Indicative List of Balance Sheet Disclosures for SPDs

1. Minimum Disclosures

At a minimum, the items listed in this Annex shall be disclosed in the Notes to Accounts (NTA) by all SPDs. The disclosures listed are intended only to supplement, and not to replace, other disclosure requirements as applicable. SPDs are required to make disclosures in their financial statements in accordance with the guidelines in these Directions, applicable accounting standards, other laws, regulations, or accounting and financial reporting standards. More comprehensive disclosures than the minimum required are encouraged, especially if such disclosures significantly aid in the understanding of the financial position and performance. SPDs may omit those line items/ disclosures which are not applicable/ not permitted or with no exposure/ no transaction both in the current year and previous year. It may be noted that mere mention of an activity, transaction or item in the disclosure template does not imply that it is permitted, and SPDs shall refer to the extant statutory and regulatory requirements while determining the permissibility or otherwise of an activity or transaction. SPDs shall disclose comparative information in respect of the previous period for all amounts reported in the current period's financial statements. Further, SPDs shall include comparative information for narrative and descriptive information if it is relevant to understanding the current period's financial statements.

2. Summary of Significant Accounting Policies

SPDs shall disclose the accounting policies regarding key areas of operations at one place along with NTA in their financial statements. A suggestive list includes - Basis of Accounting, Transactions involving Foreign Exchange, Investments - Classification, Valuation, etc, Advances and Provisions thereon, Fixed Assets and Depreciation, Revenue Recognition, Employee Benefits, Provision for Taxation, Net Profit, etc.

	(Amount in ₹ crore)					
	Particulars	Current Year	Previous Year			
i)	CRAR (%)					
ii)	CRAR – Tier 1 capital (%)					
iii)	CRAR - Tier 2 capital (%)					
iv)	Amount of subordinated debt raised as Tier 2 capital					
v)	Amount raised by issue of Perpetual Debt					
	Instruments					

3.2 Investments

			(Amou	nt in ₹ crore)
	Particulars			Previous Year
(1)	Valu	le of Investments		
	(i)	Gross Value of Investments		
		(a) In India		
		(b) Outside India,		
	(ii)	Provisions for Depreciation		
		(a) In India		
		(b) Outside India,		
	(iii)	Net Value of Investments		
		(a) In India		
		(b) Outside India.		
(2)	2) Movement of provisions held towards depreciation on			
	inve	stments.		
	(i)	Opening balance		
	(ii)	Add : Provisions made during the year		
	(iii)	Less : Write-off / write-back of excess provisions		
		during the year		
	(iv)	Closing balance		

3.3 Derivatives

3.3.1 Forward Rate Agreement / Interest Rate Swap

	(Amount in ₹ crore)				
	Particulars	Current Year	Previous Year		
(i)	The notional principal of swap agreements				
(ii)	Losses which would be incurred if counterparties failed to fulfill their obligations under the agreements				
(iii)	Collateral required by the SPD upon entering into swaps				
(iv)	Concentration of credit risk arising from the swaps \$				
(v)	The fair value of the swap book @				
<u> </u>	e. Nature and terms of the swaps including information	on credit and	l markat risk		

Note: Nature and terms of the swaps including information on credit and market risk and the accounting policies adopted for recording the swaps should also be disclosed.

\$ Examples of concentration could be exposures to particular industries or swaps with highly geared companies.

@ If the swaps are linked to specific assets, liabilities, or commitments, the fair value would be the estimated amount that the SPD would receive or pay to terminate the swap agreements as on the balance sheet date.

	(Amount in ₹ crore				
S. No.		Particulars	Amount		
(i)	Noti	onal principal amount of exchange traded IR derivati	ves undertaken		
	durir	ng the year (instrument-wise)			
	a)				
	b)				
	C)				
(ii)		onal principal amount of exchange traded IR derivation	ves outstanding		
		n 31st March (instrument-wise)	1		
	a)				
	b)				
	c)				
(iii)	Notional principal amount of exchange traded IR derivatives outstanding				
	and	not "highly effective" (instrument-wise)			
	a)				
	b)				
	C)				
(iv)	Marl	k-to-market value of exchange traded IR derivatives of	outstanding and		
	not '	'highly effective" (instrument-wise)			
	a)				
	b)				
	C)				

