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July 11, 2023

सेबी/सीएफडी/RAC-डीआईएल1/P/OW/2023/27842/1
SEBI/HO/CFD/RAC-DIL1/P/OW/2023/27842/1

Arihant Capital Markets Limited
1011, Building No. 10,
Solitaire Corporate Park,
Guru Hargovindji Road, Chakala,
Andheri (East)
Mumbai – 400 093
Maharashtra, India

Kind Attention: Mr. Satish Kumar Padmanabhan

महोदय,
Dear Sir,

**विषय /Sub: RBZ Jewellers Limited के प्रारंभिक प्रॉस्पेक्टस के मसौदे के संबंध में स्पष्टीकरण /
Clarifications on the DRHP of RBZ Jewellers Limited**

हमें उपरोक्त कंपनी का प्रारूप प्रारंभिक प्रॉस्पेक्टस (डीआरएचपी) प्राप्त हुआ है, जो हमारे पास तारीख/We are in receipt of Draft Red Herring Prospectus (DRHP) of the captioned company forwarded to us vide letter dated June 16, 2023 के पत्र के साथ भिजवाया गया है।

इस संबंध में, कृपया संलग्नक-क के अनुसार स्पष्टीकरण प्रदान करें।
In this regard, please provide the clarifications as mentioned at Annexure A.

भवदीया/Yours faithfully,

Poonam

सहायक प्रबंधक

Assistant Manager

(संलग्नक/Encl: उपरोक्तानुसार /As above)

सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400 051.
दूरभाष : 2644 9950 / 4045 9950 (आई.वी.आर. एस.), 2644 9000 / 4045 9000 फैक्स : 2644 9019 से 2644 9022 वेब : www.sebi.gov.in



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Annexure A

Clarifications sought on the DRHP of RBZ Jewellers Limited

With reference to the Draft Red Herring Prospectus of captioned IPO filed with SEBI, you are advised to clarify the following points:

General Clarifications:

1. LM is advised to examine the applicability of SEBI (Framework for Rejection of Draft Offer Documents) Order, 2012, to the DRHP of Issuer Company and confirm whether the said general order is applicable to the instant public issue/DRHP. LM is further advised to provide a para-wise reply on the applicability of aforesaid order.
2. LM is advised to examine the applicability of SEBI (Issuing Observations on Draft Offer Documents Pending Regulatory Actions) Order, 2020, dated Feb 05, 2020, to the DRHP of Issuer Company and confirm whether the said general order is applicable to the instant public issue/DRHP. LM is further advised to provide a para-wise reply on the applicability of aforesaid order.
3. LM is advised to submit whether there has been any instance of issuance of equity shares in the past by the issuer Company, the Group Companies or entities forming part of the Promoter Group to more than 49 investors in violation of:
 - a) Section 67(3) of Companies Act, 1956; or
 - b) Relevant section(s) of Companies Act, 2013, including Section 42 and the rules notified thereunder; or
 - c) The SEBI Regulations; or
 - d) The SEBI (Disclosure and Investor Protection) Guidelines, 2000, as applicable.
4. LM is advised to ensure compliance with all instructions issued by SEBI to AIBI.

Specific Clarifications:

5. It may be noted that Clause 24 (3) of SEBI (ICDR) Regulations, 2018, requires that the LM shall exercise due diligence and satisfy himself about all aspects of the issue including the veracity and adequacy of disclosure in the draft offer document and the offer document. LM is advised that the DRHP shall not contain any information where no responsibility is taken by the LM or the Issuer



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Company/ Expert. The Issuer Company /LM shall ensure that the “Industry Overview” section represents a fair and true view of the comparable industry scenario and the same is neither exaggerated nor any underlying assumptions have been omitted for investors to make an informed decision.

6. At all relevant sections of the Offer Document where the report has been mentioned, it needs to be disclosed that the industry report has been exclusively prepared for the purpose of the Issue, and is commissioned and paid-for by the Issuer. The date of appointment of the provider of the industry report and the date of the report to be clearly disclosed. Also disclose whether the provider of the industry report is in any way related to the Issuer/ its directors/ promoters. Further, such report shall be part of material documents available for inspection.
7. LM is advised to ensure that at all places, where the Industry Report has been mentioned, such report to be provided in bibliography / or as weblink.
8. **Page No. 23** – It is disclosed that this DRHP contains certain “forward-looking statements”. It may be noted that SEBI (ICDR) Regulations, 2018 states that the offer document should not make any forward looking statements that cannot be substantiated. In view of the same, LM is advised to confirm and explain compliance with aforesaid provision with respect to all such forward looking statements made in the DRHP.

