

November 11, 2024

To
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai- 400 001
Scrip Code: 512008

Sub.: Monitoring Agency Report on the utilization of proceeds raised through preferential issue, for quarter ended 30th September, 2024.

Dear Sir/Ma'am,

Pursuant to Regulation 32(6) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with Regulation 162A of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("SEBI ICDR Regulations"), please find enclosed herewith Monitoring Agency Report issued by CARE Ratings Limited, in respect of utilization of proceeds raised through the preferential issue of equity shares to non-promoters, for the quarter ended 30th September, 2024.

Kindly take the same on record.

Thanking You,
For EFC (I) Limited

Aman Gupta
Company Secretary

Encl.: As above

EFC (I) Limited

Regd. Office: 6th Floor, VB Capitol Building, Range Hill Road, Opp. Hotel Symphony, Bhoslenagar, Shivajinagar,
Pune-411007, Maharashtra | CIN: L74110PN1984PLC216407

Tel.: 020 3502 6526 | Email Id: compliance@efclimited.in | Website: www.efclimited.in

Monitoring Agency Report



No.CARE/HO/GEN/2024-25/1088

**The Board of Directors
EFC(I) Limited**

6th Floor, VB capitol building, Range Hill Road,
Opp. Hotel Symphony, Bhoslenagar, Shivajinagar,
Pune – 411007, Maharashtra, India.

November 11, 2024

Dear Sir/Ma'am,

Monitoring Agency Report for the quarter ended September 30, 2024 - in relation to Preferential issue of EFC(I) Limited ("the Company")

We write in our capacity of Monitoring Agency for the Preferential Issue for the amount aggregating to Rs. 242.44 crore of the Company and refer to our duties cast under 162(A) of the Securities & Exchange Board of India (Issue of Capital & Disclosure Requirements) Regulations.

In this connection, we are enclosing the Monitoring Agency Report for the quarter ended September 30, 2024 as per aforesaid SEBI Regulations and Monitoring Agency Agreement dated December 06, 2023.

Request you to kindly take the same on records.

Thanking you,

Yours faithfully,

A handwritten signature in black ink, appearing to read "Darshan Shah".

Darshan Shah

Assistant Director

Darshan.Shah@careedge.in

Report of the Monitoring Agency

Name of the issuer: EFC(I) Ltd

For quarter ended: September 30, 2024

Name of the Monitoring Agency: CARE Ratings Limited

(a) Deviation from the objects: Nil

(b) Range of Deviation: Not applicable

Declaration:

We declare that this report provides an objective view of the utilization of the issue proceeds in relation to the objects of the issue based on the information provided by the Issuer and information obtained from sources believed by it to be accurate and reliable. The MA does not perform an audit and undertakes no independent verification of any information/ certifications/ statements it receives. This Report is not intended to create any legally binding obligations on the MA which accepts no responsibility, whatsoever, for loss or damage from the use of the said information. The views and opinions expressed herein do not constitute the opinion of MA to deal in any security of the Issuer in any manner whatsoever. Nothing mentioned in this report is intended to or should be construed as creating a fiduciary relationship between the MA and any issuer or between the agency and any user of this report. The MA and its affiliates also do not act as an expert as defined under Section 2(38) of the Companies Act, 2013.

The MA or its affiliates may have credit rating or other commercial transactions with the entity to which the report pertains and may receive separate compensation for its ratings and certain credit related analyses. We confirm that there is no conflict of interest in such relationship/interest while monitoring and reporting the utilization of the issue proceeds by the issuer, or while undertaking credit rating or other commercial transactions with the entity.

We have submitted the report herewith in line with the format prescribed by SEBI, capturing our comments, where applicable. There are certain sections of the report under the title "Comments of the Board of Directors", that shall be captured by the Issuer's Management / Audit Committee of the Board of Directors subsequent to the MA submitting their report to the issuer and before dissemination of the report through stock exchanges. These sections have not been reviewed by the MA, and the MA takes no responsibility for such comments of the issuer's Management/Board.