3.3.2 Exchange Traded Interest Rate (IR) Derivatives

3.3.3 Disclosures on Risk Exposure in Derivatives

Qualitative Disclosure

SPDs shall describe their risk management policies pertaining to derivatives with particular reference to the extent to which derivatives are used, the associated risks and business purposes served. The discussion shall also include:

a) the structure and organization for management of risk in derivatives trading,

b) the scope and nature of risk measurement, risk reporting and risk monitoring systems,

c) policies for hedging and / or mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges / mitigants, and

d) accounting policy for recording hedge and non-hedge transactions; recognition of income, premiums and discounts; valuation of outstanding contracts; provisioning, collateral and credit risk mitigation.

Quantitative Disclosures

(Amount in ₹ crore)					
SI.	Particular		Currency	Interest Rate	
No.			Derivatives	Derivatives	
(i)	Derivatives (Notional Principal Amount)				
	For	hedging			
(ii)	Marked to Market Positions [1]				
	a)	Asset (+)			
	b)	Liability (-)			
(iii)	Credit Exposure [2]				
(iv)	Unhedged Exposures				

3.4 Disclosures relating to Securitisation

3.4.1 The NTA of the originating applicable NBFCs shall indicate the outstanding amount of securitised assets as per books of the SPVs sponsored by the applicable NBFC and total amount of exposures retained by the NBFC as on the date of balance sheet to comply with the Minimum Retention Requirements (MRR). These figures shall be based on the information duly certified by the SPV's auditors obtained by the originating applicable NBFC from the SPV. These disclosures shall be made in the format given below.

Sr. No.	Par	ticulars	No./Amount in ₹ crore
1.		of SPVs sponsored by the applicable NBFC for puritisation transactions*	
2.		al amount of securitised assets as per books of the SPVs onsored	
3.		al amount of exposures retained by the applicable NBFC comply with MRR as on the date of balance sheet	
	a)	Off-balance sheet exposures First loss Others	
	b)	On-balance sheet exposures First loss Others	
4.	Am MR a)	ount of exposures to securitisation transactions other than	
		ii) Exposure to third party securitisations First loss	

		Others	
b)	Or	h-balance sheet exposures	
	i)	Exposure to own securitisations	
		First loss	
		Others	
	ii)	Exposure to third party securitisations	
		First loss	
		Others	
*Only the	e SP	Vs relating to outstanding securitisation transactions sh	all be reported
here			

3.4.2 Details of Financial Assets sold to Securitisation / Reconstruction Company for Asset Reconstruction

	(Amount in ₹ crore				
	Particulars	Current year	Previous Year		
(i)	No. of accounts				
(ii)	Aggregate value (net of provisions) of accounts sold to SC / RC				
(iii)	Aggregate consideration				
(iv)	Additional consideration realized in respect of accounts transferred in earlier years				
(v)	Aggregate gain / loss over net book value				

3.4.3 Details of Assignment transactions undertaken by applicable NBFCs

	(Amount in ₹ crore				
	Particulars	Current year	Previous Year		
(i)	No. of accounts				
(ii)	Aggregate value (net of provisions) of accounts sold				
(iii)	Aggregate consideration				
(iv)	Additional consideration realized in respect of				
(1V)	accounts transferred in earlier years				
(v)	Aggregate gain / loss over net book value				

3.4.4 Details of non-performing financial assets purchased / sold

Applicable NBFCs which purchase non-performing financial assets from other NBFCs shall be required to make the following disclosures in the NTA to their Balance sheets:

A. Details of non-performing financial assets purchased :

	(Amount in ₹ crore				
		Particulars	Current year	Previous Year	
1.	(a)	No. of accounts purchased during the year			
	(b)	Aggregate outstanding			
2.	(α)	Of these, number of accounts restructured during			
	(a)	the year			
	(b)	Aggregate outstanding			

B. Details of Non-performing Financial Assets sold:

	(Amount in ₹ crore)				
	Particulars	Current year	Previous Year		
1.	No. of accounts sold				
2.	Aggregate outstanding				
3.	Aggregate consideration received				

