







Ref No: PSB/HO/Shares Cell / 88 /2024-25

भारत सरकार का उपक्रम

पजाब एण्ड सिध

January 15, 2025

То,	
BSE Limited,	National Stock Exchange of India Ltd.,
Department of Corporate Services,	Exchange Plaza, C – 1, Block – G,
25 th floor, Phiroze Jeejeebhoy Towers,	Bandra Kurla Complex, Bandra (East),
Dalal Street, Fort,	<u>Mumbai – 400 051</u> .
<u>Mumbai – 400 001</u> .	SYMBOL: PSB SERIES: EQ
SCRIP ID : PSB	
SCRIP CODE : 533295	

Dear Sir,

Reg: Outcome of Board Meeting

We wish to inform that the Board of Directors of the Bank at its meeting held on January 15, 2025 has considered and approved the Reviewed Unaudited Financial Results of the Bank for the Quarter (Q3) / Nine Months ended December 31, 2024.

In this connection, we enclose the following:

1. A copy of Reviewed Un-audited Financial Results, Segment Reporting and Limited Review Report by Auditors.

2. Deviation/Variation in Utilization of Funds Raised during the Quarter ended December 31, 2024 in terms of Regulation 32(1) and 52(7) of SEBI (LODR) Regulations, 2015 is NIL and the same is enclosed.

3. Security Cover Certificate as on December 31, 2024

The same can also be viewed on the website of the Bank i.e. <u>https://punjabandsindbank.co.in/</u>

The meeting of the Board of Directors commenced at 03:30 p.m. and concluded at 5:45 p.m.

You are requested to take a note of the above.

Yours faithfully

Saket Mehrotra Company Secretary



S. P. Chopra & Co.,	Gupta Sharma & Associates,
Chartered Accountants,	Chartered Accountants,
31-F, Connaught Place, Radial Road no.7,	142,Sector 3,Trikuta Nagar,
New Delhi-110001	Jammu - 180012
O P Totla & Co .,	NBS & Co.,
Chartered Accountants,	Chartered Accountants,
302, Alankar Point, Geeta Bhawan Square,	14/2, Western India House, Sir P.M. Road,
Indore – 452001 (MP)	Fort, Mumbai - 400001

Independent Auditor's Limited Review Report on Unaudited Financial Results for the Quarter and Nine Months ended December 31, 2024 of 'Punjab & Sind Bank' Pursuant to the Regulations 33 and 52 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended

To The Board of Directors Punjab & Sind Bank New Delhi

- We have reviewed the accompanying statement of unaudited financial results ('the Statement') of Punjab & Sind Bank ("the Bank") for the quarter and nine months ended December 31, 2024, being submitted by the Bank pursuant to the requirement of Regulations 33 and 52 read with Regulation 63(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ('the Regulations'). Our responsibility is to issue a report on these financial results based on our review. The disclosures relating to "Pillar 3 under Basel III Capital Regulations", "Leverage Ratio", "Liquidity Coverage Ratio" and "Net Stable Funding Ratio", as have been disclosed on Bank's website and in respect of which a link has been provided in the aforesaid Statement have not been reviewed by us. We have initialed the Statement for identification purposes only.
- 2. This statement, which is the responsibility of the Bank's Management and approved by the Board of Directors has been prepared in accordance with the recognition and measurement principles laid down in Accounting Standard 25 "Interim Financial Reporting", prescribed by the Institute of Chartered Accountants of India (ICAI), the relevant provisions of the Banking Regulation Act, 1949, the circulars, guidelines and directions issued by the Reserve Bank of India (RBI) from time to time ("RBI Guidelines") and other accounting principles generally accepted in India. Our responsibility is to express a conclusion on the statement based on our review.



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- 3. We conducted our review of the Statement in accordance with the Standard on Review Engagements (SRE) 2410 "Review of Interim Financial Information Performed by the Independent Auditor of the Entity", issued by the Institute of Chartered Accountants of India. This standard requires that we plan and perform the review to obtain moderate assurance as to whether the Statement is free of material misstatement. A review is limited primarily to inquiries of Bank personnel and analytical procedures applied to financial data and thus provides less assurance than an audit. We have not performed an audit and accordingly, we do not express an audit opinion.
- 4. These financial results include the relevant returns of 20 branches and Treasury Division reviewed by us, 350 branches reviewed by concurrent auditors and un-reviewed returns of 1,214 branches. The financial results also include the relevant returns of various head office departments reviewed by us. In the conduct of our review, we have also relied upon the review reports submitted by external concurrent auditors (including the retired employees of the Bank). These review reports cover 75.99% including 56.96% of which has been covered by us of the advance portfolio (excluding the advances of asset recovery branches and food credit) and 66.92%, including 23.86% of which has been covered by us, of gross non-performing assets (excluding the non-performing assets of assets recovery branches) of the Bank as on December 31, 2024. Apart from these review reports, in the conduct of our review, we have also relied upon various information, reports and returns received from the un-reviewed branches/other offices of the Bank and generated through centralized database at Bank/s Head and Zonal offices.
- 5. Based on our review conducted as above, subject to the limitations as mentioned in Para 3 and 4 above, nothing has come to our attention that causes us to believe that the accompanying statements of unaudited financial results read together with notes thereon, prepared in accordance with applicable accounting standards and other recognized accounting practices and policies, has not disclosed the information required to be disclosed in terms of Regulations 33 and 52 read with Regulation 63(2) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, including the manner in which it is to be disclosed, or that it contains any material misstatement or that it has not been prepared in accordance with the relevant prudential norms issued by the Reserve Bank of India in respect of income recognition, asset classification, provisioning and other related matters.

6. Emphasis of Matter

We draw attention to Note No. 18 to the financial results, regarding amortization of estimated additional liability on account of revision in family pension amounting to Rs. 236.84 crores. As stated therein, the Bank has charged amount of Rs. 12.00 crores and Rs. 36.00 crores to the Profit & Loss account for the current quarter and nine months ended December 31, 2024 respectively and the unamortized expense amounting to Rs. 58.73 crores has been carried forwarded in terms of RBI Circular No. RBI/ 2021-22/105 DOR.ACC.REC.57/21.04.018/2021-22 dated October 04, 2021.

Our conclusion is not modified in respect of the above matter.



