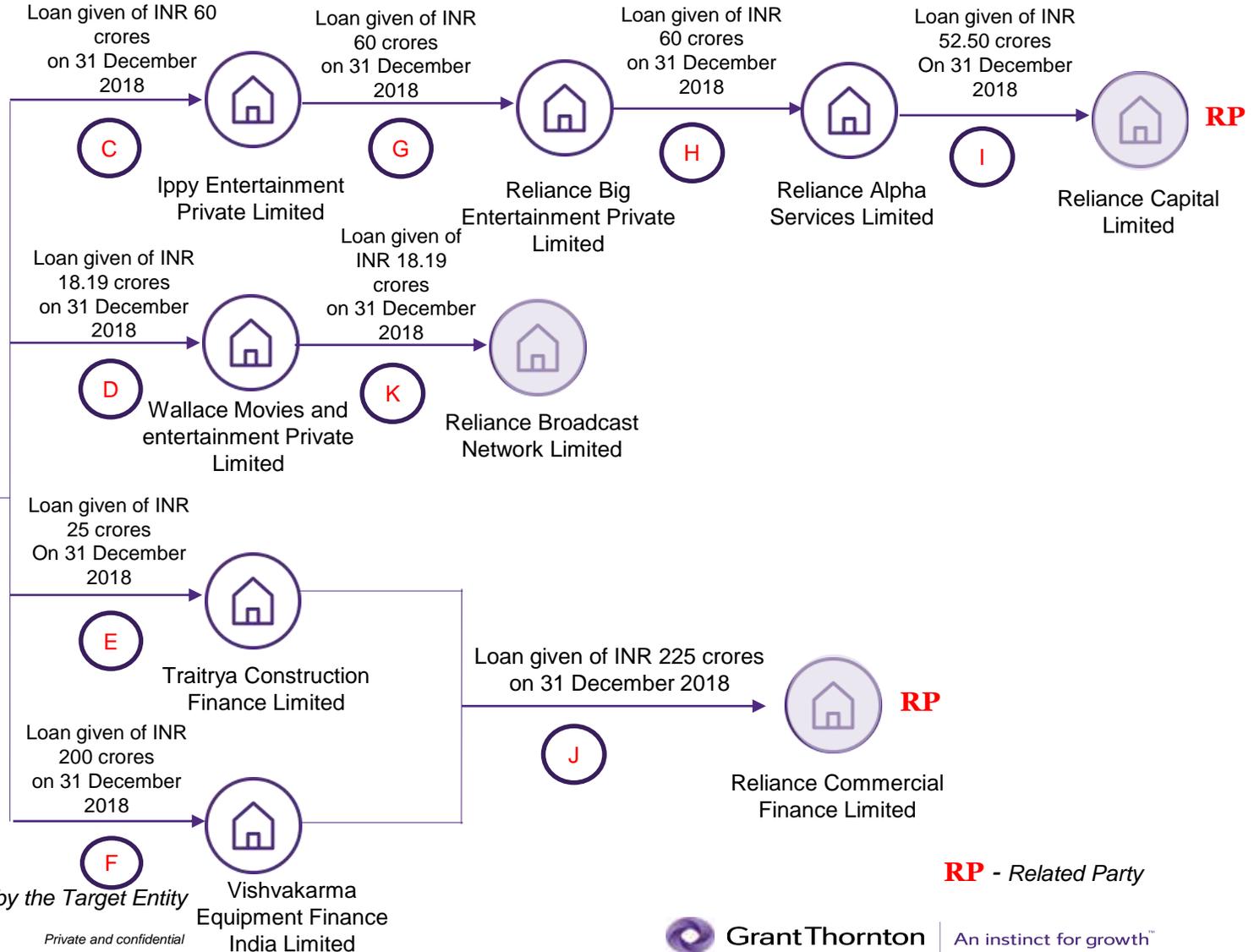
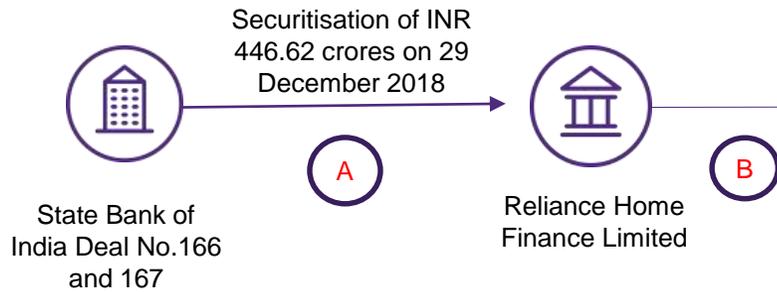
Transaction Date	Description	Debit	Credit
25 March 2019	RTGS CR-INDB0000098-INDUSIND BANKLTD-RELIANCE HOME FINANCELTD-INDBR22019032500387788		311.03
25 March 2019	RTGS-INDBR22109032200375207-INDUSIND BANK LTD-0016		144.42
25 March 2019	FT-57500000309130-ARION MOVIEPRODUCTIONS PVT LTPage	200.00	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 9

On our review of debt securitised by Target Entity to State Bank of India of INR 446.62 crores, it appears that an amount aggregating to INR 303.19 crores was transferred to potential indirectly linked entities (Ippy Entertainment Private Limited, Wallace Movies and Entertainment Private Limited, Traitrya Construction Finance Limited, Vishvakarma Equipment Finance India limited) as general purpose corporate loans, which were eventually transferred to Reliance Capital Limited, Reliance Broadcast Network Limited and Reliance Commercial Finance Limited.

Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**(G) (H) (I) (J)** Information pertaining to these transactions were provided by the Target Entity

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 9 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
31 December 2018	31 December 2018	RHWCCOR000074423	Ippy Entertainment Private Limited	60.71	60.00	RHF -GENERAL PURPOSE CORPORATE LOAN
31 December 2018	31 December 2018	RHWCCOR000074428	Wallace Movies & Entertainment private Limited	18.41	18.19	RHF -GENERAL PURPOSE CORPORATE LOAN
29 January 2019	29 January 2019	RHWCCOR000074621	Traitrya Construction Finance Limited	25.00	25.00	RHF -GENERAL PURPOSE CORPORATE LOAN
29 January 2019	29 January 2019	RHWCCOR000074620	Vishvakarma Equipment Finance India Limited	200.00	200.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347 and HDFC Bank 00600310022433

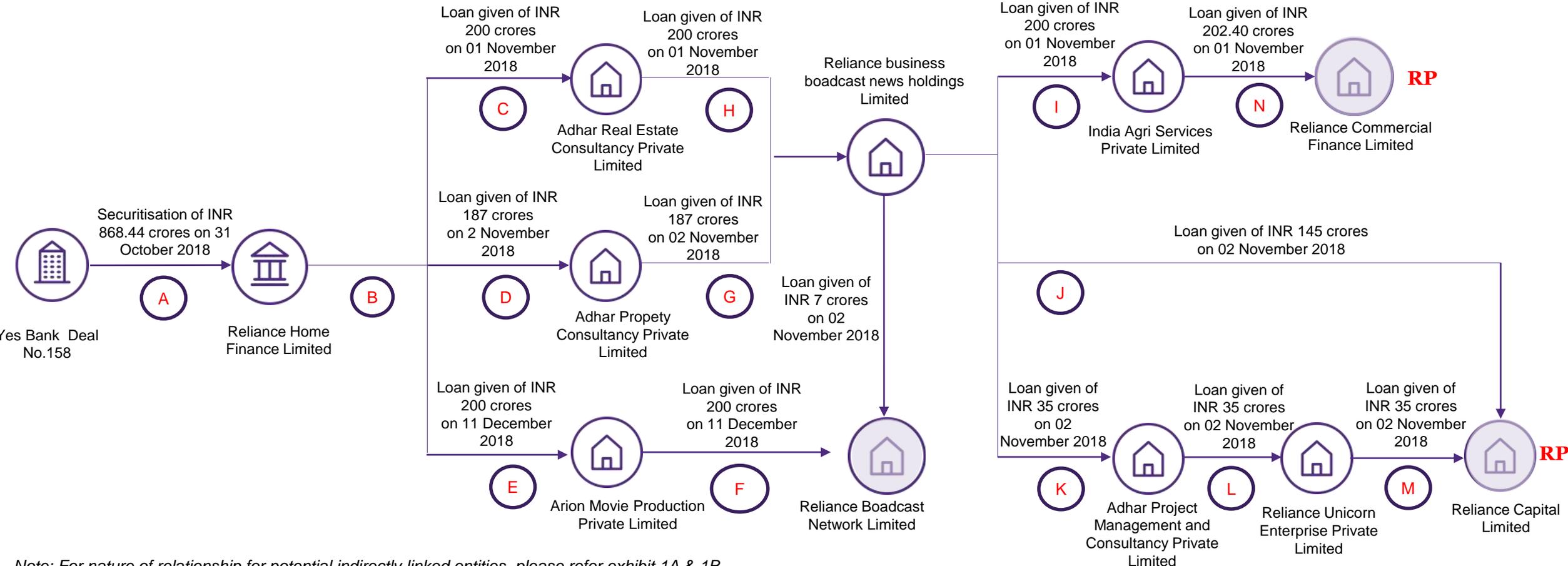
(INR in crores)

Transaction Date	Description	Debit	Credit
29 December 2018	NEFT CR-SBIN0000656-SBI SPL BRANCH00656-RELIANCE HOME FINANCELIMITED-SBIN318363552029		278.90
29 December 2018	NEFT CR-SBIN0000656-SBI SPL BRANCH00656-RELIANCE HOME FINANCELIMITED-SBIN318363552599		167.72
31 December 2018	TRAITRYA 12345	25.00	
31 December 2018	VISHVAKARMA 12345	200.00	
31 December 2018	IPPY 12345	60.00	
31 December 2018	WALLACE 12345	18.19	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 10

On our review of debt securitisation to State Bank of India of INR 868.44 crores by Target Entity, it appears that amount aggregating to INR 587 crores was transferred to potential indirectly linked entities ('Adhar Real Estate Consultancy Private Limited, 'Adhar Property Consultancy Private Limited' and 'Arion Movie Productions Private Limited') as general purpose corporate loans on 10 December 2018 which were eventually transferred to Reliance Business Broadcast Network Limited, Reliance Commercial Finance Limited and Reliance Capital Limited. Pictorial representation of these transactions are provided below:



Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

**G H I J K L M N** Information pertaining to these transactions were provided by the Target Entity | **RP** - Related Party

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Observation: Case 10 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Agreement Date	Loan Account No.	Customer Name	Disbursal Amount	Disbursed Amount	Nature of Loan
10 December 2018	10 December 2018	RHWCCOR000074350	Adhar Real Estate Consultancy Private Limited	200.00	202.40	RHF -GENERAL PURPOSE CORPORATE LOAN
10 December 2018	10 December 2018	RHWCCOR000074349	Adhar Property Consultancy Private Limited	187.00	189.20	RHF -GENERAL PURPOSE CORPORATE LOAN
12 December 2018	12 December 2018	RHWCCOR000074354	Arion Movie Productions Private Limited	200.00	202.39	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Bank Account entries HDFC Bank 00600310022347, Axis Bank 911020038138411 and Yes Bank 000185700002739

(INR in crores)

Transaction Date	Description	Debit	Credit
31 October 2018	NEFT CR-YESB0000803-INDIANRECEIVABLE-RELIANCE HOME FINANCELTD-N304180163238872		368.44
31 October 2018	FUNDS TRF-NARIMAN PT.-041985700000558		500.00
1 November 2018	FT-00600310038493-ADHAR REAL ESTATECONSULTANCY	200.00	
2 November 2018	FT-00600310037156-ADHAR PROPERTYCONSULTANCY PVT	187.00	
11 December 2018	RTGS/SK/UTIBR52018121100352899/124/ARION MOVIE PR	200.00	

## 4.6 Proceeds of Securitisation transferred to related parties/group companies through potential indirectly linked entities (Contd.)

### Management response:

- The transfer of proceeds from Securitization listed above to alleged potentially related entities has been utilized for debt servicing of exposures to various lenders within Reliance group.
- The Company has also furnished full details to GT of the loans given including its end-use, evidencing that such end-use was for debt servicing to banks and lenders.
- The details of the same are provided below for your reference.

Sl. No	Ultimate End Use of CP proceeds	Amount (INR Crore)
1	ICICI Bank	350.00
2	Axis Bank	348.00
3	Punjab National Bank	225.00
4	Bank of Baroda	170.00
5	IndusInd Bank	118.19
6	Canara Bank	100.00
7	State Bank of India	100.00
8	NCD holders	727.90
9	Opex	22.00
	<b>Total</b>	<b>2161.09</b>

As can be noted from the table above, around 99% of the alleged transfer to related parties/ group entities has been utilized only for servicing of debt including banks who are also lenders to the Company.

*Note: Management response is reproduced in full as provided by the company.*

# Site visit

## 4.7 PILE - Borrowers having similar registered address

### Observation: Borrowers having similar registered address

We noted 11 instances where the registered address of the borrowers of GPCL appears to be similar. In one instance, it appears that 10 GPCL borrowers have a similar registered address as per MCA records, indicating that these entities might be potentially indirectly linked. We noted a total of 47 such entities to whom 151 loans were disbursed during our review period aggregating to INR 12,342.39 crores. **For details refer annexure 1**

(INR in crores)

#	Registered Address as per MCA records	Amount	No. of loan disbursed	No. of borrowers
1	Manek Mahal, 6th Floor, 90 Veer Nariman Road, Mumbai Mumbai City MH 400020 IN	2451.60	30	5
2	Raheja Point Wing B, 7th Floor, Nehru R Near Shamrao Vithal Bank, Vakola, Santacruz (East) Mumbai MH 400055 IN	2479.66	41	10
	B / 702, Raheja Point 1, Pandit Jawaharlal Nehru Road, Vakola, Santacruz (East) Mumbai City MH 400055 IN			
3	8th Floor, 803/804, Lotus Grandeur, Veera Desai Road Andheri West MUMBAI Mumbai City MH 400053	1555.69	21	7
4	Dev House, 260-261, Tribhuvan Complex, Ishwar Nagar, New Friends Colony New Delhi New Delhi DL 110065 IN	1413.00	17	2
5	502, Plot No 91/94, Prabhat Colony Santa Cruz (East) Mumbai MH 400055 IN	974.54	14	5
6	401, 4 <sup>th</sup> Floor Infiniti Mall, Link Road, Andheri West, Mumbai, MH 400053 IN	740.00	6	3
7	Cama Building, 1 <sup>st</sup> Floor, Dalal Street, Fort, Mumbai, MH 400001 IN	1235.44	8	6
	24/26, Cama Building, 1st Floor, Dalal Street Fort Mumbai Mumbai City MH 400001 IN			
8	20, Diplomatic Enclave Sardar Patel Marg New Delhi New Delhi DL 110003 IN	345.00	4	2
9	Plot Bearing CTS No C/1361 B1/1 of at Pali Hill, Bandra West Mumbai Mumbai City MH 400050	324.45	4	2
10	H Block, 1st Floor, Dhirubhai Ambani Knowledge City Navi Mumbai MH 400710 IN	261.00	3	2
11	Unit 101, Windsor, Off CST Road, Vidyanagari Marg, J P Morgan Lane, Kalina, Santacruz (E) Mumbai Mumbai City MH 400098 IN	562.00	3	3
	<b>Total</b>	<b>12,342.39</b>	<b>151</b>	<b>47</b>

## 4.7 PILE - Site visit

Our source enquires for sample 5 addresses reveals the followings;

### 1. Site Visit at Manek Mahal, 6<sup>th</sup> Floor, 90 Veer Nariman Road, Mumbai City MH 400020 IN

(INR in crore)

#	Name of the borrower	Loan amount	Total dues	Registered address of borrowers
1	Adhar Project Management And Consultancy Private Limited <b>NPA</b>	650.60	210.12	<b>Manek Mahal, 6th Floor, 90 Veer Nariman Road, Mumbai Mumbai City MH 400020 IN</b>
2	Gamesa Investment Management Private Limited <b>NPA</b>	614.00	184.74	
3	PHI Management Solutions Private Limited	540.00	208.55	
4	Medybiz Private Limited	325.00	205.02	
5	Reliance Unicorn Enterprise Private Limited	285.00	0.00	
6	Netizen Engineering Private Limited	212.00	214.54	

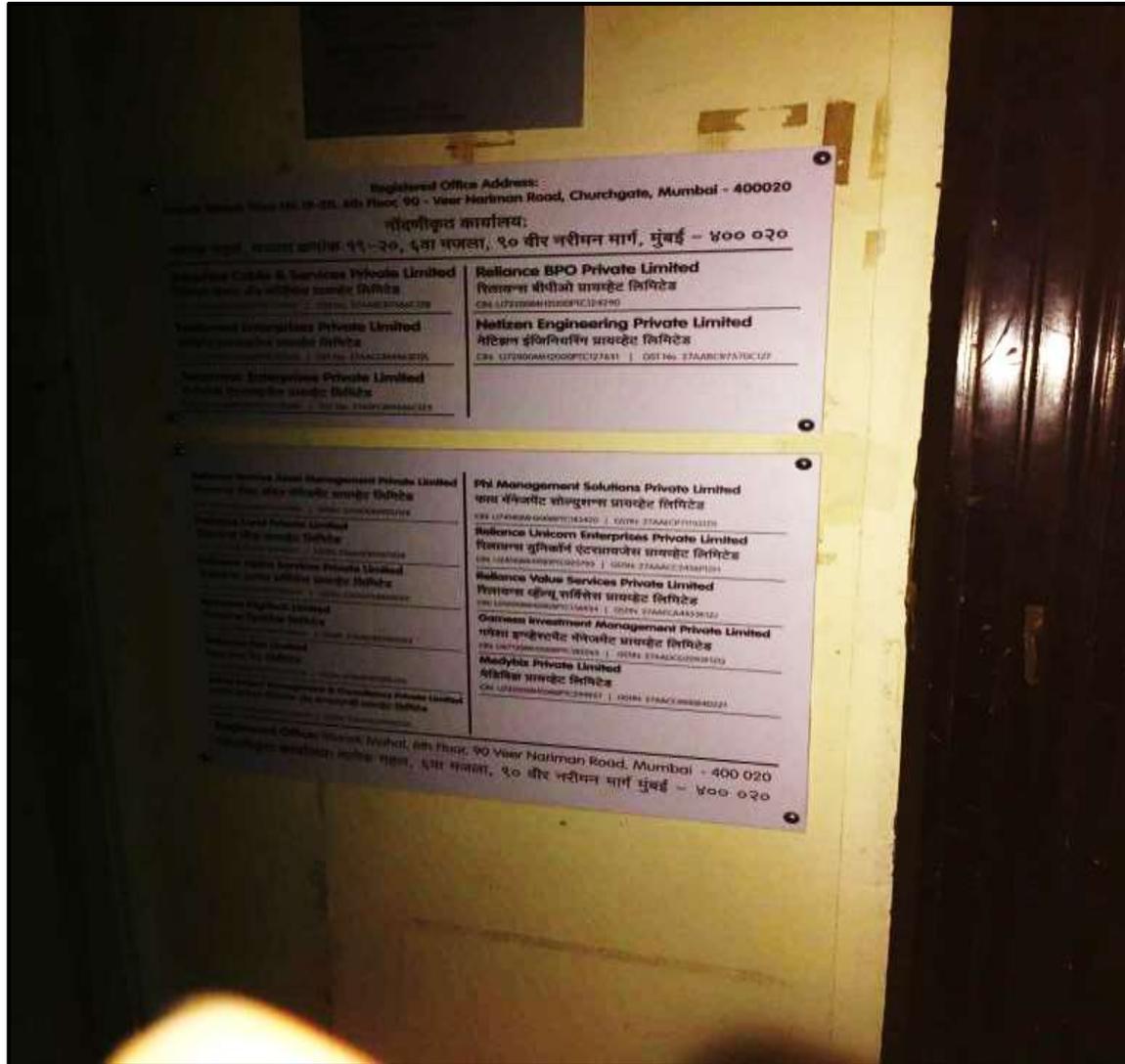
#### Observation:

- The source enquiry was performed on 20 November 2019
- The security guard stationed on ground floor said that there has been no operation on 6<sup>th</sup> floor for past 18 years
- Name plate was found on the 6<sup>th</sup> floor which says that the address belongs to above mentioned 6 borrowers along with 10 other companies. However, the office premise was locked and appears to have been unused for a prolonged period
- A notice was attached on the entrance door of property specifying that “For any courier or post related to reliance or other companies security is available here”
- On further inquiry with the security guard stationed at ground floor, it was noted that a separate security guard is hired by a private entity for the 6<sup>th</sup> who sits from 10 A.M to 5 P.M.
- Apart from the above mentioned 6 entities following other enterprises were also registered on the same address as per MCA records
  1. Sapphire Cable and Services Private Limited
  2. Telebrand Enterprises Private Limited
  3. Tenormac Enterprises Private Limited
  4. Reliance Ventures Asset Management Private Limited
  5. Reliance Land Private Limited
  6. Reliance Alpha Services Private Limited
  7. Reliance DigiTech Limited
  8. Reliance Net Limited
  9. Reliance BPO Private Limited
  10. Reliance Value Securities Private Limited

**NPA** - Non Performing Asset as on 31 October 2019

# 4.7 PILE - Site visit (Contd.)

## 1. Site Visit at Manek Mahal, 6<sup>th</sup> Floor, 90 Veer Nariman Road, Mumbai City MH 400020 IN (Contd.)



## 4.7 PILE - Site visit (Contd.)

### 1. Site Visit at Manek Mahal, 6<sup>th</sup> Floor, 90 Veer Nariman Road, Mumbai City MH 400020 IN (Contd.)



## 4.7 PILE - Site visit (Contd.)

### 2. Cama Building, 1<sup>st</sup> Floor, Dalal Street, Fort, Mumbai, MH 400001 IN

(INR in crore)

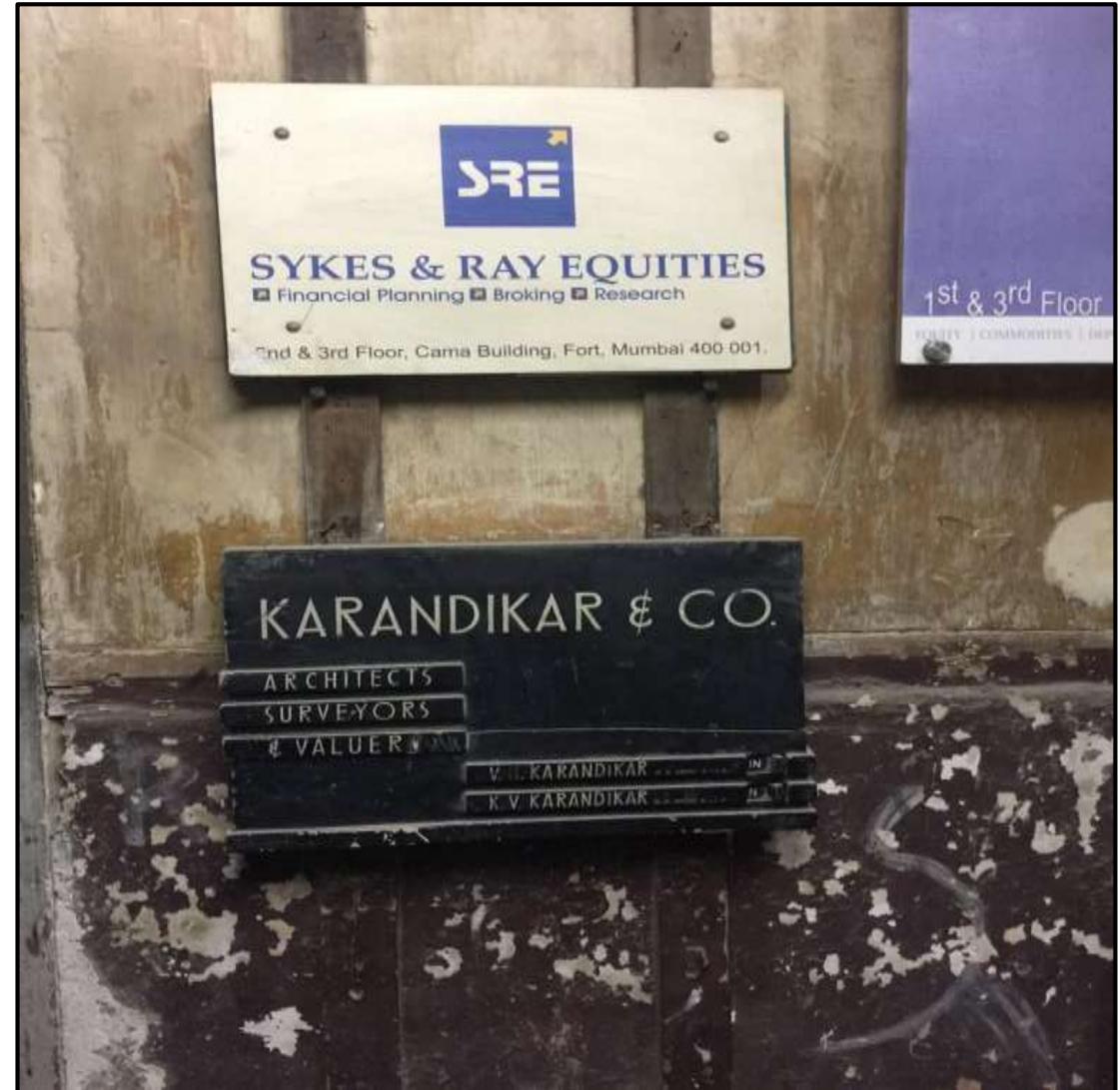
#	Name of the borrower	Loan Amount	Total dues	Registered address of borrowers
1	Citi Securities And Financial Services Private Limited	220.80	220.80	<b>Cama Building,1<sup>st</sup> Floor ,Dalal Street, Fort, Mumbai, MH 400001,IN</b>
2	Deep Industrial Finance Limited	220.00	220.00	
3	Neptune Steel Strips Limited	209.64	102.50	
4	Pearl Housing Finance India Limited	200.00	200.00	
5	Traitrya Construction Finance Limited	185.00	185.00	
6	Vishvakarma Equipment Finance India Limited	200.00	200.00	

#### Observation:

- The source enquiry was performed on 20 November 2019.
- The Security Guard stationed at ground floor said that none of the above-mentioned entities existed at the premises
- However, on going through the name plate on the ground floor it was observed that there existed an entity named as V.B. Desai
- It was observed that all of the above- mentioned entities to whom the loans had been disbursed had their email addresses on MCA as vijaykar@vbdesai.com

## 4.7 PILE - Site visit (Contd.)

### 2. Cama Building, 1<sup>st</sup> Floor, Dalal Street, Fort, Mumbai, MH 400001 IN (Contd.)



## 4.7 PILE - Site visit (Contd.)

### 2. Cama Building, 1<sup>st</sup> Floor, Dalal Street, Fort, Mumbai, MH 400001 IN (Contd.)



## 4.7 PILE - Site visit (Contd.)

### 2. Cama Building, 1<sup>st</sup> Floor, Dalal Street, Fort, Mumbai, MH 400001 IN (Contd.)



## 4.7 PILE - Site visit (Contd.)

### 3. Site Visit at Raheja Point Wing B, 7th Floor, Nehru R Near Shamrao Vithal Bank, Vakola, Santacruz (East) Mumbai MH 400055 IN (INR in crores)

#	Name of the borrower	Loan Amount	Total Dues	Registered address of borrowers
1	Space Trade Enterrises Private Limited <b>NPA</b>	445.72	145.34	<b>Raheja Point Wing B, 7th Floor, Nehru R Near Shamrao Vithal Bank, Vakola, Santacruz (East) Mumbai MH 400055 IN</b>  <b>and</b>  <b>B / 702, Raheja Point 1, Pandit Jawaharlal Nehru Road, Vakola, Santacruz (East) Mumbai City MH 400055 IN</b>
2	Aashish Power plant Equipment Private Limited <b>NPA</b>	109.75	112.06	
3	Crest Logistics and Engineers private Limited <b>NPA</b>	378.50	182.63	
4	Skyline Global trade private Limited <b>NPA</b>	309.00	103.23	
5	Species Commerce and trade Private limited <b>NPA</b>	244.00	137.42	
6	Worldcom Solution Limited	229.50	56.91	
7	Hirma Power limited <b>NPA</b>	375.00	210.46	
8	Summit CemInfra Private Limited <b>NPA</b>	269.00	125.82	
9	Tulip Advisors Private Limited <b>NPA</b>	215.00	224.03	

#### Observation:

- The source enquiry was performed on 08 December 2019
- Name plate was found on the 7th floor which says the address belongs to above mentioned borrowers along with 6 other companies. However, the office premise was closed with shutter half open and no one inside.
- It also appear from the site visit that the above mentioned companies (“Worldcom Solutions Limited”, “Hirma Power Limited”, “Summit Ceminfra Private Limited” and “Tulip Advisors Private Limited”) do not exist at the given address.
- Apart from the above mentioned 5 entities, following other enterprises were also registered on the same address as per MCA records.
  - a) Creative Ashtech Power Projects Limited
  - b) Creative Ashtech Engineering Projects Private Limited
  - c) Creative Ashtech Energy Projects Private Limited
  - d) Creative Ashtech Utility Projects Private Limited
  - e) Shivani Power Plant Equipment private Limited
  - f) Jolly Power plant Equipment Private Limited

\*Site visit was conducted on 6 December 2019

**NPA** - Non Performing Asset as on 31 October 2019

## 4.7 PILE - Site visit (Contd.)

### 3. Site Visit at Raheja Point Wing B, 7th Floor, Nehru R Near Shamrao Vithal Bank, Vakola, Santacruz (East) Mumbai MH 40055 IN (Contd.)



As per news article dated 24 July 2019\*, it seems that 7<sup>th</sup> floor was registered in the name of Reliance Infrastructure Limited.

\*<https://www.bloomberquint.com/bq-blue-exclusive/crest-logistics-mystery-firm-that-owes-anil-ambanis-loss-making-reliance-infra-rs-7000-crore>

## 4.7 PILE - Site visit (Contd.)

### 3. Site Visit at Raheja Point Wing B, 7th Floor, Nehru R Near Shamrao Vithal Bank, Vakola, Santacruz (East) Mumbai MH 400055 IN (Contd.)



Registered Office Address: B/702, Raheja Point 1, Pandit Jawaharlal Nehru Road, Vakola, Santacruz (E), Mumbai - 400 055	
नोंदणीकृत कार्यालय: बी/७०२, रहेजा पॉइंट १, पंडित जवाहरलाल नेहरु रोड, वाकोला, सांताक्रुझ (पू.), मुंबई - ४०० ०५५	
<b>Space Trade Enterprises Private Limited</b> स्पेस ट्रेड एंटरप्राइजेज प्रायव्हेट लिमिटेड CIN: U51909MH1996PTC099106   GST No: 27AACCE767K1ZP	<b>Creative Ashtech Energy Projects Private Limited</b> क्रिएटिव्ह अंशटेक एनर्जी प्रोजेक्ट्स प्रायव्हेट लिमिटेड CIN: U29260MH2009PTC193659
<b>Skyline Global Trade Private Limited</b> स्काईलाइन ग्लोबल ट्रेड प्रायव्हेट लिमिटेड CIN: U51900MH1996PTC099105   GST No: 27AACCE7830A1ZM	<b>Creative Ashtech Utility Projects Private Limited</b> क्रिएटिव्ह अंशटेक युटिलिटी प्रोजेक्ट्स प्रायव्हेट लिमिटेड CIN: U29255MH2009PTC193667
<b>Species Commerce And Trade Private Limited</b> स्पिशीज कॉमर्स अँड ट्रेड प्रायव्हेट लिमिटेड CIN: U65910MH17006PTC162605   GST No: 27AACCE4783A1Z7	<b>Aashish Power Plant Equipment Private Limited</b> आशिष पॉवर प्लांट इक्विपमेंट प्रायव्हेट लिमिटेड CIN: U29260MH2009PTC190194
<b>Crest Logistics and Engineers Private Limited</b> क्रेस्ट लॉजिस्टिक्स अँड इंजिनियर्स प्रायव्हेट लिमिटेड CIN: U45200MH2003PTC140946   GST No: 27AACCE7266A1ZM	<b>Shivani Power Plant Equipment Private Limited</b> शिवानी पॉवर प्लांट इक्विपमेंट प्रायव्हेट लिमिटेड CIN: U40109MH2009PTC190202
<b>Creative Ashtech Power Projects Private Limited</b> क्रिएटिव्ह अंशटेक पॉवर प्रोजेक्ट्स प्रायव्हेट लिमिटेड CIN: U29299MH2009PTC258419   GST No: 27AADCE0054F1Z7	<b>Jolly Power Plant Equipment Private Limited</b> जॉली पॉवर प्लांट इक्विपमेंट प्रायव्हेट लिमिटेड CIN: U29253MH2009PTC190197
<b>Creative Ashtech Engineering Projects Private Limited</b> क्रिएटिव्ह अंशटेक इंजिनियरिंग प्रोजेक्ट्स प्रायव्हेट लिमिटेड CIN: U29305MH2009PTC393664	

## 4.7 PILE - Site visit (Contd.)

### 4. Site Visit at Unit 101, Windsor, Off CST Road, Vidyanagari Marg, J P Morgan Lane, Kalina, Santacruz (E) Mumbai Mumbai City MH 400098 IN

(INR in crores)

#	Name of the borrower	Loan Amount	Total Dues	Registered address of borrowers
1	Adhar Real Estate Consultancy Private Limited	202.40	202.40	<b>Unit 101, Windsor, Off CST Road, Vidyanagari Marg, J P Morgan Lane, Kalina, Santacruz (E) Mumbai Mumbai City MH 400098 IN</b>
2	Adhar Property Consultancy Private limited	189.20	189.20	
3	Nationwide Communication Private Limited	175.00	175.00	

#### Observation:

- The source enquiry was performed on 06 December 2019
- The security guard stationed on ground floor said that unit 101 of Windsor was closed since a long time and before that it belonged to a news channel.
- The security guard restricted entry in the premises.