Signature:

Name of the Authorized Signatory: Darshan Shah

Designation of Authorized person/Signing Authority: Assistant Director

1) Issuer Details:

Name of the issuer : EFC(I) Ltd
Name of the promoter : Umesh Kumar Sahay, Abhishek Narbaria and Aditi Umesh Sahai
Industry/sector to which it belongs : Realty

2) Issue Details

Issue Period : Not Applicable
Type of issue (public/rights) : Preferential Issue
Type of specified securities : Equity Shares
IPO Grading, if any : Not applicable
Issue size (in crore) : Rs. 242.44 crore

3) Details of the arrangement made to ensure the monitoring of issue proceeds:

Particulars	Reply	Source of information / certifications considered by Monitoring Agency for preparation of report	Comments of the Monitoring Agency	Comments of the Board of Directors
Whether all utilization is as per the disclosures in the Offer Document?	Yes	Bank Statement, Management Certificate, Auditor's Certificate, Board Resolution, PAS-4, Revised Board Resolution* and Supporting Invoices	Utilization is in line with the stated objects.	NIL
Whether shareholder approval has been obtained in case of material deviations# from expenditures disclosed in the Offer Document?	Yes	-	The company has obtained Board approval via Board Resolution dated May 29, 2024 for changes in the Preferential Issue.*	NIL
Whether the means of finance for the disclosed objects of the issue have changed?	No	-	Not Applicable	NIL
Is there any major deviation observed over the earlier monitoring agency reports?	Not Applicable	-	Not Applicable	NIL
Whether all Government/statutory approvals related to the object(s) have been obtained?	Not Applicable	-	Not Applicable	NIL
Whether all arrangements pertaining to technical assistance/collaboration are in operation?	Not Applicable	-	Not Applicable	NIL
Are there any favorable/unfavorable events affecting the viability of these object(s)?	No	-	Not Applicable	NIL
Is there any other relevant information that may materially affect the decision making of the investors?	No	-	Not Applicable	NIL

#Where material deviation may be defined to mean:

- a) Deviation in the objects or purposes for which the funds have been raised
- b) Deviation in the amount of funds actually utilized by more than 10% of the amount projected in the offer documents.

*During the Board meeting held on May 29, 2024, Upon reference by the Audit Committee, the Board approved a clarification on the objective of the preferential issue, which was initially approved by the Board of Directors in their meeting on December 1, 2023, and subsequently by the members in the extraordinary general meeting on December 24, 2023. The clarification specifies that the phrase ‘backward or forward integration, direct or indirect activities, in an organic or inorganic manner’ implies and includes ‘investment in subsidiaries by way of securities, capital, loans, advances, etc.’ The company has further quantified the amount to be utilised under each object.

4) Details of objects to be monitored:

(i) Cost of objects –

Sr. No	Item Head	Source of information / certifications considered by Monitoring Agency for preparation of report	Original cost (as per the Offer Document) in Rs. Crore	Revised Cost in Rs. Crore	Comments of the Monitoring Agency	Comments of the Board of Directors		
						Reason for cost revision	Proposed financing option	Particulars of - firm arrangements made
1	To grow businesses of the Company through backward or forward integration, direct or indirect activities in an organic or inorganic manner;	PAS-4, Board Resolution	242.44	169.71	Not Applicable	NIL	NIL	NIL
2	To invest in technology, human resources and other supporting infrastructure to achieve the targeted growth	PAS-4, Board Resolution		12.12	Not Applicable	NIL	NIL	NIL
3	To provide adequate working capital, including to fund trade and other liabilities, if any.	PAS-4, Board Resolution		60.61	Not Applicable	NIL	NIL	NIL
Total			242.44	242.44				

*Sourced from Prospectus and Allotment Securities form-4 passed at Board meeting held on December 01, 2023 and Board meeting held on May 29, 2024.