Further, the factors disclosed that may cause actual results to differ materially from Company's expectations, LM is advised to incorporate specific business related factors such as gold demand, gold prices, seasonality of business, macroeconomic conditions, share market performance, etc., as applicable.

9. LM is advised to disclose face value of equity shares on front page of DRHP.
10. LM is advised to provide correct cross-reference to exact page numbers instead of page number from where the relevant section starts. The same shall be followed for all cross-references in the DRHP.
11. **Offer Document Summary:**
 - a) LM is advised to verify and substantiate with facts the statement, “*We are one of the leading organized manufacturers of gold jewellery in India...*” or delete the statement from all places in the DRHP in absence of adequate supporting data. The same shall apply for statement “*Our company also operates its retail showroom under the brand name “Harit Zaveri” and is a leading player in Ahmedabad.*”



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- b) In summary of Industry in which the company operates, LM is advised to disclose market size of organized gems and jewellery industry and its bifurcation on wholesale, retail and job work basis.
- c) In Objects of Issue, LM is advised to add a row with amount of Total Proceeds.
- d) LM is advised to disclose details of bank guarantee given by the company in notes to the table of contingent liabilities.
- e) In reference to disclosures related to weighted average price, LM is advised to disclose in notes to tables whether the price is Nil due to issuance of bonus shares by the company.
- f) LM is advised to disclose separately wherever the price of acquisition is Nil due to issue of bonus shares and transfer by way of gifts at Nil consideration.
12. **Risk Factors:**
- a) LM is advised to rearrange the risk factors based on materiality.
- b) **Risk Factor 1:** LM is advised to disclose past instances, if any of brand dilution or negative publicity/ adverse brand perception of clients, etc. impacting the company adversely.
- c) **Risk Factor 2:** LM is advised to disclose details of personal guarantees and securities from Promoter and members of Promoter Group for financing arrangements entered into by the company. Further, quantify impact of interest rate fluctuations on financial performance of the company and also disclose solvency ratios such as debt/equity, interest coverage ratio, etc. along with reasons for deterioration in such ratios, if applicable for last 3 FY.
- d) **Risk Factor 4:** LM is advised to disclose sales mix of retail, wholesale, and job work services; margin for each segment, revenue from top 10 clients in each segment, volume of orders in each segment, and working capital requirement as percentage of total working capital requirements of the company in a tabular format for the last 3 FY.
- e) **Risk Factor 5:** LM is advised to disclose details of top 10 customers along with percentage revenue earned from them, volume of gold involved, average relationship tenure with such customers, and tenure of agreements entered into with them for the last 3 FY in tabular format. Further, disclose name of customer referred to as "*nationwide retailer*", disclose details of specific terms and conditions of sale laid down by customers and whether any key customer has terminated his contract with the company in the last 3 FY. Also, disclose



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- what percentage of total orders for manufacturing are received on pre-order basis.
- f) **Risk Factor 6:** LM is advised to modify the heading of risk factor to clearly disclose the risks associated with company's own manufacturing process and that of third party manufacturers to whom company outsources manufacturing. Further, disclose what percentage of its total sales (in amount and volume) is from products manufactured by company and that manufactured by third party manufacturers.
- g) **Risk Factor 7:** LM is advised to disclose details of capacity utilization of machinery for last 3 FY. Further, disclose in the entire process of jewellery manufacturing, whether the role of machinery is for part manufacturing or the entire process is dependent on machinery for certain types of products and specify details for the same.
- h) **Risk Factor 8:** LM is advised to disclose in a tabular format, details of gold procured as raw material and gold sold for revenue in quantity and cost/sales amount. Further, disclose risk of concentration in procurement of gold from top 10 suppliers, if applicable. Also, disclose details of factors along with relevant supporting data that impacted purchase and sale of gold by the company in last 3 FY.
- i) **Risk Factor 10:** LM is advised to disclose in a tabular format, breakup of inventories consisting of raw materials, stock in trade and finished goods (quantity and amount) along with inventory days for last 3 FY. Further, disclose reasons for change in inventory days and any losses due to excess/ shortage of inventory and gold price fluctuations in last 3 FY.
- j) **Risk Factor 11:** LM is advised to disclose reasons for negative cash flow from operating activities.
- k) **Risk Factor 12:** LM is advised to disclose details of number of artisans employed by the company, their attrition rates and what percentage of total revenue is dependent on these artisans that may be directly impacted in case there is shortage/ non-availability of these artisans. Further, disclose whether company undertakes any training etc. of these artisans to maintain/ improve quality of work.
- l) **Risk Factor 13:** LM is advised to disclose whether there has been a downgrade of rating/ outlook for company's borrowings in the last 3 FY.
- m) **Risk Factor 14:** LM is advised to disclose financial data to substantiate seasonality of revenues of the company for last 3 FY.