# PILE - Revenue contribution

## 4.8 Income earned owing to loans disbursed to PILE

- During the review period a total of INR 12,691.55 crores of general purpose corporate loans ('GPCL') were disbursed to Potential Indirectly Linked Entities ('PILE'). As on 31 October 2019 the principal outstanding against the loans disbursed to PILE's was INR 7,900.89 crores.
- On verifying the income generated owing to loans disbursed to PILE it was observed that out of total INR 1959.89 crores of income from business operation generated in FY 18-19 around 28% pertains to loans disbursed to PILE. Similarly, in Q1 of FY 19-20 44% of income from business operations was contributed by loans disbursed to PILE. **For details refer annexure 2.**

(INR in Crores)

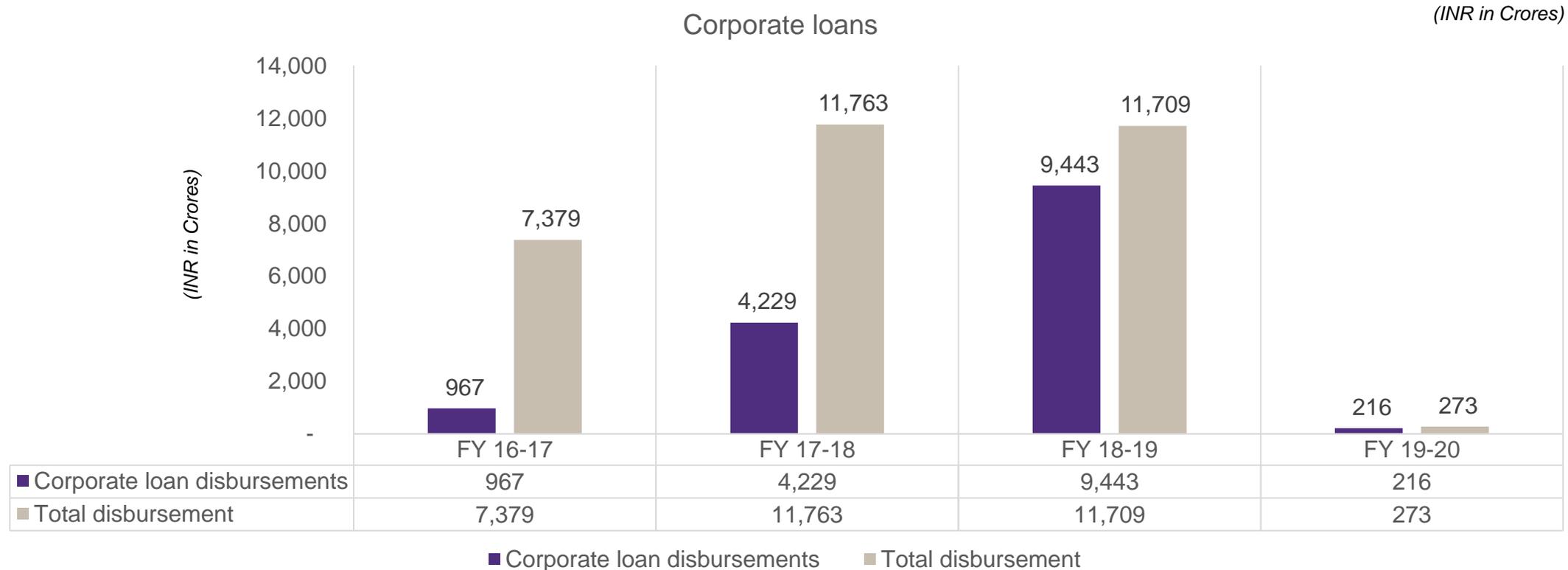
Particular	FY 16-17	FY 17-18	FY 18-19	FY 19-20 (Q1)
Income from business operations* (A)	1,078.57	1,622.37	1,959.89	532.16
Income earned from loans disbursed to PILE (B)	18.75	229.06	555.43	232.95
% of income earned from loans disbursed to PILE compared to total income from business operations (B)/(A) *100	2%	14%	28%	44%

\*Note – Income from business operation includes interest income, fee and commission income.

# Potential regulatory anomalies

## 4.9 Potential violation of section 2(B) of National Housing Bank Act, 1987

- The Target Entity is an Housing Finance Company ('HFC') whose primary objective is to deal in the business of providing finance for housing purposes as per section 2(B) of The National Housing Bank Act, 1987. During the review, it was observed that the Target's non housing disbursement was around 80% of total disbursements in FY 18-19.
- The corporate loans disbursed during the review period were in the nature of general purpose corporate loans ('GPCL') which were having bullet repayment of principal and interest at the end of loan tenor which on an average was around 12 months.



## 4.9 Potential violation of section 2(B) of National Housing Bank Act, 1987 (Contd.)

### Management response:

- The observation once again has raised doubts on compliance without identifying any specific breach or violation.
- Attention is invited to section 2(d) of The National Housing Bank Act, 1987 which defines a Housing Finance entity as under:
 

*"Housing finance institution" includes every institution, whether incorporated or not, which primarily transacts or has as one of its principal objects, the transacting of the business of providing finance for housing, whether directly or indirectly.*
- As is evident, the said provision requires the Company to have housing as a priority however it does not prohibit a Housing Finance Company from extending non-housing loans.
- The Company, as a Housing Finance Company has on a monthly basis furnished the requisite portfolio data to NHB, disclosing its loan portfolio including ‘Loans to Corporates – others’ which forms part of non-housing loans. The Company has also noted NHBs observations on the increase in proportion of non-housing loans and have sought time to correct the same.
- It is submitted that NHB vide its letter dated August 7, 2019 advised the Company to bring down its non-housing loan portfolio to below 50% of the total loans (housing plus non- housing). The Company vide its letter dated August 16, 2019 has sought time from the Regulator to be able to be in compliance with the same.
- This was a procedural irregularity of NHB directions, for which the Company has been levied a penalty of a nominal amount of INR 45,000 by NHB vide its letter dated August 27, 2019.

We are therefore of the view that there is no irregularity as claimed since it has already been evaluated and adjudicated upon by the regulator and the Company having paid the penalty.

*Note: Management response is reproduced in full as provided by the company.*

## 4.9 Anomalies identified in calculation of CRAR (Capital Adequacy)

- As per note 57 of the annual report of Reliance Commercial Finance Limited ('RCFL') for FY 18-19, RCFL has advanced loans to 26 entities, in the ordinary course of business, which have undertaken onward lending transactions to companies that are identified as group companies by Reliance Capital Limited ('RCL') as per the Core Investment Companies (Reserve Bank) Directions, 2016. RCL is the 100% holding company of RCFL and also the holding company of the target entity. Considering the end use of such loans, RCFL has considered these loans as 'exposure to group companies' as a result of which its CRAR as on 31 March 2019 stood at -49.03% compared to +18.39 % in previous financial year.
- On review, it was identified that the target entity has advanced loans to 22 out of above mentioned 26 entities which are having POS of INR 3,668.35 crores as on 30 June 2019. These entities have also undertaken onward lending transaction to other companies. However, loans to these entities were not considered as 'exposure to group companies' for the calculation of CRAR by the Target Entity. Had the same been considered, the CRAR of the target entity may have been negative leading to violation of regulatory norms of 12% as mandated in the Master Circular - Housing Finance Companies (NHB) Directions, 2010. Details of all the loans advanced to such entities during the review period along with their total dues as on 31 October 2019 is presented below. (INR in crores)

#	Name of the borrower	Loan Amount	No. of loans	No. loans outstanding	Total dues	Status
1	Indian Agri Services Private Ltd	948.15	11	6	314.10	-
2	Mohanbir Hi Tech Build Private Limited	465.00	6	4	267.91	-
3	Tulip Advisors Private Limited	215.00	3	3	224.03	NPA
4	Adhar Project Management And Consultancy Private Limited	650.59	10	3	223.44	NPA
5	Vinayak Ventures Private Limited	221.13	2	2	221.13	-
6	Medybiz Private Limited	435.90	4	3	220.71	-
7	Hirma Power Limited	375.00	3	2	210.46	NPA
8	Celebrita Mediahouse Private Limited	210.00	2	2	210.00	-
9	Thwink Big Content Private Limited	207.44	2	2	207.44	-
10	Edrishti Movies Private Limited	200.96	2	2	200.96	-
11	Kunjbihari Developers Private Limited	186.61	3	3	188.87	-
12	Accura Productions Private Limited	186.74	5	5	186.74	-
13	Gamesa Investment Management Private Limited	614.21	8	4	185.97	NPA
14	Crest Logistics And Engineers Private Limited	378.50	8	4	182.62	NPA
15	Nationwide Communication Private Limited	175.00	1	1	175.00	-
16	RPL Aditya Power Private Limited	139.50	1	1	158.61	-
17	Species Commerce And Trade Private Limited	244.00	5	2	137.42	NPA
18	Summit Ceminfra Private Limited	269.00	4	3	125.81	NPA
19	Aashish Power Plant Equipment Private Limited	109.75	2	1	112.05	NPA
20	Skyline Global Trade Private Limited	309.00	6	2	103.23	NPA
21	Worldcom Solutions Limited	229.50	4	1	56.90	-
22	Reliance Cleangen Limited	40.48	1	1	46.19	-
	<b>Total</b>	<b>6,811.47</b>	<b>93</b>	<b>57</b>	<b>3,959.61</b>	-

## 4.9 Anomalies identified in calculation of CRAR ( Capital Adequacy) (Contd.)

- Snapshots of Note 57 of Annual Report of RCFL of FY 2018-19

57 During the current and previous financial year, the Company has given General Purpose Corporate Loan/Working Capital Term Loan to certain bodies corporate in the ordinary course of business. None of these loans constitute as transactions with related parties.

In few cases, the Company's borrowers have undertaken onward lending transactions to companies which are identified as Group Companies by Reliance Capital Limited (holding company) in terms of the Core Investment Companies (Reserve Bank) Directions, 2016.

Considering the end use of loans given, the Company has considered the below loans amounting to ₹ 4,799.55 crore, as 'Exposure to group companies' for the purpose of various regulatory disclosures. These loans are secured and in few cases its further guaranteed by the Group Companies.

(₹ in crore)

Sr. No	Party Name	Principal Outstanding as at March 31, 2019
1	Aashish Power Plant Equipment Private Limited	185.00
2	Accura Productions Private Limited	300.00
3	Adhar Project Management & Consultancy Private Limited	20.25
4	Celebrita Mediahouse Private Limited	90.00
5	Crest Logistics & Engineers Private Limited	286.90
6	Edrishti Movies Private Limited	125.00
7	Gamesa Investment Management Private Limited	30.70
8	Hirma Power Limited	222.41
9	Indian Agri Services Private Limited	95.00
10	Kalai Power Private Limited	260.80
11	Kunjbihari Developers Private Limited	108.75
12	Medybiz Private Limited	118.00
13	Mohanbir Hi-Tech Build Private Limited	5.44
14	Nationwide Communication Private Limited	25.00
15	Reliance Big Entertainment Private Limited	246.83
16	Reliance Cleangen Limited	270.49
17	RPL Solaris Power Private Limited	188.00
18	RPL Aditya Power Private Limited	40.00
19	Skyline Global Trade Private Limited	290.00
20	Species Commerce & Trade Private Limited	235.50
21	Summit Ceminfra Private Limited	300.00

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### Reliance Commercial Finance Limited

#### Notes to the Standalone Financial Statements for the year ended March 31, 2019

(₹ in crore)

Sr. No	Party Name	Principal Outstanding as at March 31, 2019
22	Thwink Big Content Private Limited	350.00
23	Tulip Advisors Private Limited	297.95
24	Vinayak Ventures Private Limited	54.50
25	Worldcom Solutions Limited	353.03
26	Zapak Digital Entertainment Limited	300.00
<b>Total</b>		<b>4,799.55</b>

#### 58 Segment Reporting

The Company is mainly engaged in the commercial finance business and all other activities revolve around the main business of the Company. Further, all activities are conducted within India and as such there is no separate reportable segment as specified in Ind AS 108 - "Operating Segments", in terms of Companies (Accounts) Rules, 2014.

#### 59 Disclosures of Restructured Accounts as required by Annex IV of RBI Directions.

This is the notes to account referred to our report of even date

For and on behalf of the Board of Directors

**For Shridhar & Associates**  
Chartered Accountants  
Firm Registration No. : 134427W

**Sushil Kumar Agrawal**   **Rashna Khan**  
(Director)   (Director)

**Ajay Vastani**  
Partner  
Membership No.: 132265

**Dhananjay Tiwari**   **Sachin Bora**  
(Executive Director)   (Whole-time Director)

Mumbai  
August 14, 2019

**Sandeep Khosla**   **Ekta Thakurel**  
(Chief Financial Officer)   (Company Secretary)

## 4.9 Anomalies identified in calculation of CRAR ( Capital Adequacy) (Contd.)

### Management response:

a. As per to section 29B of The National Housing Bank Act, 1987

*“subsidiaries” and “companies in the same group” shall have the same meanings assigned to them in the Companies Act, 1956.*

b. As per Para 2(da) of Master Circular – The Housing Finance Companies (NHB) Directions, 2010 the term “companies in the same group” was updated and notified in July 2018 as under:

*"companies in the same group" shall mean an arrangement involving two or more entities related to each other through any of the following relationships:*

- (i) Subsidiary - Parent, Joint Venture, Associate, A Related Party as defined under the Companies Act, 2013, Indian Accounting Standards (Ind AS),*
- (ii) Promoter – Promotee (as provided in the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011) for listed companies,*
- (iii) Common Brand Name, and*
- (iv) investment in equity shares of 20% and above;"*

c. Pursuant to above, as also in compliance with the applicable Accounting Standards, the transactions with companies in the same group have been duly disclosed in the Annual Report of the respective financial years ended 31 March 2017, 31 March 2018 and 31 March 2019. The same have been duly audited by the Company's statutory Auditors.

d. Since the said entities do not fall under any of the above criteria, the same are not considered as 'exposure to group companies' and accordingly, there was no requirement of reducing the said exposure from the Net Owned Funds for calculation of CRAR.

*Note: Management response is reproduced in full as provided by the company.*

# Loan written - off

## 5. Loan disbursement to Valuecorp Securities and Finance Limited written off

### Observation: Loan disbursement to Valuecorp Securities and finance Limited written off within 4 months of disbursement:

- During our review period, the Target entity has disbursed a loan of INR 118.49 crore on 13 December 2018 to Valuecorp Securities and finance Limited ('Valuecorp')
- As per the latest available financial statements, it appears that the borrowing entity is not having any income from business operations, no fixed assets, minimal operating expenditure and was having accumulated losses. Most of the money borrowed appears to have been utilized towards short term loans and advances. The company has reported minimal operation related expenditure which prima facie gives the impression that the company has no business activity.
- Basis review of the data provided by the target entity, the entire loan given to Valuecorp has been written off in March 2019 i.e. within a period of 4 months from the date of disbursement.
- The borrower has similar registered address and email ID as that of six other potential indirectly linked entities. Details of the same are provided in the 'site visit' section of the report.

(INR in crores)

Key areas of financial statement	18-19	17-18	16-17	15-16	14-15
<b>Equity &amp; Liabilities</b>					
Shareholders fund	57.82	15.94	15.94	15.95	15.95
Short Term borrowing	398.49	0.00	0.00	0.00	0.00
Other current liabilities & Non Current Liability	14.41	13.31	13.31	13.32	13.32
<b>Assets</b>					
Total fixed assets	0.00	0.00	0.00	0.00	0.00
Non current investments	17.24	17.15	17.15	17.15	17.15
Cash & cash equivalents	0.001	0.001	0.001	0.001	0.004
Unsecured short term loans & advances	452.77	0.00	0.00	0.00	0.00
Other current & non current assets	0.70	12.11	12.11	12.12	12.12
<b>Revenue</b>					
Revenue from sale of goods or services	0.00	0.00	0.00	0.00	0.00
Other Income	0.60	0.00	0.00	0.00	0.01
<b>Expenses</b>					
Operating Expenses	0.44	0.00	0.01	0.00	0.43
Finance cost	0.00	0.00	0.00	0.00	0.00
Net profit/loss	0.01	(0.00)	(0.00)	(0.00)	(0.40)

Valuecorp	Details
Date of Incorporation	15 July 1991
Current Directors	1. Samir Dedhia 2. Antoo Kallan 3. Pradip Shroff 4. Girish Damania
Address	24/26, 1 <sup>st</sup> floor, Cama Building, Dalal Street, Fort Mumbai 400001
Business area	Financial Services
Email ID	vijaykar@vbdesai.com

## 5. Loan disbursement to Valuecorp Securities and Finance Limited written off (Contd.)

### Management response:

- a. The loan given to Valuecorp was on-lent exposure to Reliance Communications Limited (RCom) and was secured by way of charge on all receivables of the borrower.
- b. At the time of sanctioning of loan, RCom had publicly announced its debt resolution plan which envisaged “zero write-off” for all the lenders. Attached for your kind reference is the press release dated December 26, 2017 issued by RCom (Annexure 4)
- c. Accordingly, the exposure to RCom group was considered to be safe and fully recoverable.
- d. The subsequent writing-off of the exposure to Valuecorp was consequent to RCom announcing its debt resolution through NCLT, for not being able to achieve resolution even after 18 months. Attached is the media release dated February 1, 2019 (Annexure 5).
- e. Such write-off was strictly in compliance with IND AS guidelines with respect to prudent credit risk management and without relinquishing the Company’s legal rights or remedies available at law and equity.

*Note: Management response is reproduced in full as provided by the company.*

# Anomalies in the credit appraisal process

## 6.1 Loan disbursed prior to the loan sanction date

### Background:

- Each loan disbursement requires prior approval of relevant authority as defined in the Credit Authority Delegation ('CAD') which was last approved in the meeting of Board of Directors held on 24 April 2017. Accordingly, loans of value greater than INR 5 crores are approved by Credit Committee which comprises of - Chief Risk Officer (CRO), Chief Executive Officer (CEO) and one Director. On discussion with the representative of the target entity, we were informed that the disbursement of the value greater than INR 5 crores is manually approved by authorities as defined in CAD by signing the loan approval memo. Post manual approval by authorities, approval in 'Finnone' is done through designated logins by officials in the credit department.

### Observation:

- On review of 170 loan files belonging to the category of general purpose corporate loans ('GPCL'), it appears that in 16 instances aggregating to INR 1,362.65 crores in value, the actual loan disbursement date as per bank statement was prior to the date of issuance of sanction letter. The difference in dates ranges from 01 days to 28 days.
- It is pertinent to note that all such borrowers were identified as potential linked entities ('PILE').

(INR in crores)

#	Range in days	No. of loans	Amount disbursed
1	1 to 3	12	1,195.65
2	4 to 6	1	7.00
3	7 to 10	2	126.00
4	>10	1	110

- Further, it was observed that the loan approval memo does not contain the date on which the approval of the credit committee was taken. In absence of this document, it is difficult to identify the date on which the approval to the loan was provided by the members of the credit committee.

*Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B*

## 6.1 Loan disbursed prior to the loan sanction date (Contd.)

Instances where loan disbursement occurred prior to loan sanctioning date

(INR in crores)

#	Name of the borrower	LAN	Amount disbursed	Date of disbursement in bank statement	Date of sanction letter	Date of loan facility agreement	Disbursal date in LOS	Difference	Total Outstanding	Loan status
1	Reliance Unicorn Enterprises Private Limited	RHWCCOR000068208	110.00	28-Feb-18	28-Mar-18	28-Mar-18	28-Mar-18	28	0.00	Closed
2	Adhar Project Management And Consultancy Private Limited	RHWCCOR000067746	61.00	12-Mar-18	21-Mar-18	21-Mar-18	21-Mar-18	9	0.00	Closed
3	Reliance Unicorn Enterprises Private Limited	RHWCCOR000067747	65.00	12-Mar-18	21-Mar-18	21-Mar-18	21-Mar-18	9	0.00	Closed
4	Crest Logistics And Engineers Private Limited	RHWCCOR000069791	7.00	20-Apr-18	26-Apr-18	26-Apr-18	26-Apr-18	6	7.81	NPA
5	Gamesa Investment Management Private Limited	RHWCCOR000074020	50.00	15-Oct-18	18-Oct-18	18-Oct-18	18-Oct-18	3	0.00	NPA
6	Adhar Project Management And Consultancy Private Limited	RHWCCOR000070303	100.00	27-Apr-18	30-Apr-18	30-Apr-18	30-Apr-18	3	0.00	Closed
7	RPL Sunlight Power Pvt. Ltd.	RHWCCOR000068206	99.95	27-Mar-18	28-Mar-18	28-Mar-18	28-Mar-18	1	112.45	NPA
8	Worldcom Solutions Limited	RHWCCOR000072378	63.24	08-Aug-18	09-Aug-18	09-Aug-18	09-Aug-18	1	73.15	NPA
9	Medybiz Pvt. Ltd.	RHWCCOR000073122	150.00	10-Sep-18	11-Sep-18	11-Sep-18	11-Sep-18	1	31.48	31 - 60 DPD
10	Mohanbir Hi Tech Build Private Limited	RHWCCOR000073124	80.00	10-Sep-18	11-Sep-18	11-Sep-18	11-Sep-18	1	8.17	31 - 60 DPD
11	Gamesa Investment Management Private Limited	RHWCCOR000073259	200.00	18-Sep-18	19-Sep-18	19-Sep-18	19-Sep-18	1	5.76	NPA
12	RPL Star Power Private Limited	RHWCCOR000068204	99.95	27-Mar-18	28-Mar-18	28-Mar-18	28-Mar-18	1	112.41	NPA
13	Crest Logistics And Engineers Private Limited	RHWCCOR000071120	99.31	19-Jun-18	20-Jun-18	20-Jun-18	21-Jun-18	1	114.33	NPA
14	Jayamkondam	RHWCCOR000071121	102.80	19-Jun-18	20-Jun-18	20-Jun-18	21-Jun-18	1	118.74	NPA
15	Adhar Project Management And Consultancy Private Limited	RHWCCOR000071863	25.00	23-Jul-18	24-Jul-18	24-Jul-18	24-Jul-18	1	27.93	NPA
16	Worldcom Solutions Limited	RHWCCOR000072586	49.40	21-Aug-18	22-Aug-18	22-Aug-18	22-Aug-18	1	56.90	61 - 90 DPD
	<b>Total</b>		<b>1362.65</b>							

## 6.1 Loan disbursed prior to the loan sanction date (Contd.)

Sample instance of Approval Memo, Sanction Letter and Facility agreement of loan extended to Crest Logistics and Engineers Private Limited, where the disbursal was prior to the date of sanction letter.

(INR in crores)

Name of the borrower	LAN	Amount disbursed	Date of disbursement in bank statement	Date of sanction letter	Date of loan facility agreement	Disbursal date in LOS
Crest Logistics And Engineers Private Limited	RHWCCOR000069791	7.00	20-Apr-18	26-Apr-18	26-Apr-18	26-Apr-18

### Approval Memo- Leadership Council

Approval Memo – Leadership Council						
Customer	Crest Logistics and Engineers Private Limited					
Product	GPCL (Limit)	Tenure	12 months			
ROI	11.50%	PF	Nil			
LOS ID	To be generated					
Proposed Exposure	Rs. 7 crore					
Total Exposure	Existing Exposure - Rs. 224 crores which includes – Crest Logistics and Engineers Private Limited – Rs. 49 crs Crest Logistics and Engineers Private Limited – Rs. 25 crs Summit Ceminfra Pvt Ltd – Rs. 150 crs Proposed Exposure - Rs. 7 crores Total Exposure - Rs. 231 crores					
Repayment	Interest and Principle - Bullet payment at the end of tenure					
<b>Background</b> Crest Logistics and Engineers Private Limited is a private company incorporated on 17th June 2003. Its authorized share capital is Rs. 31,000,000.500 and its current paid up capital is Rs. 316,260,064. It is involved in engineering and construction activities, investment activities and project consultancy. Directors of Crest Logistics And Engineers Private Limited are Dinesh Navnidal Modi, Hari Ganesh and Chandra Prakash Shukla. Dinesh Navnidal Modi (DIN: 00004556), aged above 65 years, is Company Secretary with more than 40 years experience in Secretarial and Company Law matters. He serves as independent director in more than 20 companies. Hari Ganesh (DIN: 05240363), aged above 50 years, is a qualified Chartered Accountant with more than 20 years experience in Corporate Accounting & Finance with special expertise in EPC business. He serves as independent director in 3 companies. Chandra Prakash Shukla (DIN: 06994474), aged above 50 years, is a qualified Chartered Accountant with more than 15 years experience in Corporate Accounting & Finance with special expertise in EPC business.						
<b>Management Team / Director's Detail:</b>						
Sr. No	Name of the Director	DOB	Nationality	DIN	Designation	Address
1	Hari Ganesh	01.04.1968	Indian	05240363	Whole Time Director	C-204, Lake Pleasant Phase II, NR Gopal Sharma School, Powai, Mumbai 400076
2	Chandra Prakash Shukla	27.11.1974	Indian	06994474	Whole Time Director	C-313, Gorai BSES Frim's CHS Ltd, Plot No. 4, L.T. Road, Gorai 3, Borivili (West), Mumbai

Crest Logistics and Engineers Private Limited Page 1

Share Holding Pattern:						
Sr. No	Name of the Equity shareholder	No. of Equity shares of Rs 10 each	% of shareholding			
1.	Spice Commerce And Trade Private Limited	50,59,895	16.67			
2.	Space Trade Enterprises Private Limited	50,59,995	16.67			
3.	Skyline Global Trade Private Limited	50,60,020	16.67			
4.	Reliance Infrastructure Limited	4,09,795	1.35			
5.	Elder IT Solutions Private Limited	23,00,000	7.58			
6.	Nectar Mercantile Private Limited	1,15,60,000	37.45			
7.	Kent Info Tech Private Limited	11,00,000	3.62			
8.	Shri Hari Ganesh jointly with Skyline Global Trade Private Limited	100	0.00			
9.	Chandra Prakash Shukla jointly with Spice Commerce and Trade Private Limited	100	0.00			
10.	Sayli Dabholkar jointly with Space Trade Enterprises Private Limited	100	0.00			
Total		3,03,50,005	100			

Sr. No	Name of the 10% Preference shareholder ( Series A)	No. of Preference shares of RS 10 each	% of shareholding
1.	Reliance Infrastructure Limited	1,09,50,000	85.82
2.	Whitegold Properties Private Limited	18,10,000	14.18
Total		1,27,60,000	100

Sr. No	Name of the 6% Preference shareholder ( Series B)	No. of Preference shares of RS 10 each	% of shareholding
1.	Reliance Infrastructure Limited	2,000	100
Total		2000	100

Sr. No	Name of the 10% Preference shareholder ( Series C)	No. of Preference shares of RS 10 each	% of shareholding
1.	Reliance Infrastructure Limited	30,00,000	100
Total		30,00,000	100

**Deal Structure:**  
Crest Logistics and Engineers Private Limited requires loan of Rs. 7 Crores for general purpose utilization of the company for 12 months.

Crest Logistics and Engineers Private Limited Page 2

## 6.1 Loan disbursed prior to the loan sanction date (Contd.)

### Approval Memo- Leadership Council

Crest Logistics and Engineers Private Limited		Year ended March 31, 2016	Year ended March 31, 2015
<b>INCOME:</b>			
Revenue from Operations		2373 05 30 555	2453 64 42 607
Other Income		24 96 90 932	92 37 432
<b>Total</b>		<b>2398 02 21 487</b>	<b>2454 56 80 039</b>
<b>EXPENSES:</b>			
Cost of materials consumed		1511 23 47 319	1286 84 56 636
Changes in inventories of work-in-progress and Stock-in-Trade		(272,566,343)	(1,009,600,642)
Employee benefits expense		13 36 97 785	17 25 29 026
Finance costs		2091 49 46 460	1949 15 84 804
Other expenses		38 54 16 501	67 81 87 023
Depreciation and Amortization expense		3 52 83 155	5 01 09 868
<b>Total</b>		<b>3630 91 24 876</b>	<b>3225 12 66 716</b>
<b>Profit/(Loss) before tax</b>		<b>(12,328,903,389)</b>	<b>(7,705,586,677)</b>
<b>Tax expense</b>			
Current tax		-	-
Tax Adjustments for Earlier Years		-	(7,796,876)
<b>Total</b>		<b>0</b>	<b>(7,796,876)</b>
<b>Profit/(Loss) for the year</b>		<b>(12,328,903,389)</b>	<b>(7,697,789,801)</b>
<b>Earnings Per Share :-</b> (Face value of Rs.10 each)			
Basic / Diluted		(406)	(254)

Balance Sheet as at March 31, 2016			
Crest Logistics and Engineers Private Limited	Note	As at March 31, 2016	As at March 31, 2015
<b>I. EQUITY &amp; LIABILITIES</b>			
Shareholders' Funds			
Share Capital	2	34 62 80 050	3031 62 80 050
Reserves & Surplus	3	2550 86 49 998	786 75 53 387
<b>Non-Current Liabilities</b>			

Crest Logistics and Engineers Private Limited Page 3

Crest Logistics and Engineers Private Limited		Year ended March 31, 2016	Year ended March 31, 2015
Long Term Borrowings	4	2200 00 00 000	2200 00 00 000
Other Long Term Liabilities	5	2450 99 81 484	2295 01 02 072
Long term Provisions	6	3 29 85 896	5 27 58 962
<b>Current Liabilities</b>			
Short-Term Borrowings	7	13040 79 97 123	11119 92 20 601
Trade Payables			
Micro and Small Enterprises	32	-	-
Others		1832 82 64 243	2203 85 73 559
Other Current Liabilities	8	1392 97 92 233	1640 35 82 757
Short Term Provisions	9	20 79 10 600	20 81 38 569
<b>Total</b>		<b>23527 18 61 627</b>	<b>23303 62 09 958</b>
<b>II. ASSETS</b>			
<b>Non-current assets</b>			
Fixed Assets	10	15 96 84 423	19 51 84 606
Non current Investments	11	9454 99 67 182	9796 41 05 679
Long Term Loans and Advances	12	3607 33 66 580	3627 67 52 066
Other Non Current Assets	13	2423 63 94 042	1980 65 65 045
<b>Current Assets</b>			
Inventories	14	1 03 25 548	82 76 848
Trade Receivables	15	708 23 05 718	1033 86 33 923
Cash and Cash Equivalents	16	6 70 08 381	2 31 92 575
Short Term Loans and Advances	17	6975 34 63 826	6538 38 25 938
Other Current Assets	18	333 93 45 927	303 96 73 278
<b>Total</b>		<b>23527 18 61 627</b>	<b>23303 62 09 958</b>

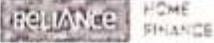
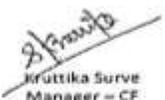
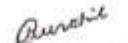
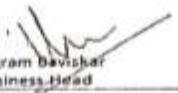
**Collateral Offered:**  
Subservient charge on Assets.

**Sanction Conditions**

- Full or part disbursement allowed. Disbursement can be in tranches/multiple tranches as per requirement of borrower.
- All Documents to be executed as required by legal
- KYC docs to be collected as per norms
- Executing and signing requisite application, forms, agreements and undertakings creating security in favour of RHFL
- Hypothecation of current assets
- ROC charge to be created within 30 days from date of disbursement
- Rollover to be done at the sole discretion of RHFL
- Part prepayment allowed & Prepayment charges – NIL
- Confirmation letter stating that the borrowing including the proposed transaction is within the limits of Board / Shareholders' resolution
- Doing and performing all acts, deeds, matters and things as may be required by RHFL for the disbursement of sanctioned amount

# 6.1 Loan disbursed prior to the loan sanction date (Contd.)

## Approval Memo- Leadership Council

		
<b>Proposed By</b>		
 Kruttika Surve Manager - CF	 Manash Purohit Chief Manager - CF	
<b>Recommended By</b>		
 Rajkumar M NCM - CF	 Sangram Davisar Business Head	
<b>Approved By</b>		
 Krishnan Gopalakrishnan CRO	 Ravindra Sudhaikar ED & CEO	 Amit Bagna Group CFO

# 6.1 Loan disbursed prior to the loan sanction date (Contd.)

## Sanction Letter

**RELIANCE HOME FINANCE** (51)

24/04/2016  
Date: 20.04.2016  
Hugcha Jain  
30.10.2012

Crest Logistics and Engineers Private Limited  
Raheja Point Wing B, 7th Floor, Nehru Road  
Near Shamrao Vithal Bank, Vakhola, Santacruz (East)  
Mumbai 400055

Dear Sirs,

Sub: Your application for GPCL loan of Rs. 7,00,00,000/- (Rupees Seven Crores Only)

Based on your application for the aforesaid loan and information provided to us, we are agreeable to sanction the loan amount applied by you on the terms & conditions mentioned below.

