

November 20, 2025

The General Manager
Corporate Relationship Department
BSE Limited
PhirozeJeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001**The Manager**
National Stock Exchange of India Ltd.
Exchange Plaza, C/1, Block G
Bandra - Kurla Complex, Bandra (East)
Mumbai 400 051**BSE Scrip Code: 532712****NSE Symbol: RCOM**

Dear Sir(s),

Sub: Disclosure under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015**Reference: Provisional attachment order received from the Directorate of Enforcement (“ED”) in respect of the assets of Reliance Communications Limited (“Company” or “RCOM”) and Reliance Realty Limited (“RRL”) (a wholly owned subsidiary of the Company)**

This disclosure is being made pursuant to regulation 30 read with sub-clause 20 under Clause A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time (“**Listing Regulations**”).

With reference to the above, we wish to inform you that the Company has received a Provisional Attachment Order bearing number Order No. 40 of 2025 dated November 19, 2025 (received on November 19, 2025) from the ED in relation to certain assets of RCOM and RRL (as detailed below) which has been issued under the 2nd proviso to Sub-Section (1) of Section 5 of the Prevention of Money Laundering Act, 2022 (“**PMLA**”).

S. No	Name of the company	Description of the asset
1	Reliance Communications Limited	<ul style="list-style-type: none">a. 6th Floor in Fortune Tower, C-Wing, Maitri Vihar, Chandrasekharapur, Bhubaneswar, District- Khurda, Odisha-751023.b. Commercial land of 53,657 sq. ft. with a 251,200 sq. ft. building, located at T.S. No. 83/3, Block No. 15, Nungambakkam Town, Egmore Taluk, Chennai District.c. Industrial Plot No. 40-A,(North Phase) 3rd Main Road, Ambattur Industrial Estate, Ambattur, Chennai.d. Land Parcel bearing S. No. 34/ A/7 / C/2, Plot No. 1 ad measuring 442.975 sq. Mtr. & plot no.2 ad measuring 428.124 sq.mtr., Village Wadgaon Sheri, Pune-land with only RCC structure- frame of G+2 construction done.

Registered Office:Reliance Communications Limited. H Block, 1st Floor, Dhirubhai Ambani Knowledge City, Navi Mumbai - 400 710
CIN No.: L45309MH2004PLC147531



2	Reliance Realty Limited (Subsidiary of Reliance Communications Limited)	a. 07 Buildings no. A8, 42,6(151), 8(41), 108 (A),09 and 43 situated at Sector-I, Plot No. MBP /2 in Trans Thane Creek Industrial Area within village limits of Mahape Taluka, District Thane, Navi Mumbai. (Also Known as Millennium Business Park) b. Building and infrastructure situated over Dhirubhai Ambani Knowledge City, Navi Mumbai, Maharashtra.
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Furthermore, legal advice is being sought on the way forward with respect to this development.

Pursuant to Regulation 30 of the Listing Regulations read with SEBI Circular SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024, the requisite disclosure with respect to the above, is set out in **Annexure A** to this letter.

A copy of the provisional attachment order received from the ED is enclosed as **Annexure B** for reference.

You are requested to kindly take the above information on record.

Thanking you.

Yours faithfully,
For **Reliance Communications Limited**

Rakesh Gupta
Company Secretary

(Reliance Communications Limited is under corporate insolvency resolution process pursuant to the provisions of the Insolvency and Bankruptcy Code, 2016. With effect from June 28, 2019, its affairs, business and assets are being managed by, and the powers of the board of directors are vested in, the Resolution Professional, Mr. Anish Niranjana Nanavaty, appointed by Hon'ble National Company Law Tribunal, Mumbai Bench, vide order dated June 21, 2019 which was published on the website of the Hon'ble National Company Law Tribunal, Mumbai Bench on June 28, 2019).

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Annexure A

Disclosure pursuant to Regulation 30(2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024

Disclosure regarding the aforementioned provisional attachment order received by the Company from the ED in respect of the assets of the Company and RRL dated November 19, 2025 (received on November 19, 2025) via email.

Sr.	Particulars	Details of Reliance Communications Limited
1	Name of the authority	Directorate of Enforcement
2	Nature and details of the action (s) taken, or order (s) passed	Provisional Attachment Order bearing number Order No. 40 of 2025 dated November 19, 2025 for provisionally attaching certain assets of RCOM and RRL (a wholly owned subsidiaries of RCOM) in terms of the PMLA.
3	Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority	Please refer to the above response.
4	Details of the violation(s)/contravention(s) committed or alleged to be committed	For the said details, please refer to the provisional attachment order for RCOM and RRL (annexed herewith as Annexure B)
5	Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible	<p>Given that the assets of Company have been provisionally attached, the same will have an adverse impact on the Company, during the continuance of the provisional attachment order passed by the ED, as referred to above.</p> <p>Additionally, since RRL is a wholly-owned subsidiary of the Company, the value of the investment of the Company in respect of RRL might also be adversely impacted during the continuance of the provisional attachment order passed by the ED, as referred to above.</p>

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ANNEXURE-B
GOVERNMENT OF INDIA
MINISTRY OF FINANCE, DEPARTMENT OF REVENUE
DIRECTORATE OF ENFORCEMENT
SPECIAL TASK FORCE
GROUND FLOOR, B-BLOCK, PRAVARTAN BHAWAN, DR. APJ
ABDUL KALAM ROAD, NEW DELHI-110011

F. No. ECIR/STF/26/2025

DATED: 19.11.2025

PROVISIONAL ATTACHMENT ORDER NO. 40 OF 2025

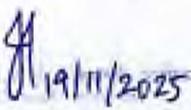
[UNDER 2nd PROVISIO TO SUB-SECTION (1) OF SECTION 5 OF THE
PREVENTION OF MONEY LAUNDERING ACT, 2002]

In exercise of the powers conferred under sub-section (1) of section 5 of the Prevention of Money Laundering Act, 2002 ("PMLA") vide Notification No GSR.441(E) dated July 1, 2005, and authorization issued vide Circular Order (Tech) No. 3/2011 dated 27.09.2011 as amended by Technical Circular No. 8/2015 dated 26.08.2015, I, Jvalin Tejpal, Deputy Director, Directorate of Enforcement, posted at Special Task Force, Headquarters, ED, New Delhi make the order as under:

1. Background of the case leading to proceeding under PMLA:

- 1.1. FIR no. RC0742025E0005 dated 21.08.2025 was registered by the Central Bureau of Investigation ("CBI"), Banking Securities Fraud Branch ("BSFB"), New Delhi under sections 120-B, 406 and 420 of the Indian Penal Code, 1860 ("IPC") and section 13(2) read with section 13(1)(d) of the Prevention of Corruption Act, 1989 ("PCA") against M/s Reliance Communications Limited ("RCOM"), Mr. Anil D. Ambani ("Mr. Ambani"), unknown public servants & unknown others.




19/11/2025
जवलिन तेजपाल / JVALIN TEJPAL
Deputy Director
Directorate of Enforcement
Ministry of Finance, Deptt. of Revenue
Govt. of India, New Delhi

1.2. The FIR was registered based on a complaint to CBI by Mr. Jyoti Kumar, Deputy General Manager, State Bank of India ("SBI"), Stressed Assets Management Branch ("SAMB") - III, Tulsiani Chamber, Nariman Point, Mumbai, vide his letter dated 18.08.2025. The complaint alleges that RCOM, its Director Mr. Ambani, and others committed offences including criminal conspiracy, cheating, criminal breach of trust, and criminal misconduct thereby, causing wrongful loss of ₹2,929.05 crores to SBI.

2. Summary of cause of action under PMLA:

2.1. PMLA is an act to prevent money laundering by prosecuting accused persons and to provide for confiscation of property derived or obtained directly or indirectly from or involved in any process or activity connected to proceeds of crime including its concealment, possession, acquisition or use and projecting or claiming it as untainted property.

2.2. As sections 120-B and 420 of IPC and section 13(2) read with section 13(1)(d) of PCA are scheduled offences under PMLA, enquiries were initiated under PMLA against the persons/entities accused in CBI, BSFB, New Delhi, after recording facts of scheduled offence in the ECIR/STF/26/2025 dated 26.08.2025, at the Directorate of Enforcement, Special Task Force.

3. Detailed findings as a result of investigation under PMLA:

3.1. The complaint on which the FIR was registered by CBI alleges a wrongful loss to SBI of ₹2,929.05 crores plus notional interest of ₹3,661.16 crores.

3.2. Credit facilities were sanctioned by SBI to RCOM, M/s Reliance Telecom Limited ("RTL") and M/s Reliance Infratel Limited ("RITL"). Together, the is referred to as the Reliance - Anil Dhirajlal Ambani Group



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("RAAG"). Credit facilities were sanctioned to RAAG by SBI's CAG-1, Mumbai (9995), Neville House, J.N. Heredia Marg, Ballard Estate, Fort Mumbai and also SBI's Project Finance and Structuring Business Unit (PFSBU) in the same branch from 20.10.2002 till 29.05.2018.

- 3.3. The fraud declared by SBI is on the basis of the Forensic Auditor viz. BDO India LLP ("BDO")'s Report dated 15.10.2020 which covers the period from 01.04.2013 to 31.03.2017. The details related to NPA and declaration of Fraud in SBI are as under:

Particulars of SBI NPA/Fraud	
Particulars	Date / Amount (Cr.)
Date of NPA	26.08.2016 (with retrospective date)
Date of detection of fraud	15.10.2020
Date of classification of fraud	10.11.2020
Date of reversal of fraud	02.09.2023
Date of re-classification of fraud	13.06.2025
Date of Report of fraud to RBI	24.06.2025
Fraud Folder No.	17.2013.2025.0002
Amount of fraud as reported to RBI	₹2929.05 crores

- 3.4. The genesis of the fraud is primarily a Consortium / Multiple Banking Arrangement ("MBA") involving credit facilities availed by the RAAG, wherein the accused individuals and companies in conspiracy with each other have availed credit facilities by misrepresentation and deception, and after disbursal of the same, misappropriated the funds of the banks by entering into transactions which were in violation of the terms and conditions of sanction of the credit facilities. However, it is also relevant to mention here that RAAG also undertook credit facilities from non-consortium banks during the same period, which comprise a set of inter-connected transactions as the credit facilities taken from consortium banks have been used for payments of non-consortium credit facilities as well. Therefore, it is necessary to take a comprehensive view of all credit facilities availed by the group from both consortium and non-



19/11

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consortium banks.