3.5 Asset Liability Management Maturity pattern of certain items of Assets and Liabilities

	Up to 30/31 days	month upto 2	Over 2 months upto 3 months	montn & up	6 Month & up to 1	& up	to 5	5	Total
Deposits									
Advances									
Investments									
Borrowings									
Foreign									
Currency									
assets									
Foreign									
Currency									
liabilities									

3.6 Exposures

3.6.1 Exposure to Real Estate Sector

				(Amount	t in ₹ crore)
			Current Year	Previous Year	
a)	Dir	ect Ex	kposure		
	(i)	Resi	dential Mortgages -		
		Lend	ing fully secured by mortgages on residential		
		prop	erty that is or will be occupied by the borrower		
		or the	at is rented		
	(ii)	Com	mercial Real Estate -		
		Lend	ing secured by mortgages on commercial real		
		estat	es (office buildings, retail space, multi-purpose		
		comr	mercial premises, multi-family residential		
		build	ings, multi-tenanted commercial premises,		
		indus	strial or warehouse space, hotels, land		
		acqu	isition, development and construction, etc.).		
		Expc	sure would also include non-fund based limits		
	(iii)		stments in Mortgage Backed Securities		
		(MBS	S) and other securitised exposures -		
		a.	Residential		
		b.	Commercial Real Estate		
			xposure		
b)			ed and non-fund based exposures on National		
		•	Bank and Housing Finance Companies.		
Tot	tal E	xposi	ure to Real Estate Sector		

3.6.2 Exposure to Capital Market

		(Amount	in ₹ crore)
	Particulars	Current	Previous
		Year	Year
(i)	Direct investment in equity shares, convertible bonds,		
	convertible debentures and units of equity-oriented		
	mutual funds the corpus of which is not exclusively		
	invested in corporate debt;		
(ii)	Advances against shares / bonds / debentures or other		
	securities or on clean basis to individuals for investment		
	in shares (including IPOs / ESOPs), convertible bonds,		
	convertible debentures, and units of equity-oriented		
	mutual funds;		
(iii)	Advances for any other purposes where shares or		
	convertible bonds or convertible debentures or units of		
	equity oriented mutual funds are taken as primary		
	security;		

· · /	I Exposure to Capital Market	
(x)	Financing to stockbrokers for margin trading	
(ix)	Underwriting commitments taken up by the SPDs in respect of primary issue of shares or convertible bonds or convertible debentures or units of equity oriented mutual funds	
(viii)	(ii) Category II (iii) Category III	
(vii)	Bridge loans to companies against expected equity flows / issues;	
(vi)	Loans sanctioned to corporates against the security of shares/bonds/debentures or other securities or on clean basis for meeting promoter's contribution to the equity of new companies in anticipation of raising resources;	
(v)	Secured and unsecured advances to stockbrokers and guarantees issued on behalf of stockbrokers and market makers;	
(iv)	Advances for any other purposes to the extent secured by the collateral security of shares or convertible bonds or convertible debentures or units of equity oriented mutual funds i.e. where the primary security other than shares / convertible bonds / convertible debentures / units of equity oriented mutual funds 'does not fully cover the advances;	

3.6.3 Details of financing of parent company products

3.6.4 Details of Single Borrower Limit (SGL)/ Group Borrower Limit (GBL) exceeded by the SPD

The SPD shall make appropriate disclosure in the NTA to the annual financial statements in respect of the exposures where the SPD had exceeded the prudential exposure limits during the year. ³⁷Computation of exposure limits shall be reckoned as per credit/investment concentration norms prescribed in these Directions.

3.6.5 Unsecured Advances

a) For determining the amount of unsecured advances the rights, licenses, authorisations, etc., charged to the SPDs as collateral in respect of projects (including infrastructure projects) financed by them, shall not be reckoned as tangible security. Hence such advances shall be reckoned as unsecured.

³⁷ Vide <u>circular DOR.CRE.REC.70/21.01.003/2023-24 dated January 15, 2024</u>.

b) SPDs shall also disclose the total amount of advances for which intangible securities such as charge over the rights, licenses, authority, etc. has been taken as also the estimated value of such intangible collateral. The disclosure shall be made under a separate head in NTA. This would differentiate such loans from other entirely unsecured loans.