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- n) **Risk Factor 15:** LM is advised to disclose risk associated with dependence of business on only two individuals in top management of the company (refer page 161). Further, disclose risks associated with company identity being closely related to and dependent on Promoters of the company. Also, disclose details of attrition rates in top management for last 3 FY.
- o) **Risk Factor 16:** LM is advised to disclose what percentage of total inventory is covered by insurance. Further, disclose past instances of infringement of intellectual property by/ of the company, if any.
- p) **Risk Factor 17:** LM is advised to disclose past instances, if any.
- q) **Risk Factor 19:** LM is advised to disclose financial impact of malware attack, if any.
- r) **Risk Factor 20:** LM is advised to disclose details of inconsistencies and discrepancies in the secretarial records and the filings made with the RoC and delay in creation of which statutory reserves. Further, confirm whether such deficiencies have been rectified and impact (penalty, other actions by RoC, etc.) in case the same is not done. Also, confirm whether these deficiencies are material and require compounding applications/ other actions to be taken by company for rectification.
- s) **Risk Factor 21:** LM is advised to move the risk factor to top 10, disclose amount of statutory dues for which there were delayed payments and reasons for delay.
- t) **Risk Factor 22:** LM is advised to disclose instances of non-compliance with any regulations, if any.
- u) **Risk Factor 23:** LM is advised to disclose whether any material permits/ licenses/ approvals are due to expire in next 3 FY and any material permits/ licenses/approvals for which approval is pending as on date.
- v) **Risk Factor 26:** LM is advised to complete the heading of risk factor appropriately and disclose details of bank guarantee which is disclosed as contingent liability.
- w) **Risk Factor 27:** LM is advised to disclose clearly risks associated with license agreement executed with Promoters for use of logos related to Harit Zaveri.
- x) **Risk Factor 28:** LM is advised to disclose past instances, if any.
- y) **Risk Factor 29:** LM is advised to disclose percentage of insurance coverage and past instances of losses due to inadequate insurance coverage, if any.



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- z) **Risk Factor 33:** LM is advised to disclose that payment of dividend also depends on financial covenants entered into with lenders in respect of financing arrangements.
- aa) **Risk Factor 34:** LM is advised to disclose names of entities related to Promoter Group which are engaged in similar line of business as the Issuer company and whether the company has any transactions with them/ are direct competitors of the company in terms of same clients/ locations.
- bb) **Risk Factor 37:** LM is advised to disclose that the industry report is commissioned and paid for by the company. Further, disclosures to be suitably modified based on other clarifications in this letter.
- cc) **Risk Factor 38:** LM is advised to explain how the management can exercise discretion in interim use of Net proceeds.
- dd) **Risk Factor 40:** LM is advised to disclose past instances, if any.
- ee) **Risk Factor 42:** LM is advised to disclose details of personal guarantees and securities given by Promoters/ Promoter group.
- ff) **Risk Factor 43:** LM is advised to disclose percentage of revenue earned from repeat customers for last 3 FY.
- gg) **Risk Factor 45:** LM is advised to disclose cross-reference to complete details of retail showroom taken on lease by the company.
- hh) **Risk Factor 46:** LM is advised to disclose complete details of advance gold purchase schemes run by the company in the past, all non-compliances/ violation of relevant laws due to such scheme, any corrective action taken by the company and consequences in case the same are subject to any regulatory/ statutory actions.
13. LM is advised to disclose an additional risk factor in top 10 related to impact of COVID-19 on the business operations of the company with relevant supporting data and risks associated with any similar event in the future.
14. LM is advised to disclose an additional risk factor related to evolving regulatory/ government compliances such as mandatory hallmarking, etc. that may have an impact on business of company/ relationships with suppliers and customers.
15. LM is advised to disclose a suitable risk factor related to contract labour employed by the company, attrition rate and that the company has not applied for certificate of registration under Contract Labour (Regulation and Abolition) Act, 1970.