3.5. Here, it is also pertinent to mention that the declaration of fraud in respect of accounts of RCOM by SBI, had been challenged by Sh. Anil Ambani, by filing W.P. No. 3037 of 2025 before the Hon'ble High Court of Bombay. However, the Hon'ble High Court vide order dated 03.10.2025, dismissed Anil Ambani's petition challenging SBI's decision to classify Reliance Communications Ltd. (RCOM) as "fraud" and report his name to the RBI. Ambani claimed that the show-cause notice issued under the old 2016 RBI Master Directions was invalid after the 2024 update, and that he was denied a fair and personal hearing. SBI and RBI countered that he was given multiple opportunities to respond in writing, which satisfies the requirements of natural justice, and that the 2024 Directions only clarified—not replaced—the earlier framework.

3.6. The Hon'ble Court agreed with SBI and RBI, ruling that a written opportunity to respond is sufficient and that a personal hearing is not mandatory. It held that Mr. Anil Ambani, as promoter and person in control of RCOM, was accountable once the company's account was found fraudulent. Concluding that SBI had followed due process, the Court upheld the fraud classification and dismissed his plea.

3.7. The consortium of banks involved in lending to RAAG through the Multi Banking Arrangement are SBI, Oriental Bank of Commerce, Central Bank of India, Syndicate Bank, Bank of India, Corporation Bank, Union Bank of India, Canara Bank, Indian Overseas Bank, and IDBI Bank. They entered into a Rupee Loan Facility Agreement dated 20.02.2015 between them as lenders and RCOM and RTL as borrowers for a Rupee loan facility of ₹6,015 crores availed by RCOM and ₹735 crores availed by 'L, resulting in a total rupee lending of ₹6,750cr to RAAG by the



Consortium Banks. The bank-wise breakup is as follows:

Sr. No.	Consortium Bank	Amount Sanctioned in ₹ Cr		Total in ₹ Cr
		RCOM	RTL	
1	State Bank of India	1,500	125	1,625
2	Bank of India	700	50	750
3	UCO Bank	740	60	800
4	IDBI Bank	750	300	1,050
5	Oriental Bank of Commerce	205	20	225
6	Central Bank of India	280	20	300
7	Union Bank	275	25	300
8	Syndicate Bank	460	40	500
9	Indian Overseas Bank	130	20	150
10	Corporation Bank	235	15	250
11	Canara Bank	740	60	800
	Total	6,015	735	6,750

3.8. The consortium loan was initially proposed in 2012. However, as per the terms of the consortium rupee facility, all the loans were to be disbursed by the consortium banks together. This was eventually done in February 2015. However, in the interim period, multiple requests were made by representatives of RCOM and RTL, including Mr. Anil Dhirajlal Ambani for interim disbursements / sanctioning of credit facilities by individual banks of consortium. These interim disbursements in 2012/13 by some of the consortium banks therefore constitute an integral part of the investigation as the consortium loans disbursed in 2015 have mostly been used to pay off the earlier loans sanctioned in 2012/13. This is further evident from the loan sanction letters for the interim loans, wherein, it was explicitly stated that these loans would be repaid as and when the consortium loans have been disbursed.

3.9. Credit facilities availed from non-consortium banks during the period from 01.04.2013 to 31.03.2017, which are also a part of the investigation, include loans from HDFC Bank, Standard Chartered Bank, Yes Bank, HSBC, ICICI Bank,




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Deutsche Bank, Axis Bank, DBS Bank, Industrial and Commercial Bank of China, and other Banks.

3.10. The outstanding loan amounts from the consortium banks as well as non-consortium banks, which constitute the Proceeds of Crime, as per the FIR, are reproduced as under:

Table 3: Brief of outstanding loans of RAAG as per FIR	
Name of FI / Bank	Outstanding (in ₹cr)
Chinese lenders	
China Development Bank	9,134.91
Export-Import Bank of China	3,048.71
Industrial & Commercial Bank of China	1,374.51
Total-Chinese Lenders	13,558.13
ECB Lenders	
GCX Bonds (USD 350 mn)	2,363.51
RCOM Bond (USD 300 mn)	2,025.86
Standard Chartered Bank	506.91
VTB Capital PLC	422.06
Deutsche Bank	405.17
Doha Bank Q.S.C.	337.64
HSBC	270.94
Emirates NBD Bank PJSC Dubai	270.12
Industrial & Commercial Bank of China	229.60
Ahli United Bank	101.29
Total ECB	6,933.10
INR Lenders	
LIC of India	3,750.00
State Bank of India	2,877.34 (O/s-2929.05)
Bank of Baroda	1,837.09
Standard Chartered Bank	1,264.00
IDBI Bank Ltd	1,055.46
Punjab National Bank	918.45
Union Bank of India	763.51
Syndicate Bank	916.59
Bank of India	690.00
Corporation Bank	696.94
UCO Bank	680.80
Canara Bank	672.00
Bank of Maharashtra	472.98
Mahimna Mercantile Credits Ltd.	432.69
United Bank of India	424.01




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 Ministry of Finance, Deptt. of Revenue
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ACRE / DBS Bank	300.00
Central Bank of India	276.00
Dena Bank	250.00
IIFCL	248.00
Oriental Bank of Commerce	216.15
IFCI Ltd	200.00
Credit Agricole	192.00
Indian Overseas Bank	138.00
Neptune Steel Strips Ltd.	67.64
Yes Bank	281.45
Vijaya Bank	100.00
Total INR Lenders	19,694.33
Overall Total	40,185.55

3.11. A fund-trail has been established for the credit facilities availed by RAAG from various bank account statements, third-party information, as well as statements of bank employees recorded on oath u/s 50 of PMLA, 2002, and other information.

3.12. RBI has issued the Master Circular on Frauds-Classification and Reporting dated 1 July 2016 (No. DBS.CO.CFMC. BC. No.1/23. 04.001/2016-17). As per the guidelines, the frauds have been classified into defined categories which include the following, to have uniformity in reporting regarding 'fraud': (i) Misappropriation and criminal breach of trust; and (ii) Fraudulent encashment through forged instruments, manipulation of books of account or through fictitious accounts and conversion of property. As per Circular No: DBOD. No.. DL(W).BC./110 /20.16.003(1)/2001-02 dated 30 May 2002, "Diversion of Funds" has been defined to include any one of the following:

- i. utilisation of short-term working capital funds for long-term purposes not in conformity with the terms of sanction;
- ii. deploying borrowed funds for purposes / activities or creation of assets other than those for which the loan was sanctioned;
- iii. transferring funds to the subsidiaries / Group companies or other




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- corporates by whatever modalities;
- iv. routing of funds through any bank other than the lender bank or members of consortium without prior permission of the lender;
 - v. investment in other companies by way of acquiring equities / debt instruments without approval of lenders;
 - vi. shortfall in deployment of funds vis-a-vis the amounts disbursed / drawn and the difference not being accounted for.

3.13. The investigation conducted so far shows that the credit facilities availed by RAAG have been fraudulently mis utilized as follows:

- (i) Loans taken by one entity from one bank were utilized for repayment of loans taken by other entities from other banks, transfer to related parties, investments in Mutual funds, which was in contravention to the terms and conditions of the sanction letter of the loans.
- (ii) Certain loans were siphoned off outside India through foreign outward remittances.
- (iii) Diverted to infrastructure companies of Mr. Anil Ambani such as M/s Reliance Infrastructure Ltd and M/s CLE Pvt. Ltd. in violation of the sanctioned loan terms.
- (iv) Dissipated as payments to various third parties.

3.14. The detailed bank-wise trail of loans is discussed in the subsequent paragraphs.

Generation of Proceeds of Crime and its Utilization

3.15. As discussed in the previous paragraphs, RCOM and RTL availed of a Multi-Banking Arrangement from the consortium banks, which materialized in 2015, and in the interim period availed of earlier loans from some of the consortium banks. Further, RCOM, RITL, and RTL also credit facilities from non-consortium banks. The outstanding



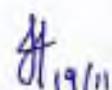

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amounts from these loans is ₹40,185.55 crores as per CBI's FIR.

3.16. As a part of investigation, summons were issued to the lender banks and statements of the authorized representatives of several of above mentioned banks were recorded u/s 50 of PMLA. While a detailed discussion follows, the overall picture of funds diversions and investments in presented in summary form below:

Table no.4: Summary of Loans Analyzed							
Sr. No.	Consortium Bank	Amount Sanctioned			Total	Purpose	Utilization / Violation
		RCOM	RTL	RITL			
1	State Bank of India	1,500	125		1,625	Subsequent Disbursal in 2015	
1.1	Interim Disbursal	1,000			1,000	meet short-term mismatch in cash flow and operational expenses	₹360cr diverted to Reliance Infrastructure Ltd. ₹380cr diverted to Tele Engineering Services Pvt. Ltd. ₹161.59cr to pay back old PNB loan
1.2	Interim Disbursal	300			300	meeting ongoing operational expenses and capital expenditure and	
1.3	Interim Disbursal	200	125		325	repayment of existing liabilities other than to related parties / shareholder loans.	₹325cr Invested in Mutual Funds
2	IDBI Bank	750	300		1,050	Subsequent Disbursal in 2015	
2.1	Interim Disbursal	500			500	operational expenses, capital expenses and repayment of existing liabilities of RCOM	₹449.05cr used to buy-back commercial papers issued by RITL
2.2	Interim Disbursal	250			250	repayment of existing cash credit limit and short term loans of RCOM on their maturity	₹60cr invested in Nippon India Money Market Fund ₹82cr utilized for payments to third parties and salaries
2.3	Interim Disbursal		300		300	meeting the working capital requirement of RTL	₹85cr used by RCOM to liquidate its term loan with Yes Bank ₹12.4cr invested in Mutual Funds by RCOM
3	Bank of India	700	50		750	₹350cr interim disbursal; rest subsequent	
3.1	Interim Disbursal	350			350	repayment of existing loans on their maturity by RCOM	₹167cr invested in Mutual Funds
3.2	Final Disbursal	350			350	operational expenses, capital expenses and repayment of existing liabilities of RCOM	₹350cr invested in Nippon India Liquid Fund
4	Bank of Baroda Non-Consortium Loan	1000			1000	To be utilized for Capital Expenditure of RCOM.	
4.1	Final Disbursal	1000			1000	₹374.21 crores was disbursed to RCIL instead of RCOM, and eventually made its way back to RCOM, of which ₹354.85 crores was remitted to the China Development Bank as repayment of principal and interest of ECBs. This is in violation of loan sanctioning terms.	
5	SBI Non-Consortium Loan	565		635	1200	To be utilized for making payments of scheduled liabilities related to ECB loans other than any related party/shareholder loans in RCOM and RITL.	
5.1	Final Disbursal	565		635	1200	Loan condition to opening Escrow Account for receivables from Reliance Jio - which were to act as security against the loan - was not complied with from 29.08.2016 till 08.03.2018. Further, from	




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						29.08.2016 to 31.03.2017, such receivables were diverted to a non-consortium bank (HDFC) from which it was diverted for payments to a third party leading to dissipation of the securitized asset.
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3.17. The bank-wise trail of funds from the different types of credit facilities availed is discussed below.