Particulars	Details
Facility type	GPCL
Facility tenor	12 months ✓
Loan Amount	Rs. 7 Crores ✓
Security	Subservient charge on current assets
Pricing	11.50% per annum ✓
Processing Fees	Nil ✓
Repayment Terms	Interest and Principle - Bullet payment at the end of tenure
Overdue Charges	RHFL will charge overdue charges for any delayed payment at the rate of 18% p.a. compounded monthly as will be detailed in the transaction documents.
Purpose of loan	For general purpose utilization of the company
Payment Mechanism	NA
Foreclosure / Prepayment Charges	Nil
Legal Documentation	<ul style="list-style-type: none"> <li>Facility cum Hypothecation agreement</li> <li>Power of attorney</li> <li>Demand promissory note</li> <li>Letter of continuity</li> <li>End use letter</li> <li>Notice of drawal and drawdown certificate</li> <li>Letter seeking disbursal</li> <li>FATCA declaration</li> <li>Declaration for signing in vernacular language</li> <li>Board Resolution</li> <li>Any other document as prescribed by RHFL Legal</li> </ul>

For Crest Logistics and Engineers Private Limited  
Crest Logistics and Engineers Private Limited  
Director

Reliance Home Finance Limited  
Registered Office: Reliance Centre, South Wing, 6<sup>th</sup> Floor, Off Western Express Highway, Santacruz (East), Mumbai - 400 055  
T +91 22 3303 6000 / F +91 22 3303 6662, E-mail: rhfl.investor@relianceada.com, Website: www.reliancehomefinance.com  
Customer Service: T +91 22 3967 1600 / 1800-300-90909 Toll free / E-mail: customercare@reliancehomefinance.com

CIN: L67190MH2008PLC183216 A RELIANCE CAPITAL COMPANY

**RELIANCE HOME FINANCE**

Other Conditions	<ul style="list-style-type: none"> <li>Full or part disbursement allowed. Disbursement can be in tranches/multiple tranches as per requirement of borrower.</li> <li>All Documents to be executed as required by legal</li> <li>KYC docs to be collected as per norms</li> <li>Executing and signing requisite application, forms, agreements and undertakings in favour of RHFL</li> <li>ROC charge to be created within 30 days from date of disbursement</li> <li>Rollover to be done at the sole discretion of RHFL</li> <li>Part prepayment allowed &amp; Prepayment charges - NIL</li> <li>Confirmation letter stating that the borrowing including the proposed transaction is within the limits of Board / Shareholders' resolution</li> <li>Doing and performing all acts, deeds, matters and things as may be required by RHFL for the disbursement of sanctioned amount</li> </ul>
Sanction letter Validity	30 days from the date of issuance of the sanction letter

Other Conditions

- This sanction letter is subject to your:
  - Furnishing all requisite documents to the satisfaction of RHFL.
  - Executing and signing requisite application, forms, agreements and undertakings creating security in favour of RHFL.
  - Doing and performing all acts, deeds, matters and things as may be required by RHFL for the disbursement of sanctioned amount.
- In the event any of the information provided by you is found to be untrue, false, misleading or you have suppressed any material facts affecting credit appraisal of you/ (Borrower), this letter shall stand revoked, cancelled and withdrawn without any prior notice to you in that regard.
- You shall bear and pay all costs, charges and expenses relating to stamp duty, registration (if required) and all incidental costs and charges required to create security in respect of the assets and properties belonging to company and directors (who are giving personal guarantee) in favour of RHFL.
- All information provided by you is true and verifications are found to be Positive. Please sign this letter in token of your acceptance of the terms & conditions mentioned above in duplicate and return the original duly signed and sealed by you. Thanking you,

Yours truly,  
For Reliance Home Finance Limited

We accept.  
Crest Logistics and Engineers Private Limited

Authorized Signatory

Authorized Signatory

Reliance Home Finance Limited  
Registered Office: Reliance Centre, South Wing, 6<sup>th</sup> Floor, Off Western Express Highway, Santacruz (East), Mumbai - 400 055  
T +91 22 3303 6000 / F +91 22 3303 6662, E-mail: rhfl.investor@relianceada.com, Website: www.reliancehomefinance.com  
Customer Service: T +91 22 3967 1600 / 1800-300-90909 Toll free / E-mail: customercare@reliancehomefinance.com

CIN: L67190MH2008PLC183216 A RELIANCE CAPITAL COMPANY

# 6.1 Loan disbursed prior to the loan sanction date (Contd.)

## Stamp Paper



**INDIA NON JUDICIAL**  
Government of National Capital Territory of Delhi

**e-Stamp**

<p>Certificate No. : IN-DL335770357532599Q</p> <p>Certificate Issued Date : 25-May-2018 03:37 PM</p> <p>Account Reference : IMPACC (IV)/ 01825003/ DELHI/ DL-DLH</p> <p>Unique Doc. Reference : SUBIN-DL DL82500308041715081099Q</p> <p>Purchased by : RELIANCE HOME FINANCE LIMITED</p> <p>Description of Document : Article 5 General Agreement</p> <p>Property Description : Not Applicable</p> <p>Consideration Price (Rs.) : 0 (Zero)</p> <p>First Party : RELIANCE HOME FINANCE LIMITED</p> <p>Second Party : Not Applicable</p> <p>Stamp Duty Paid By : RELIANCE HOME FINANCE LIMITED</p> <p>Stamp Duty Amount(Rs.) : 200 (Two Hundred only)</p>	<p>IN-DL335770357532599Q</p>
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.....Please write or type below this line.....

*This Stamp paper forms an integral part of facility -cum- Hypothecation Agreement executed on 20.04.2018*

For Great Logistics and Engineers Private Limited  
*(Signature)*  
Director

## First Schedule of Loan Agreement

FIRST Schedule	
Date of Agreement	26/04/2018
Place of Agreement	Delhi
Loan Application Date	26/04/2018
Sanction Letter Date	26/04/2018
Name of the Lender	Reliance Home Finance Limited
Address of the Lender	Registered Office Add: Resource Centre, 6th Floor, South Wing, Off Western Express Highway, Santacruz East, Mumbai 400 055. Branch Office Add: _____
Details of Borrower	Name: M/s/Mr./Mrs. <i>Great Logistics and Engineers Private Limited</i> Registered Office Address/Residential Address: <i>Rajya Laxmi wing B, 7th Floor, Nehru Road, New Market, Uthkal Bank, Wakola Santacruz East Mumbai 400055</i> Constitution (tick as applicable): Individual/Partnership/Company/ Proprietorship Concern/ Hindu Undivided Family/ Trust/ Society/ Association of Persons/ Limited Liability Company PAN number: <i>BACCR7266A</i> Name: M/s/Mr./Mrs. _____ Registered Office Address/Residential Address: _____
Details of Co-Borrower	Name: M/s/Mr./Mrs. _____ Registered Office Address/Residential Address: _____ Constitution (tick as applicable): Individual/Partnership/Company/ Proprietorship Concern/ Hindu Undivided Family/ Trust/ Society/ Association of Persons/ Limited Liability Company PAN number: _____
Details of Co-Borrower	Name: M/s/Mr./Mrs. _____ Registered Office Address/Residential Address: _____ Constitution (tick as applicable): Individual/Partnership/Company/ Proprietorship Concern/ Hindu Undivided Family/ Trust/ Society/ Association of Persons/ Limited Liability Company PAN number: _____
Details of Co-Borrower	Name: M/s/Mr./Mrs. _____ Registered Office Address/Residential Address: _____ Constitution (tick as applicable): Individual/Partnership/Company/ Proprietorship Concern/ Hindu Undivided Family/ Trust/ Society/ Association of Persons/ Limited Liability Company PAN number: _____

18

For Great Logistics and Engineers Private Limited  
*(Signature)*  
Director

## 6.1 Loan disbursed prior to the loan sanction date (Contd.)

### Management response:

- a. The loans have been sanctioned and disbursed adopting the due processes as per then applicable Policies.
- b. This is part of regular rectification of post sanction procedural deficiencies in documentation, pursuant to the Company's own internal review and risk management process.

*Note: Management response is reproduced in full as provided by the company.*

## 6.2 Loan disbursed to parties with weak financials

### Observation:

- On review of General Purpose Corporate Loans disbursed during the review period, it was noted that the Target Entity has extended various loan facilities to borrowers which were having weak financial metrics i.e. negative or minimal net worth and nominal paid up share capital ranging from INR 0.001 crores to INR 0.12 crores.
- The total loan disbursed to these entities during our review period aggregates to INR 7,908.49 crores with total outstanding dues as on 31 October 2019 of INR 5,454.03 crores. **For details refer annexure 3**
- Borrower wise details are presented in below table;

(INR in crores)

#	Borrower	Borrower status	Total disbursement	No. of loans disbursed	Total outstanding	No. of loans outstanding	Paid up capital	Net worth (17-18)**	Loan status
1	Indian Agri Services Pvt Ltd	PILE	948.15	11	314.10	6	0.12	0.12	61 – 90 DPD
2	Mohanbir Hi Tech Build Private Limited	PILE	465.00	6	267.91	4	0.01	0.01	31 – 60 DPD
3	RPL Star Power Private Limited	PILE	200.00	3	226.17	3	0.01	0.01	NPA
4	Tulip Advisors Private Limited	PILE	215.00	3	224.03	3	0.033	0.033	NPA
5	Adhar Project Management And Consultancy	PILE	650.59	10	223.44	3	0.01	0.01	NPA
6	Vinayak Ventures Private Limited	PILE	221.13	2	221.13	2	0.01	0.01	Not Due
7	Netizen Engineering Private Limited	PILE	214.54	4	214.54	4	0.01	0.01	Not Due
8	Celebrita Mediahouse Private Limited	PILE	210.00	2	210.00	2	0.01	*N.A	Not Due
9	Thwink Big Content Private Limited	PILE	207.44	2	207.44	2	0.001	*N.A	Not Due
10	Adhar Real Estate Consultancy Private Limited	PILE	202.40	1	202.40	1	0.01	0.01	Not Due
11	Edrishti Movies Private Limited	PILE	200.96	2	200.96	2	0.01	*N.A	Not Due
12	RPL Solar Power Private Limited	PILE	185.00	3	200.26	3	0.01	0.01	NPA
13	Ippy Entertainment Private Limited	PILE	196.32	5	196.32	5	0.01	*N.A	Not Due

\*These entities were incorporated in Nov 2018 due to which their financial details were not available in public domain

\*\* The net worth is considered from the latest available financial statements of the borrower

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

## 6.2 Loan disbursed to parties with weak financials (Contd.)

(INR in crores)

#	Borrower	Borrower status	Total disbursement	No. of loans disbursed	Total outstanding	No. of loans outstanding	Paid up capital	Net worth (17-18)	Loan status
14	Adhar Property Consultancy Private Limited	PILE	189.20	1	189.20	1	0.01	0.01	Not due
15	Kunjbihari Developers Private Limited	PILE	186.61	3	188.87	3	0.01	0.01	Not due
16	Pifiniti Movies Private Limited	PILE	188.66	2	188.66	2	0.01	*N.A	Not due
17	Arion Movie Productions Private Limited	PILE	402.39	2	187.50	2	0.01	*N.A	Not due
18	Accura Productions Private Limited	PILE	186.74	5	186.74	5	0.01	*N.A	Not due
19	Gamesa Investment Management Private Limited	PILE	614.21	8	185.97	4	0.01	0.01	NPA
20	RPL Surya Power Private Limited	PILE	164.00	2	185.60	2	0.01	0.01	NPA
21	RPL Sunlight Power Private Limited	PILE	147.00	2	165.91	2	0.01	0.01	NPA
22	Wallace Movies And Entertainment Private Limited	PILE	178.40	3	160.49	3	0.01	*N.A	Not due
23	RPL Aditya Power Private Limited	PILE	139.50	1	158.61	1	0.01	0.01	61-90 DPD
24	Sahishnota Advisory Services Private Limited	PILE	150.00	1	150.00	1	0.01	*N.A	Not due
25	Space Trade Enterprises Private Limited	PILE	445.72	6	145.34	1	0.01	0.01	NPA
26	Summit Ceminfra Private Limited	PILE	269.00	4	125.81	3	0.05	0.05	NPA
27	Creatoz Builders Private Limited	Others	120.00	1	114.94	1	0.05	0.05	NPA
28	Golden Beach Infracon Private Limited	Others	115.00	2	109.22	2	0.01	0.01	NPA
29	Worldcom Solutions Limited	PILE	229.50	4	56.90	1	0.05	0.05	61-90 DPD
30	Avigna Housing Private Limited	Others	20.00	1	19.67	1	0.02	0.02	31-60 DPD
31	Varin Infra Projects Private Limited	Others	20.00	1	12.24	1	0.04	0.04	1-30 DPD
32	Darvesh Bussa Realtors Private Limited	Others	18.00	1	11.55	1	0.05	0.05	NPA
33	Shantiniketan Ashraya	Others	8.00	2	1.99	1	0.01	0.01	Not due
	<b>Total</b>		<b>7,908.49</b>	<b>106</b>	<b>5,454.03</b>	<b>79</b>			

\*These entities were incorporated in Nov 2018 due to which their financial details were not available in public domain

## 6.3 Loans disbursed to entities recently incorporated

### Observation:

We noted 24 instances where loans were disbursed to entities which were incorporated in FY 18-19 & Q1 of FY 19-20 aggregating to INR 1,910.69 crores. Since these entities were newly incorporated, their financial records were not available either in the loan file or in the public domain. All the borrowers were found to be potential indirectly linked entities ('PILE). **For details refer annexure 4**

(INR in crores)

#	Name of the borrower	Date of Incorporation	Date of First Disbursal of loan	Loan Amount	Number of loans	Total Outstanding	No. of loan disbursed in Q3 FY 19	No. of loan disbursed in Q4 FY 19	No. of loan disbursed in Q4 FY 20	Number of outstanding loans	Loan Status
1	Thwink Big Content Private Limited	20-Apr-18	13-Nov-18	205.00	2	207.44	2			2	Not due
2	Pifiniti Movies Private Limited	05-Nov-18	27-Nov-18	188.50	2	188.66	2			2	Not due
3	Edrishti Movies Private Limited	12-Nov-18	30-Nov-18	200.00	2	200.96	2			2	Not due
4	IPPY Entertainment Private Limited	13-Nov-18	31-Dec-18	194.00	5	196.32		5		5	Not due
5	Wallace Movies And Entertainment Private Limited	13-Nov-18	31-Dec-18	178.19	3	160.49		3		3	Not due
6	Accura Productions Private Limited	27-Nov-18	23-Jan-19	185.00	5	186.74		5		5	Not due
7	Arion Movie Productions Private Limited	27-Nov-18	12-Dec-18	400.00	2	187.50	1	1		2	Not due
8	Celebrita Mediahouse Private Limited	27-Nov-18	18-Feb-19	210.00	2	210.00		2		2	Not due
9	Sahishnota Advisory Services Private Limited	13-Dec-18	23-Apr-19	150.00	1	150.00			1	1	Not due
	<b>Total</b>			<b>1,910.69</b>	<b>24</b>	<b>1,688.12</b>				<b>24</b>	

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

## 6.3 Loans disbursed to entities recently incorporated

### Management response on Loan disbursed to parties with weak financials and Loan disbursed to entities which were recently incorporated:

Loans are sanctioned based on underlying security and overall recoverability. In the instances, where the borrowers are separate SPVs, the overall group strength and/ or project potential and/ or underlying security is considered.

For the end use of the loans in by RCap Group and RInfra Group:

The same are extended taking into account the underlying strength and asset base of the respective group.

- i. Reliance Capital Group (RCap Group): RCap is the holding group of RHFL with significant diverse holdings across financial services space. At the time of sanctioning of the loans, RCap had Credit Rating of AA+, net worth of INR 15,207 Crore and asset base of INR 93,851 Crore.
- ii. RInfra Group: The loans were sanctioned and disbursed taking into account the underlying security and overall recoverability of such loans. In addition to charge on receivables of the Borrower, these facilities are fully recoverable pursuant to additional security by way of corporate guarantee of RInfra which is secured by way subservient charge on its assets.

The assets of RInfra comprise the following:

#	Particulars	RINFRA (INR Crore)
1	Consolidated Net Worth as on March 31, 2019	15,866
	<b>Net Assets</b>	
2	Operating SPVs	2,947
3	Power Business	5,555
4	Other Assets	1,574
5	Arbitration/Claims	15,740
6	Standalone Debt	-6,000
	<b>TOTAL</b>	<b>19,816</b>

Accordingly, the Company has followed the prescribed policies and procedures in granting the said loans.

*Note: Management response is reproduced in full as provided by the company.*

## 6.4 Potential anomalies in creation of charge on the security provided to RHFL

### Observation:

- As per section 77(1), 78 & 79 of Companies Act, 2013, an application should be made within a period of 30 days from the date of execution of deed for registration of charge to Registrar of Companies ('ROC') along with fee in Form CHG-1. ROC may, on application by the borrower, allow the registration of charge within 300 days (30 days + additional period of 270 days).
- On review of cases which were disbursed during the review period, 30 instances were identified where charge on the assets of the borrower was not registered by the Target Entity. Out of that, in 13 instances, the loans are still active and the total dues as on 31 October 2019 was INR 658.92 crores. All the borrowers were found to be potential indirectly linked entities ('PILE').

(INR in crores)

Sr. No	Loan Account No.	Name of the borrower	Loan amount	Date of disbursement	Total Dues	Loan status	Charge created
1	RHWCCOR000074827	Gamesa Investment Management Private Limited	144.00	20-Mar-19	144.00	NPA	✗
2	RHWCCOR000074762	Adhar Project Management and Consultancy Private Limited	100.00	05-Mar-19	100.00	NPA	✗
3	RHWCCOR000071120	Crest Logistics and Engineers Private Limited	100.50	21-Jun-18	114.33	NPA	✗
4	RHWCCOR000074417	Netizen Engineering Private Limited	80.96	28-Dec-18	80.96	Not Due	✗
5	RHWCCOR000074418	Netizen Engineering Private Limited	50.60	28-Dec-18	50.60	Not Due	✗
6	RHWCCOR000074413	Netizen Engineering Private Limited	32.38	28-Dec-18	32.38	Not Due	✗
7	RHWCCOR000074947	Mohanbir Hi Tech Build Private Limited	30.00	16-Apr-19	30.00	31 – 60 DPD	✗
8	RHWCCOR000074822	Gamesa Investment Management Private Limited	35.00	19-Mar-19	26.21	NPA	✗
9	RHWCCOR000074821	Indian Agri Services Pvt Ltd	25.00	19-Mar-19	25.15	61 – 90 DPD	✗
10	RHWCCOR000074826	Mohanbir Hi Tech Build Private Limited	25.00	20-Mar-19	25.00	31 – 60 DPD	✗
11	RHWCCOR000073595	Crest Logistics and Engineers Private Limited	11.00	01-Oct-18	12.47	NPA	✗
12	RHWCCOR000074733	Gamesa Investment Management Private Limited	60.00	28-Feb-19	10.00	NPA	✗
13	RHWCCOR000069791	Crest Logistics and Engineers Private Limited	7.00	26-Apr-18	7.81	NPA	✗
		<b>Total</b>	701.44		658.92		

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

## 6.4 Potential anomalies in creation of charge on the security provided to RHFL (Contd.)

- In various instances, the charge on current assets of the borrowers was created and registered against GPCL given. On review, we noted that the value of the current assets, as evident from the latest available financial statements in the public domain, was less than the amount of total dues as on 31 October 2019. A total of 31 GPCL were disbursed to below mentioned 17 borrowers during our review period in which the value of current assets was substantially less than the total dues as on 31 Oct 2019. All the borrowers were found to be potential indirectly linked entities ('PILE'). **For details refer annexure 5**

#	Borrower	Loan amount	Charge Amount	No. of loans	Total Dues (1)	Current assets (2) (FY 17-18)	Shortfall (3) = (1) –(2)	Loan status
1	Phi Management Solutions Pvt Ltd	220.00	220.00	2	222.01	0.16	221.68	31-60 DPD
2	Vinayak Ventures Private Limited	221.13	221.13	2	221.13	0.02	221.08	Not Due
3	Citi Securities and Financial Services Private Limited	220.80	220.80	1	220.80	0.02	220.77	Not Due
4	Adhar Real Estate Consultancy Private Limited	202.40	202.40	1	202.40	0.005	202.39	Not Due
5	Medybiz Pvt. Ltd.	175.90	175.90	2	189.23	0.009	189.21	31-60 DPD
6	Adhar Property Consultancy Private Limited	189.20	189.20	1	189.20	0.01	189.18	Not Due
7	Tulip Advisors Private Limited	160.00	160.00	2	181.47	0.20	181.06	NPA
8	Azalia Distribution Private Limited	175.00	175.00	1	179.93	0.31	179.61	NPA
9	Nationwide Communication Private Limited	175.00	175.00	1	175.00	0.54	174.45	Not Due
10	Mohanbir Hi Tech Build Private Limited	200.00	200.00	1	204.74	62.01	142.73	31-60 DPD
11	Indian Agri Services Pvt Ltd	110.00	110.00	3	114.70	0.07	114.49	61-90 DPD
12	Adhar Project Management And Consultancy Private Limited	95.00	95.00	1	95.51	36.25	59.261	NPA
13	RPL Surya Power Private Limited	164.00	164.00	2	185.60	100.16	85.44	NPA
14	RPL Sunlight Power Pvt. Ltd.	147.00	147.00	2	165.91	100.13	65.78	NPA
15	RPL Star Power Private Limited	200.00	200.00	3	226.17	100.13	126.04	NPA
16	RPL Solar Power Private Limited	185.00	185.00	3	200.26	100.16	100.10	NPA
17	Summit Ceminfra Private Limited	119.00	119.00	3	125.81	83.28	42.53	NPA
	<b>Total</b>	<b>2,959.43</b>	<b>2,959.43</b>	<b>31</b>	<b>3,099.91</b>		<b>2,515.80</b>	

- Further, it was observed that the amount of charge created and registered covers only the principal component of the loans. The interest component and other charges which are levied in the event of a default were not included in the charge amount. Below mentioned are details of 61 GPCL having charge amount equivalent to the loan amount. **For details refer annexure 6**

Financial Year	Loan amount	Charge amount	POS	Total Dues	No. of loans
FY 17-18	520.00	520.00	503.30	564.71	5
FY 18-19	5437.10	5437.11	5384.27	5781.48	54
FY 19-20	186.00	186.00	186.00	186.00	2
<b>Grand Total</b>	<b>6,143.10</b>	<b>6,143.11</b>	<b>6,073.57</b>	<b>6,532.19</b>	<b>61</b>

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

## 6.4 Potential anomalies in creation of charge on the security provided to RHFL (Contd.)

- It was observed that Reliance Infrastructure Limited ('RInfra') and Reliance Power limited ('RPower') have entered into a deed of hypothecation wherein, RInfra and RPower are acting as hypothecator for loan disbursed by the Target Entity to below-mentioned entities. The obligations of the borrowers are secured by way of a subservient charge on all current assets, present and future, of RInfra and RPower pursuant to the deed of hypothecation entered between the hypothecator, RHFL and the Borrowers ("**Deed of Hypothecation**"). All the borrowers were found to be potential indirectly linked entities ('PILE').
- It is pertinent to note that these deeds were executed substantially after the disbursement of loans. (In 86% of loans the deed was executed after 9-15 months of disbursement). The Inter Creditor Agreement was signed on 6 July 2019. **For details refer annexure 7**

(INR in crores)

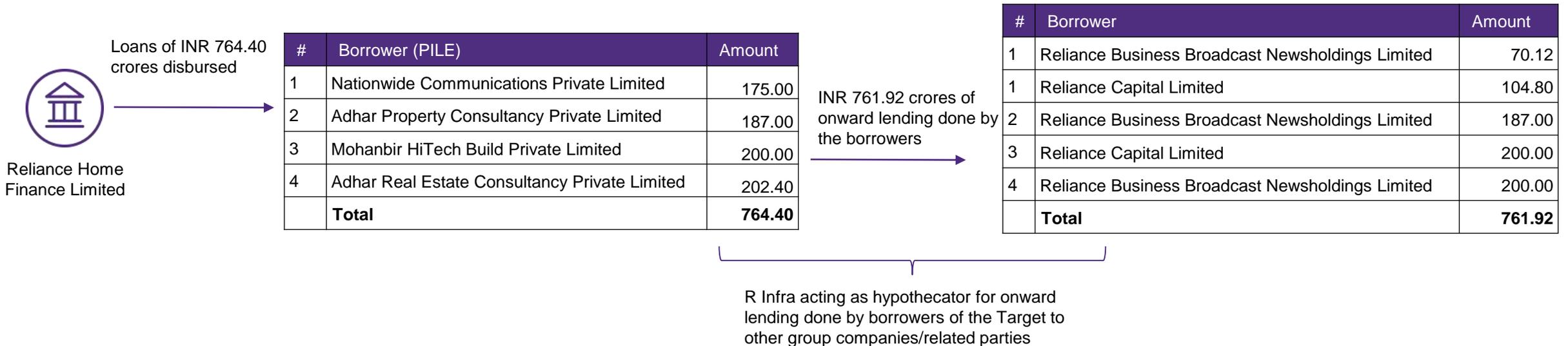
#	Name Of Borrower	No of Loans	Loan Amount	Hypothecator	Date of Deed	POS	Total Dues	Loan Status
1	Aashish Power Plant Equipment Private Limited	1	100.00	Reliance Infrastructure Limited	08-Aug-19	99.60	112.06	NPA
2	Hirma Power Limited	2	225.00	Reliance Infrastructure Limited	08-Aug-19	210.00	210.46	NPA
3	Jayamkondam Power Limited	1	104.00	Reliance Infrastructure Limited	08-Aug-19	104.00	118.75	NPA
4	Reliance Cleangen Limited	1	40.48	Reliance Power limited	18-Sep-19	40.48	46.19	31-60 DPD
5	RPL Solar Power Private Limited	3	185.00	Reliance Infrastructure Limited	08-Aug-19	181.00	200.26	NPA
6	RPL Star Power Private Limited	3	200.00	Reliance Infrastructure Limited	08-Aug-19	200.00	226.17	NPA
7	RPL Sunlight Power Private Limited	1	47.00	Reliance Infrastructure Limited	08-Aug-19	47.00	53.46	NPA
8	RPL Surya Power Private Limited	2	164.00	Reliance Infrastructure Limited	08-Aug-19	164.00	185.61	NPA
9	Skyline Global Trade Private Limited	2	91.00	Reliance Infrastructure Limited	08-Aug-19	91.00	103.23	NPA
10	Space Trade Enterprises Private Limited	1	136.61	Reliance Infrastructure Limited	08-Aug-19	136.61	145.34	NPA
11	Species Commerce And Trade Private Limited	2	121.00	Reliance Infrastructure Limited	08-Aug-19	121.00	137.42	NPA
12	Tulip Advisors Private Limited	3	215.00	Reliance Infrastructure Limited	08-Aug-19	202.00	224.03	NPA
13	Vinayak Ventures Private Limited	2	221.13	Reliance Infrastructure Limited	08-Aug-19	221.13	221.13	Not Due
14	Worldcom Solutions Limited	1	50.00	Reliance Infrastructure Limited	08-Aug-19	50.00	56.91	61-90 DPD
15	Crest Logistics and Engineers Private Limited	4	160.50	Reliance Infrastructure Limited	18-Mar-19	160.50	182.63	NPA
	<b>Total</b>	<b>29</b>	<b>2,060.72</b>			<b>2,027.83</b>	<b>2,223.65</b>	

#	Range in months	No. of loans	Amount disbursed
1	0-3	2	385.00
2	3-6	1	136.61
3	6-9	1	11.00
4	9-12	10	520.00
5	12-15	15	1,007.28
	<b>Total</b>	<b>29</b>	<b>2,060.72</b>

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

## 6.4 Potential anomalies in creation of charge on the security provided to RHFL (Contd.)

- Further, in 4 instances it was observed that Reliance Infrastructure Limited ('R Infra') has entered into a deed of hypothecation wherein, R Infra is acting as hypothecator for existing borrowers of the Target Entity who have entered into onward lending of loans to group companies/related parties of the Target. The obligations of the group companies/related parties of the Target are secured by way of a subservient charge on all current assets, present and future, of R Infra pursuant to the deed of hypothecation entered between the hypothecator, borrowers of the Target and group companies/related parties of the Target. ("**Deed of Hypothecation**")
- All the borrowers were found to be potential indirectly linked entities ('PILE'). (INR in crores)



#	Name Of Borrower	No of Loans	Loan Amount	Date of Deed	Total Dues	Loan Status
1	Nationwide Communications Private Limited	1	175.00	08-Aug-19	175.00	Not due
2	Adhar Property Consultancy Private Limited	2	187.00	08-Aug-19	189.20	Not due
3	Mohanbir HiTech Build Private Limited	1	200.00	08-Aug-19	204.74	1- 30 DPD
4	Adhar Real Estate Consultancy Private Limited	1	202.40	18-Sep-19	202.40	Not dues
	<b>Total</b>	<b>5</b>	<b>764.40</b>		<b>771.34</b>	

Note: For nature of relationship for potential indirectly linked entities, please refer exhibit 1A & 1B

Details of onward lending entered into by the borrowers as provided by the Target Entity

## 6.4 Potential anomalies in creation of charge on the security provided to RHFL (Contd.)

### Management response

- The loans have been sanctioned and disbursed adopting the due processes as per policy, with valid and enforceable security documents.
- Rectification of minor deficiencies in documentation and filing of charge with the registrar was pending only in a singular case which is being pursued with the borrower.
- GT's observation that a total of 31 GPCL disbursed to 17 borrowers in which the value of current assets was mentioned to be substantially less than the total loan amount of INR 2,959.43 Crore and total dues of INR 3,099.91 Crore as on 31<sup>st</sup> Oct 2019 is misinterpreted.
- We clarify that the charge on current assets includes all present as well as future receivables and other current assets of the Borrower and covers the Company's entire exposure to the Borrower.

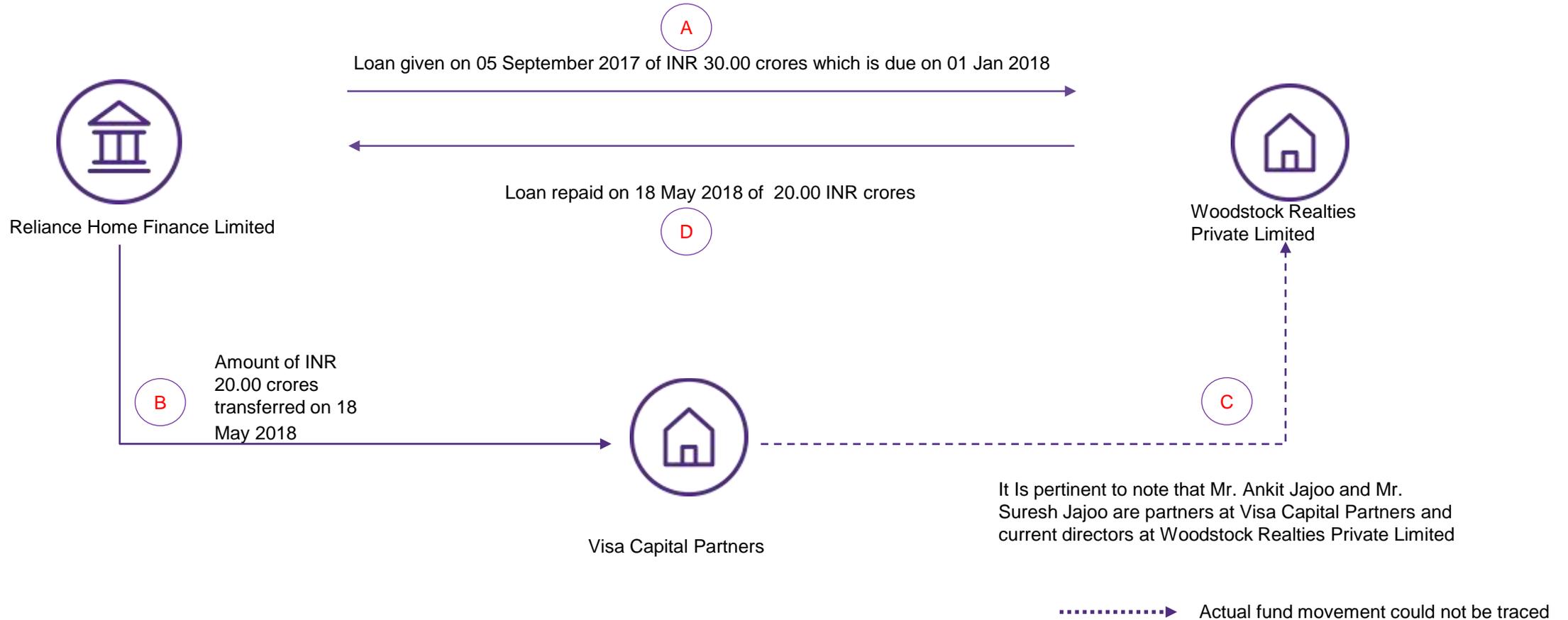
*Note: Management response is reproduced in full as provided by the company.*

# Others - Potential circular transactions

## 7. Others - Potential Circular Transactions

### Observation: Case 1

On 18 May 2018, Target Entity extended a GPCL to Visa Capital Partners Limited which was potentially used to repay the existing loan of Woodstock Realities Private Limited.