3.6.6 Intra-group exposures

SPDs shall make the following disclosures for the current year with comparatives for the previous year:

(i) Total amount of intra-group exposures

(ii) Total amount of top 20 intra-group exposures

(iii) Percentage of intra-group exposures to total exposure of the SPD on counterparties.

3.6.7 Unhedged foreign currency exposure

SPDs shall disclose details of its unhedged foreign currency exposures. Further, they shall also disclose their policies to manage currency induced risk.

4. Miscellaneous

4.1 Registration obtained from other financial sector regulators

4.2 Disclosure of Penalties and strictures imposed by the Reserve Bank and other regulatory/ statutory authority

Consistent with the international best practices in disclosure of penalties or strictures imposed by the Reserve Bank or any other regulatory/ statutory authority, placing the details of the levy of penalty on the SPD in public domain will be in the interests of the investors and depositors. Further, strictures or directions on the basis of inspection reports or other adverse findings should also be placed in the public domain. The penalties and strictures shall also be disclosed in the NTA.

4.3 Related Party Transactions

- a. Deleted
- b. Deleted

c. Related Party Disclosure

The SPD shall disclose the policy on dealing with Related Party Transactions on its website and also in the Annual Report. The details of material transactions with related parties shall be disclosed in the annual report. Further, the SPD shall additionally disclose the related party transactions in the following format:

(Amount in ₹ crore)

Related Party	(as owner	rent per ship or trol)	Subsi	diaries	Jo	ciates/ bint tures		ey gement @ Previous	K Manag	ives of ey gement onnel [@]	Othe	ers*	To	otal Previous
Items	year	year	year	year	year	year	year	year	year	year	year	Year	year	year
Borrowings#														
Deposits [#]														
Placement of deposits [#]														
Advances [#]														
Investments [#]														
Purchase of fixed/other assets														
Sale of fixed/other assets														
Interest paid														
Interest received														
Others*														

@Disclosures for directors and relatives of directors should be made separately in separate columns from other KMPs and relatives of other KMPs.

The outstanding at the year end and the maximum during the year are to be disclosed.

* Specify item if total for the item is more than 5 percent of total related party transactions. Related parties would include trusts and other bodies in which the SPD can directly or indirectly (through its related parties) exert control or significant influence.

Notes:

- Related party, in the context of the aforementioned disclosure, shall include all related parties as per the applicable accounting standards. Further, related party shall also include following related parties defined under Section 2(76) of the Companies Act, 2013.
 - (i) a director or his relative;
 - (ii) a key managerial personnel or his relative;
 - (iii) a firm, in which a director, manager or his relative is a partner;
 - (iv) a private company in which a director or manager or his relative is a member or director;
 - (v) a public company in which a director or manager is a director or holds along with his relatives, more than two percent of its paid-up share capital;

- (vi) any body corporate whose Board of Directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director or manager;
- (vii) any person on whose advice, directions or instructions a director or manager is accustomed to act.

Provided that nothing in clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;

- 2. At a minimum, Key Management Personal (KMPs) shall include following key managerial personnel as per Section 2(51) of the Companies Act, 2013.
 - (i) the Chief Executive Officer or the managing director or the manager;
 - (ii) the company secretary;
 - (iii) the whole-time director;
 - (iv) the Chief Financial Officer;
 - (v) such other officer, not more than one level below the Directors who is in whole-time employment, designated as key managerial personnel by the Board; and
 - (vi) such other officer as may be prescribed.
- Relatives of KMPs at the minimum, shall include following relatives as defined under Section 2(77) of the Companies Act, 2013 and Rule 4 of the Companies (Specification of definitions details) Rules, 2014.
 - (i) They are members of a Hindu Undivided Family;
 - (ii) They are husband and wife; or
 - (iii) One person is related to the other in such manner as may be prescribed;

A person shall be deemed to be the relative of another, if he or she is related to another in the following manner, namely:-

- (i) Father; Provided that the term "Father" includes step-father.
- (ii) Mother: Provided that the term "Mother" includes the step-mother.
- (iii) Son: Provided that the term "Son" includes the step-son.
- (iv) Son's wife.
- (v) Daughter.
- (vi) Daughter's husband.
- (vii) Brother: Provided that the term "Brother" includes the step-brother;
- (viii) Sister: Provided that the term "Sister" includes the step-sister.