7. Other Matter

We draw attention to the fact that corresponding figures for the quarter and nine months ended December 31, 2023, quarter ended September 30, 2024 and year ended March 31, 2024 are based on previously issued financial results / statements of the Bank, that were reviewed / audited by the predecessor auditors M/s. Chaturvedi & Co. LLP and M/s Manohar Chowdhry & Associates, along with two present auditors M/s. S. P. Chopra & Co and M/s Gupta Sharma & Associates, who had expressed an unmodified conclusion / opinion on those financial results / statements.

Our conclusion is not modified in respect of the above matter.



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PUNJAB & SIND BANK

Reviewed Unaudited Financial Results for the Quarter/ Nine Months ended 31st December, 2024

		QUARTER ENDED			NINE MONTHS ENDED		pees in lacs) YEAR
SI. No.	Particulars	31,12,2024	30.09.2024	31.12.2023	31.12.2024 31.12.2023		ENDED
140.		Reviewed	Reviewed	Reviewed	Reviewed	Reviewed	31.03.2024 Audited
1	INTEREST EARNED (a+b+c+d)	293114	273895	249103	832236	721271	96939
	a).Interest/ discount on advances/bills	210439	189333	178451	582724	518344	69512
	b) Income on Investments	80141	79890	68271	241326	196179	26560
	c) Interest on Balances with RBI & Other Inter Bank Funds	618	378	633	1243	1624	220
	d) Others	1916	3794	1748	6943	5124	646
2	Other Income	33823	35891	36168	89089	80852	12214
3	TOTAL INCOME (1+2)	326937	309786	285271	921325	802123	109154
4	Interest Expended	199238	186610	175175	566072	506099	68529
5	Operating Expenses (i)+(ii)	79301	77381	82397	229400	216565	29315
	i) Employees Cost	49275	49330	54767	144629	143126	19442
	ii) Other Operating Expenses	30026	28051	27630	84771	73439	9873
6	TOTAL EXPENDITURE (4+5) (excluding Provisions & Contingencies)	278539	263991	257572	795472	722664	97845
7	Operating Profit before Provisions & Contingencies (3-6)	48398	45795	27699	125853	79459	11309
8	Provisions (other than tax) and Contingencies	10933	15064	9629	36335	8440	1939
	Of Which Provisions for Non-Performing Assets	9629	9150	(31991)	(14835)	(29018)	(1788)
9	Exceptional Items	0	0	0	0	0	
10	Profit (+)/ Loss (-) from Ordinary Activities before tax (7-8-9)	37465	30731	18070	89518	71019	9369
11	Tax Expense	9269	6772	6639	19213	25412	3415
12	Net Profit (+)/ Loss (-) from Ordinary Activities after tax (10-11)	28196	23959	11431	70305	45607	5954
13	Extraordinary items (net of tax expense)	0	0	0	0	0	
14	Net Profit (+)/ Loss (-) for the period (12-13)	28196	23959	11431	70305	45607	5954
15	Paid-up Equity Share Capital (Face Value Rs.10/-)	677779	677779	677779	677779	677779	6777?
16	Reserves excluding Revaluation Reserve (as per Balance Sheet of previous accounting year)		. 6 1 2				76892
17	Analytical Ratios	IOXAICE STATISTICS	Long Della Contra Contra Contra		log sole of the second s	De Variate School State	
	(I). Percentage of shares held by Government of India	98.25	98.25	98.25	98.25	98.25	98.2
	(ii) Capital Adequacy Ratio (Basel III)	15.95	16.89	16.13	15.95	16.13	17.1
	a). CET 1 Ratio	14.04	14.55	13.75	14.04	13.75	14.7
	b). Additicnal Tier 1 Ratio	0	0	0	0	0	
	(iii) Earning per share (of Rs.10/- each) (Not Annualised) (Rs.)	0	0		0		
	 (a) Basic and diluted EPS before Extraordinary items (net of tax expense) for the period, for the year to date and for the 						
	previous year (not annualized) (b) Basic and diluted EPS after Extraordinary items for the	0.42	0.35	0.17	1.04	0.67	0.8
	period, for the year to date and for the previous year (not annualized)	0.42	0.35	0.17	1.04	0.67	0.8
	(iv) NPA Ratios	2		2 12			
	(a) Amount of Gross Non-Performing Assets	367581	383542	475923	367581	475923	46653
	(b) Amount of Net Non-Performing Assets	116886	129394	144377	116886	144377	13504
	(c) % of Gross NPAs	3.83	4.21	5.70	3.83	5.70	5.4
	(d) % of Net NPAs	1.25	1.46	1.80	1.25	1.80	1.6
	(v) Return on Assets (Annualised)	0.73	0.65	0.31	0.63	0.42	0.4
	(vi) Outstanding redeemable Preference shares (quantity and value)	Nil	Nil	Nil	Nil	Nil	Nil
	(vii) Capital redemption reserve /debenture redemption reserve	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
	(viii) Net worth*	923441	892067	745351	923441	745351	78357
	(ix) Paid up Debt Capital/Outstanding Debt**	609675	263716	199848	609675	199848	24338
	(x) Debt Equity Ratio** (Borrowings/Net worth)	0.66	0.30	0.27	0.66	0.27	0.3
	(xi) Total Debts to Total Assets (Borrowings/Total Assets)	0.04	0.02	0.01	0.04	0.01	0.0
	(xii) Operating Margin % (Operating Profit/Total Income)	14.80	14.78	9.71	13.66	9.91	10.3
	(xiii) Net Profit Margin % (Net Profit after tax/Total Income)	8.62	7.73	4.01	7.63	5.69	5.