3.18. State Bank of India

3.18.1. Statement of Mr. Sanjiv Kumar, Assistant General Manager, SBI, was recorded on 18.09.2025 & 19.09.2025 u/s 50 of PMLA, in the capacity of authorized representative of State Bank of India. As per his statement, RCOM, RTL, and RITL cumulatively borrowed ₹2825 crores as term loan - ₹1625 crores in the year 2015 and ₹1200 crores in 2016. Out of this, ₹2,929.05 crores and ₹486.39 crores is still outstanding respectively. The initial loans disbursed by the bank are depicted pictorially below:

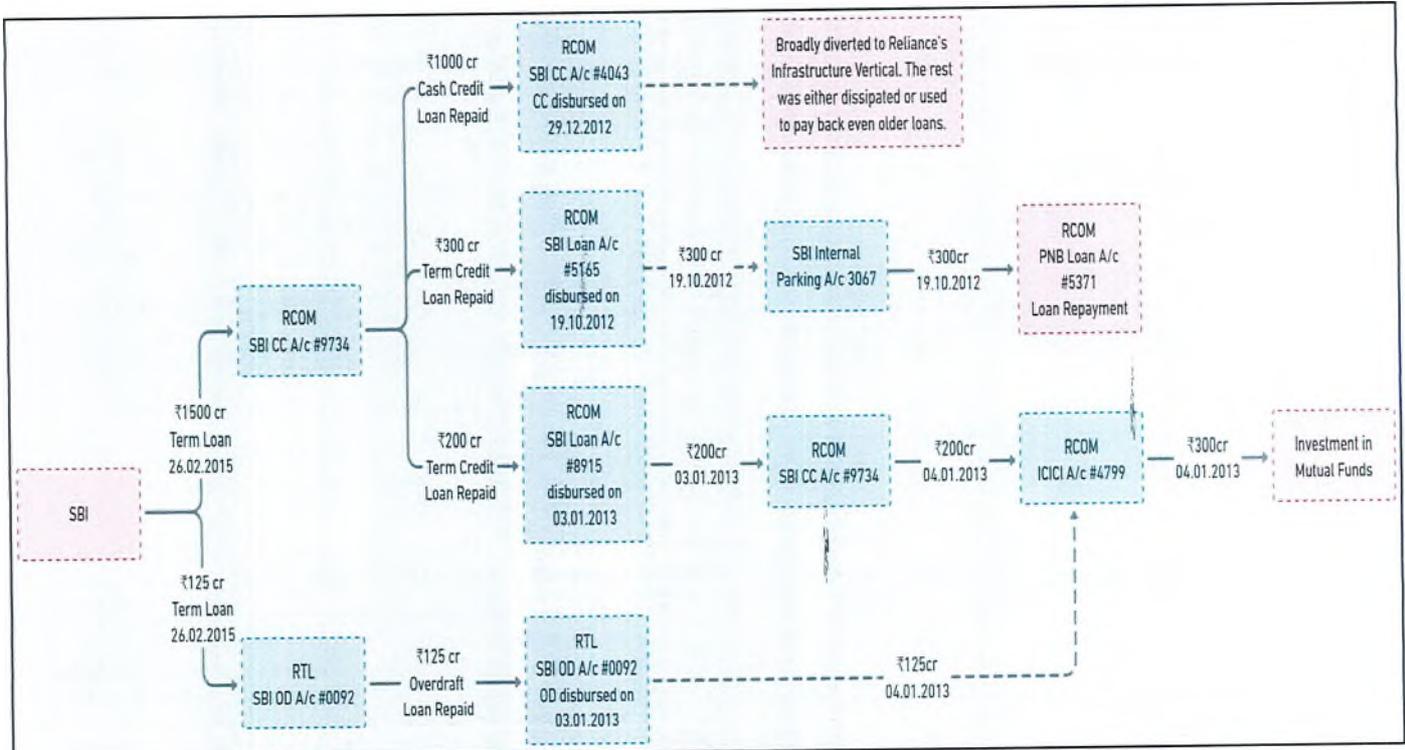


Figure 1 : Fund Trail of Consortium Loans sanctioned by SBI to RCOM and RTL

3.18.2. As can be seen from the fund trail above, ₹1500 crores term loan



19/11
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 वित्त विभाग, राजस्व
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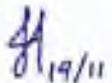
was disbursed by SBI to RCOM's SBI Cash Credit A/c #9734 on 26.02.2015, and ₹125 crores term loan was disbursed by SBI to RTL's SBI Overdraft A/c #0092 on 26.02.2015. The ₹1500 crores loan to RCOM was utilized to re-pay three prior earlier loans disbursed in 2012 and 2013 through transfer of ₹1000 crores to RCOM's SBI Cash Credit A/c #4043 (*interim loan of ₹1000 crores disbursed on 29.12.2012*), transfer of ₹300 crores to RCOM's SBI Loan A/c 5165 (*interim loan of ₹300 crores disbursed on 19.10.2012*), and transfer of ₹200 crores to RCOM's SBI Loan A/c #8915 (*interim loan of ₹200 crores disbursed on 03.01.2013*). Similarly, the ₹125 crores loan disbursed to RTL on 26.02.2015 in its SBI Overdraft A/c #0092 was utilized to pay-off an previous earlier loan of ₹125 crores disbursed in the same account on 03.01.2013. The relevant bank statement extracts are reproduced below for reference:

Date	Description	Debit (₹)	Credit (₹)	Counter-Party
26-02-2015	DEP TFR 0034741913573 OF RELIANCE COMMUNICATION AT 61341 SAMB-III, MUMBAI		15,00,00,00,000	Loan Disbursal to RCOM
26-02-2015	WDL TFR TL CLOSURE 0032747748915 OF RELIANCE COMMUNICATION AT 61341 SAMB-III, MUMBAI	2,02,02,05,479		Repayment of previous interim term loan from 2013
26-02-2015	WDL TFR TL CLOSURE 0032611725165 OF RELIANCE COMMUNICATION AT 61341 SAMB-III, MUMBAI	3,03,03,08,219		Repayment of previous interim term loan from 2012
26-02-2015	WDL TFR TRF FRM 11083979734 TO 32400964043 0032400964043 OF RELIANCE COMMUNICATION AT 61341 SAMB-III, MUMBAI	10,07,87,89,656		Repayment of previous interim cash credit loan from 2012

Date	Description	Debit (₹)	Credit (₹)	Counter-Party
26-02-2015	DEP TFR 0034741759086 OF RELIANCE TELECOM LIMIT AT 10331 KOPAR KHAIRANE		1,25,00,00,000	Loan Disbursal
26-02-2015	WDL TFR TL CLOSURE 0032748133433 OF RELIANCE TELECOM LIMIT AT 10331 KOPAR KHAIRANE	1,26,26,28,425		Repayment of previous interim OD loan from 2013

3.18.3. The fund trail of the earlier loans was also traced. The ₹1000cr earlier loan was granted to meet short-term mismatch in cash flow and operational expenses. However, the ₹1000 crores earlier loan




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disbursed to RCOM on 29.12.2012 was found to be substantially diverted to Reliance's Infrastructure Vertical. In particular, ₹360 crores was diverted through 5 layers to M/s Reliance Infrastructure Ltd. and ₹380 crores was diverted to Tele Engineering Services Pvt. Ltd. (later amalgamated into Northern Wireless Solutions Private Limited) - both of which were not the sanctioned purpose of the loans, as the loan was for operations in the communications vertical. Further, ₹161.59 crores was utilized to pay back an even older loan of RCOM from Punjab National Bank in RCOM's PNB A/c #5371 - which again was not the sanctioned purpose of the loan. Another ₹46.23 crores was dissipated as payments to third parties such as Indus Towers Ltd., Airtel, Viom Infranetworks Ltd., etc. Another ₹14.79 crores was utilized as interest payments to service various RCOM loans from UCO Bank, IDBI Bank, and PNB. The bank trail is depicted pictorially for ease of reference as follows:




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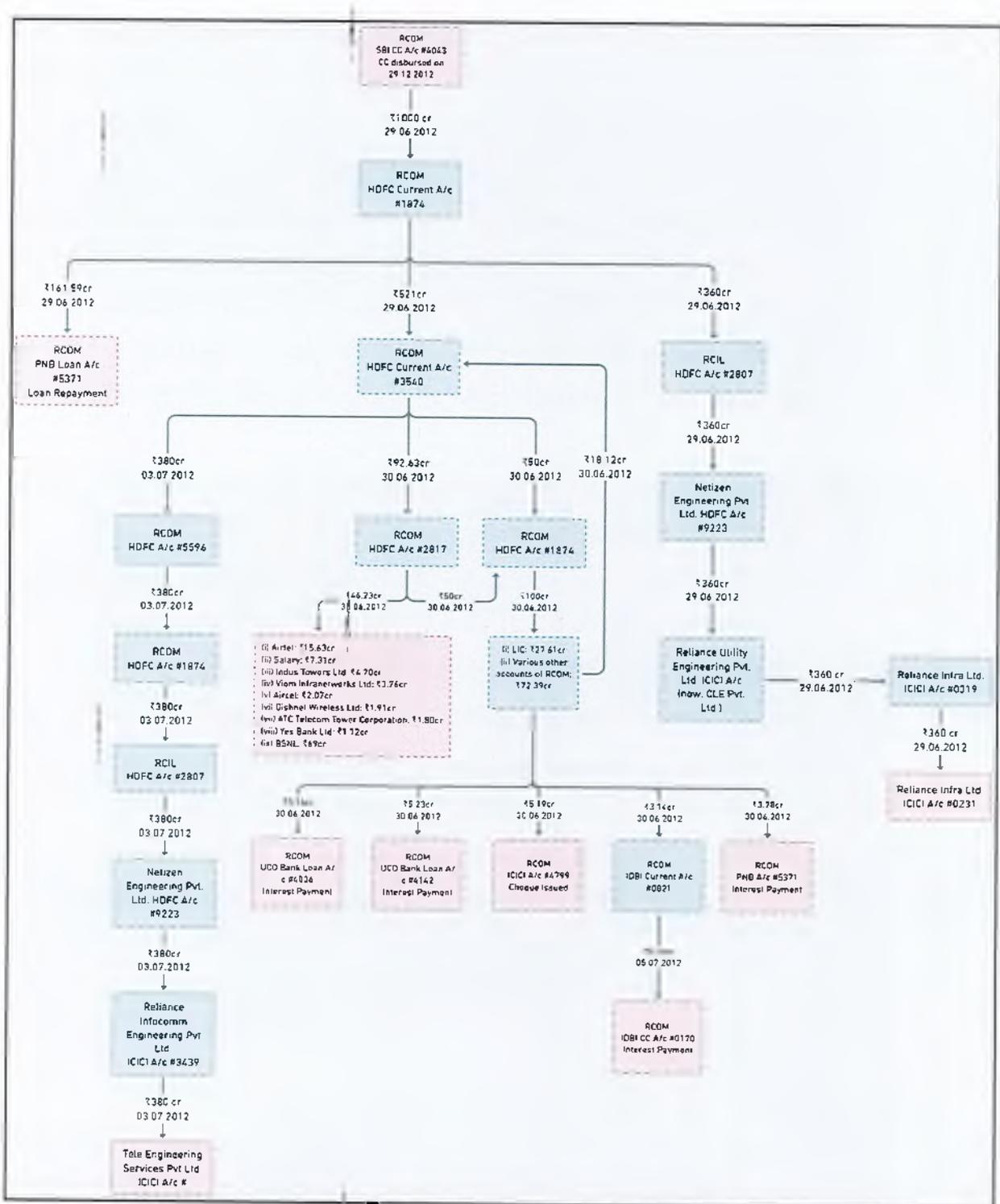