4.4 Ratings assigned by credit rating agencies and migration of ratings during the year

4.5 Remuneration of Directors

All pecuniary relationship or transactions of the non-executive directors vis-à-vis the company shall be disclosed in the Annual Report.

4.6 Management Discussion and Analysis Report

As part of the directors' report or as an addition thereto, a Management Discussion and Analysis report should form part of the Annual Report to the shareholders. This Management Discussion & Analysis shall include discussion on the following matters within the limits set by the company's competitive position:

- a. Industry structure and developments.
- b. Opportunities and Threats.
- c. Segment-wise or product-wise performance.
- d. Outlook
- e. Risks and concerns.
- f. Internal control systems and their adequacy.
- g. Discussion on financial performance with respect to operational performance.
- h. Material developments in Human Resources / Industrial Relations front, including number of people employed.

4.7 Net Profit or Loss for the period, prior period items and changes in accounting policies

Since the format of the profit and loss account of SPDs does not specifically provide for disclosure of the impact of prior period items on the current year's profit and loss, such disclosures, wherever warranted, shall be made in the NTA.

4.8 Revenue Recognition

An enterprise shall also disclose the circumstances in which revenue recognition has been postponed pending the resolution of significant uncertainties.

4.9 Consolidated Financial Statements (CFS)

SPDs shall be guided by applicable Accounting Standards in this regard.

A parent company, presenting the CFS, should consolidate the financial statements of all subsidiaries - domestic as well as foreign. The reasons for not consolidating a subsidiary shall be disclosed in the CFS. The responsibility of determining whether a particular entity shall be included or not for consolidation would be that of the Management of the parent entity. In case, its Statutory Auditors are of the opinion that an entity, which ought to have been consolidated, has been omitted, they should incorporate their comments in this regard in the "Auditors Report".

4.10 Breach of covenant

SPDs shall disclose all instances of breach of covenant of loan availed or debt securities issued.

5. Additional Disclosures

5.1 Provisions and Contingencies

To facilitate easy reading of the financial statements and to make the information on all Provisions and Contingencies available at one place, SPDs are required to disclose in the NTA the following information:

	(Amount in ₹ crore)		
Break up of 'Provisions and Contingencies' shown under	Current	Previous	
the head Expenditure in Profit and Loss Account	Year	Year	
Provisions for depreciation on Investment			
Provision towards NPA			
Provision made towards Income tax			
Other Provision and Contingencies (with details)			
Provision for Standard Assets			

5.2 Draw Down from Reserves

Suitable disclosures shall be made regarding any draw down of reserves in the NTA.

5.3 Concentration of Deposits, Advances, Exposures and NPAs

5.3.1 Concentration of Deposits (for deposit taking NBFCs)

(Amo	ount in ₹ crore)
Total Deposits of twenty largest depositors	
Percentage of Deposits of twenty largest depositors to Total Deposits of	
the deposit taking NBFC.	

5.3.2 Concentration of Advances

(Amo	ount in ₹ crore)
Total Advances to twenty largest borrowers	
Percentage of Advances to twenty largest borrowers to Total Advances of	
the applicable NBFC	

5.3.3 Concentration of Exposures

(Amou	nt in ₹ crore)
Total Exposure to twenty largest borrowers / customers	
Percentage of Exposures to twenty largest borrowers / customers to	
Total Exposure of the SPD on borrowers / customers	

5.3.4 Concentration of NPAs

	(Amount in ₹ crore)
Total Exposure to top four NPA accounts	

5.3.5 Deleted

5.3.6. Sectoral exposure

	С	urrent Yea	ar	Previous Year			
Sectors	Total Exposure (includes on balance sheet and off-balance sheet exposure) (₹ crore)	Gross NPAs (₹ crore)	Percentag e of Gross NPAs to total exposure in that sector	Total Exposure (includes on balance sheet and off- balance sheet	Gross NPAs (₹ crore)	Percentag e of Gross NPAs to total exposure in that sector	
1. Agriculture and							
Allied Activities							
2. Industry							
i. MSME							
ii. Corporate borrowers							
Others							
Total of Industry							
(i+ii++Others)							
3. Services							
i							
ii							
Others							
Total of Services							
(i+ii++Others)							

4. Personal Loans			
i. Unsecured personal loans			
ii. Auto loans			
Others			
Total of Personal			
Loans			
(i+ii++Others)			
5. Others, if any			
(please specify)			

Notes:

(i) The disclosures as above shall be based on the sector-wise and industry-wise bank credit (SIBC) return submitted by scheduled commercial banks to the Reserve Bank and published by the Reserve Bank as 'Sectoral Deployment of Bank Credit'.