Unaudited Financial R	esults for the Quarter /	Nine Months ended	31st December, 2024
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		C	QUARTER ENDED			NINE MONTHS ENDED	
SI. No.	Particulars	31.12.2024	30.09.2024	31.12.2023	31.12.2024	31.12.2023	ENDED 31.03.2024
110.		Reviewed	Reviewed	Reviewed	Reviewed	Reviewed	Audited
18	Public Shareholding:						
	No. of Shares	118735354	118735354	118735354	118735354	118735354	118735354
	Percentage of Shareholding	1.75	1.75	1.75	1.75	1.75	1.75
19	Promoters and promoter group Share holding						
	(a) Pledged/ Encumbered						
	Number of shares	Nil	Nil	Nil	Nil	Nil	Nil
	Percentage of Shares (as a % of the total shareholding of promoter and promoter group)	Nil	Nil	Nil	Nil	Nil	Nil
	Percentage of Shares (as a % of the total share capital of the Bank)	Nil	Nil	Nil	Nil	Nil	Nil
	(b) Non-encumbered						
	Number of shares	6659051093	6659051093	6659051093	6659051093	6659051093	6659051093
	Percentage of Shares (as a % of the total shareholding of promoter and promoter group)	100.00	100.00	100.00	100.00	100.00	100.00
	Percentage of Shares (as a % of the total share capital of the Bank)	98.25	98.25	98.25	98.25	98.25	98.25

* After considering the impact of valuing the Non-Interest bearing Recapitalization Bonds at Fair Value for the Quarter / Nine Months ended 31.12.2023 and Year ended 31.03.2024.

**Total debts represent total borrowings of the Bank. Borrowings represent debts due for more than one year

Note: Disclosure of Interest service coverage ratio and Debt service coverage ratio is not applicable to Bank.

Segment Reporting:

A: BUSINESS SEGMENT:

For the purpose of segment reporting in terms of AS-17 of ICAI and as prescribed in RBI guidelines, the business of the Bank has been classified into four segments i.e. a) Treasury Operations b) Corporate/wholesale Banking, c) Retail Banking and d) Other Banking Operations. Further, Retail Banking Segment has been sub-divided into Digital Banking and Other Retail Banking Segment. Segmental Revenue, Results, Assets & Liabilities in respect of Corporate / Wholesale and Retail Banking segment have been bifurcated on the basis of exposure to these segments. Assets and Liabilities, wherever directly related to segments have been accordingly allocated to segments and wherever not directly related have been allocated on the basis of pro-rata segment revenue.

					(R	upees in Lacs)
		Quarter Ende	d	Nine Mon	ths ended	Year ended
Particulars	31.12.2024 (Reviewed)	30.09.2024 (Reviewed)	31.12.2023 (Reviewed)	31.12.2024 (Reviewed)	31.12.2023 (Reviewed)	31.03.2024 (Audited)
1. Segment Revenue						
a) Treasury	86998	94600	62239	266331	195349	266742
b) Corporate/ Wholesale Banking	163108	96177	119142	353960	293491	396780
c) Retail Banking	76217	118220	103123	299046	311356	425175
- Digital Banking	7	7	6	20	11	17
- Other Retail Banking	76210	118213	103117	299026	311345	425158
d) Other Banking Operations	614	789	767	1988	1927	2848
Total	326937	309786	285271	921325	802123	1091545
2. Segment Result						
a) Treasury	17021	30044	6952	66252	40179	55336
b) Corporate/ Wholesale Banking	26064	13962	24549	55500	48140	68349
c) Retail Banking	12522	17270	22893	46890	51069	73240
- Digital Banking	(39)	(40)	(28)	(104)	(93)	(136)
- Other Retail Banking	12561	17310	22921	46994	51162	73376
d) Other Banking Operations	614	788	767	1988	1927	2848
Total	56221	62064	55161	170630	141315	199773
3. Unallocated Expenses	7823	16269	27462	44777	61856	86679
4. Operating Profit	48398	45795	27699	125853	79459	113094
5. Provisions & Contingencies	10933	15064	9629	36335	8440	19396
6. Income Tax	9269	6772	6639	19213	25412	34156
7. Extra Ordinary Items	0	0	0	0	0	0
8. Net Profit	28196	23959	11431	70305	45607	59542











		Quarter Ende	b	Nine Mon	ths ended	Year ended	
Particulars	31.12.2024 (Reviewed)	30.09.2024 (Reviewed)	31.12.2023 (Reviewed)	31.12.2024 (Reviewed)	31.12.2023 (Reviewed)	31.03.2024 (Audited)	
Other Information:	, , , , , ,						
9. Segment Assets							
a) Treasury	4681941	4560760	5061632	4681941	5061632	5036082	
b) Corporate/ Wholesale Banking	5758232	4605539	4433748	5758232	4433748	4538604	
c) Retail Banking	4864876	5377192	4703642	4864876	4703642	4863409	
- Digital Banking	251	234	168	251.00	168	158	
- Other Retail Banking	4864625	5376958	4703474	4864625	4703474	4863251	
d) Other Banking Operations	0	0	0	0	0	0	
e) Unallocated Assets	165719	284483	327119	165719	327119	327558	
Total Assets	15470768	14827974	14526141	15470768	14526141	14765653	
10. Segment Liabilities							
a) Treasury	4369336	4278813	4632093	4369336	4632093	4606925	
b) Corporate/ Wholesale Banking	5373766	4320825	4057493	5373766	4057493	4151841	
c) Retail Banking	4540057	5044775	4304483	4540057	4304483	4448967	
- Digital Banking	355	302	261	355	261	294	
- Other Retail Banking	4539702	5044473	4304222	4539702	4304222	4448673	
d) Other Banking Operations	0	0	0	0	0	0	
e) Unallocated Liabilities	9122	25886	8347	9122	8347	4577	
Total Liabilities	14292281	13670299	13002416	14292281	13002416	13212310	
Capital Employed							
a) Treasury	312605	281947	429539	312605	429539	429157	
b) Corporate/ Wholesale Banking	384466	284714	376255	384466	376255	386763	
c) Retail Banking	324819	332417	399159	324819	399159	414442	
- Digital Banking	(104)	(68)	(93)	(104)	(93)	(136)	
- Other Retail Banking	324923	332485	399252	324923	399252	414578	
d) Other Banking Operations	0	0	0	0	0	0	
e) Unallocated Liabilities	156597	258597	318772	156597	318772	322981	
Total Capital Employed	1178487	1157675	1523725	1178487	1523725	1553343	

B: GEOGRAPHIC SEGMENT: Since the Bank does not have any overseas branch, reporting under Geographic Segment is not applicable.