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16. LM is advised to disclose only Legal Counsel to the Issuer.
17. LM is advised to confirm whether monitoring agency will be appointed in case Issue size is Rs. 100 crores or less as the same is mandatory only for Issue size exceeding Rs. 100 crores.
18. LM is advised to clarify/explain the disclosure regarding Underwriting agreement wherein it is stated that *"the company intends to enter into an underwriting agreement with the Underwriters for the Equity shares on or after the pricing date but prior to registration of the Prospectus with the RoC or prior to filing of Red Herring Prospectus with the RoC in the event of undersubscription in the Issue."* (page 72)
19. **Capital Structure:** LM is advised to disclose form of consideration in case of transfer of equity shares to Promoters. In case no consideration is paid, reasons may be disclosed in notes to the table (page 76-77).
20. In tables disclosing percentage (%) of pre-Issue share capital held by Promoters on page 81, LM to clarify on calculation of such percentage as the shareholding of Promoters is 99.98% as on date of filing DRHP.
21. **Objects of the Offer:**
 - LM is advised to add a row disclosing Net Proceeds in table with heading Fresh Issue on page 83. Further, disclose amount for Gross Proceeds or Net Proceeds, as applicable.
 - In page 83, last paragraph, LM is advised to delete, *"....and have not been verified by the BRLM or....."*
 - In page 84, under heading *"Funding of working capital requirements"*, LM is advised to disclose utilized working capital loans (bifurcating short term and long term) as against sanctioned limits.
 - LM is advised to disclose details of average working capital cycle days (last 3 FY) for its wholesale (production cycle and debtor collection period) and retail (production cycle and inventory days) sales. (page 84)
 - LM is advised to disclose break-up of inventories into Inventories-RM, WIP and Stores and Inventories-FG in the table disclosing working capital for last 3 FY.



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- LM is advised to disclose break-up of working capital borrowings into Short term and long term borrowings in funding pattern of working capital. (page 85). The same shall be updated in Risk factor 2.
- LM is advised to explain the disclosure, “#The figures above have been taken from the audited Restated Financial Statements wherein they have been regrouped/ reclassified/ restated by the Statutory Auditors in accordance with IND AS as well as SEBI ICDR Regulations.” (page 85) The same shall be updated in Risk factor 2.
- In reference to disclosure of estimated working capital requirements for FY 2023-24, LM is advised to explain reasons for increase in capital required for Inventory and holding period of Inventory-RM/WIP. The same shall be elaborated in justification for holding period levels also along with elaboration of phrases, “...based on the manufacturing plans of the company”, “basis the growth plans of the company”. (Page 86)
- In object related to General Corporate Purposes, LM is advised to delete the disclosure stating that GCP can be utilized for financing additional working capital requirements in line with definition of GCP as per SEBI ICDR Regulations.

22. **Basis for Offer Price:**

- LM is advised to delete any qualitative factor not adequately substantiated by facts and figures.
- In qualitative factors disclosed, LM is advised to substantiate/ modify the factor, “Client mix and geographical spread”.
- In reference to listed peers disclosed, LM is advised to disclose business profile and product segments for each listed peer and explain how the same is similar to/ different from the business/ product range of the company. Further, disclose reasons for selectin of these listed peers only from the entire peer set available in the gems and jewellery industry.
- In respect of disclosure of KPIs for listed peers, LM is advised to redraft the same in tabular format with year-wise data of company and peers in a single table for ease of comparison.

23. **Industry Overview:**



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- LM is advised to re-examine and ensure superlatives are used only where the same can be substantiated by facts.
- LM is advised to provide latest/updated data wherever applicable.
- LM is advised to define "CY" used in the report.
- LM is advised to disclose size of organized jewellery market share out of total jewellery market in percentage and absolute (amount) terms. Further, bifurcation of size of wholesale and retail market in the organized market shall be disclosed. (page 114)
- LM is advised to disclose details of market leaders/ company's competitors in the organized jewellery industry. Ranks/ market share of such companies vis-à-vis Issuer company shall also be disclosed.
- LM is advised to disclose summary of financial information (Revenues, EBITDA, PAT, profit margins, Net worth, etc.) for key listed/ large players in gems and jewellery retail industry for comparison purpose.