(ii) Progress in the objects –

Sr. No	Item Head	Source of information / certifications considered by Monitoring Agency for preparation of report	Amount as proposed in the Offer Document in Rs. Crore	Revised Cost in Rs. Crore	Amount utilised in Rs. Crore			Total unutilised amount in Rs. crore	Comments of the Monitoring Agency	Comments of the Board of Directors	
					As at beginning of the quarter in Rs. Crore	During the quarter in Rs. Crore	At the end of the quarter in Rs. Crore			Reasons for idle funds	Proposed course of action
1	To grow businesses of the Company through backward or forward integration, direct or indirect activities in an organic or inorganic manner;	PAS-4*, Bank Statement ^s , CA Certificate**, Board Resolution	242.44	169.71	98.18 [^]	25.00	123.18	46.53	During Q2FY25, the company had utilized Rs.25.00 crores towards Object no.1, through transferring the amount to its subsidiary namely EFC Limited (wholly owned subsidiary of EFC (I) Limited). Subsequently, EFC Limited transferred Rs. 20.00 crore to EFC (REIT)	NIL	NIL

Sr. No	Item Head	Source of information / certifications considered by Monitoring Agency for preparation of report	Amount as proposed in the Offer Document in Rs. Crore	Revised Cost in Rs. Crore	Amount utilised in Rs. Crore			Total unutilised amount in Rs. crore	Comments of the Monitoring Agency	Comments of the Board of Directors	
					As at beginning of the quarter in Rs. Crore	During the quarter in Rs. Crore	At the end of the quarter in Rs. Crore			Reasons for idle funds	Proposed course of action
									Private Limited (step-down subsidiary of EFC (I) Limited) and Rs. 5.00 crore to Big Box Ventures Limited (step-down subsidiary of EFC (I) Limited). The funds of the issue have been routed through current accounts having numerous other transactions pertaining to company's day to		

Sr. No	Item Head	Source of information / certifications considered by Monitoring Agency for preparation of report	Amount as proposed in the Offer Document in Rs. Crore	Revised Cost in Rs. Crore	Amount utilised in Rs. Crore			Total unutilised amount in Rs. crore	Comments of the Monitoring Agency	Comments of the Board of Directors	
					As at beginning of the quarter in Rs. Crore	During the quarter in Rs. Crore	At the end of the quarter in Rs. Crore			Reasons for idle funds	Proposed course of action
									day business operations.		
2	To invest in technology, human resources and other supporting infrastructure to achieve the targeted growth	PAS-4*, Invoices, CA Certificate**, Board Resolution		12.12	0.34	0.00	0.34	11.78	Nil utilisation during the quarter	NIL	NIL
3	To provide adequate working capital, including to fund trade and other liabilities, if any.	PAS-4*, Bank Statements [§] , Invoices&, CA Certificate**, Board Resolution		60.61	13.69	0.03	13.72	46.89	Utilised towards vendor payment for maintenance charges	NIL	NIL
Total			242.44	242.44	112.21	25.03	137.24	105.20			

*Sourced from Prospectus and Allotment Securities form-4 passed at Board Meeting held on December 01, 2023 and Board meeting held on May 29, 2024.

**The above details are verified by Mehra Goel & Co vide its CA certificate dated November 07, 2024.

^During Q1FY25, the company had utilized Rs.27.94 crores towards Object no.1, by transferring Rs. 10.02 crore to EFC Limited, Rs.8.44 crore to Whitehills Interiors Limited (subsidiary of EFC (I) Limited), Rs.4.48 crore EK Designs Industries Limited (subsidiary of EFC (I) Limited) and Rs.5.00 crore to EFC Estate Private Limited (wholly owned subsidiary of EFC (I) Limited).

During Q4FY24, the company had utilized Rs.70.25 crores towards Object no.1, by transferring Rs.59.82 crore to EFC limited, Rs.10.32 crores towards Whitehills Interiors Limited (subsidiary of EFC (I) Limited), Rs.0.11 crore towards EK Designs Industries Limited (subsidiary of EFC (I) Limited).