(ii) In the disclosures as above, if within a sector, exposure to a specific subsector/industry is more than 10 percent of Tier 1 capital of SPD, the same shall be disclosed separately within that sector. Further, within a sector, if exposure to specific sub-sector/industry is less than 10 percent of Tier 1 capital, such exposures shall be clubbed and disclosed as "Others" within that sector.

			(Amoun	t in ₹ crore)	
		Particulars	Current Year	Previous Year	
(i)	Net	NPAs to Net Advances (%)			
(ii)	Mov	vement of NPAs (Gross)			
	(a)	Opening balance			
	(b)	Additions during the year			
	(C)	Reductions during the year			
	(d)	Closing balance			
(iii)) Movement of Net NPAs				
	(a)	Opening balance			
	(b)	Additions during the year			
	(C)	Reductions during the year			
	(d)	Closing balance			
(iv)	Mov	vement of provisions for NPAs (excluding provisions of	on standard	assets)	
	(a)	Opening balance			
	(b)	Provisions made during the year			
	(C)	Write-off / write-back of excess provisions			
	(d)	Closing balance			

5.4 Movement of NPAs

5.5 Overseas Assets (for those with Joint Ventures and Subsidiaries abroad)

Name of the Joint Venture/	Other Partner	Country	Total
Subsidiary	in the JV		Assets

5.6 Off-balance Sheet SPVs sponsored

(which are required to be consolidated as per accounting norms)

Name of the SPV sponsored			
Domestic	Overseas		

6. Disclosure of Complaints

6.1 Summary information on complaints received by the SPDs from customers and from the Offices of Ombudsman (applicable in case included under The Reserve Bank – Integrated Ombudsman Scheme, 2021)

Sr. No	Particulars	Current Year	Previous Year
	Complaints received by the SPD from its cust	omers	•
(a)	No. of complaints pending at the beginning of the year		
(b)	No. of complaints received during the year		
(C)	No. of complaints disposed during the year		
	(i) Of which, number of complaints rejected by the SPD		
(d)	No. of complaints pending at the end of the year		
	Maintainable complaints received by the SPD from the Off	ice of Ombu	dsman
(applicable in case included under The Reserve Bank - Inte	grated Omb	udsman
	Scheme, 2021)		
(α)	Number of maintainable complaints received by the SPD		
(e)	from the Office of Ombudsman		
	(i) Of (e), number of complaints resolved in favour of the		
	SPD by Office of Ombudsman		
	(ii) Of (e), number of complaints resolved through		
	conciliation/ mediation/ advisories issued by the Office of		
	Ombudsman		
	(iii) Of (e), number of complaints resolved after passing of		
	Awards by the Office of Ombudsman against the SPD		
(f)	Number of Awards unimplemented with the stipulated time		
(1)	(other than those appealed)		
Note	: Maintainable complaints refer to complaints on the ground	ls specificall	y mentioned
in the	e Integrated Ombudsman Scheme, 2021 and covered in the	e ambit of the	e Scheme.

6.2. Top five grounds³⁸ of complaints received by the SPDs from customers

Grounds of complaints, (i.e. complaints relating to)	complaints pending at the	Number of complaint s received during the year	% increase/ decrease in the number of complaints received over the previous year	Number of complaints pending at the end of the year	Of 5, number of complaints pending beyond 30 days
1	2	3	4	5	6
			Current Year	·	
Ground - 1					
Ground - 2					
Ground - 3					
Ground - 4					
Ground - 5					
Others					
Total					
		L	Previous Year	L	
Ground - 1					
Ground - 2					
Ground - 3					
Ground - 4					
Ground - 5					
Others					
Total					

7. Corporate governance

Securities and Exchange Board of India [Listing Obligations and Disclosure Requirements(LODR)] Regulations, 2015 (paragraph C of Schedule V - Annual Report) as amended from time to time, specifies disclosures to be made in the section on the corporate governance of the Annual Report. With respect to the corporate governance report, non-listed SPDs should also endeavor to make full disclosure in accordance with the requirement of SEBI (LODR) Regulations, 2015. Non-listed SPDs at the minimum should disclose following under the corporate governance section of the annual report.