24. **Our Business:**

LM is advised to disclose/modify the following:

- a) LM is advised to re-examine and ensure superlatives are used only where the same can be substantiated by facts.
- b) Disclose data in a tabular format wherever it pertains to multiple years or multiple segments.
- c) LM is advised to delete statements such as, "We are one of the leading....", "leading player in Ahmedabad" in case same cannot be adequately substantiated by data.
- d) LM is advised to disclose in a tabular format, details of bifurcation of revenue from Manufacturing(own), job-work, trading, export sales, etc. in absolute terms and as percentage of total revenue of the company for the last 3 FY. Further, disclose revenue break-up of sales on wholesale and retail basis.
- e) LM is advised to disclose sales value (amount) along with quantitative details of sales in table disclosed on page 142.



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- f) LM is advised to explain its geographical spread in 19 states and 72 cities considering the company has manufacturing facility and retail showroom only at Ahmedabad.
- g) In the table disclosing names of top 10 customers, LM is advised to disclose revenue percentage earned from these customers and tenure of agreements entered into with these customers.
- h) LM is advised to disclose complete details of manufacturing facility, retail showroom and leased properties, if any of the company.
- i) LM is advised to explain reasons for low capacity utilization by the company. Further, confirm that the details of capacity utilization have been certified by an expert.
- j) LM is advised to disclose sum insured as a percentage of total assets in the category for which insurance is taken. Further, disclose industry benchmark for gems and jewellery industry for average insurance coverage of assets. (page 161)

25. History and Certain Corporate Matters:

- LM is advised that it is categorically disclosed that none of the special rights available to the Promoters / Shareholders (except for nominee/nomination rights and information rights) would survive post listing of the Equity Shares of the Company and same shall cease to exist or shall expire / waived off immediately before or on the date shares are allotted to public shareholders in IPO, without requiring any further action.
- LM is advised to make disclosures if special rights for nominee/nomination rights and information rights are available to certain Promoters / Shareholders that would continue post listing and if yes, then details of the same may be clearly disclosed.
- Further, LM shall specifically disclose that special rights, post listing shall be subject to approval of the Shareholders by way of a special resolution, in the first general meeting of the Company held post listing of the Equity Shares.
- LM is advised to ensure that special rights which will continue post listing are not prejudicial or adverse to the interest of the minority / public shareholders.



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- LM is advised that inter-se agreements/ arrangements between the shareholders are disclosed.
 - LM is advised that a categorical statement from the Issuer Company/ Promoters / Shareholders, may be provided that there are no other inter-se agreements/ arrangements and clauses / covenants which are material and which needs to be disclosed and that there are no other clauses / covenants which are adverse / pre-judicial to the interest of the minority / public shareholders. Also that there are no other agreements, deed of assignments, acquisition agreements, SHA, inter-se agreements, agreements of like nature other than disclosed in the DRHP.
 - Further, the LMs shall also confirm to SEBI that they have gone through the inter-se agreements/ arrangements, if any, as disclosed in the DRHP and they also do not see any clauses / covenants which are material and need to be disclosed, which have not been disclosed and that there are no other clauses / covenants which are adverse / pre-judicial to the interest of the minority / public shareholders.
26. LM is advised to explain reasons for filing application for registration of Harit Zaveri related logos in the names of Promoter instead of company. Further, explain how the terms of the license agreement entered into with Promoters for use of these logos shall not be prejudicial to the interests of public shareholders post listing of the company. (page 180)
27. LM is advised to explain appointment of additional non-executive independent Directors in the company and then later their regularization and confirm whether the same is in compliance with extant laws and regulations. (page 187)
28. **Financial Information:**
- LM is advised to rectify statement related to restated financial information being compiled from "Audited Proforma Ind AS financial statements". Please note that audited special purpose financial statements are to be relied on/ disclosed in DRHP in case of transition of company from previous GAAP to Ind AS and preparation of such Ind AS financial statements by making AS adjustments to previous GAAP financial statements.
 - LM is advised to explain reasons for increase in Property, Plant and equipment for the FY 2023 as compared to FY2022.
 - LM is advised to explain reasons for Nil Rights of use assets and corresponding Lease liabilities for FY 2023.