STATEMENT OF ASSETS AND LIABILITIES AS ON 31st DECEMBER, 2024

(Rs. in L				
Particulars	AS ON 31.12.2024 (Reviewed)	AS ON 31.12.2023 (Reviewed)	AS ON 31.03.2024 (Audited)	
CAPITAL & LIABILITIES				
Capital	677779	677779	677779	
Reserves & Surplus	500707	845946	875564	
Deposits	12739721	11835534	11940955	
Borrowings	1261191	881053	977086	
Other Liabilities & Provisions	291370	285829	294269	
Total	15470768	14526141	14765653	
ASSETS				
Cash & Balance with Reserve Bank of India	626929	621481	731246	
Balance with Banks & Money at call and short notice	82186	47140	7055	
Investments	4607160	4988128	4959916	
Advances	9348803	8032478	8273638	
Fixed Assets	169140	156407	175578	
Other Assets	636550	680507	618220	
Total	15470768	14526141	14765653	











NOTES FORMING PART OF THE UNAUDITED FINANCIAL RESULTS OF THE BANK FOR THE QUARTER AND NINE MONTHS ENDED 31ST DECEMBER 2024:

- The above financial results have been reviewed and approved by the Board of Directors of the Bank in their meeting held on 15th January, 2025. The same have been subjected to "Limited Review" by the Statutory Central Auditors of the Bank and are in line with the guidelines issued by the Reserve Bank of India and as per the requirements of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (as amended).
- 2. The above financial results for the quarter and nine months ended 31st December, 2024 have been prepared in accordance with Accounting Standard (AS) - 25 on Interim Financial Reporting issued by the Institute of Chartered Accountants of India (ICAI), following the same accounting policies and practices as those followed in the Annual Financial Statements for the year ended 31st March, 2024 except for the classification and valuation of investments which is as per the Master Direction No. RBI/DOR/2023-24/104 DOR.MRG.36/21.04.141/2023-24 on Classification, Valuation and Operation of Investment Portfolio of Commercial Banks (Directions), 2023 dated 12th September, 2023 issued by Reserve Bank of India and applicable from 01st April, 2024. While hitherto, the investment portfolio was classified under the Held to Maturity (HTM), Available for Sale (AFS) and Held for Trading (HFT) categories, the revised norms/framework bring in a principle-based classification of investment portfolio and a symmetric treatment of fair value gains and losses. In accordance with the revised framework and the Bank's Board Approved Policy, the Bank has classified its investment portfolio as on 01st April, 2024 under the categories of Held to Maturity (HTM), Available for Sale (AFS) and Fair Value Through Profit and Loss (FVTPL) with Held for Trading (HFT) as a sub-category of FVTPL and from that date, measures and values the investment portfolio under the revised framework. On transition to the framework on 01st April, 2024, the net difference of Rs.4,249.54 crore (debit), net of tax impact, between the revised carrying value and the previous carrying value of the investment portfolio has been adjusted / debited in the General Reserve in accordance with this framework. Also, the balances in Investment Reserve Account (IRA) as of 31st March, 2024 amounting to Rs.33.32 crore has been transferred to the Revenue/ General Reserve since Bank meets the minimum regulatory requirements of IFR. Further, there is increase in income on investments by Rs.113.17 crores and Rs.342.59 crores during the quarter and nine months ended 31st December, 2024 respectively and by Rs.115.34 crores during the quarter ended 30th September, 2024, and decrease in AFS Reserve by Rs.73.84 crores during the current quarter ended 31st December, 2024, increase in AFS Reserve by Rs.83.07 crores during the previous quarter ended 30th September, 2024 and net increase in AFS Reserve by Rs.26.91 crores during the nine months ended 31st December, 2024.
- 3. The financial results have been arrived at after considering provisions for Non-Performing Assets, Non-Performing Investments, Standard Assets (including Stress sector), Restructured Assets, provision for exposure to entities with Unhedged Foreign Currency exposure, Amortization of premium relating to Investment under 'Held to Maturity' category, Depreciation on Investments and on Fixed Assets, Employee Benefits, Income tax including Deferred Tax on the basis of extant guidelines issued by Reserve Bank of India and applicable accounting standards issued by the Institute of Chartered Accountants of India.
- 4. Provision for Depreciation on Fixed assets, Employee Benefits, Income Tax (Including Deferred Tax) and other usual and necessary provisions have been made on estimated basis, which are subject to adjustment, if any at the year end.
- 5. The Government of India, vide the Taxation Laws (Amendment) Act, 2019, inserted section 115BAA in the Income Tax Act 1961 w.e.f. 01st April, 2019. The Bank has evaluated the options available under section 115BAA of the Income Tax Act, 1961 and opted to continue to recognize the Taxes on Income as per the earlier provisions.
- 6. Review of Deferred Tax Assets has been carried out based on Bank's management estimate of possible tax benefits against timing difference in accordance with Accounting Standard 22 "Accounting for Taxes on income" issued by The Institute of Chartered Accountants of India and Net Deferred Tax Assets of Rs.1,428.11 crore is recognized as at 31st December, 2024 (Rs.1,658.28 crore as at 31st December, 2023).











- As per the Reserve Bank of India directions for initiating Insolvency Process- Provisioning Norms, vide letter No. DBR. No. BP:15199/21.04.048/2016-17 dated 23rd June, 2017, and DBR.No.BP.1907/21.04.048/2017-18 dated 28th August, 2017, the Bank is holding the provisioning of Rs.435.70 crore as on 31st December, 2024 (31st December 2023 Rs.230.25 crore) as against the balance outstanding of Rs.435.70 crore as on 31st December, 2024 (31st December 2023 Rs.230.25 crore) in respect of NPA borrowal accounts referred in aforesaid circular.
- In accordance with the RBI Circular. No. DBR.No.BP.BC.18/21.04.048/2018-19 dated 01st January, 2019 DOR.No.BP.BC.34/21.4.048/2019-20 dated 11th February, 2020 and DOR.NO.BP.BC/4/21.04.048/2020-21 dated 06th August, 2020 on "Micro, Small and Medium enterprises (MSMEs) sector Restructuring of Advances", the details of MSME restructured accounts are as under:

As on	No. of Accounts Restructured	Amount (Rs. in crore)	Provision held (Rs. in crore)
31 st December, 2024	3455	182.98	69.64
30 th September, 2024	3639	198.13	58.55
31 st March, 2024	4061	236.96	54.10
31 st December, 2023	4626	278.51	57.75

