

2 December, 2020

BSE Limited

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Vedanta Limited

1st Floor, 'C' Wing, Unit 103, Corporate Avenue,
Atul Projects, Chakala, Andheri (East),
Mumbai, Maharashtra, 400093

E-mail: comp.sect@vedanta.co.in

Dear Sir/ Madam,

**Subject: Discrepancy in disclosure under Regulation 31 of SEBI (SAST) Regulations 2011.
Vedanta Ltd 500295**

The encumbrance over the shares of Vedanta Limited (held by Vedanta Resources Limited and its subsidiaries) which was disclosed pursuant to the disclosure dated September 22, 2020 (“**Disclosure**”) was released on October 13, 2020 and a disclosure regarding the such release of encumbrance was made on October 15, 2020.

Discrepancies:

1. Type of encumbrance not specified properly (pledge/ lien/ non disposal undertaking/ others)

VRL Response: The definition of the term ‘encumbrance’ under the SEBI SAST Regulations covers a wide range of actions and includes: (a) any restriction on the free and marketable title to shares, by whatever name called, whether executed directly or indirectly; (b) pledge, lien, negative lien, non-disposal undertaking; or (c) any covenant, transaction, condition or arrangement in the nature of encumbrance, by whatever name called, whether executed directly or indirectly.

Given that one or more conditions under the facility agreement were likely to fall within the scope of the aforesaid definition, therefore instead of stating the type of encumbrance in the column, a cross reference has been made to the note where it has been explained why disclosure has been made.

2. Name of the entity in whose favor shares are encumbered not specified properly.

VRL Response: As mentioned in the Disclosure, the encumbrance was created in favor of the Finance Parties. As the note specifies who all fall within the scope of “Finance Parties”, a cross reference to the note has been made in the column.



- a. Clarify the reason why no. of shares Pledge on 18/09/2020, Pre transaction Pledge transaction and Post transaction pledge shareholding are same

VRL Response: No pledge was created over the shares of Vedanta Limited. Please refer to our response to point no. 1 above. The reason why the number of shares were the same because further encumbrance was created on the same set of shares which were already encumbered.

4. Please rectify and submit revised disclosure with supporting letter stating details of revision made in revised disclosure under Regulation 31 of SEBI (SAST) Regulations 2011.

VRL Response: We request you to treat this email as the supporting letter explaining the disclosures made. In light of the clarification, we submit that the filing of the revised disclosure is not required. In any event, as mentioned above, the encumbrance disclosed in the Disclosure was released on October 13, 2020 and a disclosure regarding the same was made on October 15, 2020.

Kindly take the above on record.

Thanking you

Yours faithfully

For and on behalf of **Vedanta Resources Limited**
and its afore mentioned subsidiaries



Deepak Kumar
Company Secretary
Vedanta Resources Limited