Figure 2 : Fund Trail of earlier loan of ₹1000cr by SBI to RCOM

3.18.4. The ₹300 crores earlier loan disbursed to RCOM's SBI Loan A/c #5165 on 19.10.2012 was found to be utilized for repayment of an even older loan of RCOM from PNB. These funds were transferred




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to RCOM's PNB Loan A/c #5371 for part repayment on 19.10.2012. Further, the ₹200 crores earlier loan disbursed to RCOM's SBI Loan A/c #8915 on 03.01.2013 was found to be transferred to RCOM's SBI Cash Credit A/c #9734 on the same date and then to RCOM's ICICI A/c #4799 on 04.01.2013. Subsequently, on the same date, it was utilized for investments in mutual funds, in violation of the loan sanction purpose - which was for meeting ongoing operational expenses and capital expenditure and repayment of existing liabilities other than to related parties / shareholder loans.

3.18.5. Further, SBI had also sanctioned a non-consortium cumulative term loan of ₹1200 crores to RAAG - with ₹565 crores disbursed to RCOM's SBI Cash Credit A/c #9734 on 29.08.2016 and ₹635 crores disbursed to RITL's SBI Cash Credit A/c #8347 on 29.08.2016. It is seen that the ₹565 crores to RCOM was siphoned off outside the country to China. Further, of the ₹635 crores disbursed to RITL, ₹339.61 crores was siphoned off outside the country to the UK, while the balance ₹295.39 crores was transferred to RITL's Yes Bank A/c for settlement of 8 outstanding loans of Yes Bank to RITL. The pictorial fund-trail and bank account fund-trail is as follows:

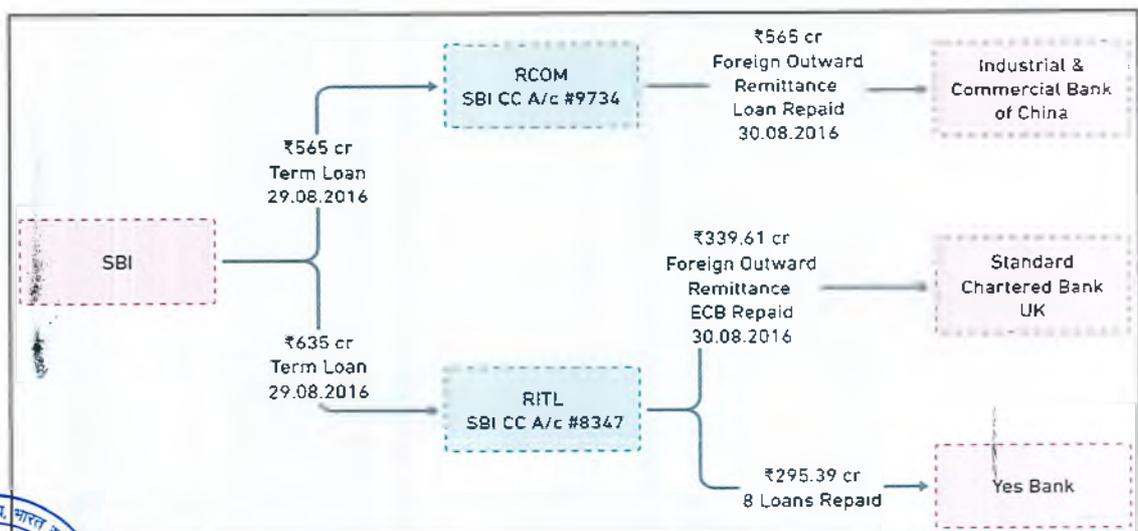


Figure 3: SBI's credit facility of ₹1200cr to RCOM and RITL in 2016



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Date	Description	Debit (₹)	Credit (₹)	Counter-Party
29-08-2016	DEP TFR tr 0030990903067 OF SBI CAG MUMBAI AT 61341 SAMB-III, MUMBAI		5,65,00,00,000	Loan Disbursal
30-08-2016	WDL TFR RTGS UTR NO: SBINR52016083033820784 0099107044300 AT 61341 SAMB-III, MUMBAI	5,65,00,00,058		Foreign outward remittance to ICBC, China

Date	Description	Debit (₹)	Credit (₹)	Counter-Party
29-08-2016	DEP TFR DEPOSIT BY TRANSFER 0036044951471 OF RELIANCE INFRATEL LTD AT 09995 CAG MUMBAI		6,35,00,00,000	Loan Disbursal
06-09-2016	T CASH WDL 16TS0064046 0999516TS000363	3,39,61,25,700		Foreign Outward Remittance to Standard Chartered Bank, UK
08-09-2016	WDL TFR NEFT UTR NO: SBIN216252126828 0099506044303 AT 09995 CAG MUMBAI	2,95,38,74,300		RITL Yes Bank A/c #0177

Date	Description	Debit (₹)	Credit (₹)	Counter-Party
08-09-2016	NEFT-SBIN216252126828-RELIANCE INFRATEL LTD		2,95,38,74,300	Loan proceeds from SBI A/c
08-09-2016	003LA02152370003-421-TERMLOAN-LIQ	6,31,31,313		Partial Repayment of Revolving Term Loan of RITL of 500 Cr with Yes Bank
08-09-2016	003LA02152880007-367-TERMLOAN-LIQ	3,86,59,793		
08-09-2016	003LA02151800003-480-TERMLOAN-LIQ	6,25,00,000		
08-09-2016	003LA02151980001-463-TERMLOAN-LIQ	3,75,00,000		
08-09-2016	003LA02161330002-131-TERMLOAN-LIQ	60,00,00,000		Repayment of Revolving Term Loan of RITL of Rs.275 Cr with Yes Bank
08-09-2016	003LA02161160003-149-TERMLOAN-LIQ	100,00,00,000		
08-09-2016	003LA02161040002-162-TERMLOAN-LIQ	100,00,00,000		
08-09-2016	003LA02161240003-144-TERMLOAN-LIQ	15,00,00,000		

3.18.6. Notably, the SBI loan of ₹1200 crores (₹565 crores to RCOM and ₹635 crores to RITL) was for making payments of scheduled liabilities related to ECB loans other than any related party / shareholder loans in RCOM and RTL. One of the conditions of this loan sanction was the creation of an escrow account with the SBI CAG branch within three months from the date of first disbursement. This escrow account was to receive all the receivables from tower sharing contracts entered into between RITL and Reliance Jio. And these receivables were the security against which SBI had lent funds of ₹1200 crores to RCOM and RITL and in the first place.




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3.18.7. While the loan was disbursed on 29.08.2016, RCOM did not open the escrow account till 08.08.2018. Even prior to opening the escrow A/c #37696189057 in the name of 'Reliance Jio Infocomm Limited - Escrow Account' - receivables from Reliance Jio were routed through RCOM's HDFC Bank A/c #0600310002817 till 31.03.2017 - a non-consortium bank, and these receivables were transferred to the Department of Telecommunications, Ministry of Communication, Government of India - instead of acting as security for the loans issued by SBI. This clearly establishes diversion and dissipation of security pledged against the loan.

3.18.8. Further, as a part of security for these ₹1200 crores loan, RCOM was also required to submit a Chartered Accountant's (CA's) certificate on the number of towers installed which are up and running and are being utilized by Reliance Jio. However, no such CA's certificate was submitted by RCOM to SBI.

3.18.9. Further, these ₹1200 crores loan was also to be secured by a personal guarantee of ₹1200 crores by Mr. Anil Dhirajlal Ambani. As per the terms of sanction of this loan, Mr. Ambani was to give a personal net worth certificate to SBI. However, no such certificate for the personal guarantee was provided by Mr. Ambani to SBI.

3.19. IDBI Bank

3.19.1. Statement of Mr. Gautam Sarkar, Deputy General Manager, IDBI Bank, was recorded on 25.09.2025 u/s 50 of PMLA, in the capacity of authorized representative of IDBI Bank. As per his statement, RCOM borrowed ₹750 crores as term loan; ₹40 crores as non-fund based limit; ₹10 crores as Rupee term loan and ₹100 crores as



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Vendor Financing Assistance in the years 2013 and 2014. Similarly, RTL has also availed term loan of ₹300 crores, Rupee term loan of ₹10 crores and non-fund-based limit of ₹190 crores from IDBI Bank. Of the said loan amounts, ₹966 crores (principal) is still outstanding and the loan accounts of RCOM and RTL has been declared as NPA. The overview of fund-trail of credit facilities availed by RCOM and RTL is presented pictorially below and discussed in detail thereafter:

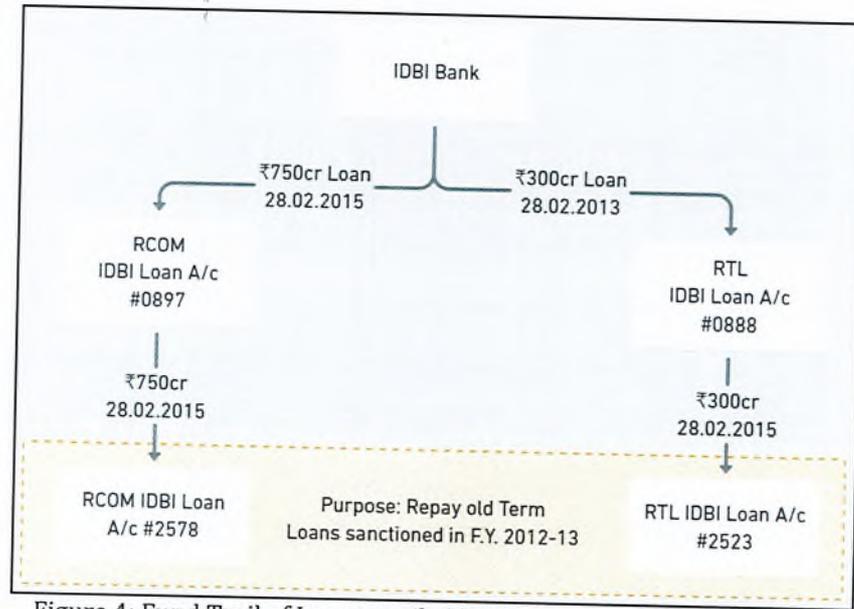


Figure 4: Fund Trail of Loans availed by RCOM and RTL from IDBI Bank

3.19.2. From the bank accounts of RCOM with IDBI Bank, it is seen that IDBI Bank has sanctioned term loan of ₹750 crores to RCOM on 28.02.2015 and disbursed it the same day by transferring the amount from Term Loan A/c #701673200000897 to RCOM's IDBI A/c #701671200002578. This loan was sanctioned for capital expenditure, operational expenditure, and repayment of existing liabilities other than to any related party / shareholder loans. On perusal of the A/c # 701671200002578, it is seen that RCOM had earlier availed loan of ₹750 crores from IDBI Bank through the account in F.Y. 2012-13 (date of sanction: 17.01.2013) and on



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receipt of loan of ₹750 crores in the year 2015, the amount was utilized by the company for repayment of the loan taken in the F.Y. 2012-13. The relevant bank account transactions are reproduced below for reference:

Table 10: Bank A/c #70167320000897 of RCOM with IDBI Bank (Loan Account)				
Date	Description	Debit (₹)	Credit (₹)	Counter-Party
28-02-2015	DISBURSEMENT	7,50,00,00,000		Loan Disbursal
Bank A/c #701671200002578 of RCOM with IDBI Bank				
28-03-2013	DISBURSEMENT	5,00,00,00,000		Old Term Loan availed during 2013
06-08-2013	DISBURSEMENT	2,50,00,00,000		Old Term loan availed during 2013
28-02-2015	REPAYMENT		7,50,00,00,000	Repayment of Old Term Loans availed in 2013

3.19.3. The earlier loan of ₹750 crores by IDBI Bank to RCOM was disbursed in two tranches to RCOM's IDBI Loan A/c #2578 on 06.08.2013 (₹250 crores) and on 28.03.2013 (₹500 crores). The ₹500 crores tranche was transferred to RCOM's IDBI Current A/c #0170 on 28.03.2013 and further, ₹449.05 crores was transferred on the same date to RITL's IDBI Current A/c #5286 for buy-back of Commercial Paper (purchased earlier by IDBI Bank for ₹485.35 crores) of RITL issued on 04.01.2013. The fund trail of the money received from IDBI bank on issuance of the Commercial Papers ends up in Mutual Fund Subscription. Notably, this earlier loan of ₹500 crores was sanctioned for the purpose of operational expenses, capital expenses and repayment of existing liabilities of RCOM. However, as per the bank trail, it is clear that the loan has been used for repayment of liabilities of RITL and not RCOM.

3.19.4. The ₹250 crores tranche ultimately ended up as follows: ₹60 crores as subscription of the Nippon India Money Market Fund, ₹50 crores for repayment of RCOM's HDFC bank short term loan, and ₹82 crores as payment to various third parties such as Direct Tax Payments (₹30.73cr), EPF Payment (₹2.94cr), Salaries (₹30.92cr),




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etc. The purpose of this loan was repayment of existing cash credit limit and short-term loans of RCOM on their maturity, which was not fully complied with by RCOM, demonstrating diversion of funds.

3.19.5. The pictorial fund-trail of the utilization of funds from initial disbursement of ₹500 crores and ₹250 crores is presented below:

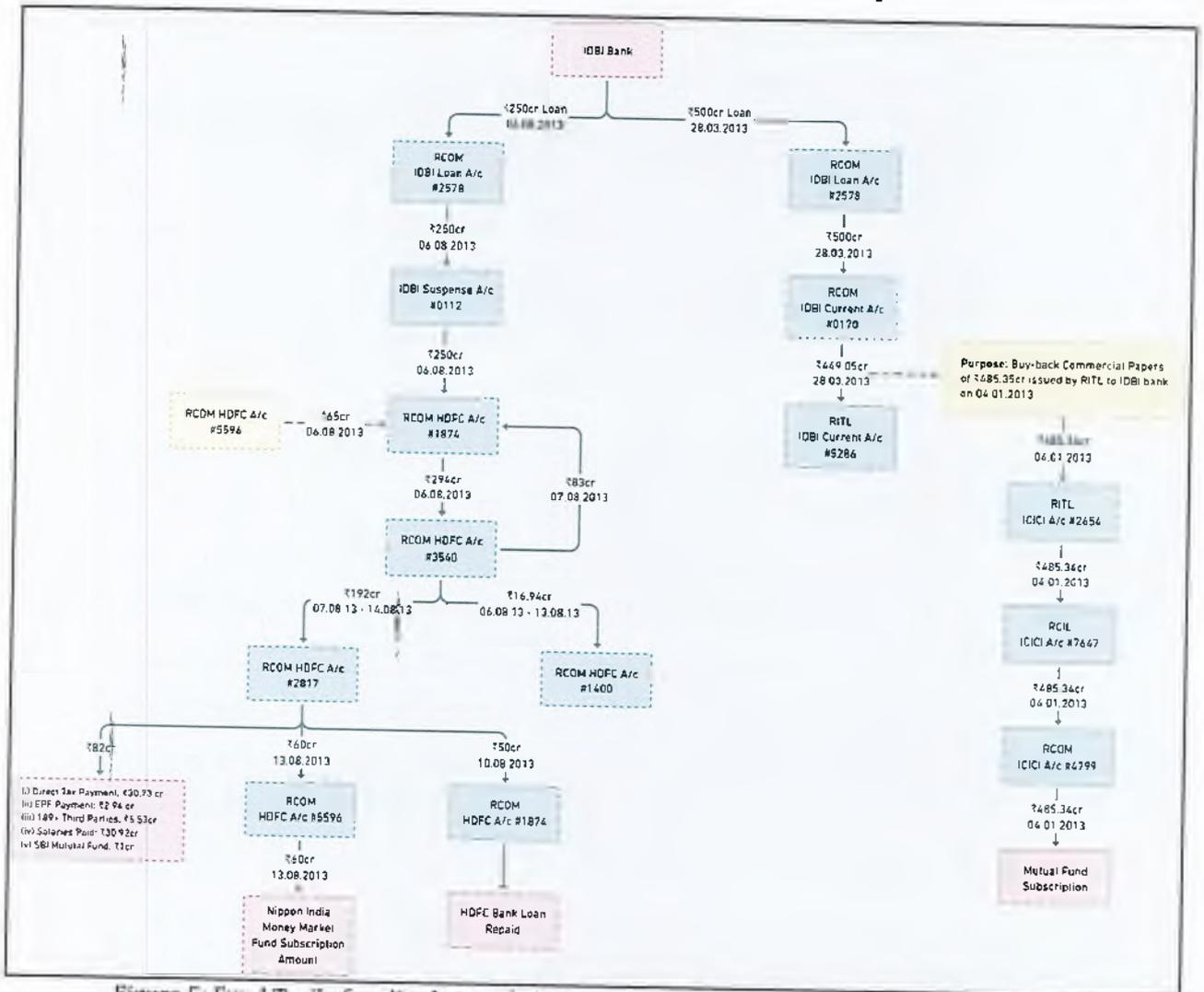


Figure 5: Fund Trail of earlier loan of ₹750 crores availed by RCOM from IDBI Bank

3.19.6. Similarly, RTL availed term loan of ₹300 crores from IDBI Bank during the year 2015, and loan amount was disbursed by the bank on 28.02.2015, from loan A/c #0701673200000888 to A/c



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#0701671200002523 of RTL with IDBI Bank. On perusal of statement of A/c #0701671200002523, it is seen that the account pertains to loan of ₹300 crores availed by RTL from IDBI Bank in the year 2013 (earlier disbursal), and the ₹300 crores loan taken in the year 2015 was used to square off the earlier loan. The purpose of this earlier loan of ₹300 crores was for meeting the working capital requirement of RTL. The relevant bank account transactions are reproduced below for reference:

Table 11: Bank A/c #0701673200000888 of RTL with IDBI Bank				
Date	Description	Debit (₹)	Credit (₹)	Counter-Party
28-02-2015	DISBURSEMENT	300,00,00,000		Loan Disbursal to 0701671200002523
Bank A/c #0701671200002523 of RTL with IDBI Bank				
22-01-2013	DISBURSEMENT	298,00,00,000		Term Loan availed during 2013
30-03-2013	DISBURSEMENT	2,00,00,000		Term loan availed during 2013
28-02-2015	REPAYMENT		300,00,00,000	Repayment of Term loan availed in 2013

3.19.7. The previous earlier loan of ₹300 crores by IDBI Bank to RTL was disbursed on 22.01.2013 in RTL's IDBI A/c #2523 and was subsequently transferred to RTL's IDBI Current A/c #1304 and then to RCIL's ICICI A/c #7647 and then to RCOM's Yes Bank A/c #0165 - all on the same day, i.e. 22.01.2013. Of this, ₹85 crores was utilized on 23.01.2013 by RCOM for liquidation of its Yes Bank Term Loan A/c #1111; ₹12.4cr was routed through RCOM's HDFC A/c #1874 (on 28.01.2013), then to RCOM's HDFC A/c #5596 (on 28.01.2013), and ultimately invested in Mutual Funds on 28.01.2013. This represents clear violation of terms mentioned in the sanction for the said interim loan, which stipulated the funds to be utilized for meeting the working capital requirements of RTL.