9. In accordance with the RBI Cir. No. DOR.STR.REC.11/21.04.048/2021-22 dated 05.05.2021 on "Resolution Framework – 2.0: Resolution of Covid – 19 related stress of Individuals and Small Business", RBI Cir. No. DOR.STR.REC.12/21.04.048/2021-22 dated 05.05.2021 and RBI Cir. No. DOR.STR.REC.21/21.04.048/2021-22 dated 04.06.2021 on "Resolution Framework 2.0 – Resolution of Covid – 19 related stress of Micro, Small and Medium Enterprises (MSMEs)", the number of borrower accounts where modification were sanctioned and implemented and the aggregate exposure to such borrowers are as under:-

As on	No. of Accounts Restructured	Amount (Rs. in crore)	Provision held (Rs. in crore)
31 st December, 2024	5795	661.83	107.64
30 th September, 2024	6085	700.61	107.96
31 st March, 2024	6642	786.84	120.40
31 st December, 2023	7060	852.11	117.72

- 10. The Bank is carrying a provision of Rs.8.75 crore as on 31st December, 2024 being 5% of outstanding food credit availed by the State Government of Punjab as per the RBI letter no. DBR (BP) No. 7201. 21.04.132 /2017-18 dated 08.02.2018 issued to SBI, the lead bank.
- 11. The Bank holds an additional standard asset provision in respect of 01 borrower's accounts, in terms of RBI Circular DBR No. BP.BC.45/21.04.048/2018-19 dated 7th June, 2019 on "Prudential Framework for Resolution of Stressed Assets" amounting to Rs.23.57 crore. The details are as under:-

				(Rs. in crore)
Amount of	Amount of Loans	Amount of Loans as	Addl. Provision required	Provision out of
Loans Impacted	to be classified as	on 31.12.2024, out of	for loans covered under	(D) made as on
by RBI Circular	NPA	(B) classified as NPA	RBI Circular	31.12.2024
(A)	(B)	(C)	(D)	(E)
66.59	-	-	23.57	23.57

- 12. (i) In accordance with RBI circular no.DOR.STR.REC.51/21.04.048/2021-22 dated 24th September, 2021; in respect of the details of loans transferred/acquired during the period ended 31st December, 2024 are given below:
 - (a) The Bank has not transferred and acquired any Special Mention Account (SMA) during the quarter and nine months ended 31st December, 2024.











(b) Details of transferred and acquired NPA accounts during the quarter and nine months ended 31st December, 2024:

(Rs. in crores)

	To ARCs	To permitted transferees	To other transferees (please specify)
No: of accounts	1	NIL	NIL
Aggregate principal outstanding of loans transferred	40.13	NIL	NIL
Weighted average residual tenor of the loans transferred	NA	NIL	NIL
Net book value of loans transferred (at the time of transfer)	40.13	NIL	NIL
Aggregate consideration	21.88	NIL	NIL
Additional consideration realized in respect of accounts transferred in earlier years	NIL	NIL	NIL
Details of loans acquired during the year			
From SCBs, RRBs, Co-operative banks, AIFIs, SFBs and Finance Companies (HFCs)	NBFCs inclue	ding Housing	From ARCs
Aggregate principal outstanding of loans acquired		NIL	NIL
Aggregate consideration paid		NIL	NIL
Weighted average residual tenor of loans acquired	NIL		NIL

(ii) Details of Standard assets acquired through assignment/ Novation and Loan Participation

Co-Lending:

		(Rs. in crores)
Particulars	Quarter ended 31.12.2024	Period ended 31.12.2024 (Cumulative)
No. of accounts purchased	1508	16309
Aggregate Outstanding (amount in crore)	358.69	3122.44
Weighted average maturity (in months)	176.67	175.76
Weighted average holding period (in months)	1.13	11.99
Retention of beneficial economic interest	MSME- 20% HL- 25%	MSME- 20% HL- 25%
Coverage of tangible security coverage (%)	198.00	190.60

Pool Buy-out:

			(R	s. in crores)
Particulars	Corporate	Agri	Retail	MSME
Mode of Acquisition	Dir	ect Assignment	t (as on 31-12-202	4)
Aggregate Principal outstanding of loans acquired (in crore)	-	-	2,873.43	288.79
Weighted Average Residual Maturity (in years)	-	-	16.41	14.85
Weighted Average Holding Period by Originator (in years)	-	n † 1	3.25	1.56
Tangible Security Coverage (%)	-	-	184.08	166.05
Rating wise distribution of Loans acquired by Value	-	-	-	-

The loans acquired are not rated as these are to non-corporate borrowers.











(iii) The distribution of the Security Receipts (SRs) held across the various categories of Recovery Ratings assigned to such SRs by the credit rating agencies are given below:

(Do in anoma)

				(Rs. in crores)
Recovery Rating Band	Book Value as on 31.12.2024	Book Value as on 30.09.2024	Book Value as on 31.03.2024	Book Value as on 31.12.2023
RR1+	Nil	Nil	Nil	Nil
RR1	Nil	Nil	21.37	22.96
RR2	Nil	Nil	Nil	Nil
RR3	Nil	Nil	Nil	Nil
RR4	Nil	Nil	Nil	Nil
RR5	Nil	Nil	Nil	Nil
Rating Withdrawn	Nil	Nil	Nil	73.67
Unrated	Nil	Nil	68.06	Nil
Total	Nil	Nil	89.43	96.63

 In terms of RBI circular-RBI/2015-16/376/DBR no.BP.BC.92/21.04.048/2015-16 dated 18th April, 2016 details of Fraud and Provision are as below:-

During the quarter and nine months ended 31st December, 2024, Bank has reported Nil cases of Non-Borrowal frauds and 10 cases of Borrowal frauds to Reserve Bank of India. The total amount reported to Reserve Bank of India for the quarter and nine months ended 31st December, 2024 is Rs.264.79 crore, out of which Rs.264.79 crore is extent of Loss to the Bank. Bank has made full provision for the same.