³⁸ The list of grounds of complaints given below are indicative only.

1.Credit Cards	Difficulty in operation of accounts	Mis-selling	Recovery Agents/				
			Direct Sales Agents				
5. Loans and advances	6. Levy of charges without prior notice/	Non-observance of	8. Staff behaviour				
	excessive charges/ foreclosure charges	fair practices code					
9. Facilities for customers	10. Others						
visiting the office/							
adherence to prescribed							
working hours, etc.							

7.1 Composition of the Board

		Capacit y (i.e. Executiv e/ Non-			mber of Board leeting s	No. of	Re	munerat	tion	No. of shares held in
SI. No.	Name of Director Director since	Executiv e/ Chairma n/ Promote r nominee/ Indepen dent)	DIN	Held	Attended	No. of other Directo r ships	Salary and other compe nsatio n	Sittin g Fee	Com m issio n	and convertibl e instrumen ts held in the SPD

Details of change in composition of the Board during the current and previous financial year.

SI. No.	Name of Director	Capacity (i.e., Executive/ Non-Executive/ Chairman/ Promoter nominee/ Independent)	Nature of change (resignation, appointment)	Effective date

Where an independent director resigns before expiry of her/his term, the reasons for resignation as given by her/him shall be disclosed.

Details of any relationship amongst the directors inter-se shall be disclosed

7.2 Committees of the Board and their composition

(i) Mention the names of the committees of the Board.

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

SI. No.	Name of Director	Member of Committee since	Capacity (i.e., Executive/ Non- Executive/ Chairman/		f Meetings of ommittee	No. of shares held in the
			Promoter nominee/ Independent)	Held	Attended	SPD
1.			Chairperson			
2.						

7.3 General Body Meetings

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

SI.	Type of Meeting (Annual/ Extra-	Date and	Special resolutions
No.	Ordinary)	Place	passed

7.4 Details of non-compliance with requirements of Companies Act, 2013

Give details and reasons of any default in compliance with the requirements of Companies Act, 2013, including with respect to compliance with accounting and secretarial standards.

8. Divergence in Asset Classification and Provisioning

SPDs shall disclose details of divergence as per the table given below, if either or both of the following conditions are satisfied:

(i) The additional provisioning requirements assessed by the Reserve Bank exceeds5 percent of the reported profits before tax and impairment loss on financial instruments for the reference period,

(ii) The additional Gross NPAs identified by the Reserve Bank exceeds 5 percent of the reported Gross NPAs for the reference period.

Sr.	Particulars	Amount
1.	Gross NPAs as on March 31, 20XX* as reported by the SPD	
2.	Gross NPAs as on March 31, 20XX as assessed by the	
	Reserve Bank	
3.	Divergence in Gross NPAs (2-1)	
4.	Net NPAs as on March 31, 20XX as reported by the SPD	
5.	Net NPAs as on March 31, 20XX as assessed by the Reserve	
	Bank	
6.	Divergence in Net NPAs (5-4)	
7.	Provisions for NPAs as on March 31, 20XX as reported by the	
	SPD	
8.	Provisions for NPAs as on March 31, 20XX as assessed by	
	the Reserve Bank	
9.	Divergence in provisioning (8-7)	
10.	Reported Profit before tax and impairment loss on financial	
	instruments for the year	
	ended March 31, 20XX	
11.	Reported Net Profit after Tax (PAT) for the year ended March	
	31, 20XX	

12	2.	Adjusted (notional) Net Profit after Tax (PAT) for the year	
		ended March 31, 20XX after considering the divergence in	
		provisioning	

* March 31, 20XX is the close of the reference period in respect of which divergences were assessed.