Note: The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – **00600310022347** and **006310022433**

## 7. Others - Potential Circular Transactions (Contd.)

### Observation: Case 1 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
05-Sept-2017	RHWCCOR000059048	WOODSTOCK REALTIES PRIVATE LIMITED	30.00	RHF -GENERAL PURPOSE CORPORATE LOAN
18-May-2018	RHWCCOR000070624	VISA CAPITAL PARTNERS	20.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
922596	35274022	RHWCCOR000059048	WOODSTOCK REALTIES PRIVATE LIMITED	20.24	22-Mar-19

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
18-May-2018	RTGS DR-KKBK0001368-VISA CAPITALPARTNERSSONAWALA,MUM-HDFCR52018051878633083	20.00	

#### Bank Account entries HDFC Bank 00600310022433

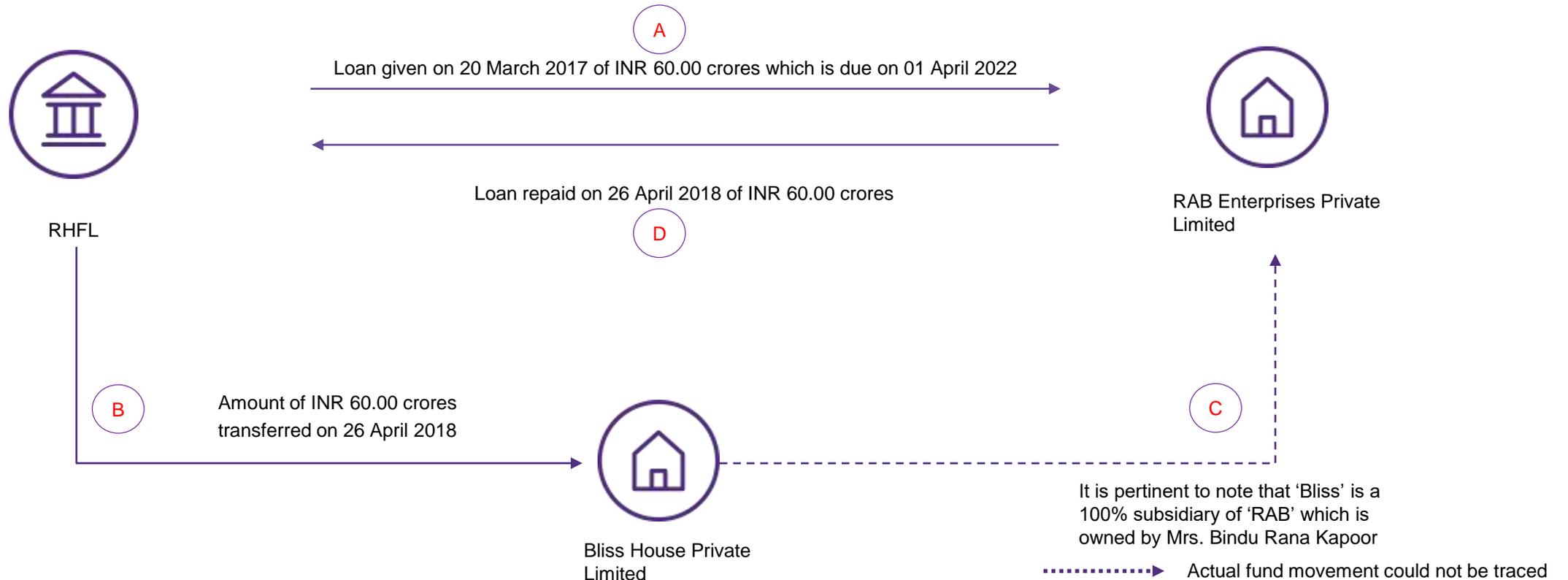
Transaction Date	Description	Debit	Credit
18-May-18	RTGS CR-KKBK0000958-WOODSTOCK REALTIESPVT LTD-RELIANCE HOME FINANCELTD-KKBKR52018051800625539		20.00
18-May-18	RTGS CR-KKBK0000958-WOODSTOCK REALTIESPVT LTD-RELIANCE HOME FINANCELTD-KKBKR52018051800626210		0.24

Loan of INR 30 crores disbursed to Woodstock Realities Private Limited was made from account of Reliance Capital,

## 7. Others - Potential Circular Transactions (Contd.)

### Observation: Case 2

On 26 April 2018, Target entity extended a GPCL to Bliss House Private Limited which was potentially used to repay the existing loan of RAB Enterprises Private Limited.



Note: 1 The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of HDFC Bank – **00600310022347** and **006310022433**  
 2 The loans disbursed to RAB Enterprises Pvt. Ltd. & Bliss House Pvt. Ltd. were repaid as on 30 June 2019

## 7. Others - Potential Circular Transactions (Contd.)

### Observation: Case 2 (Contd.)

#### Loan Disbursal Details

(INR in crores)

Disbursal Date	Loan Account No.	Customer date	Disbursed Amount	Nature of Loan
18-Mar-17	RHWCCOR000048643	RAB Enterprises	60.00	RHF -GENERAL PURPOSE CORPORATE LOAN
26-Apr-18	RHWCCOR000069804	Bliss House Private Limited	60.00	RHF -GENERAL PURPOSE CORPORATE LOAN

#### Loan repayment

Agreement ID	Cheque ID	Loan Account No.	Customer Name	Cheque Amount	Received Date
889651	35172222	RHWCCOR000048643	RAB ENTERPRISES INDIA PRIVATE LIMITED	60.00	26-Apr-18

#### Bank account entries HDFC Bank00600310022347

Transaction Date	Description	Debit	Credit
20-Mar-17	RHF	60.00	
26-Apr-18	RTGSDR-HSBC0400002-BLISSHOUSEPRIVATELIMITED-NETBANK, MUM-HDFCR52018042675715743	60.00	

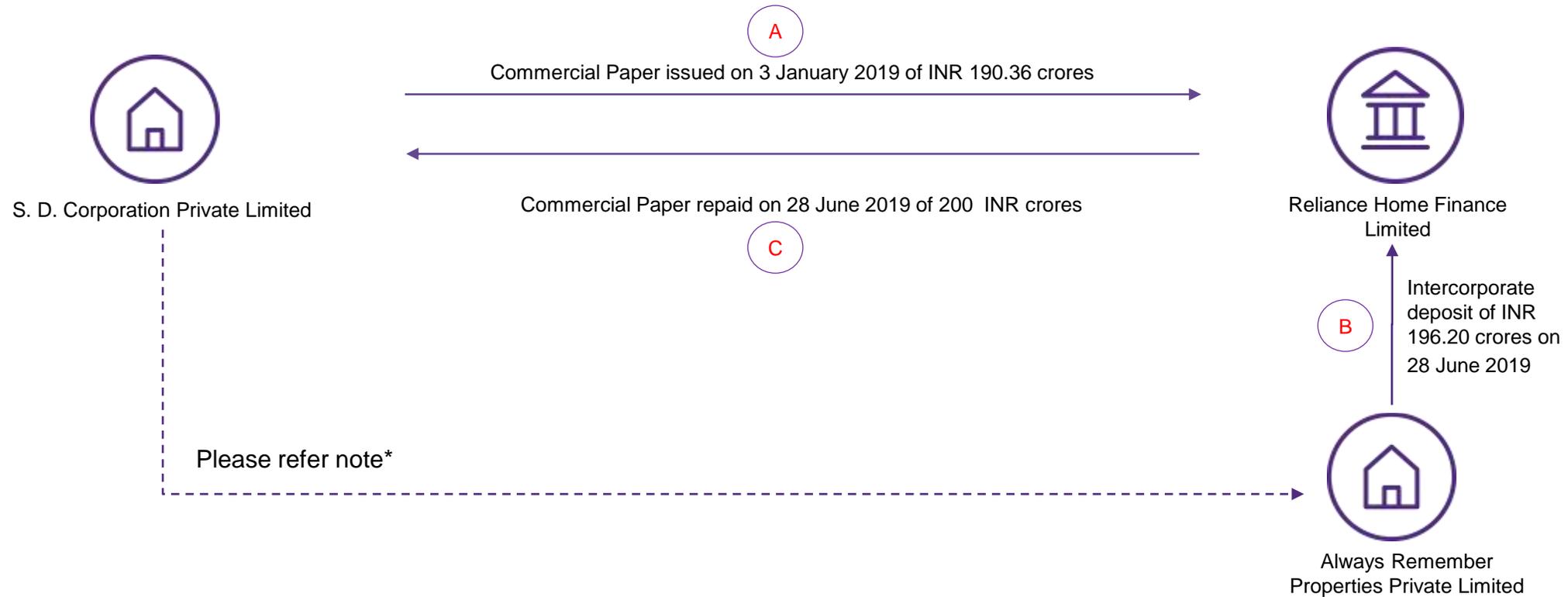
#### Bank account entries Bank-00600310022433

Transaction Date	Description	Debit	Credit
26-Apr-18	NEFT CR-HSBC0400002-RAB ENTERPRISES(INDIA) PRIVATE LIM-RELIANCE HOMEFINANCE LIMITED-HSBCN18116409989		60.00

## 7. Others - Potential Circular Transactions (Contd.)

### Observation: Case 3 – Commercial Papers

- On our review of commercial paper issued by the Target Entity to S. D. Corporation Private Limited of INR 200 crores (maturity value), we noted that inter corporate deposit was received from Always Remember Properties Private Limited on maturity date for payment of existing commercial paper liability.



\*On performing public domain search, we noted that the registered office address and email id of S. D. Corporation Private Limited and Always Remember Properties Private Limited is same i.e. 70, Nagindas Master Road, Fort, Mumbai 400023 and [cs-spre@shahpoorji.com](mailto:cs-spre@shahpoorji.com) respectively. (Source: [www.mca.gov.in](http://www.mca.gov.in)). It appears that S. D. Corporation Private Limited and Always Remember Properties Private Limited are indirectly linked.

Note: The dates and amount considered above represents actual dates on which funds are debited or credited in the bank account statement of **ICICI Bank 039305003236**

## 7. Others - Potential Circular Transactions (Contd.)

### Observation: Case 3 – Commercial papers (Contd.)

(INR in crores)

CP No.	Investor name	Issue date	Maturity date	Issue amount	Maturity amount	End use
248	S.D. Corporation Private Limited	3 January 2019	28 June 2019	190.36	200.00	I. Interest payment of NCD of INR 190.36 crores

### Bank Account entries ICICI Bank 039305003236

(INR in crores)

Transaction Date	Description	Debit	Credit
3 January 2019	RTGS-HDFCR52019010359226738-S D CORPORATION PVT LT		190.36
28 June 2019	NEFT-N179190861733352-ALWAYS REMEMBER PROPERTIES P		196.20
28 June 2019	TRFR TO:S D CORPORATION PVT LTD	200.00	

# Loan advanced to other groups

## 8. Disbursement made to other entities with inadequate repayment capacity

### Observation:

- It was observed that the Target Entity has disbursed general purpose corporate loans to other entities which appear to have inadequate repayment capacity as per their financial records
- Four loans aggregating to INR 324.95 crores were disbursed during our review period against which total dues as on 31 Oct 2019 were INR 310.02 crores. It is pertinent to note that all the four cases have been classified as a Non-performing Assets ('NPA') as on 31 October 2019.
- Moreover, it was observed that the loan facility agreement does not contain any clause for obtaining quarterly chartered accountant certified status reports on utilization of the credit facility provided by the Target. The said clause is present in majority of general purpose corporate loans disbursed during the review period.
- Details of each case is provided over subsequent slides.

(INR in crores)

#	LAN	Name of the borrower	Loan Amount	Total dues	Net worth	Revenue	Status
1	RHWCCOR000057491	Creatoz Builders Private Limited	120.00	114.94	(43.10)	5.90	NPA
2	RHWCCOR000050577	Golden Beach Infracon Private Limited	90.00	85.47	(1.93)	-	NPA
3	RHWCCOR000049507	Wadhawan Holdings Private Limited	90.00	85.87	(422.40)	16.56	NPA
4	RHWCCOR000051860	Golden Beach Infracon Private Limited	24.95	23.74	(1.93)	-	NPA
		<b>Total</b>	<b>324.95</b>	<b>310.02</b>			

Note: The above analysis pertains to cases for which loan is outstanding as on 30 June 2019. Hence, we have not considered those cases where the loan amount has been recovered during our review period.

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Creatoz Builders Private Limited

- It was observed that the Target Entity has advanced a loan of INR 120 crores on 01 August 2017 to Creatoz Builders Private Limited ('Creatoz'). Total dues against this loan as on 31 Oct 2019 was INR 114.94 crores.
- A charge against immovable property of INR 120 crores has been registered on MCA in favour of the Target Entity for 60 days whereas the loan was sanctioned for 60 months.
- It is pertinent to note that the borrower has been classified as NPA as on 31 October 2019 by the target entity. Details of current and past directors of the borrower is presented below.

#### Current directors

DIN	Name	Appointment date	Remarks
06631368	Tushar Pathak	03 Sep 2018	Basis a public domain search, it appears that Tushar Pathak has no online presence.
08208132	Rakesh Sampangi	03 Sep 2018	Basis a public domain search, it appears that Rakesh Sampangi has no online presence.

#### Past directors

DIN	Name	Appointment date	Cessation date	Remarks
03207296	Mehul Bavishi	1 Dec 2010	29 July 2017	Basis a public domain search, it appears that Mr. Mehul Bavishi is currently also a director in Sunblink Real Estate Pvt. Ltd, a company accused by Enforcement Directorate of buying Iqbal Mirchi's properties
00455748	Manoj Bhojwani	26 July 2011	13 Sep 2013	Basis a public domain search, it appears that Manoj Bhojwani is a VP-corporate affairs at Dheeraj Realty, the real estate arm of Wadhawan group
00420988	Hetin Sakhuja	18 Dec 2009	26 July 2011	Basis a public domain search, it appears that Hetin Sakhuja was a director at Dheeraj Consultancy Private Limited till 15 October 2013, in which Dheeraj Wadhawan was also a director till 10 June 2008.
00110066	Krishna kumar Ponniah	15 Feb 2007	01 Dec 2010	Basis a public domain search, it appears that Krishnakumar Ponniah was a director in DHFL Sales & Services Limited till 20 March 18, in which Kapil Wadhawan was also a director till 4 November 2014

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Creatoz Builders Private Limited (Contd.)

- As per the latest available financial statements, it appears that the borrowing entity has negative net worth, negligible fixed assets and was having accumulated losses. Most of the money borrowed appears to have been utilized towards investment in unquoted shares, inventories and advance to suppliers.
- Creatoz is having a paid up capital of INR 0.05 crores and negative net worth of INR 43.06 crores as on 31 March 2017. The Target Entity has disbursed loans worth INR 120 crores which is approx. 20.34 times the revenue from business operations of Creatoz.
- Based on information available in the public domain, it appears that Creatoz has not filed its annual return with ROC for FY 17-18 & FY 18-19 as on 1 Dec 2019.

(INR in crores)

Key areas of financial statement	16-17	15-16	14-15
<b>Equity &amp; Liabilities</b>			
Shareholders fund	(43.06)	(36.60)	(30.58)
Long term borrowing	0.00	0.00	226.22
Other current liabilities, short term borrowing & provisions	282.53	280.25	114.42
<b>Assets</b>			
Fixed Asset	0.04	0.07	0.07
Non current investment in unquoted shares	13.27	41.27	41.27
Inventories (Construction work in progress)	138.02	105.87	79.22
Other current assets (Advance to suppliers)	87.91	96.32	203.78
<b>Revenue</b>			
Revenue from sale of goods or services	5.90	45.32	30.19
Other Income	12.87	2.85	0.82
<b>Expenses</b>			
Operating expenses	25.21	54.15	18.03
Finance cost	0.26	0.07	0.26
Other expenses	11.99	1.74	2.26
Net profit/loss	(6.46)	(6.02)	(17.55)

Creatoz	Details
Date of Incorporation	23 November 2005
Current Directors	1. Tushar Pathak 2. Rakesh Sampangi
Address	Unit no. 8, Abhishek premises CSL, Dalia industrial estate, off new link road, Andheri west Mumbai Mh 400051 In
Business area	Real estate
Email ID	inform2co@gmail.com

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Creatoz Builders Private Limited (Contd.)

Snapshot of CHG-1 of Creatoz

12. Brief particulars of the principal terms and conditions and extent and operation of the charge	
(a) Date of Creating Security Interest by actual/ constructive deposit of title deeds within bank/ housing finance company	22/09/2017 (DD/MM/YYYY)
(b) Borrower's customer/account number	
(c) *Rate of interest	12.50% per annum
(d) Repayment term (in months)	60 days
(e) * Terms of Repayment	As per sanctioned terms.
(f) Nature of facility	As per sanctioned terms.

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Creatoz Builders Private Limited (Contd.)

Snapshot of public domain search of Mr. Mehul Anil Bavishi

Zauba Technologies & Data Services Pvt Ltd [IN] <https://www.zaubacorp.com/company/CREATOZ-BUILDERS-PRIVATE-LIMITED/U54200MH2005PT>

03207296 MEHUL ANIL BAVISHI 01 December 2010 29 July 2017 [View other directorships](#)

#### Other Companies Associated with

Company	Designation	Appointment Date
<a href="#">SHREESAY REALTORS PRIVATE LIMITED</a>	Director	11 December 2014
<a href="#">VALENCIA BUILDERS PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">RAGINI REAL ESTATE DEVELOPERS PRIVATE LIMITED</a>	Director	11 December 2014
<a href="#">SPECTACULAR BUILDCON PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">SKILL REALTORS PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">ELATED DEVELOPERS PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">SHREESH TRADING PRIVATE LIMITED</a>	Director	11 December 2014
<a href="#">VALENCIA DEVELOPERS PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">REVOLUTION REALTY PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">UNI WORTH REAL ESTATE DEVELOPERS PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">STRONGHOLD REALTY PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">SUNBLINK REAL ESTATE PRIVATE LIMITED</a>	Director	01 December 2010
<a href="#">GLOWSTER PROPERTIES PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">MARKER INFRACON PRIVATE LIMITED</a>	Director	10 December 2014
<a href="#">WHITE LION REAL ESTATE DEVELOPERS PRIVATE LIMITED</a>	Director	10 December 2014

Snapshot of public domain search of SunBlink Real Estate Private Limited

<https://economictimes.indiatimes.com/news/politics-and-nation/mirchi-case-wadhawans-quizzed-by-ed/>

These show that in 2010 Sunblink took secured and unsecured loans totalling Rs 22.10 crore from DHFL. In the same year, it bought 9,500 fully paid equity shares of RKW Developers for Rs 95 lakh. One document pertaining to the list of allotment of equity shares of RKW Developers showed that Sunblink "allotted 9,500 shares" at Rs 1,000 each.

In 2010, Sunblink invested Rs. 9.35 crore in Juhu Investment and Rs 5.10 crore in Golden Beach Hotels & Resorts. While Juhu Investment is now known as Juhu Real Estate Developers, Golden Beach Hotels & Resorts is now known as Golden Beach Infracon. In both these companies, Dheeraj Wadhawan was a director earlier.

Another document, the share subscription agreement entered between RKW Developers and Sunblink in February 2019, is signed by Wadhawan and Placid Naronha, directors of RKW Developers, and Sunny Bathija and Mehul Bavishi, directors of Sunblink. Further, in August this year, RKW Developers pledged its shares with DHFL to secure a payment of Rs 1,013 crore sanctioned to Wadhawan Realty, of which Wadhawan and Naronha are former directors.

<https://economictimes.indiatimes.com/news/politics-and-nation/mirchi-case-wadhawans-quizzed-by-ed/>



Mumbai: **Kapil Wadhawan**, chairman and MD of Dewan Housing Finance Corp. Ltd (DHFL [NSE -4.26%](#)), and his brother Dheeraj, who is a promoter of the company, were questioned over the weekend by the Enforcement Directorate (ED) over Rs 2,186-crore loans given by their non-banking financial company (NBFC) to a property firm under the scanner for alleged dealings with gangster Iqbal Memon alias Iqbal Mirchi.

*Kapil Wadhawan, chairman and MD of Dewan Housing Finance Corp. Ltd (DHFL)*

#### Related

- ED looking to attach Iqbal Mirchi's 25 UK assets
- ED searches DHFL offices over exposure to firm having links with gangster Mirchi
- DHFL exposure: RBI rejects banks' 'Trust' proposal
- Exposure to Sunblink: an outcome of market consolidation: DHFL

Other than the loans by DHFL, the ED has questioned the two, specifically Dheeraj, on the transactions between Sunblink Real Estate — the property firm under scrutiny—and RKW Developers Pvt Ltd, said people with knowledge of the matter. Dheeraj Wadhawan has been a whole-time director of RKW Developers since 2007. Ranjeet Bindra, an agent, allegedly brokered the deal between Sunblink Real Estate and Mirchi.

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Creatoz Builders Private Limited (Contd.)

Snapshot of public domain search of Mr. Hetin Sukheja

Zauba Technologies & Data Services Pvt Ltd [IN] <https://www.zaubacorp.com/company/DHEERAJ-CONSULTANCY-PRIVATE-LIMITED/U74300MH1>

Email ID: cs.dheerajconsultancy@gmail.com  
 Website: [Click here](#) to add.  
 Address:  
 1ST FLOOR, CAPRI, ANANT KANEKAR MARG, BANDRA (EAST)  
 MUMBAI MH 400051 IN



**Director Details**

DIN	Director Name	Designation	Appointment Date	
06606332	ARVIND PARSHURAM PATIL	Director	08 February 2014	<a href="#">View other directorships</a>
00418226	LAKHMINDER DAYAL SINGH	Director	15 October 2013	<a href="#">View other directorships</a>

**Past Director Details**

DIN	Director Name	Appointment Date	Cessation Date	
02972931	MITESH DILIP PAREKH	09 October 2015	31 August 2016	<a href="#">View other directorships</a>
00658998	VASANT DATTATRAYA GAVADE	20 August 2005	15 September 2012	<a href="#">View other directorships</a>
00420988	HETIN RAMESH SAKHUJA	06 March 1999	15 October 2013	<a href="#">View other directorships</a>
00421759	DHONDU RAM JADYAR	15 September 2012	08 February 2014	<a href="#">View other directorships</a>
00096026	DHEERAJ RAJESHKUMAR WADHAWAN	03 May 2004	10 June 2008	<a href="#">View other directorships</a>

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Creatoz Builders Private Limited (Contd.)

Snapshot of public domain search of Mr. Krishnakumar Ponniah

Zauba Technologies & Data Services Pvt Ltd [IN] <https://www.zaubacorp.com/company/DHFL-SALES-AND-SERVICES-PRIVATE-LIMITED/U74120MH2010>

#### Director Details

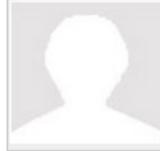
DIN	Director Name	Designation	Appointment Date	
03388656	PRALHAD NARASINGRAO KULKARNI	Director	04 November 2014	<a href="#">View other directorships</a>
08132354	SUMIT SHAMBHUNATH TRIPATHY	Director	14 May 2018	<a href="#">View other directorships</a>
08215963	UJJWAL DAS	Director	05 November 2018	<a href="#">View other directorships</a>

#### Past Director Details

DIN	Director Name	Appointment Date	Cessation Date	
00110066	KRISHNAKUMAR PONNIAH	04 November 2014	20 March 2018	<a href="#">View other directorships</a>
06983509	JITENDRA CHATURVEDI	20 March 2018	14 May 2018	<a href="#">View other directorships</a>
00230202	BHAGWAT SWARUP SHARMA	01 October 2012	05 November 2014	<a href="#">View other directorships</a>
01100093	VIJAY SHANKAR TAMBE	04 November 2014	20 March 2018	<a href="#">View other directorships</a>
06445334	PRANAY VISHNU PATIL	20 March 2018	05 November 2018	<a href="#">View other directorships</a>
00028528	KAPIL WADHAWAN	25 October 2010	04 November 2014	<a href="#">View other directorships</a>
00096026	DHEERAJ RAJESHKUMAR WADHAWAN	25 October 2010	04 November 2014	<a href="#">View other directorships</a>

Snapshot of public domain search of Mr. Manoj Bhojwani

[www.brijj.com/manoj-bhagwandas-bhojwani](http://www.brijj.com/manoj-bhagwandas-bhojwani)



### Manoj Bhagwandas Bhojwani

VP-Corporate Affairs Business Development, Dheeraj Realty  
, India

Profile Url: <http://www.brijj.com/manoj-bhagwandas-bhojwani>

[Send Direct Message to Manoj Bhagwandas Bhojwani](#)

Professional Details
Site Activity

#### Manoj Bhagwandas Bhojwani's Snapshot Profile

**Organisations:** • VP-Corporate Affairs Business Development at Dheeraj Realty for 9 years

**Academic:** • Commerce, 1992 , Osmania University Hyderabad

#### Manoj Bhagwandas Bhojwani's Professional Summary

**Expertise:** Business Development / Corporate Affairs. Having more than 21 years in the Real Estate and specialise in Business Development and Expansion with key skills of Laisoning

**Work Experience:** 21 years

**Industry Type:** Real Estate

**Functional Area:** Sales / BD

**Role:** Head/VP/GM/National Mgr -Sales

#### Detailed Profile

#### Manoj Bhagwandas Bhojwani's Professional Experience

**VP-Corporate Affairs Business Development at Dheeraj Realty**  
India  
2010 - 2019 ( 9 years)  
Job Summary: Business Development . Expansions and Sales

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Golden Beach Infracon Private Limited

- It was observed that the Target Entity has advanced a loan of INR 90 crores and INR 25 crores on 18 April 2017 and 16 May 2017 respectively to Golden Beach Infracon Private Limited ('Golden Beach'), a company fully owned by Wadhawan Realtors Private Limited. The total dues against these loans as on 31 October 2019 was INR 85.47 crores & INR 23.74 crores. The average tenure for loan to corporate borrowers under GPCL is around 12 months, however, the tenure for this loan was of 60 months.
- Golden Beach is having a paid-up capital of INR 0.01 crores and net worth of INR 1.93 crores as on 31 March 2017. The Target Entity has disbursed loans worth INR 115 crores which is approx. 60 times the net worth of Golden Beach. Moreover, no charge was registered on MCA in favor of the Target Entity for the loan disbursed.
- It is pertinent to note that the borrower has been classified as NPA as on 31 October 2019 by the target entity. Details of current and past directors of the borrower is presented below. Despite of our multiple follow up loan file of Golden Beach was not made available for our review.

		Current directors			Past directors					
		DIN	Name	Appointment date	Remarks	DIN	Name	Appointment date	Cessation date	Remarks
Golden Beach Infracon Pvt. Ltd.	100% subsidiary of	07187144	Ballabh Chaturvedi	13 Feb 2017	Basis a public domain search, it appears that Ballabh Chaturvedi is an accountant at Dish Hospitality Pvt. Ltd, food and beverage arm of Wadhawan Group	00028528	Kapil Wadhwan	30 March 2010	25 July 2011	Former chairman & MD of DHFL
		08457849	Dimpal Jitendra Chauhan	21 May 2019	Basis a public domain search, it appears that Dimpal Chauhan has no online presence	00096026	Dheeraj Wadhawan	30 March 2010	01 Oct 2012	Former non- executive director of DHFL
						03031999	Placid Jacob Naronha	04 Aug 2010	13 Feb 2017	Basis a public domain search, it appears that Placid Jacob Naronha is AVP at Dheeraj Realty, the real estate arm of Wadhawan group
						00230202	Bhagwat Swarup Sharma	30 March 2010	13 Feb 2017	Basis a public domain search, it appears that Bhagwat Swarup Sharma is also a director in DHFL Ventures trustee Company Private Limited, in which Kapil Wadhawan was also a director till 25 May 2017
						Wadhawan Realtors Private Limited.				

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Golden Beach Infracon Private Limited (Contd.)

- As per the latest available financial statements, it appears that the borrowing entity is not having any income from business operations, negligible fixed assets, no operating expenditure and was having accumulated losses. Most of the money borrowed appears to have been utilized towards investment in unquoted shares and inventories. The company has not reported any operation related expenditure which prima facie gives the impression that the company has no business activity. The major expenditure pertains to finance cost and other expenses which include filing fees and auditor's remuneration.
- Based on information available in public domain, it appears that Golden Beach has not filed its annual return with ROC for FY 17-18 & FY 18-19 as on 1 Dec 2019.

(INR in crores)

Key areas of financial statement	16-17	15-16	14-15
<b>Equity &amp; Liabilities</b>			
Shareholders fund	1.93	7.51	-3.25
Long term borrowing	267.31	222.05	196.74
Other current liabilities, short term borrowing & provisions	45.83	35.51	51.26
<b>Assets</b>			
Non current investment in unquoted shares	31.75	32.90	32.90
Other non current asset (advances & security deposits)	4.00	3.81	3.04
Inventories (Construction work in progress)	262.62	212.13	191.67
Fixed assets	0.88	1.63	2.09
Other current assets (Advance to suppliers)	15.75	14.40	13.73
<b>Revenue</b>			
Revenue from sale of goods or services	0.00	0.00	0.00
Other Income	0.00	0.00	0.06
<b>Expenses</b>			
Operating expenses	0.00	0.00	0.00
Finance cost	4.99	4.67	0.11
Other expenses	2.86	0.61	1.55
Net profit/loss	-7.85	-5.28	-1.59

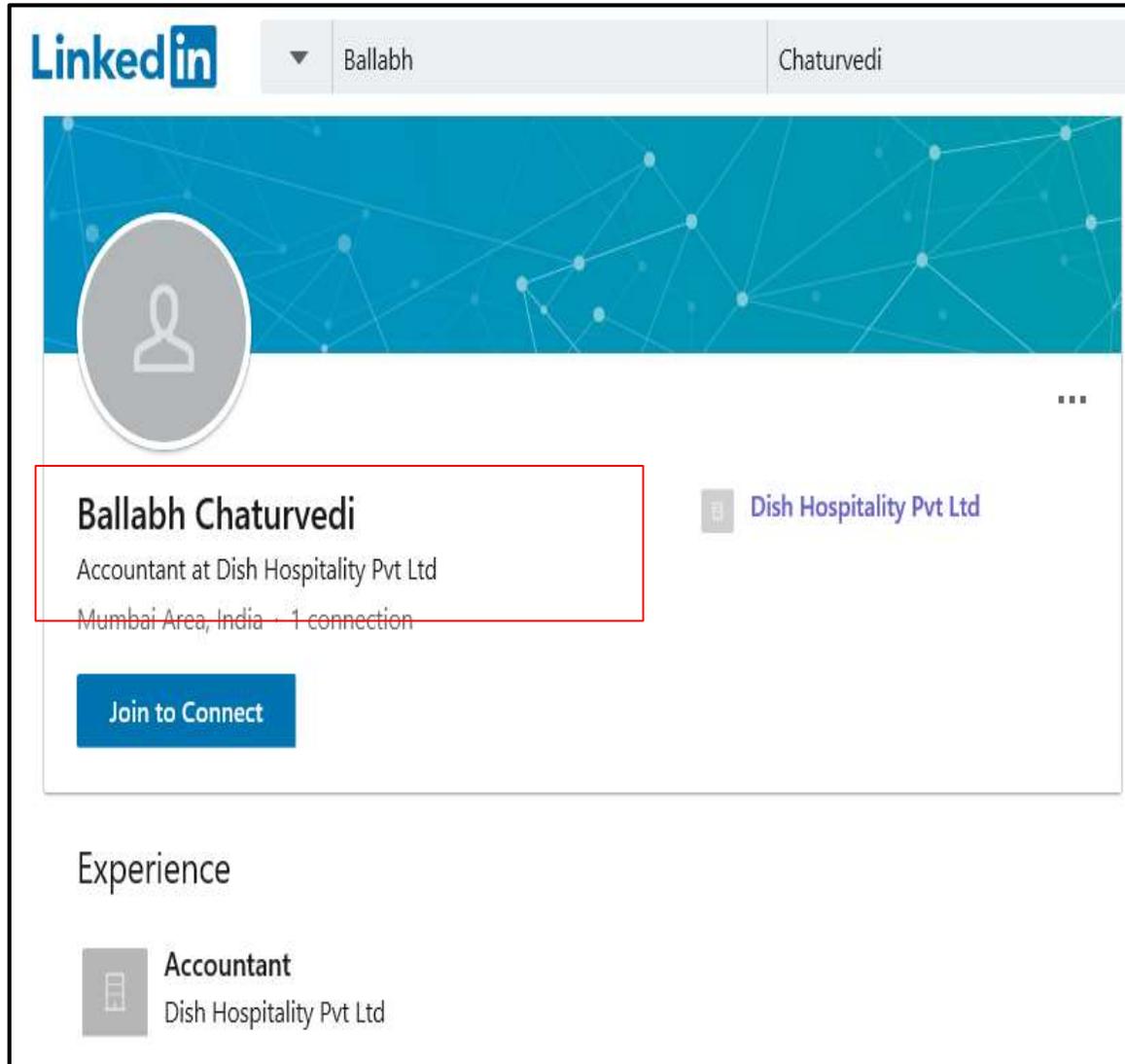
Shareholders	16-17	15-16	14-15
Wadhawan Realtors Private Limited	100%	100%	100%

Golden Beach	Details
Date of Incorporation	31 March 2009
Current Directors	1. Dimpal Jitendra Chauhan 2. Ballabh Nath Chaturvedi
Address	4th Floor, HDIL Towers, Anant Kanekar Marg, Bandra - East Mumbai Mh 400051 In
Common address with	Wadhawan Holdings Private Limited
Business area	Real estate
Email ID	jitendra.kadam@whpl.co.in

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

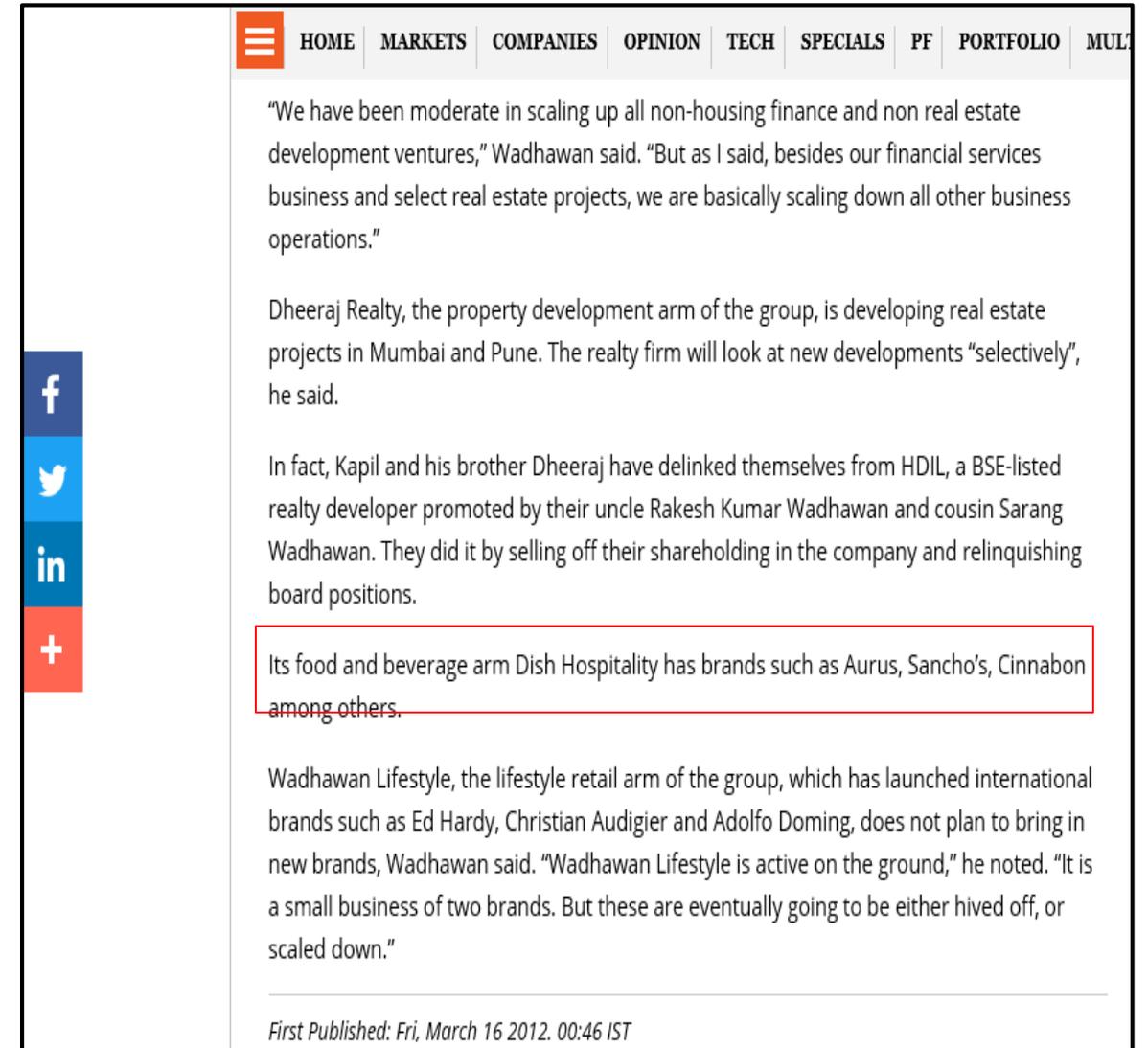
### Observation: Disbursement made to Golden Beach Infracon Private Limited (Contd.)