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- LM is advised to explain reasons for increase in inventory (Finished goods and WIP) and trade receivables for the FY 2023 as compared to FY2022.
 - LM is advised to explain reasons for high cash and cash equivalents for FY2023.
 - LM is advised to explain reasons for increase in current and non-current borrowings for the FY 2023 as compared to FY2022.
 - LM is advised to explain detailed reasons for increase in revenues from FY2021 as compared to FY2022.
 - LM is advised to explain detailed reasons for lower PAT margins in FY2022 and FY2023 as compared to FY2021 despite increase in revenues.
 - LM is advised to explain detailed reasons for negative cash flows from operating activities for FY2021 and FY2023.
 - In respect of reasons explained in above clarifications, LM is advised to suitably update the “*Management’s Discussion and Analysis of financial condition and results of operations*” section.
29. In page 292, presentation of financial information may be suitably modified by LM as per clarifications in this letter.
30. **Management’s Discussion and Analysis of financial condition and results of operations:**
- LM is advised to disclose data pertaining to multiple years in a tabular format wherever applicable.
31. **Outstanding Litigations and Other Material Information:** LM is advised to disclose amount involved in litigations, wherever possible and a confirmation statement in case amount involved cannot be ascertained.
32. In page 315, LM is advised to explain details of indirect tax litigation filed against the company (GST matter).
33. **Offer Related Information:**
- LM is advised to remove content of similar nature, if any, from all section(s) of DRHP.
- “None among our company, the selling shareholders or any member of the Syndicate shall be liable for any failure in (i) uploading the bids due to faults in any software/hardware system or otherwise; or (ii) the blocking of Bid Amount in the ASBA Account on receipt of instructions from the*



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Sponsor Bank on account of any errors, omissions or non-compliance by various parties involved in, or any other fault, malfunctioning or breakdown in, or otherwise, in the UPI Mechanism”.

34. **Miscellaneous:**

a) Any risk on pricing of the issue / basis of issue price, track record of BRLMs, average cost of acquisition of shares by selling shareholders etc. which is proposed to be included in the issue advertisement may be submitted.

b) LM is advised to ensure following disclosures in the Issue advertisement for announcement of Price Band and all further advertisements as a box item below the price band:

"Risks to Investors:

i.a) The [to be disclosed] Merchant Bankers associated with the issue have handled [to be disclosed] public issues in the past three years out of which [to be disclosed] issues closed below the issue price on listing date."

i.b) Any adverse data/ noting in the basis for issue price should be disclosed. For example:

- "The Price/Earnings ratio based on diluted EPS for [latest full financial year] for the issuer at the upper end of the Price band is as high as [to be disclosed] as compared to the average industry peer group PE ratio of [to be disclosed]."
- "Average cost of acquisition of equity shares for the selling shareholders in IPO is [to be disclosed] and offer price at upper end of the price band is [to be disclosed]."
- "Weighted Average Return on Net Worth for [last three full financial years] is [to be disclosed] %."

c) LM is advised that Market Value at Issue Price to Total Turnover and P.E. Ratio at issue price can be added in Price Advertisement.

d) The portion pertaining to "Risks to Investors" shall constitute at least 33% of the price band advertisement space.

e) The risks to investors shall include weighted average cost of acquisition of all shares transacted in last 3 years and 1 year, from the date of RHP, in the following format:



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Period	Weighted Average Cost of Acquisition (in Rs.)	Cap Price is 'X' times the Weighted Average Cost of Acquisition	Range of acquisition price: Lowest Price - Highest Price (in Rs.)
Last 1 year			
Last 3 years			

- f) The font size for price band and "Risk to investors" should be increased to match the font of BID/Offer Programme.
- g) Matters related to ASBA and UPI may be brought subsequent to Price Band, Risks to Investors, Bid/ Offer Programme and other offer details, and can be of smaller font.
- h) The portion pertaining to "BRLMs" shall not constitute more than 10% of the price band advertisement space.

The data on above disclosures shall be updated and disclosed prominently (in the same font size as the price band) in advertisements of Price Band and all further advertisements, website of the company and the stock exchange. Further, any adverse ratio / data in basis for issue price should also be disclosed. LM shall submit the draft advertisement for announcement of Price Band with SEBI before its publication in the newspapers for our comments.