					(Rs. in crore)
Particulars	Quarter ended on 31.12.2024	Nine Months ended on 31.12.2024	Quarter ended on 30.09.2024	Year ended on 31.03.2024	Quarter ended on 31.12.2023
Number of frauds reported	10	240	101	79	65
Amount involved in fraud	264.79	835.96	93.30	42.42	0.33
Amount of provision made for such frauds	264.79	544.43	92.87	34.46	0

- 14. In terms of Reserve Bank of India (RBI) circular, Banks are required to make Pillar 3 disclosures including Leverage ratio, Liquidity coverage ratio and Net Stable funding Ratio (NSFR) under the Basel III capital regulations. These Disclosures will be made available on the Bank's website: https://punjabandsindbank.co.in. The Disclosures have not been subjected to review by Statutory Central Auditors of the Bank.
- 15. The Bank has estimated the liability towards Unhedged Foreign Currency Exposure in terms of RBI (Unhedged Foreign Currency Exposure) Directions, 2022 vide circular DOR.MRG.REC.76/00-00-007/2022-23 dated 11th October, 2022 and is holding a provision of Rs.0.07 crore as on 31st December, 2024 (30th September, 2024 Rs.0.33 crore, 31st March, 2024 Rs.0.38 crore and 31st December, 2023 Rs.0.30 crore).
- 16. The Bank has funded exposure of Rs.123.84 crore in 02 borrower's accounts which are under litigation and respective adjudicating authorities have granted stay on downgrading. The Bank has made adequate provisions for the accounts.
- 17. The Provision Coverage Ratio (Including T.W.O) as at 31st December, 2024 works out to 89.53% (30th September, 2024 88.56%, 31st March, 2024 88.69% and 31st December, 2023 88.16%).











- 18. The estimated additional Pension liability on account of revision in family pension was Rs.236.84 crore. RBI vide its Circular RBI/2021-22/105 DOR.ACC.REC.57/21.04.018/2021-22 dated 4th October, 2021, has permitted all member Banks of Indian Banks Association to amortize the said additional liability over a period not exceeding five years beginning with the financial year ending 31st March, 2022, subject to a minimum of 1/5th of the total amount being charged every year. The Bank is amortizing the said liability over a period, not exceeding 5 years commencing from the financial year ended 31st March, 2022, subject to a minimum of Rs.47.37 crore every year. Balance unamortized amount as on 31st March, 2024 was Rs.94.73 crore. Accordingly, the Bank has charged 1/4th amount of Rs.47.37 crore per quarter to the Profit and Loss Account i.e. Rs.12.00 crore for the previous quarter ended 31st December, 2024, Rs 12.00 crore and Rs.36.00 crore for the current quarter and nine months ended 31st December, 2024 respectively and the balance unamortized amount of Rs.58.73 crore has been carried forward. Had the Bank charged the entire additional liability to the Profit and Loss Account, the net profit (after tax) for the quarter and nine months ended 31st December, 2024 would have been lower by Rs.38.21 crore.
- 19. In terms of RBI Circular DOR.AUT.REC.12/22.01.001/2022-23 dated 07th April, 2022 on establishment of Digital Banking Units (DBUs) and reporting of Digital Banking Segment as a Sub- segment of Retail Banking Segment and as per Accounting Standard 17 "Segment Reporting", Bank has reported Digital Banking Segment as a sub segment of Retail Banking Segment.
- 20. Details of Investors complaints received and disposed-off during the quarter and nine months ended 31st December, 2024:

Beginning	Received	Disposed off	Lying unresolved
0	1	1	0

- 21. During the quarter, Bank has raised Rs.3,000 crore by way of issue of Long Term Infrastructure Bonds on private placement basis
- 22. The Bank has purchased Priority Sector lending Certificate (PSLC) Agriculture of Rs.200 crore and Rs.1,095 crores during the quarter and nine months ended 31st December, 2024 respectively and Priority Sector lending Certificate (PSLC) Small & Marginal Farmers of Rs.800 crore during the quarter / nine months ended 31st December 2024.
- 23. As per the Accounting Policy till 31st March, 2024, the recovery in non-performing assets (other than the cases covered under special schemes introduced by RBI, Strategic Debt Restructuring, Flexible Structuring of Long-Term Project Loans, Change in Ownership of Borrowing Entities, Outside Strategic Debt Restructuring Scheme where subsequently the account turns NPA) was appropriated first towards principal and thereafter towards interest and charges. To ensure better financial presentation and in consonance with industry practice, the Bank during the quarter ended 30th September, 2024 has changed the said practice retrospectively from the beginning of the current year i.e. from 01st April, 2024 and accordingly has appropriated the recovery in the non-performing assets (NPA) first towards Charges, Costs etc., thereafter towards Interest irregularities /accrued Interest and then towards the principal. The same has resulted in an increase in interest income by Rs.14.27 crore and Rs.31.85 crore for the quarter and nine months ended 31st December, 2024 respectively and increase in NPA and provision by Rs 31.85 crore and Rs 15.23 crore respectively as at 31st December, 2024.
- 24. The Bank does not have any subsidiary/associate/joint venture as on 31st December, 2024, as such consolidated financial statements are not applicable to the Bank.











S Arnab Goswamy CHIEF FINANCIAL OFFICER Raieev **EXECUTIVE DIRECTOR**

EXECUTIVE DIRECTOR

Swartin Kurraz Salan MANAGING DIRÉCTOR & CEO

As per our Limited Review Report of even date attached

S. P. CHOPRA & CO. **GUPTA SHARMA & ASSOCIATES** Chartered Accountants **Chartered Accountants** FRN: 000346N FRN: 001466N UDIN: 250925298MH 29123 UDIN: 250 872 62 BAR 0 8231 JAMMU NEW DELHI (CA. Pawan K. Gupta) (CA. Vinay Saraf) Partner Partner RED A ACCO M. No. 092529 M. No. 087262 O. P. TOTLA & CO. NBS & CO. Chartered Accountants Chartered Accountants FRN: 000734C FRN: 110100W UDIN: 254291008MKS07 UDIN: 25046940B MUMBA omai INDORE (CA. Pradeep/Shetty) (CA. Naveen Kumar Soman Partner Partner DACC M. No. 429100 M. No. 046940

Dated: January 15, 2025 Place: New Delhi

पंजाब एण्ड सिंध बैंक (भारत सरकार का उपक्रम) प्र.का.लेखा एवं लेखा परीक्षा विभाग ईमेल: ho.accts@psb.co.in

ੴਸ਼੍ਰੀ ਵਾਹਿਗੁਰੂ ਜੀ ਕੀ ਫ਼ਤਹਿ Punjab & Sind Bank

(A Government Of India Undertaking) H.O. Accounts & Audit Deptt. E-mail: ho.accts@psb.co.in