Snapshot of public domain search of Mr. Ballabh Chaturvedi



LinkedIn profile for Ballabh Chaturvedi. The profile shows a blue header with the LinkedIn logo and the name 'Ballabh Chaturvedi'. Below the header is a blue banner with a network diagram. The profile picture is a grey placeholder. The name 'Ballabh Chaturvedi' is highlighted with a red box. Below the name, it says 'Accountant at Dish Hospitality Pvt Ltd' and 'Mumbai Area, India · 1 connection'. A blue button labeled 'Join to Connect' is visible. Below the profile information, the 'Experience' section is shown, listing 'Accountant' at 'Dish Hospitality Pvt Ltd'.

Snapshot of public domain search showing Dish Hospitality is an arm of Wadhawan group



Article snippet showing Dish Hospitality is an arm of the Wadhawan group. The article includes a navigation bar with links: HOME, MARKETS, COMPANIES, OPINION, TECH, SPECIALS, PF, PORTFOLIO, MUL. The main text discusses the company's scaling strategy and its food and beverage arm. A red box highlights the sentence: 'Its food and beverage arm Dish Hospitality has brands such as Aurus, Sancho's, Cinnabon among others.' The article is dated 'First Published: Fri, March 16 2012. 00:46 IST'.

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Golden Beach Infracon Private Limited (Contd.)

Snapshot of public domain search of Mr. Bhagwat Swarup Sharma.

## Directors named Bhagwat Swarup sharma

100 records found

Show  entries

Search:

DIN	Name	Company
00230202	BHAGWAT SWARUP SHARMA	DHFL SALES AND SERVICES LIMITED
00230202	BHAGWAT SWARUP SHARMA	DHFL VENTURES TRUSTEE COMPANY PRIVATE LIMITED

Showing 1 to 2 of 2 entries (filtered from 100 total entries)

Previous **1** Next

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Wadhawan Holdings Private Limited

- It was observed that the Target Entity has advanced a loan of INR 90 crores on 30 March 2017 to Wadhawan Holding Private Limited ('WHPL'), a company in which members of Wadhawan family directly own approx. 2.5% paid up share capital and indirectly own 100% of paid up share capital. Total dues against this loan as on 31 Oct 2019 was INR 85.87 crores.
- WHPL is having a paid-up capital of INR 3.28 crores and negative net worth of INR 422.42 crores as on 31 March 2018. The Target Entity has disbursed loans worth INR 90 crores which is 5 times the revenue from business operations of WHPL.
- It is pertinent to note that the borrower has been classified as NPA as on 31 October 2019 by the target entity. Details of current and past directors of the borrower is presented below.

Current directors					Past directors				
DIN	Name	Appointment date	Remarks	DIN	Name	Appointment date	Cessation date	Remarks	
07017236	Ashwini Kumar Chaturvedi	16 March 2015	Basis a public domain search it appears that Ashwini Kumar Chaturvedi is Sr. Executive - Credit Appraisal at DHFL, the financial services arm of Wadhawan group.	00028528	Kapil Wadhwan	22 April 2002	16 March 2015	Former chairman & MD of DHFL	
07011862	Yellaiya Kistaiya Tumma	12 April 2018	Basis a public domain search it appears that Yellaiya Kistaiya Tumma is Asst. Manager – F&A at WHPL	00096026	Dheeraj Wadhawan	10 Dec 2007	16 March 2015	Former non- executive director of DHFL	
				03031999	Placid Jacob Naronha	02 Aug 2017	01 Sep 2017	Basis a public domain search it appears that Placid Jacob Naronha is AVP at Dheeraj Realty, the real estate arm of Wadhawan group.	
				00230202	Bhagwat Swarup Sharma	24 Jan 2008	01 Sep 2017	Basis a public domain search it appears that Bhagwat Swarup Sharma is also a director in DHFL Ventures trustee Company Private Limited, in which Kapil Wadhawan was also a director till 25 May 2017	

Wadhawan Holding Private Limited

↓  
 2.5% directly and potentially 100% indirectly controlled by (as on 31 March 2018)

1. Kapil Wadhawan  
 2. Dheeraj Wadhawan  
 3. Aruna Wadhawan

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Wadhawan Holdings Private Limited (Contd.)

- As per the latest available financial statements, it appears that the borrowing entity is having negative net worth and accumulated losses. Most of the money borrowed appears to have been utilized towards investment in unquoted shares, advancing of inter corporate deposits and in other current assets, the break-up for which was not provided in the financial statements.
- Based on information available in public domain, it appears that WHPL has not filed its annual return with ROC for FY 18-19 as on 1 Dec 2019.

(INR in crores)

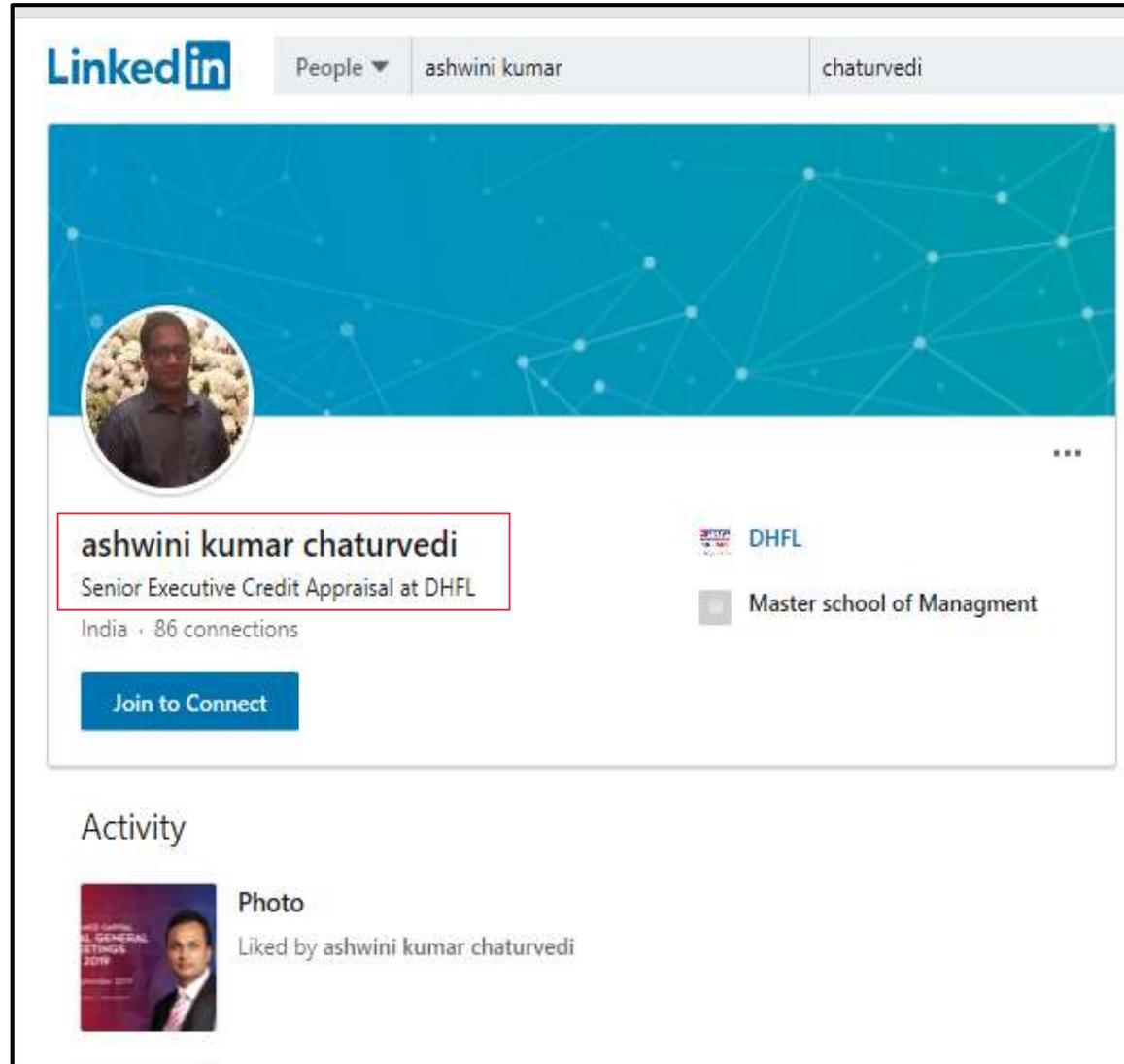
Key areas of financial statement	17-18	16-17	15-16	14-15
<b>Equity &amp; Liabilities</b>				
Shareholders fund	-422.43	-375.10	184.04	205.09
Long term borrowing	1232.22	1137.73	708.29	1027.80
Other current liabilities, short term borrowing & provisions	544.26	1052.95	762.02	710.24
<b>Assets</b>				
Non current investment (Majorly investment in unquoted shares of group companies)	296.66	639.24	1023.21	1373.39
Long/short term loans & advances (Majorly Inter corporate deposit)	546.76	456.13	315.53	325.26
Other current assets (Break-up not disclosed)	387.76	604.50	156.97	58.67
Fixed assets	101.02	109.94	135.74	141.82
Cash & cash equivalent	19.30	1.38	2.04	3.04
<b>Revenue</b>				
Revenue from sale of goods or services	16.56	15.12	28.01	34.67
Other operating revenue	0.00	0.00	0.00	0.00
Other Income	102.23	-404.77	21.98	15.42
<b>Expenses</b>				
Employee benefit	6.00	5.85	5.60	5.46
Finance cost	27.04	5.57	5.76	6.32
Other expenses	133.07	33.72	52.15	50.46
Net profit/loss	<b>-47.32</b>	<b>-434.78</b>	<b>-13.52</b>	<b>-12.15</b>

Wadhawan Holdings Pvt. Ltd.	Details
Date of Incorporation	22 April 2002
Current Directors	1. Ashwini Kumar Chaturvedi 2. Yellaiya kistaiya Tumma
Address	4th Floor, HDIL Towers, Anant Kanekar Marg, Bandra - East Mumbai
Business area	Real Estate

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

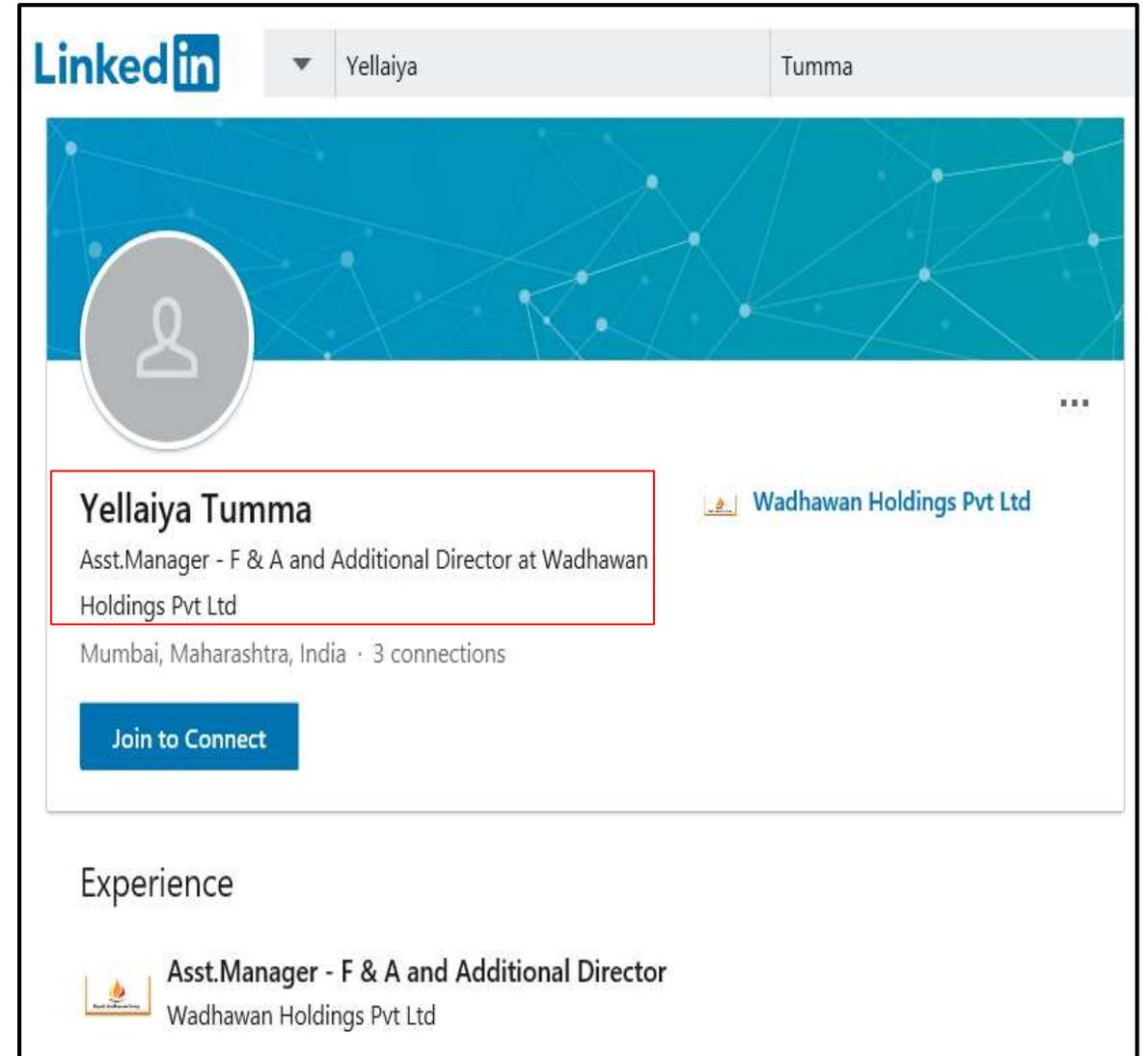
### Observation: Disbursement made to Wadhawan Holdings Private Limited (Contd.)

Snapshot of public domain search of Mr. Ashwini Kumar Chaturvedi



LinkedIn profile of Ashwini Kumar Chaturvedi. The profile shows a search for "ashwini kumar chaturvedi" in the "People" category. The profile picture is a circular image of a man with glasses. The name "ashwini kumar chaturvedi" is highlighted with a red box. Below the name, it says "Senior Executive Credit Appraisal at DHFL". There are also logos for "DHFL" and "Master school of Managment". The location is "India" with "86 connections". A blue "Join to Connect" button is visible. Under the "Activity" section, there is a photo of a man in a suit, with the text "Liked by ashwini kumar chaturvedi".

Snapshot of public domain search of Mr. Yellaiya Tumma

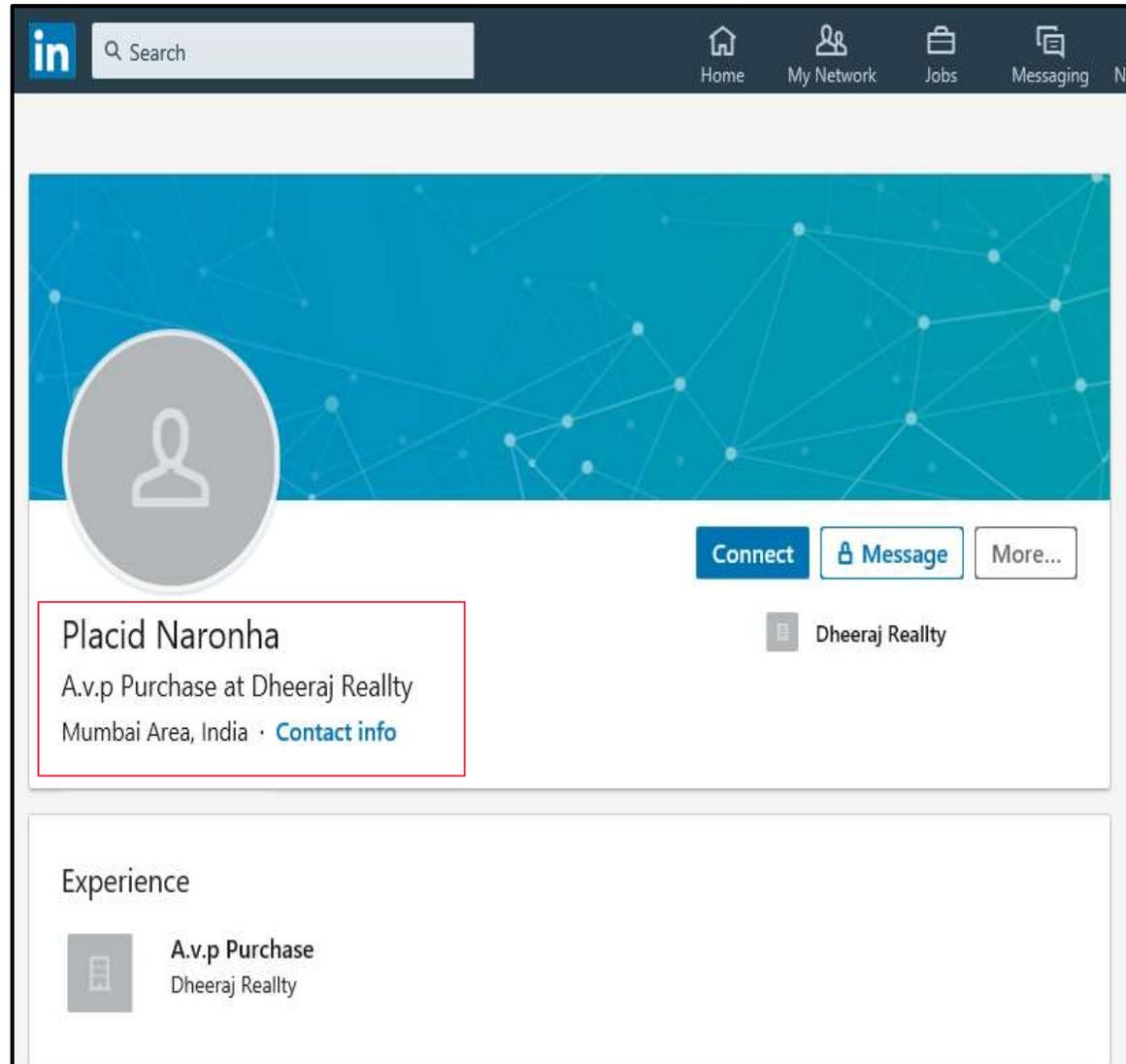


LinkedIn profile of Yellaiya Tumma. The profile shows a search for "Yellaiya Tumma". The profile picture is a circular icon of a person. The name "Yellaiya Tumma" is highlighted with a red box. Below the name, it says "Asst.Manager - F & A and Additional Director at Wadhawan Holdings Pvt Ltd". There is also a logo for "Wadhawan Holdings Pvt Ltd". The location is "Mumbai, Maharashtra, India" with "3 connections". A blue "Join to Connect" button is visible. Under the "Experience" section, it lists "Asst.Manager - F & A and Additional Director" at "Wadhawan Holdings Pvt Ltd".

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

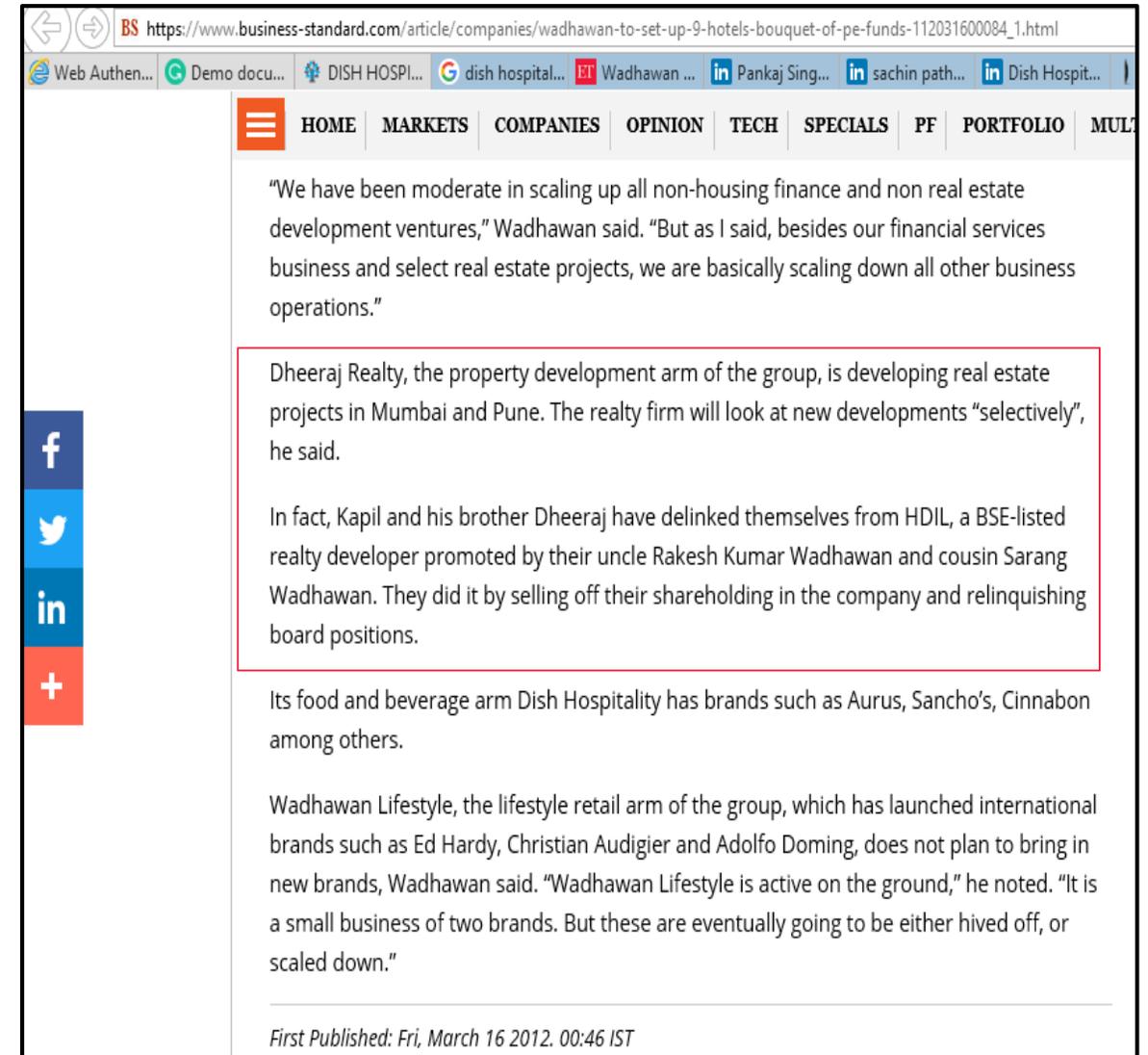
### Observation: Disbursement made to Wadhawan Holdings Private Limited (Contd.)

Snapshot of public domain search of Mr. Placid Naronha



LinkedIn profile of Placid Naronha. The profile shows a blue header with the LinkedIn logo and a search bar. Below the header is a blue banner with a network diagram. A circular profile picture placeholder is visible. The name "Placid Naronha" is highlighted with a red box. Below the name, it says "A.v.p Purchase at Dheeraj Realty" and "Mumbai Area, India · Contact info". To the right of the name are buttons for "Connect", "Message", and "More...". Below the name, there is a small icon and the text "Dheeraj Realty". Under the "Experience" section, there is a small icon and the text "A.v.p Purchase" and "Dheeraj Realty".

Snapshot of public domain search showing Dheeraj Realty is an arm of Wadhawan group



Business Standard article snippet. The URL is [https://www.business-standard.com/article/companies/wadhawan-to-set-up-9-hotels-bouquet-of-pe-funds-112031600084\\_1.html](https://www.business-standard.com/article/companies/wadhawan-to-set-up-9-hotels-bouquet-of-pe-funds-112031600084_1.html). The article text is as follows:

"We have been moderate in scaling up all non-housing finance and non real estate development ventures," Wadhawan said. "But as I said, besides our financial services business and select real estate projects, we are basically scaling down all other business operations."

Dheeraj Realty, the property development arm of the group, is developing real estate projects in Mumbai and Pune. The realty firm will look at new developments "selectively", he said.

In fact, Kapil and his brother Dheeraj have delinked themselves from HDIL, a BSE-listed realty developer promoted by their uncle Rakesh Kumar Wadhawan and cousin Sarang Wadhawan. They did it by selling off their shareholding in the company and relinquishing board positions.

Its food and beverage arm Dish Hospitality has brands such as Aurus, Sancho's, Cinnabon among others.

Wadhawan Lifestyle, the lifestyle retail arm of the group, which has launched international brands such as Ed Hardy, Christian Audigier and Adolfo Doming, does not plan to bring in new brands, Wadhawan said. "Wadhawan Lifestyle is active on the ground," he noted. "It is a small business of two brands. But these are eventually going to be either hived off, or scaled down."

First Published: Fri, March 16 2012. 00:46 IST

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Observation: Disbursement made to Wadhawan Holdings Private Limited (Contd.)

Snapshot of public domain search of Mr. Bhagwat Swarup Sharma.

## Directors named Bhagwat Swarup sharma

100 records found

Show  entries

Search:

DIN	Name	Company
00230202	BHAGWAT SWARUP SHARMA	DHFL SALES AND SERVICES LIMITED
00230202	BHAGWAT SWARUP SHARMA	DHFL VENTURES TRUSTEE COMPANY PRIVATELIMITED

Showing 1 to 2 of 2 entries (filtered from 100 total entries)

Previous **1** Next

## 8. Disbursement made to other entities with inadequate repayment capacity (Contd.)

### Management response

- The loans were given under the “GPCL” loan product based on the merits of the individual case including but not limited to underlying security, project, the underlying group and promoter strengths.
- The mentioned entities here belong to the Dewan Housing Finance Limited (“DHFL”) group, which was a AAA rated entity belonging to a large financial services and real estate group in the country at the time of our lending to these entities.
- As on 31 March 17, the financials of DHFL were strong as the Net Worth was INR 7,995.80 Crore, Assets worth INR 92,297.98 Crore. Total Income was INR 8,857.23 Crore and PBT was INR 3,371.82 Crore. Out of total assets, Cash & cash equivalent worth INR 3,429.99 Crore was available. The overall CRAR ratio was 19.12% which consists of Tier I Capital 14.75% and Tier II capital 4.37%. The GNPA stood at 0.94% of the total loan book.
- The accounts are as on date under stress owing to overall, stress in the group and the industry as a whole.
- The Company has followed the prescribed policies and procedures in granting the above loans.

*Note: Management response is reproduced in full as provided by the company.*

# Anomalies identified during loan file review

## 9.1 Income verification documents not obtained

### Observation:

- As per the discussion with the representative of the target entity, it was informed that the credit assessment department verifies the financial statements and Income Tax Returns (ITR) to ascertain the credit worthiness and repayment capacity of the loan applicant.
- We noted 50 instances where financial statements were not found in the loan file aggregating to INR 3,897.41 crores and 47 instances where Income Tax Returns (ITR) were not found aggregating to INR 3,698.65 crores. **For details refer annexure 8**

(INR in crores)

#	Name of the Borrower	Amount	No. of Loan Disbursed	Financials Obtained	ITR Obtained
1	Arion Movie Productions Private Limited	400.00	2	X	X
2	Sistema Shyam Teleservices Limited	315.00	3	X	X
3	Space Trade Enterprises Private Limited	309.11	5	X	X
4	Skyline Global Trade Private Limited	307.92	6	X	X
5	Divyashakti Real Estate Private Limited	300.00	1	X	X
6	Tulip Adviosrs Private Limited	212.46	3	X	X
7	Celebrita Mediahouse Private Limited	210.00	2	X	X
8	Thwink Big Content Private Limited	205.00	2	X	X
9	Edrishti Movies Private Limited	200.00	2	X	X
10	RPL Star Power Private Limited	198.76	3	X	✓
11	Ippy Entertainment Private Limited	194.00	5	X	X
12	Ayken Mining Private Limited	190.00	1	X	X
13	Pifiniti Movies Private Limited	188.50	2	X	X
14	Accura Productions Private Limited	185.00	5	X	X
15	Sahishnota Advisory Services Private Limited	150.00	1	X	X
16	Renew Power Ventures Private Limited	90.00	1	X	X
17	Rab Enterprises India Private Limited	60.00	1	X	X
18	Reliance Defence And Engineering Limited	55.00	1	X	X
19	Noida Global Sez Private Limited	49.50	1	X	X
20	Fortis Healthcare Limited	38.00	1	X	X
21	Woodstock Realities Private Limited	30.00	1	X	X
22	Broadband Pacenet India Private Limited	9.16	1	X	X
	<b>Total</b>	<b>3,897.41</b>	<b>50</b>		

## 9.1 Income verification documents not obtained (Contd.)

### Management response

We would like to highlight that all the loans have been sanctioned and disbursed on the merits of the individual cases and within the then extant policy parameters of the Company. In the instances of newly incorporated entities, the facilities have been extended taking into account the strength(s) of the underlying group and / or security.

It may also be noted that ITR is collected only as an additional document where available and is not a requirement for processing GPCL facilities. However, we would like to clarify further that;

- In 21 instances (8 borrowers) aggregating to INR 1,732.50 Crore, the entities have been incorporated recently i.e. in FY2019 itself and hence the audited financials were not available at the time of sanction and hence not part of the sanction docket.
- In 3 instances (3 borrower) aggregating to INR 520 Crore, the loans have originally been sanctioned by Reliance Capital Limited and have become part of Reliance Home Finance Limited only in Sept 2017 on account of scheme of arrangement as part of demerger in Reliance Capital. It may also be noted that these loans are completely closed as on date.
- In 17 instances (4 borrowers) aggregating to INR 1,028.25 Crore the financials are available in the docket. We are glad to further engage with GT to clarify the same.
- In the remaining 9 instances (7 borrowers) aggregating to INR 616.70 Crore, where the facilities are already repaid and closed as on date., the Company is working to retrieve the documents.

*Note: Management response is reproduced in full as provided by the company.*

## 9.2 Borrowers having similar contact numbers

### Observation:

We noted eight instances where contact details of the borrowers of GPCL appear to be similar. as mentioned in the Finnone indicates that these entities might be potentially indirectly linked. We noted a total of 28 of such entities to whom 84 loans were disbursed during our review period aggregating to INR 7,965.15 crores. **For details refer annexure 9A**

(INR in crores)

#	Contact Number	No. of Loan Disbursed	Amount	No. of Borrowers	Public domain search of provided contact number
1	9594357776	18	1578.50	8	Contact number belongs to Mr. Anurag Mathur who is a director in one out of the eight borrower (Azalia Distribution Private Limited)
2	9820400844	7	1018.99	5	Contact Number belongs to Mr. Shashank Vijaykar who is a director in three borrowers (Citi Securities and financial Service Private Limited, Deep Industrial Finance Limited, Vishvakarma Equipment Finance India Limited)
3	1234567890	17	1818.00	4	Invalid contact number
4	9324977108	8	800.00	3	Contact number belongs to Jagdish Patil who is a director in one of the borrower (Reliance Mediaworks Financial Services Private Limited)
5	9322232040	18	1264.59	2	Contact number does not belong to the directors of the borrowing company.
6	33033561	8	511.17	2	Invalid contact number
7	9834232323	6	586.87	2	Invalid contact number
8	40987495	2	387.00	2	Contact Number could not be determined on Public Domain
	<b>Total</b>	<b>84</b>	<b>7,965.15</b>	<b>28</b>	

### Management response:

All the loans have been sanctioned and disbursed on the merits of the individual cases and within the then extant policy parameters of the Company, and the said exposure is secured.

Note: Management response is reproduced in full as provided by the company.