The relevant fund-trail is represented pictorially below:




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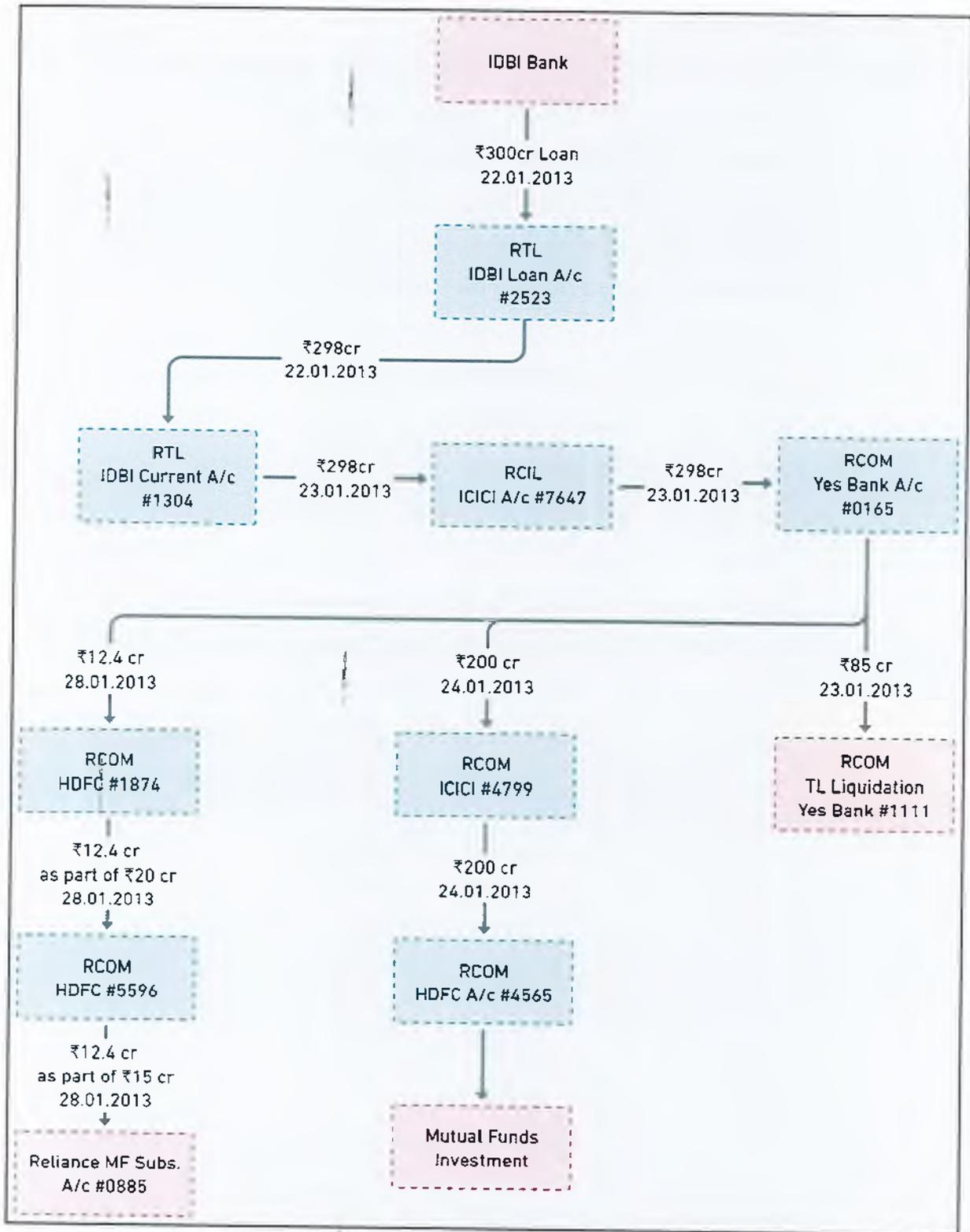


Figure 6: Fund Trail of earlier loan of ₹300 crores availed by RTL from IDBI Bank




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3.20. Bank of India

3.20.1. Statement of Mr. John Justus, Chief Manager, Bank of India, was recorded on 09.10.2025 was recorded u/s 50 of PMLA, in the capacity of authorized representative of Bank of India. As per his statement, RCOM borrowed ₹350 crores as term loan in the year 2012, ₹700 crores as term loan in the year 2015, and overdraft limit of ₹632.5 Crores in the year 2015. Similarly, RTL has borrowed ₹50 Crores in the year 2015. Of the said loan amount, ₹724.78 crores is still outstanding for RCOM, and ₹51.77 crores is outstanding for RTL. These accounts have been declared as NPA. Further, Bank of India has classified the loan accounts of RCOM, Mr. Ambani (promoter and erstwhile director of RCOM), and Smt. Manjari Ashok Kacker (erstwhile director of RCOM) as fraud on 08.08.2025. It has further classified the loan accounts of RTL, Mrs. Grace Thomas (erstwhile director of RTL and present director of RCOM), Mr. Gautam Doshi, Mr. Sateesh Seth, and certain other persons as fraud on 11.08.2025 (RCOM) and 12.08.2025 (RTL). The loans sanctioned by BOI as a part of the consortium loan are represented pictorially as follows:

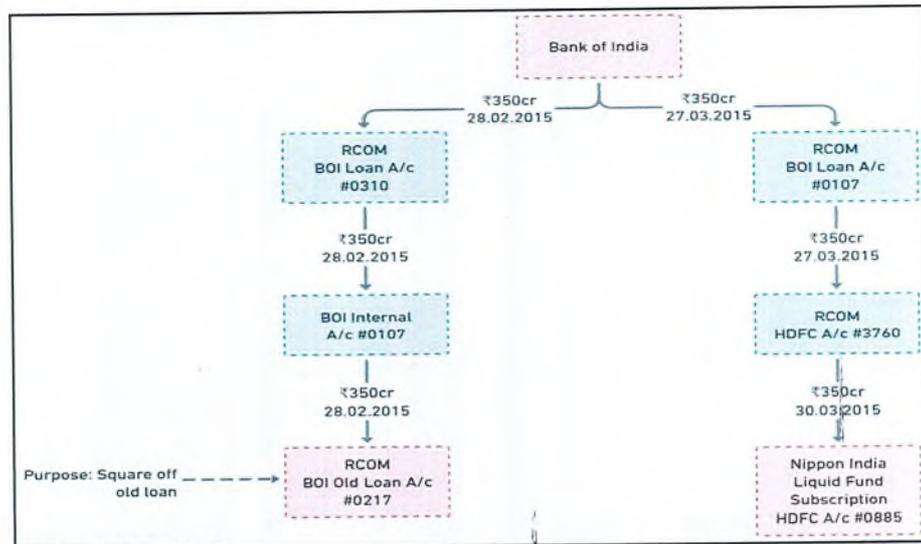


Figure 7: Fund Trail of loan of ₹700 crores available by RCOM from Bank of India




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3.20.2. Bank of India has sanctioned loan of ₹700 crores to RCOM vide sanction letter dated 21.01.2015. Subsequently, an amount of ₹350 crores was disbursed on 28.02.2015 from loan account number 016065410000310 and another ₹350 crores was disbursed from the same account on 27.03.2015. The purpose of this loan of ₹700 crores is for meeting operational expenses, capital expenses and repayment of existing liabilities of RCOM. The loan amount disbursed on 28.02.2015 was transferred to internal account of Bank of India, having A/c # 016090200000107 and from there, the amount was transferred to A/c # 016065410000217 of RCOM with Bank of India. On perusal of this account, it is seen that the account pertains to term loan of RCOM from Bank of India, wherein, an amount of ₹350 crores was disbursed on 29.12.2012 (initial disbursement). It is seen that the amount of ₹350 crores received on 28.02.2015 was utilized to square off the earlier loan amount.

3.20.3. Regarding the loan amount of ₹350 crores disbursed on 27.03.2015, the amount was transferred to internal A/c of Bank of India, having #016090200000107, and from there, the amount was transferred on the same day, i.e., 27.03.2015 to RCOM's A/c #00600310033760 maintained with HDFC Bank for investment into Nippon India Liquid Fund. This loan was sanctioned for the purpose of Operational Expenditure, Capital Expenditure, and for repayment of existing liabilities of RCOM. However, amount of ₹350 Cr was utilized for investment in mutual funds which represents a clear diversion from the sanctioned purpose. The relevant bank account transactions are reproduced below for reference:

Table 12: Bank A/c #016065410000310 of RCOM with Bank of India				
Date	Description	Debit (₹)	Credit (₹)	Counter-Party




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28-02-2015	016065410000310 Loan Disbursement Debit	350,00,00,000		transferred to internal a/c #016090200000107 and from there transferred to A/c # 016065410000217
27-03-2015	016065410000310 Loan Disbursement Debit	350,00,00,000		transferred to internal a/c #016090200000107 and from there transferred to RCOM HDFC A/c #00600310033760 for investment in Nippon India Mutual Fund
Bank A/c #016065410000217 of RCOM with Bank of India				
29-12-2012	016065410000217 Loan Disbursement Debit	350,00,00,000		Term Loan availed during 2012
30-03-2015	16090200000107		350,00,00,000	repayment of term loan availed during 2012
Bank A/c #00600310033760 of RCOM with HDFC Bank				
27-03-2015	RTGS CR-BKID0000160-RELIANCE COMMUNICATI		350,00,00,000	Received from internal a/c #016090200000107 of Bank of India
30-03-2015	00600350000885-Rel Communications Ltd	350,00,00,000		Transfer of funds to Nippon India Mutual Fund Subscription A/c

3.20.4. The earlier disbursal of ₹350 crores on 29.12.2012 was for the purpose of repayment of existing loans on their maturity by RCOM. However, as per the banking fund trail, it is seen that ₹167 crores was invested in mutual funds on 01.01.2013. Further, the balance ₹183 crores was sent to Barclays Bank as repayment of interest and principal on ECBs. The fund trail is represented pictorially as follows:




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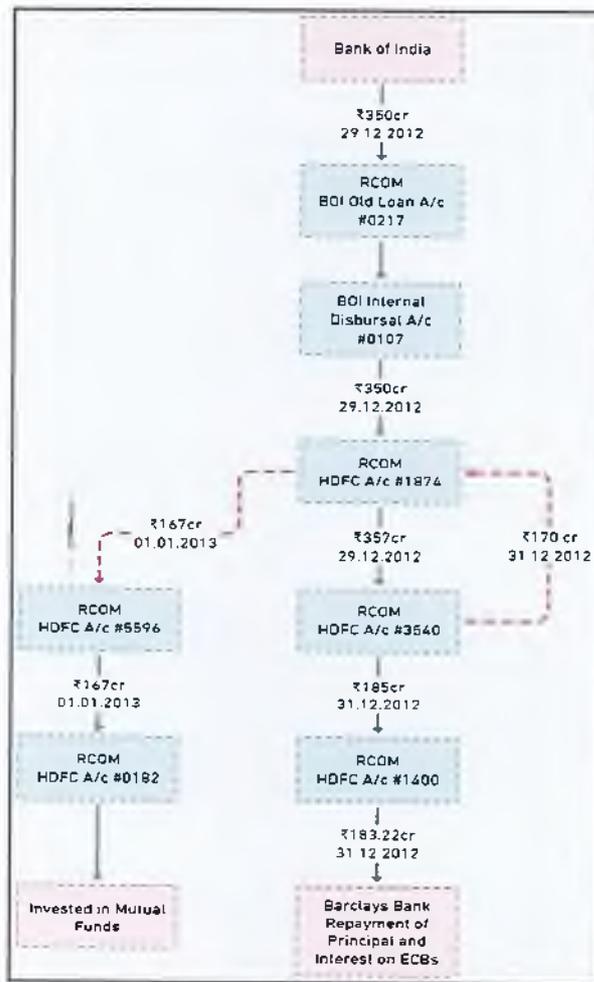