STATEMENT OF DEVIATION / VARIATION IN UTILISATION OF FUNDS

Name of l	isted entity			Punjab & Sind Bank				
Mode of r	aising funds			Public Issues/Rights Issues/Preferentia Issues/QIP/Others				
Date of Ra	aising Funds			NA for Q3	FY 2024-25			
Amount ra	aised			NIL for Q3	FY 2024-25			
Report file	ed for Quarter	ended		December 3	1, 2024			
Monitorin	ig Agency			NA for Q3	FY 2024-25			
Monitorin	g Agency nar	ne, if applicat	ole	NA for Q3	FY 2024-25			
If there is raised	deviation / va	ariation in the	use of funds	NA for Q3	FY 2024-25			
•		e is pursuant t	•	ΝA				
		bjects, which w	was approved					
by the sha								
	te of sharehol			ΝΛ				
		iation/ variation		NA				
Comment	s of the Audit	Committee a	fter review	NIL				
	s of the audito			NIL				
.,		s have been ra		NA				
	re has been a	deviation, in t	he following					
table								
Original Object	Modified Object, if any	Original Allocation	Modified allocation, if any	Funds Utilized	Amount of Deviation/ Variation for the quarter according to applicable object	if any		
NA	NΛ	NA	NA	NΛ	ΝΛ	NA		

For Punjab & Sind Bank

(Arnab Goswamy) Chief Financial Officer



Place: New Delhi Dated: 15.01.2025

पंजाब एण्ड सिंध बैंक (भारत सरकार का उपक्रम) प्र.का.लेखा एवं लेखा परीक्षा विभाग

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(A Government Of India Undertaking) H.O. Accounts & Audit Deptt. E-mail: ho.accts@psb.co.in

PUNJAB & SIND BANK

A. Statement of utilization of issue proceeds:

Name of the	ISIN	Mode of Fund Raising	Type of instrument	Date of	Amount Raised	Funds utilized	Any deviation	If 8 is Yes, then specify	Remarks, if any
Issuer		(Public issues/ Private placement)		raising funds			(Yes/ No)	the purpose of for which the funds were utilized	
1	2		4	5	6	7	8	9	10
Punjab & Sind Bank	INE608A080 58	Private Placement	Long Term (Infra) Bonds	20-12- 2024	3000	Yes	No	NΛ	NΛ

B. Statement of deviation/ variation in use of Issue proceeds:

Name of I	listed entity		Punjab & Sind Bank					
Mode of I	Fund Raising			Private Placement				
Type of I	nstrument					Non-Convertible See	urities	
Date of R	aising Funds					As above		
Amount r	aised					As above		
	ed for Quarte					December 31, 2024		
Is there a l	Deviation / Va	riation in use o	of funds raised?	?		No		
	any approval he prospectu:	•	o vary the objo ment?	ects of the i	ssue	Not Applicable		
If yes, det	tails of the ap	proval so req	juired?			Not Applicable		
Date of ap	proval					Not Applicable		
Explanatio	on for the Devi	ation / Variati	on			Not Applicable		
Comment	ts of the Audi	t Committee	after review			Not Applicable		
Comment	ts of the audit	ors, if any				Not Applicable		
	or which function viation, in the		raised and wh able	ere there ha	15	Not Applicable		
Original Object	Modified Object, if any	if Original allocation, I funds Variation for the Utilized according to			tion for the half year	Remarks if any		
NΛ	ΝΛ	NΛ	ΝΛ	NΛ		NΛ	NΛ	

Deviation could mean:

(a) Deviation in the objects or purposes for which the funds have been raised

(b) Deviation in the amount of funds actually utilized as against what was originally disclosed.

For Punjab & Sind Bank

(Arnab Goswamy) Chief Financial Officer



Place: New Delhi Dated: 15.01.2025 **S. P. CHOPRA & CO.** Chartered Accountants

Unit No. 1505, Astralis Supernova, Sector-94, Noida, UP, 201301 Tel: 91-11-23313495-6 GSTN: 09AACFS2450C1ZK ICAI Regn.No.000346N Web Site: www.spchopra.in E-mail: <u>spc1949@spchopra.in</u>

Certificate on maintenance of security cover and compliance with the covenants as per the Offer Document/Information Memorandum pursuant to Regulation 54 (2) & (3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended

To The Board of Directors of Punjab & Sind Bank,

1. Introduction

As required by Regulation 54 (2) & (3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (the "SEBI Guidelines"), **Punjab & Sind Bank** ("the Bank") desires a certificate regarding maintenance of security cover as on December 31, 2024, including compliance with the general covenants of such Offer Document/Information Memorandum in respect of listed non-convertible debt securities issued by the Bank.

As at December 31, 2024, Bank has outstanding listed non-convertible debt securities which are unsecured in nature amounting to Rs.4237.30 Cr as detailed below:

ISIN	Private Placement / Public Issue	Secured / Unsecured	Issued Amount (Rs Crore)
INE608A08017	Private Placement	Unsecured	500.00
INE608A08033	Private Placement	Unsecured	237.30
INE608A08041	Private Placement	Unsecured	500.00
INE608A08058	Private Placement	Unsecured	3000.00
Total			4237.30

2. Management's Responsibility

The Management of the Bank is responsible for:

- a. ensuring that maintenance of the security cover available is more than the cover required as per Offer Document / Information Memorandum in respect of listed non-convertible debt securities which are secured;
- b. accurate computation of security cover available for listed non-convertible debt securities which are secured based on Unaudited financial results of the Bank as on December 31, 2024;
- c. compliance with the covenants of the Offer Document/Information Memorandum in respect of listed non-convertible debt securities.



d. preparation and maintenance of proper accounting and other records and design, implementation and maintenance of adequate internal procedures / systems / processes / controls relevant to the creation and maintenance of the aforesaid records.

This responsibility includes ensuring that the relevant records provided to us for our examination are correct and complete.

3. Auditor's Responsibility

Based on our examination of the relevant records provided by the Bank, our responsibility is to provide limited assurance that security cover available, has been maintained in accordance with Offer Document / Information Memorandum in respect of secured listed non-convertible debt securities.