## 9.3 Borrowers having incorrect contact numbers

### Observation:

We noted 21 instances where contact details of the borrower of GPCL appear to be invalid or were belonging to the entities other than the borrowing entity. We noted 22 such entities to whom loans were disbursed during our review period aggregating to INR 3,380.51 crores. **For details refer annexure 9B**

(INR in crores)

#	Contact Number	No. of Loan Disbursed	Amount	No. of Borrowers	Name of the borrower	Public domain search of provided contact number
1	9930023521	2	400	1	Arion Movie Productions Private Limited	Contact number does not belong to the borrowing company
2	4812500	3	315	1	Sistema Shyam Teleservices Limited	Invalid contact number provided
3	30099999	5	309.11	1	Space Trade Enterprises Private Limited	Contact number does not belong to the borrowing company
4	9834567854	4	268.39	1	Summit Ceminfra Private Limited	Invalid contact number provided
5	33031000	2	209.64	1	Neptune Steel Strips Limited	Contact Number belongs to Reliance Asset Reconstruction Customer care
6	4125236	1	190	1	Ayken Mining Private Limited	Invalid contact number provided
7	30999999	3	186.61	1	Kunjibhari Developers Private Limited	Contact number belongs to Kokilaben Dhirubhai Ambani Hospital
8	9820400944	2	185	1	Traitrya Construction Finance Limited	Contact number not found on public domain search
9	9320695265	3	180	1	Netizen Engineering Private Limited	On public domain search contact number belongs to Avinash Kashid who was found to be an employee at Reliance Communications
10	9820186058	1	175	1	Azalia Distribution Private Limited	Contact number to Neeraj Jain (AVP Finance at Reliance Broadcast Network Private Limited)
11	9970150278	1	175	1	Nation Wide Communication Private Limited	Contact number does not belong to the directors of the borrowing company.
12	30971710	1	137.84	1	RPL Aditya Power Private Limited	Contact number not found on public domain search
13	9699320110	1	118.49	1	Valuecorp Securities And Finance Limited	Contact number belongs to Ms. Amrita Ramchandani who appears to be an employee at Reliance Commercial Finance Limited
14	7314873	2	109.7	1	Aashish Power Plant Equipment Private Limited	Invalid contact number provided
15	52412536	1	96.87	1	SKIL Infrastructure Limited	Invalid contact number provided

## 9.3 Borrowers having incorrect contact numbers (Contd.)

### Observation:

(INR in crores)

#	Contact Number	No. of Loan Disbursed	Amount	No. of Borrowers	Name of the borrower	Public domain search of provided contact number
16	9619168005	1	90	1	Wadhwan Holdings Private Limited	Contact number does not belong to the directors of the borrowing company.
17	9870688428	1	66.7	1	D B Reality Limited	Contact number does not belong to the directors of the borrowing company
18	41152356	1	60	1	Rab Enterprises India Private Limited	Invalid contact number provided
19	9619848518	1	60	1	Bliss House Private Limited	Contact number belong to Mrs. Rutva oza who is CS at Yes Bank
20	42295222	1	38	1	Fortis Healthcare Limited	Invalid contact number provided
21	428888	1	9.16	1	Broadband Pacenet India Private Limited	Invalid contact number provided
	<b>Total</b>	<b>38</b>	<b>3,380.51</b>	21		

### Management response

- As part of the process, contact details of the contact person in the borrowing entity is captured. In some of the cases, the contact persons have provided their individual mobile numbers. In 13 instances (9 borrowers) aggregating to INR 1,469.54 Crore, the numbers are available and belong to the concerned contact persons.
- In the some of the cases the contact details are invalid on account of change in contact details from the time the facility was sanctioned or clerical errors at the time of data entry.

Note: Management response is reproduced in full as provided by the company.

## 9.4 Borrowers having similar email address

### Observation:

#### Borrowers having similar e-mail address

We noted 9 instances where e-mail addresses of the borrower of corporate loans appear to be similar. In one instance, it appears that 7 GPCL borrowers whose e-mail addresses as per MCA records were similar, indicating that these entities might be potentially indirectly linked. We noted a total of 28 such entities to whom 72 loans were disbursed during our review period aggregating to INR 6,950.67 crores. **For details refer annexure 9C**

(INR in crores)

#	Registered E-mail Address as per MCA records	Amount	No. of Loan Disbursed	No. of Borrowers
1	<a href="mailto:adhar.project@gmail.com">adhar.project@gmail.com</a>	1,079.00	14	2
2	<a href="mailto:anuragmathur2006@gmail.com">anuragmathur2006@gmail.com</a>	973.19	12	4
3	<a href="mailto:communications@reliancebroadcast.com">communications@reliancebroadcast.com</a>	590.00	5	2
4	<a href="mailto:finance@btvi.in">finance@btvi.in</a>	1,212.60	13	4
5	<a href="mailto:Mcafiling.kh@relianceada.com">Mcafiling.kh@relianceada.com</a>	324.45	4	2
6	<a href="mailto:neeraj.jain@radiobigfm.com">neeraj.jain@radiobigfm.com</a>	582.50	9	3
7	<a href="mailto:office.rabenterprises@gmail.com">office.rabenterprises@gmail.com</a>	345.00	4	2
8	<a href="mailto:secretarialgurgaon@yahoo.in">secretarialgurgaon@yahoo.in</a>	490.00	2	2
9	<a href="mailto:vijayakar@vbdesai.com">vijayakar@vbdesai.com</a>	1,353.93	9	7
	<b>Total</b>	<b>6,950.67</b>	<b>72</b>	<b>28</b>

### Management response:

All the loans have been sanctioned and disbursed on the merits of the individual cases and within the then extant policy parameters of the Company, and the said exposure is secured.

Note: Management response is reproduced in full as provided by the company.

## 9.5 Method of obtaining confirmation from holding company not defined

### Observation:

- On discussion with the representative of the Target Entity, it was informed that on 1 November 2018 there was a revision in Demand / Call loan policy which states that, 'loans booked under GPCL Product Code in 'Corporate Branch' shall have a portfolio cap of INR 6,750 crores. Any deviation or any transaction beyond this threshold shall require confirmation by the holding company.'
- The revision does not specify the method through which confirmation from holding company is to be obtained. Presently, from Feb 2019 onwards, all the GPCL loans disbursed were getting approved by the Chairman of the Reliance Group, who holds directorship in the holding company.
- Moreover, the executed version of revision in Demand / Call loan policy was not provided. Details of such disbursements are mentioned below along with their total outstanding as on 31 October 2019. **For details refer annexure 10**

(INR in crores)

Name of the borrower	Loan amount	No. of loans	Disbursement quarter	Total Outstanding	Borrower Status	Loan Status
Accura Productions Private Limited	80	2	Q 4 FY 18-19	80.96	PILE	Not Due
Adhar Project Management And Consultancyprivate Limited	100	1	Q 4 FY 18-19	100.00	PILE	NPA
Arion Movie Productions Private Limited	200	1	Q 4 FY 18-19	187.00	PILE	Not Due
Azalia Distribution Private Limited	175	1	Q 4 FY 18-19	179.93	PILE	NPA
Celebrita Mediahouse Private Limited	210	2	Q 4 FY 18-19	210.00	PILE	Not Due
Citi Securities And Financial Services Private Limited	220.8	1	Q 4 FY 18-19	220.80	PILE	Not Due
Gamesa Investment Management Private Limited	199	3	Q 4 FY 18-19	170.21	PILE	NPA
Hirma Power Limited	175	1	Q 4 FY 18-19	175.00	PILE	NPA
Indian Agri Services Pvt Ltd	75	2	Q 4 FY 18-19	75.15	PILE	61-90 DPD
Ippy Entertainment Private Limited	50	1	Q 4 FY 18-19	50.60	PILE	Not Due
Mohanbir Hi Tech Build Private Limited	30	1	Q1 FY 19-20	30.00	PILE	31-60 DPD
Neptune Steel Strips Limited	102.5	1	Q 4 FY 18-19	102.50	PILE	Not Due
Summit Ceminfra Private Limited	32	1	Q 4 FY 18-19	32.00	PILE	NPA
Vinayak Ventures Private Limited	210	1	Q 4 FY 18-19	210.00	PILE	Not Due
Wallace Movies And Entertainment Private Limited	160	2	Q 4 FY 18-19	160.00	PILE	Not Due
<b>Grand Total</b>	<b>2019.3</b>	<b>21</b>		<b>1,984.25</b>		

### Management response

There has been no deviation from the prescribed policy and procedure in the above respect.

*Note: Management response is reproduced in full as provided by the company.*

## 9.6 CA certified end use certificate not provided for our review

### Observation:

As per clause 26(J) of the loan facility agreement the borrower has to submit quarterly status reports certified by Chartered Accountants on utilization of the credit facility/business entities offered/financed by availing the credit facility hereunder by the borrower". In 165 instances the status report certified by Chartered Accountants was not available. The total dues as on 31 October 2019 for these instances aggregating to 8,102.03 crores. **For details refer annexure 11 (A)**

(INR in crores)

#	Name of Borrower	No. of loans disbursed	Loan Amount	Total dues	Borrower status
1	Indian Agri Services Pvt Ltd	11	948.15	314.10	PILE
2	Adhar Project Management And Consultancyprivate Limited	10	650.59	223.44	PILE
3	Gamesa Investment Management Private Limited	8	614.21	185.97	PILE
4	Phi Management Solutions Pvt Ltd	4	540.00	232.05	PILE
5	Mohanbir Hi Tech Build Private Limited	6	465.00	267.91	PILE
6	Medybiz Private Limited	4	435.90	220.71	PILE
7	Arion Movie Productions Private Limited	2	402.39	187.50	PILE
8	Azalia Distribution Private Limited	3	386.50	180.47	PILE
9	Reliance Unicorn Enterprises Private Limited	3	285.00	0.00	PILE
10	Space Trade Enterprises Private Limited	6	445.72	145.34	PILE
11	Ippy Entertainment Private Limited	5	196.32	196.32	PILE
12	Hirma Power Limited	3	375.00	210.46	PILE
13	Vinayak Ventures Private Limited	2	221.13	221.13	PILE
14	Citi Securities And Financial Services Private Limited	1	220.80	220.80	PILE
15	Deep Industrial Finance Limited	1	220.00	220.00	PILE

## 9.6 CA certified end use certificate not provided for our review (Contd.)

#	Name of Borrower	No. of loans disbursed	Loan Amount	Total dues	Borrower status
16	Tulip Advisors Private Limited	3	215.00	224.03	PILE
17	Netizen Engineering Private Limited	4	214.54	214.54	PILE
18	Celebrita Mediahouse Private Limited	2	210.00	210.00	PILE
19	Neptune Steel Strips Limited	2	209.64	102.50	PILE
20	Thwink Big Content Private Limited	2	207.44	207.44	PILE
21	Adhar Real Estate Consultancy Private Limited	1	202.40	202.40	PILE
22	Edrishti Movies Private Limited	2	200.96	200.96	PILE
23	Pearl Housing Finance India Limited	1	200.00	200.00	PILE
24	Rpl Star Power Private Limited	3	200.00	226.17	PILE
25	Vishvakarma Equipment Finance India Limited	1	200.00	200.00	PILE
26	Adhar Property Consultancy Private Limited	1	189.20	189.20	PILE
27	Pifiniti Movies Private Limited	2	188.66	188.66	PILE
28	Accura Productions Private Limited	5	186.74	186.74	PILE
29	RPL Solar Power Private Limited	3	185.00	200.26	PILE
30	Traitrya Construction Finance Limited	2	185.00	185.00	PILE
31	Wallace Movies And Entertainment Private Limited	3	178.40	160.49	PILE
32	Nationwide Communication Private Limited	1	175.00	175.00	PILE
33	Jayamkondam Power Limited	4	283.50	118.74	PILE
34	RPL Surya Power Private Limited	2	164.00	185.60	PILE
35	Crest Logistics And Engineers Private Limited	8	378.50	182.62	PILE
36	Sahishnota Advisory Services Private Limited	1	150.00	150.00	PILE
37	RPL Sunlight Power Private Limited	2	147.00	165.91	PILE
38	RPL Aditya Power Private Limited	1	139.50	158.61	PILE

## 9.6 CA certified end use certificate not provided for our review (Contd.)

#	Name of Borrower	No. of loans disbursed	Loan Amount	Total dues	Borrower status
39	Species Commerce And Trade Private Limited	5	244.00	137.42	PILE
40	Summit Ceminfra Private Limited	4	269.00	125.81	PILE
41	Valuecorp Securities And Finance Limited	1	118.49	Written Off	PILE
42	Worldcom Solutions Limited	4	229.50	56.90	PILE
43	Aashish Power Plant Equipment Private Limited	2	109.75	112.05	PILE
44	Bamboo Hotel And Global Centre Delhi Private Limited	1	100.00	0.00	Others
45	Skyline Global Trade Private Limited	6	309.00	103.23	PILE
46	Reliance Media Works Financial Services Private Limited	1	80.00	0.00	PILE
47	Kunjibhari Developers Private Limited	3	186.61	188.87	PILE
49	Rajhans Infrabuild Llp	1	30.00	16.78	PILE
50	Reliance Commercial Finance Limited	1	50.00	0.00	Related Party
51	Reliance Cleangen Limited	1	40.48	46.19	PILE
52	Fortis Healthcare Limited	1	38.00	0.00	Others
53	Avigna Housing Private Limited	1	20.00	19.67	Others
54	Varin Infra Projects Private Limited	1	20.00	12.24	Others
55	Visa Capital Partners	1	20.00	19.15	Others
56	Rajhans Infracon India Private Limited	3	36.50	1.22	Others
57	Lakhani And Desai Developers	1	7.50	0.29	Others
58	Gupta Builders And Promoters Private Limited	1	5.00	0.99	Others
59	Vignaharta Developers	1	3.50	0	Others
	<b>Total</b>		<b>12,934.55</b>	<b>8,102.03</b>	

## 9.6 CA certified end use certificate not provided for our review (Contd.)

### Management response

The end use certificate is a requirement for loans sanctioned for specific end-use like construction finance, project finance etc. As loans sanctioned and disbursed under General Purpose Corporate Loan are short term in nature and hence, the same is not taken. However, it may be noted that the loan documents used are standard loan documents and hence the clause.

*Note: Management response is reproduced in full as provided by the company.*

## 9.7 Deviation in underwriting norms

### Observation:

- On reviewing the disbursements of general purpose corporate loans made during the review period, it was observed that in approx. 91% of the instances the majority of the underwriting norms were found to be deviated.
- Majority of these deviations were taken for potential indirectly linked entities.

For details refer annexure 11 (B)

(INR in crores)

#	Deviation	No. of Loan Disbursed	Amount of Loan disbursed	% of total corp. loan disbursed
1	Field investigation waived	97	8546	58%
2	Personal discussion waived			
3	Eligibility of applicant not as per norms			
4	Principal repayment is bullet instead of monthly payment			
5	Rate of interest, processing charges & foreclosure charges not as per the norms			
6	Maximum loan amount exceeding the cap			
7	Security post dated cheque (PDC) not obtained			
8	Projected cash flow not taken owing to bullet repayment			
9	Individual holding shares in applicant and holding company not on loan structure			
10	51% Shareholding of the company not on deal structure			
11	Stamp paper is dated post disbursement	21	1944	13%
12	Hunter/ Desktop search not performed	21	2805	19%
	<b>Total</b>	<b>139</b>	<b>13,295</b>	<b>91%</b>

## 9.7 Deviation in underwriting norms (Contd.)

### Management response

- All the deviations have been provided based on the merits and requirements for each case and with requisite approvals. The same have been shared, however the same have not been captured appropriately in the draft report by GT.
- Also with respect to the point that in 21 cases aggregating to 19% of the total loan disbursed it was highlighted that Hunter/ Desktop search has not been performed. Hunter search is a necessary step in processing for all the loans and understand that the same has been performed. However, we are glad to engage further with GT and resolve this gap in understanding.

*Note: Management response is reproduced in full as provided by the company.*

# End use of funds

## 10.1 End Use of Funds – Equity Share Capital

### Overview of equity share capital infusions and its end utilisation

(INR in Crores)

Sr No	Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>A</b>	<b><u>Equity Share Capital Infusion</u></b>					
	Reliance Capital Limited	200.00	372.95	-	-	<b>572.95</b>
	<b>Total (A)</b>	<b>200.00</b>	<b>372.95</b>	-	-	<b>572.95</b>
<b>B</b>	<b><u>End use of funds</u></b>					
	<b><u>Investment In Mutual Funds*</u></b>					
	ICICI Prudential Mutual Fund	100.00	-	-	-	<b>100.00</b>
	Reliance Liquid Mutual Fund	100.00	-	-	-	<b>100.00</b>
	DHFL Pramerica Mutual Fund	-	100.00	-	-	<b>100.00</b>
	Indiabulls Liquid Mutual Fund	-	100.00	-	-	<b>100.00</b>
	Axis Mutual Fund	-	100.00	-	-	<b>100.00</b>
	Invesco Mutual Fund	-	72.95	-	-	<b>72.95</b>
	<b>Total (B)</b>	<b>200.00</b>	<b>372.95</b>	-	-	<b>572.95</b>

For transaction wise details, please refer Annexure 12

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

## 10.2 End Use of Funds – Term Loans

### Overview of term loans extended to the Target Entity during our review period

On review of the books of accounts and details as provided by the Target Entity and respective banks, we noted that total of INR 3,366 crores of term loans were extended to the Target Entity during our review period. Bank wise summary of term loans disbursement is provided below;

(INR in Crores)

Sr. No	Bank Name	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
1	Axis Bank	-	-	-	40.00	40.00
2	AU Small Finance Bank	-	50.00	-	-	50.00
3	Bank of Bahrain and Kuwait	-	30.00	-	-	30.00
4	Bank of Baroda	300.00	300.00	-	-	600.00
5	Bank of India	200.00	200.00	-	-	400.00
6	Catholic Syrian Bank	-	50.00	-	-	50.00
7	Dena Bank	-	600.00	-	-	600.00
8	HDFC Bank	110.00	-	-	-	110.00
9	ICICI Bank	-	-	300.00	-	300.00
10	IDFC First Bank	-	300.00	-	-	300.00
11	Indian Bank	-	150.00	-	-	150.00
12	Punjab & Sind Bank	-	200.00	-	-	200.00
13	Syndicate Bank	-	300.00	-	-	300.00
14	The Federal Bank	100.00	100.00	-	-	200.00
15	Vijaya Bank	-	-	25.00	-	25.00
16	Woori Bank	-	-	11.00	-	11.00
	<b>Total</b>	<b>710.00</b>	<b>2280.00</b>	<b>336.00</b>	<b>40.00</b>	<b>3366.00</b>

## 10.2 End Use of Funds – Term Loans (Contd.)

### End utilisation summary of term loans extended to the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Disbursement</b>	<b>710.00</b>	<b>2280.00</b>	<b>336.00</b>	<b>40.00</b>	<b>3366.00</b>
<b>Utilisation</b>					
<b>Payment to potentially indirectly linked entities</b>	-	<b>110.00</b>	<b>230.00</b>	-	<b>340.00</b>
Mohanbir Hi Tech Build Private Limited	-	60.00	80.00	-	<b>140.00</b>
Medybiz Private Limited	-	-	150.00	-	<b>150.00</b>
Gamesa Investment Private Limited	-	50.00	-	-	<b>50.00</b>
<b>Investment in mutual funds*</b>	<b>537.07</b>	<b>2090.00</b>	<b>101.00</b>	-	<b>2728.07</b>
Reliance Liquid Mutual Fund	185.00	1850.00	101.00	-	<b>2136.00</b>
SBI Magnum Insta Cash Fund	-	100.00	-	-	<b>100.00</b>
UTI Mutual Fund	-	90.00	-	-	<b>90.00</b>
Birla Sunlife Mutual Fund	-	50.00	-	-	<b>50.00</b>
HSBC Cash Mutual Fund	30.00	-	-	-	<b>30.00</b>
Mirae Asset Cash Mutual Fund	10.00	-	-	-	<b>10.00</b>
India Bulls Short Term Mutual Fund	87.07	-	-	-	<b>87.07</b>
Invesco Mutual Fund	50.00	-	-	-	<b>50.00</b>
DHFL Pramerica Mutual Fund	50.00	-	-	-	<b>50.00</b>
Kotak Mahindra Mutual Fund	50.00	-	-	-	<b>50.00</b>
LIC Nomura Mutual Fund	75.00	-	-	-	<b>75.00</b>
<b>Others</b>					
Term loan principal repayment	150.00	15.00	-	-	<b>165.00</b>
Term loan interest repayment	-	65.00	-	-	<b>65.00</b>
Onward lending for business purpose	22.93	-	5.00	-	<b>27.93</b>
Utilisation towards CC facility				40.00	<b>40.00</b>
<b>Total</b>	<b>710.00</b>	<b>2280.00</b>	<b>336.00</b>	<b>40.00</b>	<b>3366.00</b>

For transaction wise details, please refer Exhibit 2 and Annexure 13 to 32

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

## 10.3 End Use of Funds – Secured Debentures - Listed

### End utilisation summary of secured debentures (listed) issued by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Infusion</b>	<b>685.00</b>	<b>2,354.00</b>	-	-	<b>3,039.00</b>
<b>Investment in mutual funds*</b>	<b>638.64</b>	<b>2,211.00</b>	-	-	<b>2,849.64</b>
Reliance liquid mutual fund	355.00	2,211.00	-	-	2,566.00
Birla sunlife mutual fund	25.00	-	-	-	25.00
Mirae asset cash mutual fund	20.00	-	-	-	20.00
Invesco mutual fund	75.00	-	-	-	75.00
Religare MF	65.00	-	-	-	65.00
SBI Premier MF	7.99	-	-	-	7.99
UTI MMF	20.00	-	-	-	20.00
Pearless Liquid MF	30.00	-	-	-	30.00
BNP Paribus MF	40.65	-	-	-	40.65
<b>Others</b>					
Reliance Capital	3.00	-	-	-	3.00
Term loan principal repayment	-	75.00	-	-	75.00
Onward lending for business purpose	18.48	9.00	-	-	27.48
Utilisation towards CC facility	-	20.00	-	-	20.00
Investment in Andhra Bank Corporate Bonds	23.16				23.16
Narration not ascertainable	1.72	39.00	-	-	40.72
<b>Total</b>	<b>685.00</b>	<b>2,354.00</b>	-	-	<b>3,039.00</b>

For transaction wise details, please refer Exhibit 3 and Annexure 33

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

## 10.4 End Use of Funds – Secured Debentures - MLD

### End utilisation summary of secured market linked debentures (MLD) issued by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Infusion</b>	<b>48.93</b>	<b>152.58</b>	<b>59.77</b>	<b>-</b>	<b>261.31</b>
<b>Utilisation</b>					
<b>Payment to potentially indirectly linked entities</b>					
Phi Management Solutions Private Limited	-	-	12.63	-	<b>12.63</b>
<b>Investment in mutual funds*</b>	<b>10.00</b>	<b>105.25</b>	<b>25.07</b>	<b>-</b>	<b>140.32</b>
Reliance liquid mutual fund	10.00	102.80	14.18	-	<b>126.98</b>
Invesco mutual fund	-	2.45	10.89	-	<b>13.34</b>
<b>Others</b>					
Reliance Securities Limited- F&O and currency hedging	4.93	16.15	2.21	-	<b>23.29</b>
Fixed Deposit	14.00	-	-	-	<b>14.00</b>
Term loan principal repayment	11.00	-	10.39	-	<b>21.39</b>
Tax payment	-	-	4.40	-	<b>4.40</b>
Onward lending for business purpose	8.65	18.34	-	-	<b>26.99</b>
Narration not ascertainable	0.35	12.84	5.09	-	<b>18.28</b>
<b>Total</b>	<b>48.93</b>	<b>152.58</b>	<b>59.77</b>	<b>-</b>	<b>261.31</b>

For transaction wise details, please refer Exhibit 4 and Annexure 34

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

## 10.5 End Use of Funds – Debentures – Public Issue

### End utilisation summary of debentures (public issue) issued by the Target Entity

(INR in Crores)

Bank Name	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Infusion</b>	<b>3030.18</b>	-	-	-	<b>3030.18</b>
<b>Utilisation</b>					
<b>Investment in mutual funds*</b>	<b>2426.75</b>	-	-	-	<b>2426.75</b>
Reliance Mutual Fund	1502.70	-	-	-	1502.70
SBI Premier Liquid Fund	350.00	-	-	-	350.00
Invesco Mutual Fund	200.00	-	-	-	200.00
L & T Mutual Fund	150.00	-	-	-	150.00
ICICI Mutual Fund	150.00	-	-	-	150.00
UTI Mutual Fund	73.00	-	-	-	73.00
Titco Taurus Mutual Fund	1.05	-	-	-	1.05
<b>Investment in bonds and NCDs</b>	<b>503.43</b>	-	-	-	<b>503.43</b>
IHFL Sec NCDs	97.20	-	-	-	97.20
Axis Unsecured Bonds	95.52	-	-	-	95.52
Yes Bank Unsecured Bonds	70.09	-	-	-	70.09
IDBI Corporate Bonds	50.92	-	-	-	50.92
PFCL Unsecured NCDs	40.92	-	-	-	40.92
BOM Corporate Bonds	36.62	-	-	-	36.62
Andhra Bank Corporate Bonds	32.89	-	-	-	32.89
THDC Secured NCDs	25.38	-	-	-	25.38
NABARD NCDs	25.32	-	-	-	25.32
BOI Corporate Bonds	17.68	-	-	-	17.68
OBC Unsecured Bonds	10.88	-	-	-	10.88

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

## 10.5 End Use of Funds – Debentures – Public Issue (Contd.)

### End utilisation summary of debentures (public issue) issued by the Target Entity

(INR in Crores)

Bank Name	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Others</b>					
Principal repayment Term loan	63.33	-	-	-	63.33
Interest on term loan	25.00	-	-	-	25.00
Onward Lending through various accounts	11.67	-	-	-	11.67
<b>Total</b>	<b>3030.18</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>3030.18</b>

For transaction wise details, please refer Exhibit 5 and Annexure 35

## 10.6 End Use of Funds – Unsecured Debentures

### End utilisation summary of unsecured debentures issued by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Infusion</b>	<b>65.00</b>				<b>65.00</b>
<b>Utilisation</b>					
<b>Investment in mutual funds*</b>	<b>60.00</b>				<b>60.00</b>
Mirae asset cash mutual fund	10.00				10.00
Invesco mutual fund	50.00				50.00
<b>Others</b>					
Narration not ascertainable	0.65				0.65
Onward lending for business purpose	4.35				4.35
<b>Total</b>	<b>65.00</b>				<b>65.00</b>

For transaction wise details, please refer Exhibit 6 Annexure 36

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

## 10.7 End Use of Funds – Commercial Papers

### End utilisation summary of commercial papers issued by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Infusion</b>	<b>6,670.10</b>	<b>4,463.92</b>	<b>3,515.46</b>	<b>115.04</b>	<b>14,764.52</b>
<b>Utilisation</b>					
<b>Payment to potentially indirectly linked entities</b>	-	-	<b>1,510.10</b>	<b>115.04</b>	<b>1,625.14</b>
Indian Agri Services Private Limited	-	-	298.00	-	<b>298.00</b>
Deep Industries Private Limited	-	-	220.00	-	<b>220.00</b>
Pifiniti Movies Private Limited	-	-	145.00	-	<b>145.00</b>
RPL Aditya Power Private Limited	-	-	137.85	-	<b>137.85</b>
Space Trade Enterprise Private Limited	-	-	135.00	-	<b>135.00</b>
Sahishnota Advisory Services Private Limited	-	-	-	115.04	<b>115.04</b>
RPL Star Power Private Limited	-	-	98.80	-	<b>98.80</b>
Adhar Project Management And Consultancy Private Limited	-	-	95.00	-	<b>95.00</b>
RPL Solar Power Private Limited	-	-	83.98	-	<b>83.98</b>
RPL Surya Power Private Limited	-	-	63.24	-	<b>63.24</b>
Worldcom Solutions Limited	-	-	49.40	-	<b>49.40</b>
Species and Commerce Private Limited	-	-	49.40	-	<b>49.40</b>
Reliance Big Entertainment Private Limited	-	-	44.20	-	<b>44.20</b>
Crest Logistics And Engineers Private Limited	-	-	41.50	-	<b>41.50</b>
Gamesa Investment Management Private Limited	-	-	28.97	-	<b>28.97</b>
Skyline Global Trade Private Limited	-	-	19.76	-	<b>19.76</b>

## 10.7 End Use of Funds – Commercial Papers (Contd.)

### End utilisation summary of commercial papers issued by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Investment In Mutual Funds*</b>	<b>6,174.99</b>	<b>4,416.11</b>	<b>1,259.01</b>	-	<b>11,850.11</b>
Reliance Liquid Mutual Fund	2,021.93	3,139.44	947.74	-	<b>6,109.11</b>
Invesco Mutual Fund	1,254.25	198.56	100.00	-	<b>1,552.81</b>
UTI Mutual Fund	379.90	200.00	49.35	-	<b>629.25</b>
ICICI Prudential Mutual Fund	265.63	183.62	-	-	<b>449.25</b>
SBI Mutual Fund	445.97	-	-	-	<b>445.97</b>
DSP Blackrock Mutual Fund	123.16	283.49	-	-	<b>406.65</b>
LIC Mutual Fund	192.54	-	161.92	-	<b>354.46</b>
DHFL Pramerica Mutual Fund	235.49	55.54	-	-	<b>291.03</b>
L&T Liquid Fund	177.26	98.62	-	-	<b>275.88</b>
Indiabulls Liquid Mutual Fund	198.70	50.00	-	-	<b>248.70</b>
Sundaram Mutual Fund	70.53	120.00	-	-	<b>190.53</b>
TITCO Taurus Mutual Fund	137.95	-	-	-	<b>137.95</b>
KMMF Liquid Fund	115.59	11.84	-	-	<b>127.43</b>
HSBC Cash Management Fund	104.10	-	-	-	<b>104.10</b>
Pearless Mutual Fund	84.73	-	-	-	<b>84.73</b>
Canera Robeco Mutual Fund	75.00	-	-	-	<b>75.00</b>
Birla Sunlife Mutual Fund	75.00	-	-	-	<b>75.00</b>
BNP Paribus Mutual Fund	73.79	-	-	-	<b>73.79</b>
Union KBC	68.47	-	-	-	<b>68.47</b>
Mirae Cash Mangment Fund	65.00	-	-	-	<b>65.00</b>
Axis Mutual Fund	-	50.00	-	-	<b>50.00</b>
Essel Liquid Fund	-	25.00	-	-	<b>25.00</b>
IFMR Finpact Long Term Mutual Fund	10.00	-	-	-	<b>10.00</b>

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

## 10.7 End Use of Funds – Commercial Papers (Contd.)

### End utilisation summary of commercial papers issued by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Others</b>					-
Maturity of Commercial Papers	-	-	487.44	-	<b>487.44</b>
Interest paid on NCDs	-	-	190.36	-	<b>190.36</b>
Investment in Gujarat State Petroleum Unsecured Bonds	122.66			-	<b>122.66</b>
Onward lending for business purpose	66.67	34.11	16.85	-	<b>117.63</b>
Investment in IL& FS Unsecured Bonds	88.08	-	-	-	<b>88.08</b>
Repayment of Term Loan	48.98	-	30.00	-	<b>78.98</b>
Investment in BOI Corporate Bonds	50.14	-	-	-	<b>50.14</b>
Fixed Deposits	49.91	-	-	-	<b>49.91</b>
Payment of Term Loan Interest	30.00	-	-	-	<b>30.00</b>
Investment in ITNL Corporate Bonds	24.68	-	-	-	<b>24.68</b>
Investment in Yes Bank unsecured bonds	-	13.70	-	-	<b>13.70</b>
Reliance Capital Limited	3.47	-	-	-	<b>3.47</b>
Indiabulls Finance Limited	0.70	-	-	-	<b>0.70</b>
Narration not ascertainable	9.82	-	21.70	-	<b>31.52</b>
<b>Total</b>	<b>6,670.10</b>	<b>4,463.92</b>	<b>3,515.46</b>	<b>115.04</b>	<b>14,764.52</b>

For transaction wise details, please refer Exhibit 7 Annexure 37 to 40

## 10.8 End Use of Funds – ICDs

### End utilisation summary of inter corporate deposits received by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Infusion</b>	-	-	<b>368.00</b>	<b>196.20</b>	<b>564.20</b>
<b>Utilisation</b>					
<b>Payment to potentially indirectly linked entities</b>					
Summit Chem Infra Private Limited			5.00		<b>5.00</b>
<b>Others</b>					
Commercial paper repayment			200.00		200.00
LIC mutual fund*			50.00		50.00
Payment of taxes			2.70		2.70
Reliance Securities Limited			0.30		0.30
Payment of interest on debentures			49.18		49.18
Reliance Commercial Finance Limited			40.00		40.00
Principal repayment of term loan			10.00		10.00
S D Corporation Limited (commercial paper matured)				196.20	196.20
Onward lending to various borrowers			3.85		3.85
Narration not ascertainable			6.97		6.97
<b>Total</b>			<b>368.00</b>	<b>196.20</b>	<b>564.20</b>

For transaction wise details, please refer Exhibit 8 Annexure 41

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

# Debt securitisation

# 11. Debt Securitisation – End Use of Funds

## End utilisation summary of debt securitisation by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Infusion</b>	<b>1,039.88</b>	<b>1,276.00</b>	<b>5,118.65</b>	<b>474.91</b>	<b>7,909.44</b>
<b>Utilisation</b>					
<b>Payment to potentially indirectly linked entities</b>	-	-	<b>2779.88</b>	<b>35.00</b>	<b>2814.88</b>
Arion Movie Private Limited	-	-	400.00	-	<b>400.00</b>
Adhar Project Management And Consultancy Private Limited	-	-	100.00	-	<b>100.00</b>
Adhar Property Consultancy Private Limited	-	-	187.00	-	<b>187.00</b>
Adhar Real Estate Consultancy Private Limited	-	-	200.00	-	<b>200.00</b>
Reliance Commercial Finance Limited	-	-	210.00	-	<b>213.25</b>
Celebrita Mediahouse Private Limited	-	-	210.00	-	<b>210.00</b>
Vishvakarma Equipment Finance India Limited	-	-	200.00	-	<b>200.00</b>
Pearl Housing Finance Limited	-	-	200.00	-	<b>200.00</b>
Traitrya Construction Private Limited	-	-	185.00	-	<b>185.00</b>
Wallace Movies Productions Private Limited	-	-	153.23	-	<b>153.23</b>
Gamesa Investment Management Private Limited	-	-	139.00	-	<b>139.00</b>
Edrishti Movies Private Limited	-	-	120.00	-	<b>120.00</b>
Neptune steel Strips Limited	-	-	102.50	-	<b>102.50</b>
Indian Agri Services Private Limited	-	-	90.00	-	<b>90.00</b>
IPPY Entertainment Private Limited	-	-	80.00	-	<b>80.00</b>
Thwink Big Content Private Limited	-	-	65.00	-	<b>65.00</b>
Reliance Capital Limited	-	-	40.00	-	<b>40.00</b>
Kunjbihari Developers Private Limited	-	-	30.00	-	<b>30.00</b>
Netizen Engineering Private Limited	-	-	25.15	-	<b>25.15</b>
Mohanbir Private Limited	-	-	25.00	-	<b>25.00</b>
Sahishnota Advisory Services Private Limited	-	-	-	35.00	<b>35.00</b>
Vinayak Ventures Private Limited	-	-	11.00	-	<b>11.00</b>
Pifiniti Movies Private Limited	-	-	7.00	-	<b>7.00</b>

# 11. Debt Securitisation – End Use of Funds (Contd.)

## End utilisation summary of debt securitisation by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Investment in mutual funds*</b>	<b>941.14</b>	<b>1,276.00</b>	<b>1,685.66</b>	-	<b>3,902.80</b>
Reliance Liquid Mutual Fund	302.77	1,133.53	1,577.95		<b>3,014.25</b>
SBI Mutual Fund	200.00	63.15	-		<b>263.15</b>
UTI Mutual Fund	45.00	29.32	100.00		<b>174.32</b>
ICICI Prudential Mutual Fund	130.46	-	-	-	<b>130.46</b>
Invesco Mutual Fund	50.00	-	-	-	<b>50.00</b>
LIC Mutual Fund	-	50.00	-	-	<b>50.00</b>
KMMF Liquid Fund	50.00	-	-	-	<b>50.00</b>
Birla Sunlife Mutual Fund	50.00	-	-	-	<b>50.00</b>
BNP Paribus Mutual Fund	50.00	-	-	-	<b>50.00</b>
HSBC Cash Management Fund	30.00	-	7.71	-	<b>37.71</b>
Mahindra Mutual Fund	30.00	-	-	-	<b>30.00</b>
Mirae Cash Mangment Fund	2.91	-	-	-	<b>2.91</b>
<b>Others</b>					
Repayment of Term Loan	-	-	73.43	410.39	<b>483.82</b>
Fixed Deposits	98.74		297.02		<b>395.76</b>
Maturity of Commercial Papers	-	-	120.00	-	<b>120.00</b>
Citi Securities Private Limited	-	-	54.25	-	<b>54.25</b>
Payment of Term Loan Interest	-	-	40.00	-	<b>40.00</b>
Onward lending for business purpose	-	-	8.52	-	<b>8.52</b>
Repayment of Term Loan	-	-	73.43	410.39	<b>483.82</b>
Narration not ascertainable	-	-	59.89	29.52	<b>89.41</b>
<b>Total</b>	<b>1,039.88</b>	<b>1,276.00</b>	<b>5,118.65</b>	<b>474.91</b>	<b>7,909.44</b>

For transaction wise details, please refer Exhibit 9 Annexure 42

\*Note: We have identified source of corporate loans disbursed by the Target entity during our Review Period which includes corporate loans disbursed from redemption of mutual funds. Refer section 12 for further details.