Figure 8: Fund Trail of earlier loan of ₹350 crores availed by RCOM from Bank of India

3.21. Bank of Baroda

3.21.1. Statement of Mr. Prashant Pandian, Chief Manager, Bank of Baroda, was recorded u/s 50 of PMLA, 2002, on 16.10.2025, in his capacity as authorized representative of Bank of Baroda. As per his statement, RCOM has borrowed ₹1600 crores from Bank of Baroda, Vijaya Bank (now merged into Bank of Baroda) and Dena Bank (now merged into Bank of Baroda) between the years 2012 and 2018 and had also availed non-fund-based limit of ₹750 crores. The total outstanding of RCOM is ₹1878.18 crores (with Bank of Baroda), ₹250 crores (Dena Bank) and ₹94.99 crores (Vijaya bank) and the




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3.21.2. The ₹1000 crores loan was disbursed on 24.08.2015 from loan a/c no. 29100600001709. The sanctioned purpose of this loan was for capital expenditure of RCOM. Part of the loan to the tune of ₹ 374.21 crores was disbursed to M/s Reliance Communications Infrastructure Limited (RCIL) at the request of RCOM. This amount was then transferred through 5 layers for ultimate utilization of repayment of EQB. On 05.09.2015, ₹371.24 crores were transferred from RCIL's HDFC A/c no. 2807 to RCOM HDFC A/c No. 2817 to RCOM HDFC A/c 3760 to RCOM HDFC A/c 1874. From here, on 08.09.2015, ₹360 crores were transferred to RCOM HDFC A/c 1400 of which ₹355.09 crores were transferred to RCOM HSBC A/c 9002, from where ₹354.85 crores was remitted outwards to China. This represents a clear violation of the loan sanction terms and a diversion of money outside India.

3.21.3. Another tranche of ₹95.25 crores was transferred to M/s Reliance Tech Services Limited (RTSL) HDFC A/c 2590 from where ₹85.21 crores was ultimately layered through 4 layers and used for debt servicing/interest payments for other loans of RCOM with BOB, BOI, Canara Bank, SBI, IDBI, Yes Bank, Syndicate Bank, Central Bank Of India and Union Bank. The balance ₹1.92 crores were invested in Mutual Funds by RCIL after layering through 7 layers. Another tranche of ₹4.33 crores was dissipated in payments to 3rd parties by RTL after layering through 6 layers. All these transactions constitute a fraudulent diversion of funds in violation of the terms of the loan which was for capital expenditure of RCOM. The fund trail is represented in pictorial form above.

3.21.4. Apart from the above-mentioned specific instances of diversion, dissipation, and violations, other loans taken by RAAG are also



19/11
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under investigation. In this regard, the statements of authorized representatives of various banks were recorded, the brief gist of which is discussed in the subsequent paragraphs.

3.22. Statement of Mr. Niranjana Kumar, Senior Manager, UCO Bank, was recorded on 06.10.2025 and 10.10.2025 u/s 50 of PMLA, 2002. As per his statement, since the year 2011, RCOM has borrowed ₹2040 crores from UCO Bank during the years 2012, 2013 and 2017, out of which one loan for ₹740 crores has been declared NPA on 29.12.2017 and an amount of ₹680 crores (Principal) is still outstanding. Further, the loan accounts of the company were declared by UCO Bank as fraud on 10.09.2025.

3.23. Statement of Mr. Shakti Kumar Sharma, Chief Manager, Canara Bank, was recorded u/s 50 of PMLA, 2002 on 08.10.2025 & 09.10.2025, in his capacity as authorized representative of Canara Bank. As per his statement, RCOM, M/s Reliance Communications Infrastructure Limited ("RCIL") (subsidiary company of RCOM) and RTL have availed various short-term loans from Canara Bank (and also erstwhile Syndicate Bank now merged with Canara Bank), at least from the year 2008. During the year 2013, RCOM availed loan of ₹240 crores and ₹500 crores from Canara Bank and during the year 2015, RCOM availed term loan of ₹740 crores. Further, RTL also availed loan of ₹60 Crores from Canara Bank during the year 2015. Similarly, RCOM and RTL also availed loan of ₹460 crores from Syndicate Bank during the year 2015. Further, RCOM also availed non-fund-based limit of ₹550 crores containing FLC/Standby Letter of Credit/Letter of Undertaking/Comfort limit of ₹350 Crores and ₹200 Crores of Bank Guarantee from Syndicate Bank. Of the LCs issued, 16 LCs were availed during the year 2017. The loan accounts of RCOM and RTL




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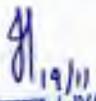
were declared as NPA during the year 2017 and claims were filed with the Resolution Professional in respect of claims of ₹906.63 crores (for Canara Bank) and ₹1225.18 crores (for Syndicate Bank) in respect of RCOM. Similarly, RTL has outstanding of ₹122.47 crores (for Syndicate Bank) and ₹169.4 crores (for Canara Bank).

3.24. Statement of Mr. KG Krishnamoorthi, Chief Manager, Bank of Maharashtra, was recorded u/s 50 of PMLA, 2002, on 03.10.2025, in his capacity as authorized representative of Bank of Maharashtra. As per his statement, during the year 2014, RCOM has availed non-fund-based limit of ₹500 crores from the Bank, which also includes sub-limit of ₹199.99 crores to RTL. The LCs were issued by Bank of Maharashtra on behalf of RCOM in favour of RTL and LCs for amount of ₹499.58 crores had devolved, and as on 11.08.2017, the outstanding amount of Bank of Maharashtra was ₹488.78 crores.

3.25. Statement of Mr. Shrivaran Kumar Bhandekar, Deputy Vice President, HDFC Bank, was recorded u/s 50 of PMLA, 2002 on 29.09.2025, in his capacity as Authorized Representative of HDFC Bank. As per his statement, RCOM has borrowed ₹220 crores and RTL availed BG facility of ₹4.1 crores. Further, HDFC Bank has at present outstanding of ₹17.9 crores in respect of RCOM and ₹4.05 crores in respect of RTL and had also filed claim of ₹3.5 lakhs in respect of RITL against a BG issued by it.

3.26. Statement of Mr. Prabhat Kumar Ambastha, Chief Manager, Union Bank of India, was recorded on 30.09.2025, u/s 50 of PMLA, 2002, in his capacity as authorized representative of Union Bank of India. As per his statement, RCOM borrowed ₹775 crores from Union Bank of India 235 crores from Corporation Bank (now merged into Union Bank




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of India) as term loan. Further RCOM also availed non-fund-based limit of ₹500 crores from Corporation Bank. The total outstanding of RCOM with Union Bank of India and Corporation Bank is ₹2585.82 crores (including interest) and the loan accounts of the company were declared NPA. Further, RTL availed Term Loan of ₹25 crores from Union Bank of India and ₹15 crores from Corporation Bank, and the total outstanding is ₹69.94 crores.

3.27. Statement of Sh. Mohit Inamdar, Senior Vice President, Yes Bank, was recorded u/s 50 of PMLA, 2002, on 16.10.2025, in his capacity as authorized representative of Yes Bank. As per his statement, Yes Bank has issued BG for ₹281.45 crores for RCOM and the same is active as on date.

3.28. It is also notable that the Central Bank of India, which had extended various credit limits to RCOM and RTL for an aggregate amount of ₹400 crores (including term loan of ₹280 crores to RCOM, term loan of ₹20 crores to RTL, and bank guarantee of ₹100 crores to RTL) has also declared these loan accounts as NPA. Further, the bank has also issued a show cause notice dated 02.09.2025 to RCOM on declaration of these accounts as fraud.

3.29. For ease of reference, the total outstanding loans extended by these banks to RCOM and its group entities are tabulated as under:

S. No.	Name of Borrower	Lender Bank	Sanctioned Loan (₹ cr)	Loan type	Amount outstanding in ₹ Cr.
1	RCOM	SBI	1500	Term Loan	3,530.42 (includes BG outstanding of ₹ 361.29 Cr)
2	RCOM	SBI	565	Term Loan	
3	RTL	SBI	125	Term Loan	
4	RITL	SBI	635	Term Loan	
5	RCOM, RTL	SBI	1150	BG Facility	




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Table No. 13: Summary of Credit availed by RCOM, RTL, and RITL					
S. No.	Name of Borrower	Lender Bank	Sanctioned Loan (₹ cr)	Loan type	Amount outstanding in ₹ Cr.
	and RITL				
6	RCOM	IDBI	750	Term Loan	690
7	RCOM	IDBI	10	Rupee Term Loan	
8	RCOM	IDBI	40	Non Fund Based	30.83
9	RCOM	IDBI	100 (later reduced to 25 Cr in 2016)	Vendor Financing Assistance	3.81
10	RTL	IDBI	300	Term Loan	276
11	RTL	IDBI	10	Rupee Term Loan	
12	RTL	IDBI	190	Non Fund Based	Devolved LCs - 55.01 Active BG -53.08
13	RCOM	Bank of India	350	Term Loan	Liquidated
14	RCOM	Bank of India	700	Term Loan	724.78
15	RCOM	Bank of India	632.5	Overdraft facility	Liquidated
16	RTL	Bank of India	50	Term Loan	51.77
17	RCOM	UCO Bank	740	Term Loan	680 (Principal)
18	RCOM	Syndicate Bank	550	Non fund Based (LC-350+BG 200)	1225.18
19	RCOM	Syndicate Bank	460	Term Loan	
20	RTL	Syndicate Bank	40	Term Loan	
21	RCOM	Canara Bank	740	Term Loan	906.63
22	RTL	Canara bank	60	Term Loan	
23	RCOM	HDFC Bank	220	Term Loan	17.9
24	RTL	HDFC Bank	4.1	Non Fund Based (BG)	4.05
25	RITL	HDFC Bank		Non Fund Based (BG)	0.03
25	RCOM	Bank of Maharas	500	Non Fund Based (LC)	488.78




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Table No. 13: Summary of Credit availed by RCOM, RTL, and RITL					
S. No.	Name of Borrower	Lender Bank	Sanctioned Loan (₹ cr)	Loan type	Amount outstanding in ₹ Cr.
		htra			
26	RCOM	UBI	775	Term Loan	2585.82
27	RCOM	Corporati on bank	235	Term Loan	
28	RCOM	Corporati on Bank	500	Non Fund based	
29	RTL	UBI	25	Term Loan	40.54
30	RTL	Corporati on Bank	15	Term Loan	29.40
31	RCOM	BoB	1000	Term Loan	1878.19
32	RCOM	BoB	250	Term Loan	
33	RCOM	BoB	750	Non Fund Based (BG)	
34	RCOM	Dena Bank	250	Term Loan	250
35	RCOM	Vijaya Bank	100	Non Fund Based (BG)	94.99

3.30. From the discussion in the preceding paragraphs, instances of diversion and dissipation of credit facilities availed by RAAG from both consortium and non-consortium banks have been enumerated. Further investigation with respect to RAAG was carried out and some properties were revealed, which are discussed hereunder.