We conducted our examination in accordance with the 'Guidance Note on Reports or Certificates for Special Purposes' (Revised 2016) ("the Guidance Note"). The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India. Further, our scope of work did not involve performing audit tests for the purpose of expressing an opinion on the fairness or accuracy of any of the financial information or the financial statements of the Bank, taken as whole. We have not performed an audit, the objective of which would be the expression of an opinion on the financial statements, specified elements, accounts or items thereof for the purpose of this certificate. Accordingly, we do not express such an opinion.

We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality control for Firms that Perform Audits and Reviews of Historical Financial Information and Other Assurance and Related Service Engagements.

A limited assurance engagement includes performing procedures to obtain sufficient appropriate audit evidence on the reporting criteria mentioned above. The procedures selected depend on Auditor's judgement, including the assessment of the risks associated with reporting criteria.

The procedures performed in a limited assurance engagement varies in nature and timing from, and are less in extent than for, a reasonable assurance. Consequently, the level of assurance obtained in a limited assurance is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

4. Conclusion

Based on our examination and as per the information and explanation given to us, Bank has made the compliance of the covenants/terms of the issue of the listed debt securities (NCD's of Rs.4237.30 cr as at December 31, 2024). Further, as these bonds are unsecured the attached **Annexure-1** is NIL.

5. Restriction/Purpose on use

The Security cover certificate is being issued in consonance with SEBI Regulations and shall have no effect on the seniority of such instruments and all other terms and conditions



applicable for the issue of the bonds as specified by RBI Master Circular No DBR.No.BP.BC.1/21.06.202/2015-16 dated July 1, 2015 for Basel III compliant bonds / RBI Master Circular No DBR.No.BP.BC.4/21.06.001/2015-16 dated July 1, 2015 for Basel II compliant bonds as amended from time to time, and the terms of the issue have been complied by the Bank.

This Certificate has been issued at the specific request of the Bank pursuant to the requirements of above-mentioned SEBI Guidelines. It should not be used by any other person or for any other purpose. Accordingly, we do not accept or assume any liability or any duty of care or for any other purpose or to any other party to whom it is shown or into whose hands it may come without our prior consent in writing.

For S. P. Chopra & Co. Chartered Accountants Firm Regn. No. 000346N

PRA (Pawan K. Gupta) V DELHI Partner M. No. 092529 UDIN: 250925 MNZKA 4689

Place: New Delhi Date: 15.01.2025

Annexure I

Column A	Column B	Column C	Column D"	Column E ⁱⁱⁱ	Column F ^{rv}	Colum nG ^v	Column H ^{si}	Column Ivii	Column J	Column K	Column L	Column M	Column N	Column O
Particulars		Exclusive Charge	Exclus ive Charge	Passu	Pari- Passu Charge	Pari- Passu Charg e	Assets not offered as Security	Eliminatio n (amount in negative)	(Total C to H)	Ro	elated to only those ite	ems covered t	by thiscertificate	
	Descrip tionof asset for which this certific ate relate	Debt for which this certificatebe ing issued	Other Secure d Debt	Debt for which this certifica te being issued	Assets shared by pari passu debt holder (includes debt for which this certificate is issued & other debt with pari- passu charge)	Other assets on which there is pari- Passu charge (excludin g items covered in column F)		debt amount considered more than once (due to exclusive plus pari passu charge)		Market Value for Assets charged on Exclusi ve basis	Carrying /book value for exclusive charge assets where market value is not ascertainable or applicable (For Eg. Bank Balance, DSRA market value is not applicable)	Market Value for Pari passu charge Assets ^{vin} Relatin	Carrying value/book value for pari passu charge assets where market value is not ascertainable or applicable (For Eg. Bank Balance, DSRA market value is not applicable) g to Column F	Total Value(=K+L+M N)
	1	Book Value	Book Value	Yes/No	Book Value	Book Value	i i i i i i i i i i i i i i i i i i i	ALINA	Net Con					
ASSETS		÷	1											
Property, Plant andEquipment														
Capital Work- in- Progress	-					10								
Right of Use Assets						IU		AP	PL	IC	ABL			
Goodwill														
Intangible Assets														
Intangible Assets under Development											ODPR -			
Investments								NB & SIND	>		NEW DELHI	20		
	No. 1910-1910				4		Wa * EAS	Accounts & Audit Deptt (Shares Cel			EPED ACCOUNT	Sim		3

Loans		
Inventories		
Trade Receivables		
C a sh and Cash E q uivalents		
Bank Balances other than Cash and Cash Equivalents		
Others		
Total		
LIABILITIES		
Debtsecurities to which this certificate pertains	NOTAPPLICABLE	
Other debt sharing pari- passu charge with above debt		
Other Debt		
Subordinated debt	not to	
Borrowings	be filled	
Bank		
Debt Securities	HOPRA	
Others	IS & SIND &	
Trade payables	HD HD HA	
	AuditCerti (shares Cell) मित्रा (क्रेयर करा) मित्रा (क्रेयर करा)	

Lease Liabilities			
Provisions			
Others			
Total			
Cover on Book Value		NOT APPLICABLE	
Cover on Market Value ^{ix}			
	Exclusive Security Cover Ratio	Pari-Passu Security Cover Ratio	

- vⁱⁱ In order to match the liability amount with financials, it is necessary to eliminate the debt which has been counted more than once (included under exclusive charge column as also under pari passu). On the assets side, there shall not be elimination as there is no overlap.
- ^{viii} Assets which are considered at Market Value like Land, Building, Residential/Commercial Real Estate to be stated at Market Value. Other assets having charge to be stated at book value/Carrying Value.

ix The market value shall be calculated as per the total value of assets mentioned in Column O



¹ This column shall include book value of assets having exclusive charge and outstanding book value of debt for which this certificate is issued.

ⁱⁱ This column shall include book value of assets having exclusive charge and outstanding book value of all corresponding debt other than column C.

¹¹¹ This column shall include debt for which this certificate is issued having any pari passu charge - Mention Yes, else No.

^{iv} This column shall include a) book value of assets having pari-passu charge b) outstanding book value of debt for which this certificate is issued and c). other debt sharing pari- passu charge along with debt for which certificate is issued.

v This column shall include book value of all other assets having pari passu charge and outstanding book value of corresponding debt.

vi This column shall include all those assets which are not charged and shall include all unsecured borrowings including subordinated debt and shall include only those assets which are paid-for.