# Source of corporate loans

## 12.1 Source of corporate loans

### Source of corporate loans issued by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Corporate Loans disbursed</b>	<b>882.13</b>	<b>4,281.62</b>	<b>9,398.33</b>	<b>216.00</b>	<b>14,778.11</b>
<b>Source</b>					
<b>Receipt from potentially indirectly linked entities</b>	-	<b>284.70</b>	<b>1,332.31</b>	-	<b>1617.01</b>
Indian Agri Services Private Limited		80.00	200.00		<b>280.00</b>
Azalia Distribution Private Limited			210.21		<b>210.21</b>
Arion Movie Productions Private Limited			147.64		<b>147.64</b>
Hirma Power Limited			190.00		<b>190.00</b>
Summit Ceminfra Private Limited			175.00		<b>175.00</b>
Gamesa Investment Management Private Limited			125.00		<b>125.00</b>
Reliance Unicorn enterprises Private Limited		85.75	-		<b>85.75</b>
Space Trade Enterprises Private Limited			77.90		<b>77.90</b>
Crest Logistics & Engineering Private Limited			70.16		<b>70.16</b>
JayamKondam Power Limited			69.58		<b>69.58</b>
Mohanbir Hi-Tech Build Private Limited		59.95	-		<b>59.95</b>
Skyline Global Trade Private Limited		49.00	-		<b>49.00</b>
Neptune Steel Strips Private Limited			28.00		<b>28.00</b>
Species Commerce & Trade Private Limited			20.92		<b>20.92</b>
Wallace Movies And Entertainment Private Limited			17.90		<b>17.90</b>
Adhar Project Management and Consultancy Private Limited		10.00	-		<b>10.00</b>
Reliance Commercial Finance Limited			3.00		<b>3.00</b>
<b>Other entities</b>	-	<b>125.14</b>	<b>40.00</b>	-	<b>165.14</b>
Mahimna Merchantile Credits Limited		107.14	-		<b>107.14</b>
Golden Beach Infracon private Limited			20.12		<b>20.12</b>
Ceartoz Builderz Private Limited			19.88		<b>19.88</b>
Fortis Healthcare Limited		18.00	-		<b>18.00</b>

## 12.1 Source of corporate loans

### Source of corporate loans issued by the Target Entity

(INR in Crores)

Particulars	FY 2016-17	FY 2017-18	FY 2018-19	FY 2019-20 (Q1)	Total
<b>Redemption of mutual funds</b>	<b>638.24</b>	<b>2,353.45</b>	<b>3,155.26</b>	<b>66.00</b>	<b>6,212.95</b>
Reliance Liquid Mutual Fund	340.47	1,426.79	2,256.59	66.00	4089.85
UTI Mutual Fund		324.00	525.00		849.00
Invesco Mutual Fund	50.00	325.00	196.44		571.44
SBI Mutual Fund	238.00	164.27	-		402.27
HSBC Mutual Fund			170.23		170.23
DHFL Pramerica Mutual Fund		63.44	-		63.44
Axis Mutual Fund		45.00	-		45.00
BNP Paribas Mutual Fund	8.59		-		8.59
LIC Mutual Fund			7.00		7.00
DSP Blackrock Mutual Fund		4.95	-		4.95
KM Mutual Fund	1.18		-		1.18
<b>Others</b>					
Commercial papers issued		34.11	1465.91	115.00	1615.02
Securitisation			2,634.09	35.00	2,669.09
Term Loan		110.00	230.00		340.00
Branch Wise Collection A/c's	26.05	31.56	62.45		120.06
Sale of Bonds	21.03				21.03
FD Maturity Proceeds	13.35				13.35
Sundaram BNP Paribas Fund Service		6.00			6.00
Entry not found	87.23	802.99	136.61		1,026.83
Narration not ascertainable	96.18	256.67	341.70		694.55
LAN's of which disbursement not made		277.00	-		277.00
<b>Total</b>	<b>882.13</b>	<b>4,281.62</b>	<b>9,398.33</b>	<b>216.00</b>	<b>14,778.11</b>

## 12.2 Summary - Investment and Redemption of Mutual Fund

### Investment in mutual funds out of total infusion of funds in the Target Entity during our Review Period

(INR in Crores)

Sr No	Particulars	Total Infusion	Investment in Mutual Funds	% of investment in mutual funds
I.	Equity Share Capital	572.95	572.95	100.00
II.	Term loan	3,366.00	2678.07	79.56
III.	Debentures	6395.46	5476.71	85.63
IV.	Commercial Papers	14,764.52	11850.11	80.26
V.	Inter-corporate deposits	564.20	-	-
	Total	25663.13	20577.84	80.18

### Redemption of mutual funds utilised for disbursement of corporate loans during our Review Period

(INR in Crores)

Sr No	Particulars	Total disbursement	Source from redemption of mutual funds	% of source from mutual funds
I.	Corporate Loans	14778.11	6242.00	42.23

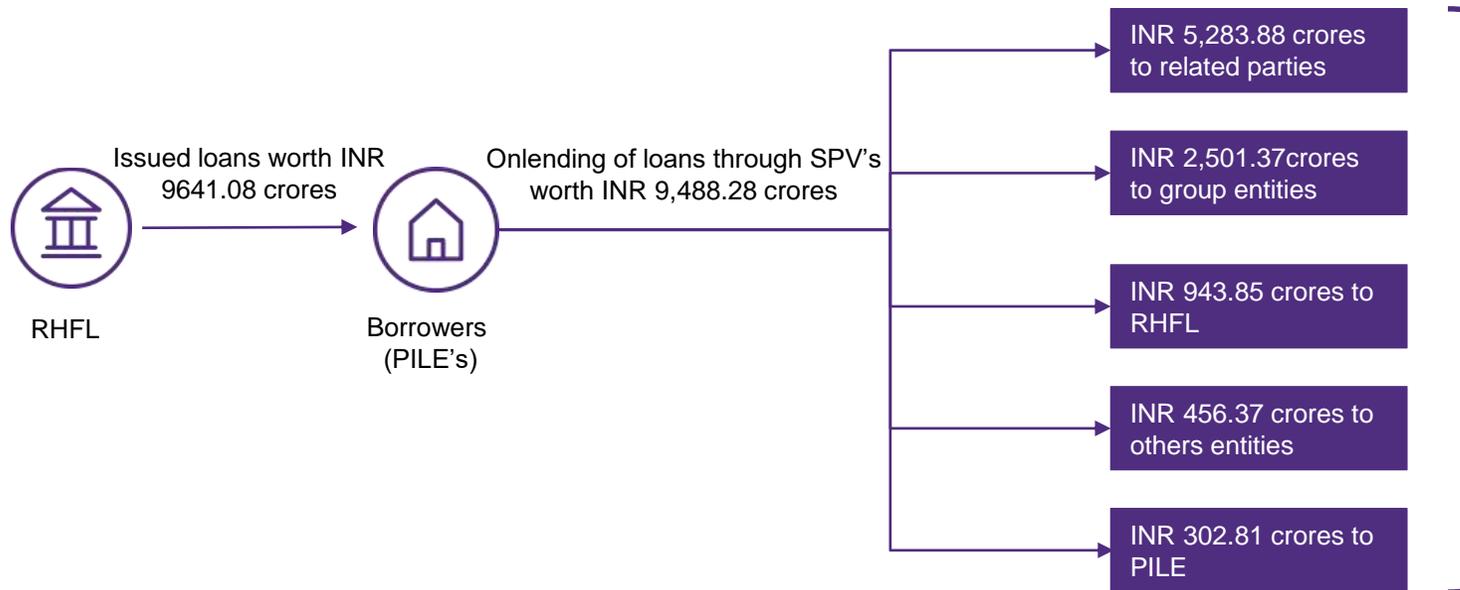
# End use of GPCL disbursed to borrowers

# 13. End use of GPCL disbursed to borrowers (Provided by the Target Entity)

## Observation:

We were provided with the details of the end utilization of the corporate loans by the Target Entity.

- During our review period, the Target Entity has issued general purpose corporate loans to 44 borrowers, aggregating to INR 9,641.08 crores, who have undertaken onward lending transactions to other companies. These companies, in turn, advanced these loans to Reliance Capital Limited ('RCL'), Reliance Commercial Finance Limited ('RCFL'), Reliance Infrastructure Limited ('Rinfra'), Reliance Home Finance Limited ('RHFL'), entities belonging to ADAG group and other entities. A summary of such transactions is presented below.
- It appears that such an approach may have been used by the Target Entity to circumvent the regulatory ceilings of credit exposure to single borrower of 15% and to group borrowers of 20% of capital funds and disclosure of such transactions in financial statements as per IND AS 24 - Related Party Disclosures, notified under section 133 of Companies Act 2013.
- Loan Account Number ('LAN') wise details is presented over next slides.



Status	Companies	INR in crores
Related party	Reliance Capital Limited	3,038.44
Related party	Reliance Commercial Finance Limited	2,234.40
Group	Reliance Infrastructure Limited	1,853.69
RHFL	Reliance Home Finance Limited	943.85
Group	Reliance Broadcast Network Limited	247.19
Group	Reliance Business Broadcast News Holdings	200.50
PILE	Kunjbihari Developers Private Limited	186.61
Others	Divyashakti	172.33
Others	Reliance Interactive Advisors Private Limited	137.82
PILE	Crest Logistics And Engineers Private Limited	116.20
Group	Reliance Power Limited	113.24
Others	Reliance Interactive Private Limited	102.77
Others	VIPL	35.75
Group	Reliance Mediaworks Financial Services	26.00
Group	Reliance Energy Generation Supply Limited	23.00
Group	Reliance Big Entertainment Private Limited	12.10
Related party	Reliance Nippon Life Insurance Co Limited	11.04
Group	Global Wind Power Limited	7.60
Others	Others	6.10
Group	Unlimit lot Private Limited	5.00
Group	Reliance Nippon Asset Mgmt Limited	4.25
Group	Reliance Naval And Engineering Limited	4.00
Group	Big Flicks Private Limited	3.40
Others	Vinod Chopra Productions	1.60
Group	Zapak Digital Entertainment Limited	1.40
<b>Total</b>		<b>9488.28</b>

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
1	RHWCCOR000074419	SPACE TRADE ENTERPRISES PRIVATE LIMITED	25 JUNE 2018	135	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	135	HIRMA POWER LIMITED	100	RELIANCE COMMERCIAL FINANCE LIMITED	100	RELIANCE COMMERCIAL FINANCE LIMITED
							RELIANCE CAPITAL LIMITED	35		RELIANCE CAPITAL LIMITED	
2	RHWCCOR000070719	SUMMIT CEMINFRA PRIVATE LIMITED	31 MAY 2018	50	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	50	SKYLINE GLOBAL TRADE PRIVATE LIMITED	26	RELIANCE HOME FINANCE LIMITED	26	RELIANCE HOME FINANCE LIMITED
							RELIANCE HOME FINANCE LIMITED	24		RELIANCE HOME FINANCE LIMITED	
3	RHWCCOR000068145	AASHISH POWER PLANT EQUIPMENT PRIVATE LIMITED	27 MARCH 2018	100	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	100	RELIANCE INFRASTRUCTURE LIMITED	100		-	RELIANCE INFRASTRUCTURE LIMITED
4	RHWCCOR000072378	RPL SURYA POWER PRIVATE LIMITED	08 AUG 2018	63	RELIANCE POWER LIMITED	63		-		-	RELIANCE POWER LIMITED
5	RHWCCOR000072661	RPL ADITYA POWER PRIVATE LIMITED	24 AUG 2018	138	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	138	RELIANCE INFRASTRUCTURE LIMITED	138		-	RELIANCE INFRASTRUCTURE LIMITED
6	RHWCCOR000070687	HIRMA POWER LIMITED	29 MAY 2018	49	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	49	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	31	RELIANCE HOME FINANCE LIMITED	31	RELIANCE HOME FINANCE LIMITED
							SPACE TRADE ENTERPRISES PRIVATE LIMITED	19	RELIANCE HOME FINANCE LIMITED	19	RELIANCE HOME FINANCE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
7	RHWCCOR000071120	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	19 JUN 2018	99	RELIANCE BIG ENTERTAINMENT PRIVATE LIMITED	99	RELIANCE INTERACTIVE ADVISORS PRIVATE LIMITED	99		-	RELIANCE INTERACTIVE ADVISORS PRIVATE LIMITED
8	RHWCCOR000072587	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	22 AUG 2018	49	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	49	RELIANCE INFRASTRUCTURE LIMITED	49		-	RELIANCE INFRASTRUCTURE LIMITED
9	RHWCCOR000070715	TULIP ADVIOSRS PRIVATE LIMITED	31 MAY 2018	54	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	54	RELIANCE HOME FINANCE LIMITED	54		-	RELIANCE HOME FINANCE LIMITED
10	RHWCCOR000069791	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	20 APR 2018	7	RELIANCE INFRASTRUCTURE LIMITED	7	RELIANCE POWER LIMITED	7		-	RELIANCE POWER LIMITED
11	RHWCCOR000072660	RPL SOLAR POWER PRIVATE LIMITED	24 AUG 2018	35	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	35	RELIANCE INFRASTRUCTURE LIMITED	29		-	RELIANCE INFRASTRUCTURE LIMITED
							OTHERS	6		-	OTHERS
12	RHWCCOR000068206	RPL SUNLIGHT POWER PRIVATE LIMITED	28 MAR 2018	100	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	100	RELIANCE INFRASTRUCTURE LIMITED	100		-	RELIANCE INFRASTRUCTURE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
13	RHWCCOR000070698	TULIP ADVIOSRS PRIVATE LIMITED	30 May 2018	99	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	99	SKYLINE GLOBAL TRADE PRIVATE LIMITED	52	RELIANCE HOME FINANCE LIMITED	52	RELIANCE HOME FINANCE LIMITED
							SPECIES COMMERCE AND TRADE PRIVATE LIMITED	47	RELIANCE HOME FINANCE LIMITED	47	RELIANCE HOME FINANCE LIMITED
14	RHWCCOR000072607	RPL SUNLIGHT POWER PRIVATE LIMITED	23 Aug 2018	46	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	46	RELIANCE INFRASTRUCTURE LIMITED	46		-	RELIANCE INFRASTRUCTURE LIMITED
15	RHWCCOR000070689	TULIP ADVIOSRS PRIVATE LIMITED	29 May 2018	59	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	59	SPACE TRADE ENTERPRISES PRIVATE LIMITED	59	RELIANCE HOME FINANCE LIMITED	59	RELIANCE HOME FINANCE LIMITED
16	RHWCCOR000070709	SKYLINE GLOBAL TRADE PRIVATE LIMITED	31 May 2018	70	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	70	JAYAMKONDAM POWER LIMITED	70	RELIANCE HOME FINANCE LIMITED	70	RELIANCE HOME FINANCE LIMITED
17	RHWCCOR000068147	RPL SOLAR POWER PRIVATE LIMITED	27 Mar 2018	100	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	100	RELIANCE INFRASTRUCTURE LIMITED	100		-	RELIANCE INFRASTRUCTURE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark	
18	RHWCCOR0000 68204	RPL STAR POWER PRIVATE LIMITED	28 Mar 2018	100	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	100	RELIANCE INFRASTRUCTURE LIMITED	100			-	RELIANCE INFRASTRUCTURE LIMITED
19	RHWCCOR0000 72659	RPL STAR POWER PRIVATE LIMITED	24 Aug 2018	49	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	49	RELIANCE INFRASTRUCTURE LIMITED	49			-	RELIANCE INFRASTRUCTURE LIMITED
20	RHWCCOR0000 70712	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	31 May 2018	70	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	70	WORLDCOM	70	RELIANCE HOME FINANCE LIMITED	70		RELIANCE HOME FINANCE LIMITED
21	RHWCCOR0000 72586	WORLDCOM SOLUTIONS LIMITED	22 Aug 2018	49	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	49	RELIANCE INFRASTRUCTURE LIMITED	49			-	RELIANCE INFRASTRUCTURE LIMITED
22	RHWCCOR0000 72658	SKYLINE GLOBAL TRADE PRIVATE LIMITED	24 Aug 2018	20	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	20	RELIANCE INFRASTRUCTURE LIMITED	20			-	RELIANCE INFRASTRUCTURE LIMITED
23	RHWCCOR0000 71121	JAYAMKONDAM POWER LIMITED	19 Jun 2018	103	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	103	RELIANCE BIG ENTERTAINMENT PRIVATE LIMITED	103	RELIANCE INTERACTIVE PRIVATE LIMITED	103		RELIANCE INTERACTIVE PRIVATE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
24	RHWCCOR000072588	RPL STAR POWER PRIVATE LIMITED	21 Aug 2018	49	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	49	RELIANCE INFRASTRUCTURE LIMITED	49		-	RELIANCE INFRASTRUCTURE LIMITED
25	RHWCCOR000072590	RPL SOLAR POWER PRIVATE LIMITED	21 Aug 2018	49	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	49	RELIANCE INFRASTRUCTURE LIMITED	49		-	RELIANCE INFRASTRUCTURE LIMITED
26	RHWCCOR000068156	RPL SURYA POWER PRIVATE LIMITED	27 Mar 2018	100	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	100	RELIANCE INFRASTRUCTURE LIMITED	68		-	RELIANCE INFRASTRUCTURE LIMITED
							RELIANCE POWER LIMITED	32		-	RELIANCE POWER LIMITED
27	RHWCCOR000072374	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	08 Aug 2018	42	RELIANCE INFRASTRUCTURE LIMITED	45	RELIANCE ENERGY GENERATION SUPPLY LIMITED	23		-	RELIANCE ENERGY GENERATION SUPPLY LIMITED
							RELIANCE NAVAL AND ENGINEERING LIMITED	4		-	RELIANCE NAVAL AND ENGINEERING LIMITED
							JR TOLL ROAD	-		-	JR TOLL ROAD
							RELIANCE INFRASTRUCTURE LIMITED	11		-	RELIANCE INFRASTRUCTURE LIMITED
28	RHWCCOR000073156	RELIANCE CLEANGEN LIMITED	12 Sep 2018	40	RELIANCE POWER LIMITED	40	VIPL	36		-	VIPL
							RELIANCE NIPPON ASSET MGMT LTD	4		-	RELIANCE NIPPON ASSET MGMT LTD

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
29	RHWCCOR0000 74844	AZALIA DISTRIBUTION PRIVATE LIMITED	22 Mar 2019	175	HIRMA POWER LIMITED	175	RELIANCE HOME FINANCE LIMITED	175		-	RELIANCE HOME FINANCE LIMITED
30	RHWCCOR0000 74905	SUMMIT CEMINFRA PRIVATE LIMITED	29 Mar 2019	32	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	32	TULIP ADVIOSRS PRIVATE LIMITED	13	RELIANCE HOME FINANCE LIMITED	13	RELIANCE HOME FINANCE LIMITED
							RPL SOLAR POWER PRIVATE LIMITED	4	RELIANCE HOME FINANCE LIMITED	4	RELIANCE HOME FINANCE LIMITED
							HIRMA POWER LIMITED	15	RELIANCE HOME FINANCE LIMITED	15	RELIANCE HOME FINANCE LIMITED
31	RHWCCOR0000 74884	HIRMA POWER LIMITED	22 Mar 2019	175	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	175	SUMMIT CEMINFRA PRIVATE LIMITED	172	DIVYASHAKTI	172	DIVYASHAKTI
32	RHWCCOR0000 74735	NEPTUNE STEEL STRIPS LIMITED	16 Feb 2019	103	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	103	RELIANCE INFRASTRUCTURE LIMITED	100		-	RELIANCE INFRASTRUCTURE LIMITED
33	RHWCCOR0000 74842	VINAYAK VENTURES PRIVATE LIMITED	19 Mar 2019	210	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	210	RELIANCE INFRASTRUCTURE LIMITED	210		-	RELIANCE INFRASTRUCTURE LIMITED
34	RHWCCOR0000 74843	CITI SECURITIES AND FINANCIAL SERVICES PRIVATE LIMITED	19 Mar 2019	221	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	220	RELIANCE INFRASTRUCTURE LIMITED	220		-	RELIANCE INFRASTRUCTURE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

 Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark		
35	RHWCCOR000074313	VINAYAK VENTURES PRIVATE LIMITED	26 Nov 2018	11	RELIANCE POWER LIMITED	11	RELIANCE NIPPON LIFE INSURANCE CO LTD	11		-	RELIANCE NIPPON LIFE INSURANCE CO LTD		
36	RHWCCOR000073595	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	01 Oct 2018	11	AASHISH POWER PLANT EQUIPMENT PRIVATE LIMITED	11	RELIANCE HOME FINANCE LIMITED	11		-	RELIANCE HOME FINANCE LIMITED		
37	RHWCCOR000074350	ADHAR REAL ESTATE CONSULTANCY PRIVATE LIMITED	01 Nov 2018	200	RELIANCE BUSINESS BROADCAST NEWS HOLDINGS LIMITED	200	INDIAN AGRI SERVICES LIMITED	200	RELIANCE COMMERCIAL FINANCE LIMITED	200	RELIANCE COMMERCIAL FINANCE LIMITED		
											RELIANCE COMMERCIAL FINANCE LIMITED		
38	RHWCCOR000074423	IPPY ENTERTAINMENT PRIVATE LIMITED	31 Dec 2018	60	RELIANCE BIG ENTERTAINMENT PVT LTD	60	RELIANCE ALPHA SERVICES PRIVATE LIMITED	60	RELIANCE CAPITAL LIMITED	53	RELIANCE CAPITAL LIMITED		
											GLOBAL WIND POWER LIMITED	5	GLOBAL WIND POWER LIMITED
											RELIANCE BUSINESS BROADCAST NEWS HOLDINGS LIMITED	3	RELIANCE BUSINESS BROADCAST NEWS HOLDINGS LIMITED
39	RHWCCOR000074428	WALLACE MOVIES AND ENTERTAINMENT PRIVATE LIMITED	31 Dec 2018	18	RELIANCE BROADCAST NETWORK LIMITED	18		-		-	RELIANCE BROADCAST NETWORK LIMITED		

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:



Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
40	RHWCCOR0000 74356	PIFINITI MOVIES PRIVATE LIMITED	11 Dec 2018	14	RELIANCE BIG ENTERTAINMEN T PVT LTD	14	ZAPAK DIGITAL ENTERTAINMENT LIMITED	1		-	ZAPAK DIGITAL ENTERTAINMENT LIMITED
									-	RELIANCE BIG ENTERTAINMENT PRIVATE LIMITED	
									-	RELIANCE BIG ENTERTAINMENT PRIVATE LIMITED	
									-	RELIANCE BIG ENTERTAINMENT PRIVATE LIMITED	
									-	RELIANCE BIG ENTERTAINMENT PRIVATE LIMITED	
									-	RELIANCE BIG ENTERTAINMENT PRIVATE LIMITED	
41	RHWCCOR0000 74354	ARION MOVIE PRODUCTIONS PRIVATE LIMITED	11 Dec 2018	200	RELIANCE BROADCAST NETWORK LIMITED	200		-		-	RELIANCE BROADCAST NETWORK LIMITED
42	RHWCCOR0000 74355	EDRISHTI MOVIES PRIVATE LIMITED	07 Dec 2018	80	RELIANCE BIG ENTERTAINMEN T PVT LTD	80	RELIANCE CAPITAL LIMITED	80		-	RELIANCE CAPITAL LIMITED
43	RHWCCOR0000 74431	IPPY ENTERTAINMENT PRIVATE LIMITED	28 Dec 2018	40	RELIANCE BIG ENTERTAINMEN T PVT LTD	40	RELIANCE ALPHA SERVICES PRIVATE LIMITED	40	RELIANCE CAPITAL LIMITED	40	RELIANCE CAPITAL LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
44	RHWCCOR000071863	ADHAR PROJECT MANAGEMENT AND CONSULTANCY PRIVATE LIMITED	23 Jul 2018	25	RELIANCE CAPITAL LIMITED	25		-		-	RELIANCE CAPITAL LIMITED
45	RHWCCOR000074545	IPPY ENTERTAINMENT PRIVATE LIMITED	28 Dec 2018	5	RELIANCE BIG ENTERTAINMENT PVT LTD	5	VINOD CHOPRA PRODUCTIONS	2		-	VINOD CHOPRA PRODUCTIONS
							BIG FLICKS PRIVATE LIMITED	3		-	BIG FLICKS PRIVATE LIMITED
46	RHWCCOR000074576	IPPY ENTERTAINMENT PRIVATE LIMITED	16 Jan 2019	39	RELIANCE BIG ENTERTAINMENT PVT LTD	39	RELIANCE INTERACTIVE ADVISORS PVT LTD	39		-	RELIANCE INTERACTIVE ADVISORS PVT LTD
47	RHWCCOR000074590	ACCURA PRODUCTIONS PRIVATE LIMITED	21 Jan 2019	40	RELIANCE BIG ENTERTAINMENT PVT LTD	40	RELIANCE ALPHA SERVICES PRIVATE LIMITED	40	RELIANCE CAPITAL LIMITED	40	RELIANCE CAPITAL LIMITED
48	RHWCCOR000074736	CELEBRITA MEDIAHOUSE PRIVATE LIMITED	22 Feb 2019	150	RELIANCE BIG ENTERTAINMENT PVT LTD	150	RELIANCE VENTURE ASSET MANAGEMENT P LTD.	150	RELIANCE CAPITAL LIMITED	150	RELIANCE CAPITAL LIMITED
49	RHWCCOR000074896	WALLACE MOVIES AND ENTERTAINMENT PRIVATE LIMITED	26 March 2019	50	RELIANCE COMMERCIAL FINANCE LIMITED	50					RELIANCE COMMERCIAL FINANCE LIMITED
											RELIANCE COMMERCIAL FINANCE LIMITED
50	RHWCCOR000074761	CELEBRITA MEDIAHOUSE PRIVATE LIMITED	01 Mar 2019	60	RELIANCE BIG ENTERTAINMENT PVT LTD	60	RELIANCE VENTURE ASSET MANAGEMENT P LTD.	60	RELIANCE CAPITAL LIMITED	60	RELIANCE CAPITAL LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

 Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
51	RHWCCOR000074883	ARION MOVIE PRODUCTIONS PRIVATE LIMITED	25 March 2019	200	RELIANCE COMMERCIAL FINANCE LIMITED	200		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
52	RHWCCOR000074732	ACCURA PRODUCTIONS PRIVATE LIMITED	14 Feb 2019	20	RELIANCE BIG ENTERTAINMENT PVT LTD	20	RELIANCE UNICORN ENTERPRISES PRIVATE LIMITED	20	RELIANCE CAPITAL LIMITED	20	RELIANCE CAPITAL LIMITED RELIANCE CAPITAL LIMITED
53	RHWCCOR000074890	NATIONWIDE COMMUNICATION PRIVATE LIMITED	22 March 2019	175	RELIANCE CAPITAL LIMITED	105	RELIANCE CAPITAL LIMITED	105		-	RELIANCE CAPITAL LIMITED
					RELIANCE BUSINESS BROADCAST NEWS HOLDINGS LIMITED	70	RELIANCE CAPITAL LIMITED	70		-	RELIANCE CAPITAL LIMITED
54	RHWCCOR000074762	ADHAR PROJECT MANAGEMENT AND CONSULTANCY PRIVATE LIMITED	01 March 2019	100	RELIANCE COMMERCIAL FINANCE LIMITED	100		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
55	RHWCCOR000074881	WALLACE MOVIES AND ENTERTAINMENT PRIVATE LIMITED	25 March 2019	110	RELIANCE COMMERCIAL FINANCE LIMITED	110		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
56	RHWCCOR000074087	ADHAR PROJECT MANAGEMENT AND CONSULTANCY PRIVATE LIMITED	30 Oct 2018	95	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	95		-		-	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

 Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
57	RHWCCOR0000 74665	DEEP INDUSTRIAL FINANCE LIMITED	02 Feb 2019	220	RELIANCE COMMERCIAL FINANCE LIMITED	220		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
58	RHWCCOR0000 73259	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	19 Sep 2018	200	RELIANCE CAPITAL LIMITED	200		-		-	RELIANCE CAPITAL LIMITED
59	RHWCCOR0000 74827	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	18 Mar 2019	144	RELIANCE COMMERCIAL FINANCE LIMITED	144	RELIANCE CAPITAL LIMITED	144		-	RELIANCE CAPITAL LIMITED
60	RHWCCOR0000 74822	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	13 Mar 2019	15	RELIANCE EXCHANGE NEXT LIMITED	15	RELIANCE CORPORATE ADVISORY SERVICES P LTD	15	RELIANCE MEDIWORKS FINANCIAL SERVICES PVT LIMITED	13	RELIANCE MEDIWORKS FINANCIAL SERVICES PVT LIMITED
				20	RELIANCE CAPITAL LIMITED	20		-		-	RELIANCE CAPITAL LIMITED
61	RHWCCOR0000 72547	INDIAN AGRI SERVICES PVT LTD	20 Aug 2018	100	RELIANCE CAPITAL LIMITED	100		-		-	RELIANCE CAPITAL LIMITED
62	RHWCCOR0000 73109	INDIAN AGRI SERVICES PVT LTD	10 Sep 2018	198	RELIANCE BUSINESS BROADCAST NEWS HOLDINGS LIMITED	198		-		-	RELIANCE BUSINESS BROADCAST NEWS HOLDINGS LIMITED
63	RHWCCOR0000 74821	INDIAN AGRI SERVICES PVT LTD	13 Mar 2019	25	RELIANCE CAPITAL LIMITED	25		-		-	RELIANCE CAPITAL LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
64	RHWCCOR0000 74169	INDIAN AGRI SERVICES PVT LTD	05 Nov 2018	20	PHI MANAGEMENT SOLUTIONS PVT LTD	20	RELIANCE HOME FINANCE LIMITED	20		-	RELIANCE HOME FINANCE LIMITED
65	RHWCCOR0000 74758	INDIAN AGRI SERVICES PVT LTD	01 Mar 2019	50	RELIANCE COMMERCIAL FINANCE LIMITED	50		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
66	RHWCCOR0000 74088	INDIAN AGRI SERVICES PVT LTD	29 Oct 2018	40	RELIANCE COMMERCIAL FINANCE LIMITED	40		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
67	RHWCCOR0000 73122	MEDYBIZ PRIVATE LIMITED	10 Sep 2018	150	RELIANCE CAPITAL LIMITED	150		-		-	RELIANCE CAPITAL LIMITED
											RELIANCE CAPITAL LIMITED
											RELIANCE CAPITAL LIMITED
68	RHWCCOR0000 74203	MEDYBIZ PRIVATE LIMITED	19 Nov 2018	75	RELIANCE UNICORN ENTERPRISES PRIVATE LIMITED	75	RELIANCE CAPITAL LIMITED	75		-	RELIANCE CAPITAL LIMITED
69	RHWCCOR0000 73999	MEDYBIZ PRIVATE LIMITED	12 Oct 2018	100	ADHAR PROJECT MANAGEMENT AND CONSULTANCY PRIVATE LIMITED	100	RELIANCE HOME FINANCE LIMITED	100		-	RELIANCE HOME FINANCE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

 Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
70	RHWCCOR0000 73124	MOHANBIR HI TECH BUILD PRIVATE LIMITED	10 Sep 2018	80	RELIANCE CAPITAL LIMITED	80		-		-	RELIANCE CAPITAL LIMITED
71	RHWCCOR0000 74826	MOHANBIR HI TECH BUILD PRIVATE LIMITED	18 Mar 2019	25	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	25	RELIANCE HOME FINANCE LIMITED	25		-	RELIANCE HOME FINANCE LIMITED
72	RHWCCOR0000 74200	MOHANBIR HI TECH BUILD PRIVATE LIMITED	14 Nov 2018	200	RELIANCE UNICORN ENTERPRISES PRIVATE LIMITED	200	RELIANCE CAPITAL LIMITED	200		-	RELIANCE CAPITAL LIMITED
73	RHWCCOR0000 74416	NETIZEN ENGINEERING PRIVATE LIMITED	28 Dec 2018	50	RELIANCE COMMERCIAL FINANCE LIMITED	50		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
74	RHWCCOR0000 74418	NETIZEN ENGINEERING PRIVATE LIMITED	21 Dec 2018	50	RELIANCE COMMERCIAL FINANCE LIMITED	50		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
75	RHWCCOR0000 74413	NETIZEN ENGINEERING PRIVATE LIMITED	21 Dec 2018	32	RELIANCE COMMERCIAL FINANCE LIMITED	32		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
76	RHWCCOR0000 74417	NETIZEN ENGINEERING PRIVATE LIMITED	21 Dec 2018	80	RELIANCE COMMERCIAL FINANCE LIMITED	80		-		-	RELIANCE COMMERCIAL FINANCE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
77	RHWCCOR0000 74622	PEARL HOUSING FINANCE INDIA LIMITED	25 Jan 2019	200	RELIANCE COMMERCIAL FINANCE LIMITED	200		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
78	RHWCCOR0000 73261	PHI MANAGEMENT SOLUTIONS PVT LTD	19 Sept 2018	210	RELIANCE CAPITAL LIMITED	210		-		-	RELIANCE CAPITAL LIMITED (Dividend Payment)
79	RHWCCOR0000 74621	TRAITRYA CONSTRUCTION FINANCE LIMITED	31 Dec 2018	25	RELIANCE COMMERCIAL FINANCE LIMITED	25		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
80	RHWCCOR0000 74618	TRAITRYA CONSTRUCTION FINANCE LIMITED	29 Dec 2018	160	RELIANCE COMMERCIAL FINANCE LIMITED	160		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
81	RHWCCOR0000 74620	VISHVAKARMA EQUIPMENT FINANCE INDIA LIMITED	31 Dec 2018	200	RELIANCE COMMERCIAL FINANCE LIMITED	200		-		-	RELIANCE COMMERCIAL FINANCE LIMITED
82	RHWCCOR0000 74424	KUNJBIHARI DEVELOPERS PRIVATE LIMITED	31 Dec 2018	70		70		-		-	KUNJBIHARI DEVELOPERS PRIVATE LIMITED
83	RHWCCOR0000 59269	KUNJBIHARI DEVELOPERS PRIVATE LIMITED	30 Sep 2017	31		-		-		-	KUNJBIHARI DEVELOPERS PRIVATE LIMITED
84	RHWCUMUM000 045450	KUNJBIHARI DEVELOPERS PRIVATE LIMITED	04 Mar 2017	86		-		-		-	KUNJBIHARI DEVELOPERS PRIVATE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
85	RHWCCOR000074733	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	28 Feb 2019	60	RELIANCE COMMERCIAL FINANCE LIMITED	60		-			RELIANCE COMMERCIAL FINANCE LIMITED
86	RHWCCOR000074759	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	01Mar 2019	20	RELIANCE COMMERCIAL FINANCE LIMITED	20		-			RELIANCE COMMERCIAL FINANCE LIMITED
87	RHWCCOR000074089	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	31 Oct 2018	54	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	21		-			CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED
					RELIANCE BROADCAST NETWORK LIMITED	22				RELIANCE BROADCAST NETWORK LIMITED	
					RELIANCE CLEANGEN	11	RELIANCE POWER LIMITED	11		RELIANCE POWER LIMITED	
88	RHWCCOR000058872	SKYLINE GLOBAL TRADE PRIVATE LIMITED	31 Aug 2017	25	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	25	RELIANCE INFRASTRUCTURE LIMITED	25		RELIANCE INFRASTRUCTURE LIMITED	
89	RHWCCOR000058877	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	31 Aug 2017	25	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	25	RELIANCE INFRASTRUCTURE LIMITED	25		RELIANCE INFRASTRUCTURE LIMITED	
90	RHWCCOR000050395	SKYLINE GLOBAL TRADE PRIVATE LIMITED	01 Apr 2017	49	RELIANCE INFRASTRUCTURE LIMITED	49		-			RELIANCE INFRASTRUCTURE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

 Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
91	RHWCCOR0000 50396	SPECIES COMMERCE AND TRADE PRIVATE LIMITED	01 Apr 2017	49	RELIANCE INFRASTRUCTU RE LIMITED	49		-			RELIANCE INFRASTRUCTURE LIMITED
92	RHWCCOR0000 50394	SPACE TRADE ENTERPRISES PRIVATE LIMITED	01Apr 2017	49	RELIANCE INFRASTRUCTU RE LIMITED	49		-			RELIANCE INFRASTRUCTURE LIMITED
93	RHWCCOR0000 61871	JAYAMKONDAM POWER LIMITED	02 Aug 2017	65	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	65	RELIANCE INFRASTRUCTURE LIMITED	65			RELIANCE INFRASTRUCTURE LIMITED
94	RHWCCOR0000 61879	WORLDCOM SOLUTIONS LIMITED	02 Aug 2017	65	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	65	RELIANCE INFRASTRUCTURE LIMITED	65			RELIANCE INFRASTRUCTURE LIMITED
95	RHWCCOR0000 61195	HIRMA POWER LIMITED	24 Nov 2017	150	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	150	RELIANCE CAPITAL LIMITED	150			RELIANCE CAPITAL LIMITED
96	RHWCCOR0000 61196	SUMMIT CEMINFRA PRIVATE LIMITED	24 Nov 2017	150	CREST LOGISTICS AND ENGINEERS PRIVATE LIMITED	150	RELIANCE CAPITAL LIMITED	150			RELIANCE CAPITAL LIMITED
97	RHWCCOR0000 73122	MEDYBIZ PRIVATE LIMITED	10 Sep 2018	150	RELIANCE CAPITAL LIMITED	150		-			RELIANCE CAPITAL LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Remark
98	RHWCCOR000073259	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	19 Sep 2018	200	RELIANCE CAPITAL LIMITED	200		-		-	RELIANCE CAPITAL LIMITED
99	RHWCCOR000074822	GAMESA INVESTMENT MANAGEMENT PRIVATE LIMITED	13 Mar 2019	35	RELIANCE EXCHANGE NEXT LIMITED	15	RELIANCE CORPORATE ADVISORS	15	RELIANCE MEDIAWORKS FINANCIAL SERVICES PVT LIMITED	13	RELIANCE MEDIAWORKS
					Reliance CAPITAL	20		-		-	RELIANCE CAPITAL LIMITED
100	RHWCCOR000073124	MOHANBIR HI TECH BUILD PRIVATE LIMITED	10 Sep 2018	80	RELIANCE CAPITAL LIMITED	80		-		-	RELIANCE CAPITAL LIMITED
101	RHWCCOR000074946	SUMMIT CEMINFRA PRIVATE LIMITED	15 Apr 2019	36	RELIANCE INFRASTRUCTURE LIMITED	36		-		-	RELIANCE INFRASTRUCTURE LIMITED
102	RHWCCOR000074947	MOHANBIR HI TECH BUILD PRIVATE LIMITED	15 Apr 2019	30	RELIANCE UNICORN ENTERPRISES PRIVATE LIMITED	30	RELIANCE DIGITECH	30	RELIANCE CAPITAL LIMITED	30	RELIANCE CAPITAL LIMITED
103	RHWCCOR000074949	SAHISHNOTA ADVISORY SERVICES PRIVATE LIMITED	18 Apr 2019	25	RELIANCE BIG ENTERTAINMENT PVT LTD	25	RELIANCE CAPITAL LIMITED	25		-	RELIANCE CAPITAL LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Leg 4	Amount	Remark
104	RHWCCOR00 0074349	ADHAR PROPERTY CONSULTANCY PRIVATE LIMITED	10 Dec 2018	189.20	RELIANCE BUSINESS BROADCAST NEWS HOLDINGS LIMITED	189.20	RELIANCE CAPITAL LIMITED	145.00					RELIANCE CAPITAL LIMITED
							ADHAR PROJECT MANAGEMENT CONSULTANCY PRIVATE LIMITED	35.00	RELIANCE UNICORN ENTERPRISES PRIVATE LIMITED	35.00	RELIANCE CAPITAL LIMITED	35.00	RELIANCE CAPITAL LIMITED
							RELIANCE BROADCAST NETWORK LIMITED	7.00					RELIANCE BROADCAST NETWORK LIMITED
105	RHWCCOR00 0074314	EDRISHTI MOVIES PRIVATE LIMITED	30 Nov 2018	120.00	ZAPAK DIGITAL ENTERTAIN MENT LTD	120.00	RELIANCE UNICORN PRIVATE LIMITED	120.00	RELIANCE DIGITECH LIMITED	10.00	RELIANCE CAPITAL LIMITED	10.00	RELIANCE CAPITAL LIMITED
									MOHANBIR HI TECH BUILD PRIVATE LIMITED	110	RELIANCE COMMERCIA L FINANCE	110.00	RELIANCE COMMERCIAL FINANCE
106	RHWCCOR00 0074172	AZALIA DISTRIBUTION PRIVATE LIMITED	06 Nov 2018	90.00	RELIANCE BROADCAST NETWORK LIMITED	90.00	RELIANCE CAPITAL LIMITED	90.00	MOHANBIR HI TECH BUILD PRIVATE LIMITED	90.00	RELIANCE HOME FINANCE LIMITED	90.00	RELIANCE HOME FINANCE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Leg 4	Amount	Leg 5	Amount	Remark
107	RHWCCOR00074731	ACCURA PRODUCTIONS PRIVATE LIMITED	28 Feb 2019	60.72	ZAPAK DIGITAL ENTERTAINMENT LTD	8.00	RELIANCE UNICORN PRIVATE LIMITED	8.00	RELIANCE DIGITECH LIMITED	8.00	RELIANCE VENTURE ASSET MANAGEMENT PRIVATE LIMITED	8.00	RELIANCE CAPITAL LIMITED	8	RELIANCE CAPITAL LIMITED
					BIG FLICKS P LTD.	52.00	RELIANCE UNICORN PRIVATE LIMITED	52.00	RELIANCE DIGITECH LIMITED	52.00	RELIANCE ALPHA SERVICES PRIVATE LIMITED	52.00	RELIANCE CAPITAL LIMITED	52	RELIANCE CAPITAL LIMITED
108	RHWCCOR00074180	THWINK BIG CONTENT PRIVATE LIMITED	29 Oct 2018	65.78	RELIANCE BIG ENTERTAINMENT PVT LTD	65.00	RELIANCE UNICORN PRIVATE LIMITED	65.00	RELIANCE DIGITECH LIMITED	65.00	RELIANCE VENTURE ASSET MANAGEMENT PRIVATE LIMITED	60.00	RELIANCE CAPITAL LIMITED	60	RELIANCE CAPITAL LIMITED
											UNLIMIT IOT PRIVATE LIMITED	5.00	RELIANCE CAPITAL LIMITED	5.00	RELIANCE CAPITAL LIMITED
109	RHWCCOR00074178	THWINK BIG CONTENT PRIVATE LIMITED	13 Nov 2018	141.67	ZAPAK DIGITAL ENTERTAINMENT LTD	140.00	RELIANCE UNICORN PRIVATE LIMITED	140.00	RELIANCE CAPITAL LIMITED	140.00	RELIANCE CAPITAL LIMITED	100.00			RELIANCE CAPITAL LIMITED
											40 CR MEDYBIZ	40.00	RELIANCE HOME FINANCE LIMITED	40	RELIANCE HOME FINANCE LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:

- Loan Account Number ('LAN') wise details:

Inadequate supporting documents  
Provided by the Target Entity

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Leg 4	Amount	Leg 5	Amount	Remark
110	RHWCCOR00074283	PIFINITI MOVIES PRIVATE LIMITED	27 Nov 2018	175.00	RELIANCE BIG ENTERTAINMENT PVT LTD	175.00	RELIANCE UNICORN PRIVATE LIMITED	175.00	INDIAN AGRICULTURE SERVICES PVT LTD	100.00	RELIANCE COMMERCIAL FINANCE LIMITED	100.00			RELIANCE COMMERCIAL FINANCE LIMITED
									RELIANCE DIGITECH LIMITED	75.00	INDIAN AGRICULTURE SERVICES PRIVATE LIMITED	60.00	RELIANCE COMMERCIAL FINANCE LIMITED	60	RELIANCE COMMERCIAL FINANCE LIMITED
											MOHANBIR HI-TECH BUILD PRIVATE LIMITED	15.00	RELIANCE COMMERCIAL FINANCE LIMITED	15	RELIANCE COMMERCIAL FINANCE LIMITED
111	RHWCCOR00074659	ACCURA PRODUCTIONS PRIVATE LIMITED	07 Feb 2019	40.00	RELIANCE BIG ENTERTAINMENT PVT LTD	40.00	RELIANCE UNICORN PRIVATE LIMITED	40.00	RELIANCE DIGITECH LIMITED	40.00	RELIANCE ALPHA SERVICES PRIVATE LIMITED	40.00	RELIANCE CAPITAL LIMITED	40	RELIANCE CAPITAL LIMITED
112	RHWCCOR00074734	IPPY ENTERTAINMENT PRIVATE LIMITED	28 Feb 2019	50.60	RELIANCE BIG ENTERTAINMENT PVT LTD	50.00	RELIANCE UNICORN PRIVATE LIMITED	50.00	RELIANCE DIGITECH LIMITED	25.00	RELIANCE ALPHA SERVICES PRIVATE LIMITED	25.00	RELIANCE CAPITAL LIMITED	25	RELIANCE CAPITAL LIMITED
									RELIANCE DIGITECH LIMITED	24.00	RELIANCE ALPHA SERVICES PRIVATE LIMITED	24.00	RELIANCE CAPITAL LIMITED	24	RELIANCE CAPITAL LIMITED

## 13. End use of GPCL disbursed to borrowers (Contd.)

### Observation:



Inadequate supporting documents  
Provided by the Target Entity

- Loan Account Number ('LAN') wise details:

(INR in crores)

#	LAN	Borrower	Date	Amount	Leg 1	Amount	Leg 2	Amount	Leg 3	Amount	Leg 4	Amount	Leg 5	Amount	Remark
113	RHWCCOR00074783	ACCURA PRODUCTIONS PRIVATE LIMITED	13 Mar 2019	25.30	RELIANCE BIG ENTERTAINMENT PVT LTD	25.30	RELIANCE UNICORN PRIVATE LIMITED	25.30	RELIANCE DIGITECH LIMITED	22.40	RELIANCE ALPHA SERVICES PRIVATE LIMITED	22.40	RELIANCE CAPITAL LIMITED	22.40	RELIANCE CAPITAL LIMITED
									GLOBAL WIND POWER LIMITED	2.60				GLOBAL WIND POWER LIMITED	

# 13. End use of GPCL disbursed to borrowers (Contd.)

## Observation:

Inadequate supporting documents provided by target entities for instance the bank statements were provided in excel or word format.

Illustrative instance of such documents are provided below:

Reliance Big Entertainment Pvt Ltd

Book Date	Description	Ledger Balance	Credit	Debit	Value Date	Reference No
02-04-2019	Opening Balance	95,64,666.49				
02-04-2019	05611050010787-TRF			-1,75,621.00	02-04-2019	
02-04-2019	14361140000069-TRF			-2,94,041.00	02-04-2019	
04-04-2019	Opening Balance	90,95,004.49				
04-04-2019	FT - Cr - 50200035318329 - ACCURA PRODUCTIONS PRIVATE LIMITED		10,00,00,000.00		04-04-2019	
04-04-2019	FT-00600310009216-RELIANCE VENTURE ASSET MANAGEM			-3,00,00,000.00	04-04-2019	
04-04-2019	FT-00600310009216-RELIANCE VENTURE ASSET MANAGEM			-5,00,00,000.00	04-04-2019	
04-04-2019	RTGS Dr-IBKL0000174-RELIANCE BIG ENTERTAINMENT PVT LTD-SONAWALA MUM-HDFCRS2019040472483040			-2,00,00,000.00	04-04-2019	HDFCRS2019040472483040
04-04-2019	FT - Dr - 50200034888241 - EDRISHTI MOVIES PRIVATE LIMITED			-40,000.00	04-04-2019	
04-04-2019	FT - Dr - 50200034873339 - PIFINITI MOVIES PRIVATE LIMITED			-40,000.00	04-04-2019	
05-04-2019	Opening Balance	90,15,004.49				
05-04-2019	RTGS OUTWARD CHARGES RTGS Dr-IBKL0000174-RELIANCE BIG ENTERTA			-25	04-04-2019	
05-04-2019	CGST - RTGS OUTWARD CHARGES - NCB1909585926460			-2.25	05-04-2019	NCB1909585926460
05-04-2019	SGST - RTGS OUTWARD CHARGES - NCB1909585926460			-2.25	05-04-2019	NCB1909585926460
05-04-2019	051007505041918090 - CBDT TAX			-80,31,933.00	05-04-2019	
05-04-2019	04042019 CSD BAL CONF ISS CHGS : OTHER INCOME CORPORATE			-100	05-04-2019	
06-04-2019	Opening Balance	9,82,941.99				
06-04-2019	CGST - OTHER INCOME CORPORATE - NCB1909686232366			-9	06-04-2019	NCB1909686232366
06-04-2019	SGST - OTHER INCOME CORPORATE - NCB1909686232366			-9	06-04-2019	NCB1909686232366
12-04-2019	Opening Balance	9,82,923.99				
12-04-2019	Chq Paid-MICR CTS-MU-SATISH TELORE			-11,000.00	12-04-2019	
12-04-2019	FT - Dr - 50200024626902 - SWARAJ INFOTECH			-70,200.00	12-04-2019	
12-04-2019	QCH27431705318_ESICCB			-1,245.00	12-04-2019	
12-04-2019	772151628-APTENG			-200	12-04-2019	
15-04-2019	Opening Balance	9,00,258.99				
15-04-2019	Chq Paid-MICR CTS-MU-THE NIRULA FAMILY C			-1,08,000.00	15-04-2019	
15-04-2019	Chq Paid-MICR CTS-MU-RADHESHYAM VISHWAKA			-38,531.00	15-04-2019	
16-04-2019	Opening Balance	7,53,727.99				
16-04-2019	Chq Paid-MICR CTS-MU-SBI AC PROFESSION T			-12,800.00	16-04-2019	
17-04-2019	Opening Balance	7,41,127.99				
17-04-2019	Chq Paid-MICR CTS-MU-VPD CONSULTANTS PVT			-81,000.00	17-04-2019	
18-04-2019	Opening Balance	6,60,127.99				
18-04-2019	FT - Cr - 50200038029802 - SAHISHNOTA ADVISORY SERVICES PVT LTD		50,00,00,000.00		18-04-2019	
18-04-2019	FT - Cr - 50200038029802 - SAHISHNOTA ADVISORY SERVICES PVT LTD		50,00,00,000.00		18-04-2019	
18-04-2019	FT - Cr - 50200038029802 - SAHISHNOTA ADVISORY SERVICES PVT LTD		25,00,00,000.00		18-04-2019	
18-04-2019	FT - Cr - 50200038029802 - SAHISHNOTA ADVISORY SERVICES PVT LTD		25,00,00,000.00		18-04-2019	
18-04-2019	FT-00600310009216-RELIANCE VENTURE ASSET MANAGEM			-25,00,00,000.00	18-04-2019	
18-04-2019	FT-00600310009216-RELIANCE VENTURE ASSET MANAGEM			-25,00,00,000.00	18-04-2019	
18-04-2019	FT-00600310009216-RELIANCE VENTURE ASSET MANAGEM			-25,00,00,000.00	18-04-2019	

Bank Stmt from Apr18 to 31st March 19.xlsx - Excel

	B	C	D
1260	3500002473		
1261	Chq Paid-MICR CTS-MU-BEST AC NO 30126005		
1262	RELIANCE LIQUID FUN-RC19 9053535 4032321		
1263	RTGS Dr-ICIC0000004-RELIANCE CAPITAL LIMITED-SONAWALA MUM-HDFCRS2018091093358159		340,197,165.78
1264	00600340025664-R010 - NSEF&O		-45
1265	FT - Cr - 00600350132817 - ALTITUDE CAPITAL ADVISORS PRIVATE LIMITE		3,199,623.40
1266	FT-00600310016821-RELIANCE CAPITAL LIMITED		5,100,000.00
1267	FT-00600350000885-RELIANCE LIQUID FUND SUBSCRIPT		500,000,000.00
1268	FT-00600310037908-MOHANBIR HITECH BUILD PRIVATE		800,000,000.00
1269	FT-00600310009648-MEDYBIZ PRIVATE LIMITED		1,500,000,000.00
1270	FT-00600310036533-RELIANCE CAPITAL LIMITED		-1,75
1271	FT-00800350089380-RELIANCE MUTUAL FUND SALARY AD		
1272	FCY OUTWARD REMITTANCE		
1273	FT-05421050104353-AMIT BAPNA		
1274	Onenion balance		22,309.60

# Other observations

## 14. Potential Anomalies in Related Party Transaction

### Background:

- As per Accounting Standard 18 - Related Party Disclosure, as issued by Institute of Chartered Accountants of India, it is mandatory for a company to disclose transactions with its related parties in the financial statements. During our review period, the Target has entered into multiple transactions with its related parties and they have disclosed the same in the financial statements.

### Observations:

- It was noted that there were potential mismatch in the disclosures made by the Target Entity in their financials vis a vis the disclosures made by related parties in their financial statements. The following table provides summary of the transactions where mismatch was noted.

(INR in crores)

#	Name of Related Party	FY 2017-18 (Financials)			FY 2016-17 (Financials)		
		As per Target Entity	As per Related Party	Difference	As per Target Entity	As per Related Party	Difference
1	Reliance General Insurance Company Limited	3.92	2.61	1.31	5.54	5.89	(0.35)
2	Reliance Commercial Financial Limited	-	-	-	5.01	29.99	(24.98)
3	Reliance Nippon Life Insurance Limited	0.40	22.53	(22.13)	0.36	0.28	0.08
4	Reliance Securities Limited	1.26	2.18	(0.92)	0.26	0.08	0.18

## 14. Potential Anomalies in Related Party Transaction (Contd.)

Details of transaction wise summary is given in the table below

(INR in crores)

Name of the Related Party	Transaction Type	FY 2017-18			FY 2016-17		
		Target Entity	Related Party	Difference	Target Entity	Related Party	Difference
Reliance General Insurance Company Limited	Insurance Premium Paid	3.05	1.81	1.24	0.65	1.04	(0.39)
	Interest Accrual on NCD	0.87	0.80	0.07	4.89	4.85	0.04
Reliance Commercial Financial Limited*	Reimbursement of Expenses received-Infrastructure cost	-	-	-	0.21	3.54	(3.33)
	Valuation charges received	-	-	-	0.02	0.22	(0.20)
	Reimbursement of Expenses Paid	-	-	-	4.78	26.23	(21.45)
Reliance Nippon Life Insurance Limited	Term Insurance Paid	0.40	22.53	(22.13)	0.36	0.28	0.08
Reliance Securities Limited	Brokerage Paid	1.26	2.18	(0.92)	0.26	0.08	0.18

## 14. Potential Anomalies in Related Party Transaction

### Management response:

#### Reliance General Insurance Limited (RGIC)

- The minor differences would be primarily due to accounting of taxes.
- The difference is primarily due to different accounting treatment followed by both the entities. For eg: RGIC has not disclosed the advance employee medical insurance premium of INR 1.27 Crore in F.Y. 2017-18.

#### Reliance Commercial Finance Limited (RCFL)

- The difference is entirely on account of reimbursement of expenses disclosed in the Company in favour of Reliance Capital Limited (RCL) instead of RCFL.

#### Reliance Nippon Life Insurance Limited (RNLIC)

- The minor differences would be primarily due to accounting of taxes.
- The difference is primarily due to different accounting treatment followed by both the entities. For eg: The group term insurance premium of INR 22.23 Crore for RHFLs' customers is disclosed as a transaction by RNLIC in 2017-18.

#### Reliance Securities Limited (RSL)

- In FY 2017-18, RSL has separately disclosed Distribution fees of INR 0.85 Crore received from the Company. The minor differences would be primarily due to accounting of taxes.

*Note: Management response is reproduced in full as provided by the company.*

## 14. Other issues

### Observations:

- Loan worth INR 85.50 cores was disbursed to potential indirectly linked entity, Kunjbihari Developers Private Limited on 4 March 2017 for construction of property. The loan was sanctioned with the terms that the property under construction will be available for security against the said loan facility provided by the Target Entity.
- On review of the charge details on the MCA portal it was observed that charge against property under construction was not created/registered under the name of the Target entity.
- The registered email ID is the borrower is [mcafiling.kh@relianceada.com](mailto:mcafiling.kh@relianceada.com) which on public domain search appears to be registered ID of Mandke Foundation (Kokilaben Dhirubhai Ambani Hosipital).

*Note: For nature of relationship of potential indirectly linked entities, please refer exhibit 1A & 1B*

# Limitations and disclaimers

## 15. Limitations and Disclaimers

### Limitations and disclaimers to the Report

- Our Services were performed and this report was prepared in accordance with the terms of Engagement Letter dated 29 August 2019 with Bank of Baroda ('Client') and is subject to the terms and conditions included therein.
- The procedures performed by Grant Thornton India LLP ("GT") do not constitute an examination or a review in accordance with generally accepted auditing standards or attestation standards. Accordingly, GT provides no attestation or opinion or other form of assurance pursuant to generally accepted auditing standards or attestation standards of the Institute of Chartered Accountants of India. GT did not verify the information supplied in connection with this engagement, from whatever source obtained, except as may be specified in this report.
- We stress that our deliverables are confidential. They should not be used, reproduced, shared, published or circulated for any other purpose, whether in whole or in part without our prior written consent (other than when required for statutory or regulatory purposes or for the internal use of the Client), which consent will be given only after full consideration of the circumstances at the time, and shall not be unreasonably withheld.
- Limitations on availability of information have restricted GT from performing some of the procedures under scope and terms of reference of the aforesaid Engagement Letter. GT's ability to perform all procedures depends on the nature and quality of information and explanations to be provided to us.
- This report is based on information received by us from the Client/ Target Entity up to 27 November 2019. The information/ data provided to us after 27 November 2019 is not considered in this report. Refer Annexure 43 for data/ information not received from the Target Entity. Further, we have incorporated responses provided by the management of the Target Entity on 1 January 2020.
- We have relied on the information provided by the Client and the Target Entity. In respect of information requested by GT, the Client and the Target Entity provided copies of documents. GT has relied on the copies of the documents provided and have not independently verified the copies with the original documents.
- Our procedures and findings are based solely on the financial data, documentation, information and explanations that have been provided to us during the course of our work. The findings presented in this report are also based on the results of our discussions with representatives from the Target Entity and are not always supported by written documentation.
- We have analysed the end use of total infusion (Equity share capital, Term loan, Debentures, Commercial Papers and Inter corporate deposits) based on the information available in the accounting records provided to us by the Target Entity and the Payee/ Beneficiary details as provided by the respective banks and analysis is done on a "First-in-First-out" basis (except where direct co-relation was established for inward and outward movement of funds from the respective bank accounts).

## 15. Limitations and Disclaimers

### Limitations and disclaimers to the Report (contd.)

- The performance of the services by us do not constitute (i) a recommendation regarding the acquisition or financing of any business, assets, liabilities or securities or (ii) an examination or compilation of prospective financial information in accordance with standards established by ICAI or any other professional institution relating to accounting and internal controls.
- Our report cannot be relied upon by any other person and we expressly disclaim all responsibility or liability for any costs, damages, losses, liabilities, expenses incurred by anyone as a result of circulation, publication, reproduction, or use of our report contrary to the provisions of this paragraph.
- GT makes no representations regarding questions of legal interpretation and cannot render legal advice. The Client should consult with its attorneys with respect to any legal matters or items that require legal interpretation including Indian laws, rules or regulations.
- This is a fact finding exercise and is not an expression of an opinion or testimony of expert witnesses.
- We make no representations regarding the sufficiency of the procedures performed, the purpose for which this report was requested, or any other purpose.
- While we have taken reasonable steps to corroborate the information obtained, we cannot guarantee its reliability or completeness. For these reasons, this report should be used for guidance purposes only. It should not form the sole basis for any decision as to a potential course of action without independent confirmation of its findings; nor should it be relied upon as preferred advice. It should also be noted that no fact or information that would have had a material bearing on our findings has been intentionally withheld or otherwise omitted.

## 15. Limitations and Disclaimers

### Limitations and disclaimers to the public domain searches and source inquiries conducted by us:

- All the public domain searches conducted in the databases and search engines on the name of the individuals and entities have been performed to the best of our efforts.
- In India, information about individuals/entities is not captured and stored in an organized manner or a centralized database. The information is collated from third parties/various secondary information sources available in the public domain. Accordingly, the factual accuracy of such information cannot be guaranteed. We have referred to the information available on the public domain as on the date of the research and have presented information accordingly. It is to be noted that some of these databases are not updated regularly.
- Although the information may have been gathered from online public record information which is generally accepted to be accurate, we cannot guarantee its veracity; nor can we monitor the speed with which these public record sources update their records. In undertaking the public record research and information gathering on this Engagement, we have identified information currently available. We may not have identified information previously filed on but subsequently removed from the public record prior to this date nor will we have identified information subsequently filed on those data sources after this period in which our work has been completed. In undertaking the public domain searches and information gathering, efforts were made to identify information currently available.
- We assume no responsibility for the accuracy and completeness of information, as cost/benefit and other considerations will preclude us from pursuing every conceivable source of information about the potential suspects. Further, we have used professional judgment to identify the information sources to be searched. If other professionals undertook similar exercises, such professionals might provide different findings. Accordingly, we do not assure that our report has identified all information that might be available in the public or private domains. Our Report should not be construed as documentary evidence on the potential suspects.
- This document contains a compilation of feedback gathered from various market sources. Wherever necessary, we have identified that information may be the personal opinion of our sources and is termed as 'hearsay' in nature and may not be accurate or reliable when identified as being alleged, or of unknown reliability. Furthermore, the sources, may not base their comments on direct information, and may themselves rely upon another party. We can, therefore, accept no responsibility for, and do not warrant the accuracy or completeness of, any of the information provided by such sources.

# Glossary

## 16. Glossary

Acronym	Description
NPA	Non Performing Asset
POS	Principal Outstanding
GPCL	General Purpose Corporate Loan
RHFL	Reliance Home Finance Limited
RCFL	Reliance Commercial Finance Limited
DPD	Days Past Due
ECL	Expected Credit Loss
LRN	Loan Recall Notice
ICA	Inter Creditor Agreement
MLD	Market Linked Debentures
PTC	Pass Through Securities
DA	Direct Assignment
HL	Home Loan
HL -AH	Home Loan - Affordable Housing
LAP	Loan Against Property
ICD	Inter Corporate Deposit
PILE	Potentially Indirectly Linked Entity
RP	Related Party
CP	Commercial Paper
RCL	Reliance Capital Limited
FY	Financial Year

# Exhibits & Annexures

## 17. Exhibits

Exhibit	Description
1A	Nature of relationship of potential indirectly linked entities with the Target Entity and its related party / group entities
1B	Snapshot pertaining to loans extended to Potential Indirectly Linked Entities
2	End use of Term Loans
3	End use of Secured Debentures - Listed
4	End use Secured Debentures – MLD
5	End use Secured Debentures – Public Issue
6	End use of Unsecured Debentures
7	End use of Commercial Papers
8	End use of Inter-Corporate Deposits
9	End use of Debt Securitisation

## 17. Annexures

Annexure	Description
1	Borrowers having similar registered address
2	Income earned owing to loans disbursed to PILE
3	Loan disbursed to parties with weak financials
4	Loan disbursed to entities recently incorporated
5	Loans in which value of current assets was substantially less than the total dues
6	Loans in which only principal component is covered under charge
7	Loans hypothecated with RInfra & RPower
8	Income verification documents not obtained
9A	Borrowers having similar contact numbers
9B	Borrowers having incorrect contact numbers
9C	Borrowers having similar email address
10	GPCL approved by Chairman of Reliance Group
11A	Loans in which CA certified end use certificate was not available
11B	Deviation in underwriting norms

## 17. Annexures

Annexure	Description
12	End use of receipts towards Equity Share Capital
13 to 32	End use of receipts towards Term Loans
33	End use of receipts towards Secured Debentures – Listed
34	End use of receipts towards Secured Debentures – MLD
35	End use of receipts towards Secured Debentures – Public Issue
36	End use of receipts towards Unsecured Debentures
37 to 40	End use of receipts towards Commercial Papers
41	End use of receipts towards Inter-Corporate Deposits
42	End use of receipts towards Debt Securitisation
43	Data/ information not received from the Target Entity

# Thank you