

## LODR norms of equity extended to debt listed entities: SEBI approves proposals in LODR

Heading	Provisions for equity-listed entities	Provisions for debt-listed entities	Proposed amendment & Rationale, if any
Financial Results (FR) approval and authentication	<b>Reg. 33(2)(a)&amp;(b) - Quarterly FR</b> (i) Approved by the Board (ii) Signed by <ul style="list-style-type: none"> <li>• Chairperson; or</li> <li>• MD; or</li> <li>• WTD; or</li> <li>• in absence of all of the above, any other director authorized by the Board.</li> </ul>	<b>Reg. 52(b) - Quarterly FR</b> (i) Taken on record by the Board (ii) Signed by MD or ED	Re. 52 (b) to be aligned with Reg. 33 (2) (a) & (b)  <b>Rationale:</b> To ensure parity
Disclosure of fraud/defaults and arrest to stock exchange	<b>Reg. 30 - Clause A.6 Part A of Schedule III</b> <ul style="list-style-type: none"> <li>• Fraud or defaults by LE or LE's Promoter, Director, KMP, SMP or Subsidiary</li> <li>• Arrest (whether occurred within India or abroad) of LE's KMP, SMP, Promoter, Director</li> </ul> <b>Fraud</b> - as defined in SEBI PFUTP Regulations <b>Default</b> - non- payment of the interest or principal amount in full on the date when the debt has become due and payable (i) Revolving facilities - default if the o/s balance continuously exceeds the limits for 30 days. (ii) Default which has or may have an impact on LE to be considered.	<b>Reg. 51 - Clause A.17 Part B of Schedule III</b> Fraud or defaults by LE or LE's <ul style="list-style-type: none"> <li>• Promoter or</li> <li>• KMP or</li> <li>• Director or</li> <li>• Employees</li> </ul> Arrest of <ul style="list-style-type: none"> <li>• KMP</li> <li>• Promoter</li> </ul>	Clause A.17 Part B to be aligned with Clause A.6 Part A of Schedule III.  <b>Rationale:</b> Both relate to fraud/ defaults/ arrest and therefore, should be aligned including definition of "fraud" and "default".
Timelines for Record Date prior intimation	<b>Reg. 42</b> (i) Within clear 7 Working Days ("WD") (ii) In case of right issue - clear 3WD	<b>Reg. 60(2) - Clear 7WD</b>	Timeline reduced from 7WD to 3WD
XBRL filings	<b>Reg. 36(4)</b> Filing to Stock Exchanges ("SE") in XBRL mode	(i) No guidance on format of filing to SE. (ii) Presently, SE requires entities to file in both XBRL and PDF format.	(i) All filing to SE to be filed in XBRL format, except FR (ii) Glide path to be given by SE for filing of FR  <b>Rationale:</b> Remove multiple filing requirement
ISIN limit relaxation for unlisted ISINs that are listed subsequently under Reg. 62A	-	<b>Reg. 62A</b> (i) LE to list all NCDs issued on/after January 01, 2024 mandatorily (ii) Option to list O/s NCDs as on December 31, 2023  <b>NCS Master Circular (Chapter VIII)</b> Maximum ISINs to mature in a FY - 14 (Applicable for ISINs issued April 01, 2023 onwards)	Unlisted ISIN (o/s on December 31, 2023) getting listed under Reg. 62A will not be counted for the ISIN limits.  <b>Rationale:</b> In absence of an exemption, this will act as a deterrent as the issuer will not choose to list and block ISINs for future financial years.

## Disclosure of DT Agreement & Consent Letter: SEBI approves proposals in NCS Regulations

Heading	Existing provisions in NCS Regulations	Proposed Amendment	Rationale
Disclosure of DTA	Schedule I (clause 3.3.32) - Following are to be disclosed in offer document: (i) Names of DTs (ii) Statement that DTs have given their consent for appointment (iii) Copy of consent letter	(i) Disclosure of Debenture Trustee Agreement (DTA) instead of consent letter in offer document (ii) DTA to be accessible by way of a QR Code/ web-link (iii) In case of GID & KID: Disclose consent letter in GID and DTA in respective KIDs (as QR/ web-link)	(i) Reg. 13 of DT Regulations provides DTs to enter into DTA with issuers (ii) DTA validates appointment of DT and not consent letter (iii) DTA is important and should be accessible by investor

