

April 26, 2023

To,  
BSE Limited  
Corporate Relationship Department  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai - 400 001.

Dear Sir,

**Sub: Non-Applicability of Large Corporate criteria for the year ended 31<sup>st</sup> March, 2023.**

**Ref: SEBI Circular No. SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018 on "Fund Raising by Issuance of Debt Securities by Large Entities".**

We hereby confirm and undertake that Black Rose industries Limited ("the Company") is not a Large Corporate as per the criteria specified in para 2.2 of SEBI Circular: SEBI/HO/DDHS/CIR/P/2018/144 dated 26th November, 2018 for the year ended 31st March, 2023.

Accordingly, please find "Annexure A" and "Annexure B2" of the said Circular for the financial year 2022-2023 enclosed herewith.

You are requested to take the above information in your records.

**For Black Rose Industries Limited**

**Harshita Shetty**  
**Company Secretary and Compliance**  
**Officer**  
**Tel: +91 22 4333 7200**  
**E-mail: investor@blackrosechemicals.com**

**For Black Rose Industries Limited**

**Ratan Agrawal**  
**Chief Financial Officer**  
**Tel: +91 22 4333 7200**  
**E-mail: ratan@texbrex.com**

**Black Rose Industries Ltd.**

145/A, Mittal Towers, Nariman Point, Mumbai - 400 021, INDIA

Tel.: +91 22 4333 7200 / 2282 4075 | Fax: +91 22 2287 3022

E-mail: investor@blackrosechemicals.com | Website: www.blackrosechemicals.com

CIN No.: L17120MH1990PLC054828

Factory: Shree Laxmi Co-op. Industrial Estate Ltd., Hatkanangle, Dist. Kolhapur, Maharashtra, INDIA

## Initial Disclosure

Sr. No.	Particulars	Details
1.	Name of the Company	Black Rose Industries Limited
2.	CIN	L17120MH1990PLC054828
3.	Outstanding borrowing of company as on 31 <sup>st</sup> March 2023, as applicable (in Rs Cr)	₹ 0.49 Crore
4.	Highest Credit Rating During the previous FY along with name of the Credit Rating Agency	CRISIL BBB+/ Stable – CRISIL Limited
5.	Name of Stock Exchange# in which the fine shall be paid, in case of shortfall in the required borrowing under the framework	BSE Limited

We confirm that we are **not a Large Corporate** as per the applicability criteria given under the SEBI circular SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018.

**For Black Rose Industries Limited**

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**Harshita Shetty**  
**Company Secretary and Compliance Officer**

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**Chief Financial Officer**

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#-In terms para of 3.2(ii) of the circular, beginning F.Y 2022, in the event of shortfall in the mandatory borrowing through debt securities, a fine of 0.2% of the shortfall shall be levied by Stock Exchanges at the end of the two-year block period. Therefore, an entity identified as LC shall provide, in its initial disclosure for a financial year, the name of Stock Exchange to which it would pay the fine in case of shortfall in the mandatory borrowing through debt markets.

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**Format of the Annual Disclosure to be made by an entity identified as a LC  
(To be submitted to the Stock Exchange(s) within 45 days of the end of the FY)  
(Applicable from FY 2022 onwards)**

1. Name of the Company: Black Rose Industries Limited
2. CIN: L17120MH1990PLC054828
3. Report filed for FY: 2022-23
4. Details of current block (all figures in Crores)

Sr. No.	Particulars	Details
i.	2-year block period (Specify financial years)	2021-22 2022-23
ii.	Incremental borrowing done in FY (T) <b>(a)</b>	Not applicable
iii.	Mandatory borrowing to be done through debt securities in FY (T) <b>(b) = (25% of a)</b>	Not applicable
iv.	Actual borrowing done through debt securities in FY (T) <b>(c)</b>	Not applicable
v.	Shortfall in the borrowing through debt securities, if any, for FY (T-1) carried forward to FY (T) <b>(d)</b>	Not applicable
vi.	Quantum of (d), which has been met from (c) <b>(e)</b>	Not applicable
vii.	Shortfall, if any, in the mandatory borrowing through debt securities for FY (T) {after adjusting for any shortfall in borrowing for FY (T-1) which was carried forward to FY (T)} <b>(f) = (b)-[(c)-(e)]</b> <b>{If the calculated value is zero or negative, write "nil"}</b>	Not applicable

5. Details of penalty to be paid, if any, in respect to previous block (all figures in Rs. crore):

Sr. No.	Particulars	Details
1.	2-year block period (Specify financial years)	2021-22, 2022-23
2.	Amount of fine to be paid for the block, if applicable <b>Fine = 0.2% of {(d)-(e)}<sup>#</sup></b>	Not applicable

**For Black Rose Industries Limited**

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