

Disclosure on liquidity risk under RBI circular no. RBI/2019-20/88 DOR.NBFC (PD) CC. No.102/03.10.001/2019-20 dated November 04, 2019 on Liquidity Risk Management Framework for Non-Banking Financial Companies and Core Investment Companies

Public disclosure on Liquidity Risk as on 31st December, 2022

(i) Funding Concentration based on significant counterparty (both deposits and borrowings)

Sr. No.	Number of Significant Counterparties** #	Amount (Rs. Lakhs) *	% of Total deposits	% of Total Liabilities
1	15	24,15,519	Not applicable	74%

*Does not include overdue interest on Secured Non-convertible debentures, Secured Long Term Infrastructure Bond, Subordinated perpetual debentures and Subordinated redeemable non convertible debentures.

** Significant counterparties are calculated basis participants in case of syndicated loan.

Above does not include collateralised borrowings as per financial statements

(ii) Top 20 large deposits (amount in Rs. Lakhs and % of total deposits)

Not Applicable

(iii) Top 10 borrowings (amount in Rs. Lakhs and % of total borrowings)

Amount (Rs. Lakhs) *	% of Total Borrowings
#	
2061757	65%

*Does not include overdue interest on Secured Non-convertible debentures, Secured Long Term Infrastructure Bond, Subordinated perpetual debentures and Subordinated redeemable non convertible debentures.

#Above does not include collateralised borrowings as per financial statements

(iv) Funding Concentration based on significant instrument/product

Sr. No.	Name of the instrument/product #	Amount (Rs. Lakhs)	% of Total Liabilities
1	Term Loan from Banks		
a.	Rupee Term loans - Secured	2,19,881	7%
b.	Foreign currency Term loans - Secured	95,196	3%
2	Working capital facilities	20,02,392	62%
3	Term Loan from Others		
a.	Rupee Term loans - Secured	2,07,630	6%
b.	Foreign currency Term loans - Secured	74,778	2%
4	Non-convertible debentures - Secured	2,55,895	8%
5	Subordinated Non convertible debentures (Tier II Capital)	2,30,469	7%

#Above does not include collateralised borrowings as per financial statements

(v) Stock Ratios:

Sr. No.	Particulars	As at 31st December 22
1	Commercial Papers to Total Public Funds	-
2	Commercial Papers to Total Liabilities	-
3	Commercial Papers to Total Assets	-
4	NCDs (Original Maturity < 1 yrs.) to Total Public Funds	-
5	NCDs (Original Maturity < 1 yrs.) to Total Liabilities	-
6	NCDs (Original Maturity < 1 yrs.) to Total Assets	-
7	Other Short Term Liabilities to Total Public Funds#	100.64%
8	Other Short Term Liabilities to Total Liabilities#	98.97%
9	Other Short Term Liabilities to Total Asset#	208.10%

Other Short term liabilities represents all borrowings and all other liabilities for maturity falling within 12 months, other than CPs and NCDs with original maturity less than 12 months.

(vi) Institutional set-up for liquidity risk management:

Post suppression of the Board of the Company by the RBI in exercise of the powers conferred under Section 45-IE (1) of the RBI Act, 1934, has vide Order / Press Release dated 4th October, 2021, ALCO has been reconstituted wef December 10th, 2021.

Notes:

1. The Reserve Bank of India ('RBI') vide press release dated October 4, 2021 in exercise of the powers conferred under Section 45-IE (1) of the Reserve Bank of India Act, 1934 ('RBI Act') superseded the Board of Directors of the Company ('the Company' or 'SEFL') and appointed an Administrator under Section 45-IE (2) of the RBI Act. Further, RBI, in exercise of powers conferred under section 45-IE (5) (a) of the RBI Act, constituted a three-member Advisory Committee to assist the Administrator in discharge of his duties. Thereafter, RBI filed applications for initiation of Corporate Insolvency Resolution Process ('CIRP') against the Company under section 227 read with clause (zk) of sub-section (2) of Section 239 of the Insolvency and Bankruptcy Code (IBC), 2016 ('the Code') read with Rules 5 and 6 of the Insolvency and Bankruptcy (Insolvency and Liquidation Proceedings of Financial Service Providers and Application to Adjudicating Authority) Rules, 2019 ('FSP Insolvency Rules') before the Hon'ble National Company Law Tribunal, Kolkata Bench ('Hon'ble NCLT'). Hon'ble NCLT vide its order dated October 8, 2021 admitted the application made by RBI for initiation of CIRP against the Company. Further, Hon'ble NCLT gave orders for appointment of Mr. Rajneesh Sharma, as the Administrator to carry out the functions as per the Code and that the management of the Company shall vest in the Administrator. Further, Hon'ble NCLT also retained the three-member Advisory Committee, as aforesaid, for advising the Administrator in the operations of the Company during the CIRP. There has been changes in the composition of the Advisory Committee on June 22, 2022 and January 31, 2023. The Consolidated Committee of Creditors (CoC) took on record three Resolution Plans received from Prospective Resolution Applicants (PRAs) on January 18, 2023. The three Resolution Plans received by the Consolidated CoC were put to vote and the same is underway.

2. Significant counterparty is defined as a single counterparty or group of connected or affiliated counterparties accounting in aggregate for more than 1% of the NBFC-NDSP's, NBFC-Ds total liabilities as defined in RBI Circular RBI/2019-20/88 DOR.NBFC (PD) CC.No.102/03.10.001/2019-20 dated November 4th, 2019 on Liquidity Risk Management Framework for Non-Banking Financial Companies and Core Investment Companies.

3. Significant instrument/product is defined as a single instrument/product of group of similar instruments/products which in aggregate amount to more than 1% of the NBFC-NDSP's, NBFC-Ds total liabilities, as defined in RBI Circular RBI/2019-20/88 DOR.NBFC (PD) CC.No.102/03.10.001/2019-20 dated November 4th, 2019 on Liquidity Risk Management Framework for Non-Banking Financial Companies and Core Investment Companies.

4. Total Liabilities has been computed as sum of all liabilities (Total of Balance Sheet less Total Equity).

5. Public funds includes funds raised either directly or indirectly through public deposits, inter-corporate deposits, bank finance and all funds received from outside sources such as funds raised by issue of Commercial Papers, debentures etc. but excludes funds raised by issue of instruments compulsorily convertible into equity shares within a period not exceeding 5 years from the date of issue, as defined in Master Direction - Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Direction, 2016.

6. The amount stated in this disclosure is based on the management certified financial statements for the nine month ended and as at December 31st, 2022.

7. CIRP has been initiated against the Company, as stated in Note No. 1 and accordingly, as per the Code, the Administrator has invited the financial/operational/other creditors to file their respective claims as on October 8, 2021 (i.e. date of commencement of CIRP). As per the Code, the Administrator has to receive, collate and verify all the claims submitted by the creditors of the Company. The claims as on October 8, 2021 so received by the Administrator till January 19, 2023 is in the process of being verified/updated from time to time and wherever, the claims are admitted, the effect of the same has been given in the books of accounts.

In respect of claims of creditors, which are rejected or under verification, the effect of the same in the books of accounts will be taken once the verification of the same is completed and it is admitted. Further, as aforesaid, since the creditors can file their claims during the CIRP, the figures of claims admitted in the books of accounts might undergo changes during the CIRP. Adjustments, if any arising out of the claim verification and admission process will be given effect in subsequent periods.

Further, the foreign currency debt of the Company has been converted into INR as per the Code on the date of commencement of CIRP and accordingly, the Company has not translated its foreign currency exposure as on December 31, 2022 as per the requirements of Ind AS 21 'The effects of changes in foreign exchange rates'.