(iii) Deployment of unutilized public issue proceeds:

Sr. No.	Type of instrument and name of the entity invested in	Amount invested (in crore)	Maturity date	Earning	Return on Investment (%)	Market Value as at the end of quarter [§]
1	Fixed Deposit with HDFC Bank	25.00	January 12, 2025	-	7.16%	25.000
2	Fixed Deposit with HDFC Bank	25.00	January 12, 2025	-	7.16%	25.000
3	Fixed Deposit with HDFC Bank	25.00	January 12, 2025	-	7.16%	25.000
4	Fixed Deposit with HDFC Bank	25.00	January 12, 2025	-	7.16%	25.000
5	Fixed Deposit with HDFC Bank	1.20	January 03, 2025	-	5.72%	1.2000
6	Fixed Deposit with HDFC Bank	2.00	March 24, 2025	-	5.72%	2.000
7	Fixed Deposit with HDFC Bank	2.00	March 26, 2025	-	5.72%	2.000
8	HDFC Bank Current Account	0.00	-	-	-	0.00
	Total Funds	105.20				105.2

The above details are verified by Mehra Goel & Co vide its CA certificate dated November 07, 2024.

§ Market Value is considered same as principal value

(iv) Delay in implementation of the object(s)

Objects	Completion Date		Delay (no. of days/ months)	Comments of the Board of Directors	
	As per the offer document	Actual		Reason of delay	Proposed course of action
To grow businesses of the Company through backward or forward integration, direct or indirect activities in an organic or inorganic manner;	Schedule of implementation of the funds is not mentioned in PAS-4.		NA	NIL	NIL
To invest in technology, human resources and other supporting infrastructure to achieve the targeted growth			NA	NIL	NIL
To provide adequate working capital, including to fund trade and other liabilities, if any.			NA	NIL	NIL

5) Details of utilization of proceeds stated as General Corporate Purpose (GCP) amount in the offer document: Nil utilization during the quarter

Sr. No	Item Head [^]	Amount in Rs. Crore	Source of information / certifications considered by Monitoring Agency for preparation of report	Comments of Monitoring Agency	Comments of the Board of Directors
Not Applicable					

[^] Section from the offer document related to GCP: Not Applicable as the same is not mentioned in PAS 4.

Disclaimers to MA report:

a) This Report is prepared by CARE Ratings Ltd (hereinafter referred to as “**Monitoring Agency/MA**”). The MA has taken utmost care to ensure accuracy and objectivity while developing this Report based on the information provided by the Issuer and information obtained from sources believed by it to be accurate and reliable. The views and opinions expressed herein do not constitute the opinion of MA to deal in any security of the Issuer in any manner whatsoever.

b) This Report has to be seen in its entirety; the selective review of portions of the Report may lead to inaccurate assessments. For the purpose of this Report, MA has relied upon the information provided by the management /officials/ consultants of the Issuer and third-party sources like statutory auditors (or from peer reviewed CA firms) appointed by the Issuer believed by it to be accurate and reliable.

c) Nothing contained in this Report is capable or intended to create any legally binding obligations on the MA which accepts no responsibility, whatsoever, for loss or damage from the use of the said information. The MA is also not responsible for any errors in transmission and specifically states that it, or its directors, employees do not have any financial liabilities whatsoever to the users of this Report.

d) The MA and its affiliates do not act as a fiduciary. The MA and its affiliates also do not act as an expert to the extent defined under Section 2(38) of the Companies Act, 2013. While the MA has obtained information from sources it believes to be reliable, it does not perform an audit and undertakes no independent verification of any information/ certifications/ statements it receives from auditors (or from peer reviewed CA firms), lawyers, chartered engineers or other experts, and relies on in its reports.

e) The MA or its affiliates may have other commercial transactions with the entity to which the report pertains. As an example, the MA may rate the issuer or any debt instruments / facilities issued or proposed to be issued by the issuer that is subject matter of this report. The MA may receive separate compensation for its ratings and certain credit-related analyses, normally from issuers or underwriters of the instruments, facilities, securities or from obligors.