Attempts by Reliance Group to influence the Resolution Process

3.31. Further, during investigation, statement has been recorded from Sh. Shashank Vijayakar, Key Managerial Person of M/s VB Desai Financial Services Ltd. and its group companies, on/s 50 of PMLA, 2002. During his statement, he had stated that funds from Reliance Commercial Finance Limited ("RCFL"), Crest Logistics and Engineers Private Limited ("CLE") (now known as CLE Pvt. Ltd.) were routed through various NBFCs of VB Desai group, such as M/s Deep Industrial Finance Ltd., M/s Shriyam Auto Fin Ltd., M/s Pearl Housing Finance India Ltd., Traitrya Construction Finance Ltd., Vishwakarma Equipment Finance



19/11

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India Ltd., Mahimna Mercantile Credits Ltd. and Neptune Steel Strips Ltd. for either repayment of loans of RAAG and assignment of the said loans to the NBFCs under VB Desai Group.

3.32. On being asked regarding the reason for such routing of funds, Sh. Shashank Vijayakar stated that Reliance group were aware of the weak financials of RCOM, RITL, and RTL and that the loans of these companies were about to become NPA, and therefore, the management of these companies wanted to have control over the Committee of Creditors as an when the Corporate Insolvency Resolution Process was initiated in respect of these companies. For this purpose, funds were pumped from RCFL and CLE to these companies to purchase their debt from several lending banks. The details of funds sourced from RCFL and CLE and utilization of the same towards purchase of debt of RAAG are as follows:

Table No. 14 Funds transferred from RCFL & CLE to RAAG				
Sl. No	Name of related party	Amount sourced (₹ cr)	Intermediary company	Utilization of funds
1	RCFL	260	Deep Industrial Finance Ltd.	₹260 Cr transferred to RCOM SBI A/c# 4988 on 29.12.17
2	RCFL	260	Shriyam Auto Finance Limited	₹260 Cr transferred to RCOM SBI A/c# 4988 on 29.12.17
3	RCFL	260	Pearl Housing Finance India Limited	₹260 Cr transferred to RCOM SBI A/c# 4988 on 29.12.17
4	RCFL	260	Traitrya Construction Finance Limited	₹260 Cr transferred to RCOM SBI A/c# 4988 on 29.12.17
5	RCFL	260	Vishwakarma Equipment Finance India Limited	₹142 Cr transferred to RCOM and ₹118 Cr transferred to RTL on 29.12.2017
6	CLE	432.68	Mahimna Mercantile Credits Limited	₹432.68 Cr transferred to IDFC Bank to settle loan of Reliance Infratel Limited




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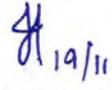
7	CLE	67.64	Neptune Steel Strips Limited	PNB for purchase of loan liabilities of RCOM with the bank
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3.33. Thus, when the CIRP was initiated in respect of these companies, the group companies of VB Desai group, such as Neptune Steel Strips Limited, Mahimna Mercantile Credits Limited, Traitrya Construction Finance Ltd., Shriyam Auto Fin. Ltd., Pearl Housing Finance Ltd., Deep Industrial Finance Ltd., Vishwakarma Equipment Finance India Limited filed claims with the Resolution professional of these companies by hiding the fact that the funds for purchasing their loans were sourced from the related parties of RAAG. Thus, the NBFCs mentioned here were considered by the Resolution Professional as non-related parties during CIRP of the company while considering the claims received from them.

3.34. Further, statement of Sh. Anish Niranjana Nanavaty, Resolution Professional of RCOM and RTL has been recorded u/s 50 of PMLA, 2002, on 06.11.2025. During his statement, he deposed that M/s Bonn Investment Inc., USA, a step down wholly owned subsidiary of RCOM, was in possession of a property in the form a residential flat in Downtown Manhattan, New York, USA. However, Ms. Vaishali Mane, the then Director of M/s Bonn Investment Inc., in collusion with Sh. Punit Garg, Director/KMP in RCOM, in an unauthorized manner, had sold the property for USD 8.3 Million, in the year 2023, without taking approval from/intimating the Resolution Professional of the company.

3.35. Sh. Anish Nanavaty further stated that the proceeds from the sale of the property were credited into a newly opened account in the name of Bonn Investment Inc. maintained with Chase Manhattan Bank, wherein Ms. Vaishali Mane was the sole authorized signatory – in variance with the




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standard practice of RCOM overseas subsidiaries having a minimum of two authorized signatories. These funds were later transferred to M/s AZCO Real Estate Brokers LLC, Dubai, with whom, M/s Bonn Investment Inc had entered into an agreement through Ms. Vaishali Mane. As per this agreement, M/s Bonn Investment was to invest USD 25 million in AZCO, and the USD 8.3 Million transferred was the first tranche of such investment. Further, it was also stipulated in the agreement that if Bonn Investment Inc. was unable to invest the remaining amount within 3 months (subsequently extended to 9 months), the amount already invested would be forfeited to AZCO. This agreement is also in variance with standard market practices. All these actions were undertaken clandestinely without consent of the Resolution Professional.

3.36. The above-mentioned facts were reported to the Hon'ble NCLT, Mumbai, by Sh. Anish Nanavaty, along with supporting documents, vide C.P (I.B) - 1387 (MB) of 2017. From the statements recorded from Sh. Anish Nanavaty and documents submitted by him, it is clearly evident that the management of RCOM had engaged in alienation of the assets of the company even after initiation of Insolvency resolution in respect of the company without the knowledge of the Committee of Creditors or the Resolution Professional.

4. Investigation with respect to properties of Reliance Communications Limited and Reliance Realty Limited

During investigation, several properties pertaining to Reliance Communications Limited and Reliance Realty Limited were identified, the details of which are discussed hereunder:



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Properties of Reliance Communications Ltd

A) Property at 6th Floor, Fortune Tower, Maitri Vihar, Chandrasekharpur, Bhubaneswar

- 4.1.** Vide lease agreement dated 20.11.1997 registered at the office of the Sub Registrar of Assurances at Bhubaneshwar under serial no. 581 dated 20.11.1997, the General Administration Department, Bhubaneshwar, Government of Orissa, has demised upon Orissa Industrial Infrastructure Development Corporation (IDCO), a parcel of land admeasuring 3.058 Acres of land situated at Revenue Mouza: Jaydev Vihar-Unit XVI, bearing Revenue Plot No. 18/4282, Khata No. 1426/1052 under Bhubaneswar Tehsil of Khurda District, Orissa. On the said land, IDCO constructed a multi-storied building for industrial purpose, known as Fortune Towers, consisting of basement, ground and seven floors.
- 4.2.** Later, IDCO entered into an agreement dated 17.04.2003 for lease of space in Fortune towers on outright payment with Reliance Infocomm Limited (*amalgamated into RCOM in 2006*). As per the said agreement, Reliance Infocomm Limited leased office premises bearing module no. A-6, B-6 and C-6 collectively admeasuring 36948 Sq. Ft super built-up area, situated on the 6th Floor of Fortune Towers, together with premises bearing No. BS-1 admeasuring 1000 Sq. Ft in the basement containing 30 no.s parking spaces and another 30 open car parking spaces in the compound of Fortune Towers, comprising 12.5% proportionate undivided share, right, title and interest in leasehold rights of the land, for a period of 80 years. For the lease of said property, Reliance Infocomm Limited, made payment of Rs.6,18,87,900 vide Cheque No. 107455 dated 17.04.2003 drawn on HDFC Bank.



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Ministry of Finance, Deptt. of Revenue
भारत सरकार, नई दिल्ली / Govt. of India, New Delhi

B) Property at No.3, Haddows Road, Nungambakkam, Chennai

- 4.3. Vide Deed of Sale dated 31.03.1975 registered as document no. 2323 of 1975, Philips India Limited purchased land bearing no.3 (Old No.2), Haddows Road, Nungambakkam, Madras, bearing part of O.S. No. 428 and R.S No. 83, admeasuring 5208.05 Sq. Mts., from K Mohammed Ibrahim and 8 others. Subsequently, the vendors constructed a building admeasuring 40,000 Sq. Ft. Built-up area on the said land. Later, vide Indenture of Absolute Sale, registered as Conveyance Deed in Document no. 30/2003 dated 10.01.2003, at the Joint Sub Registrar 2, Thousand Lights, Chennai, the land along with the building was sold by Philips India Limited to Reliance Infocomm Limited, for a purchase consideration of ₹12,01,00,000.

C) Property at Ambattur Industrial Estate, Tamil Nadu

- 4.4. Vide Assignment Deed dated 03.03.1971 registered as Document No. 3547 of 1971 on 21.07.1971 at the Office of Sub Registrar of Assurances at Ambattur, the Government of Tamil Nadu assigned developed plot bearing No. 40-A (NP), situated at Ambattur Industrial Estate in Saidapet Taluk and Chengalpet MGR District, admeasuring 3.44 acres or thereabouts in Sy! No.s 114 Pt. 65 pt. 81 Pt., 113 Pt., 82 Pt. 64 pt. Of Ambattur Village in the name of Stewarts and Lloyds of India Limited. Later, vide Sale Deed in Document No. 3330/1996 dated 19.04.1994 registered at the Office of Sub Registrar of Assurance at Ambattur, The Tamil Nadu Small Industries Development Corporation Limited transferred ownership of the land to Stewarts and Lloyds of India Limited.
- 4.5. Later, Stewarts and Lloyds of India, vide Agreement to Sell dated 26.09.2003, sold the above-mentioned land at Ambattur to Reliance Infocomm Limited, for a consideration of ₹3,25,00,000 and advance of



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₹32,50,000 in this regard was made vide Demand Draft No. 484105 dated 22.09.2003 drawn on HDFC Bank, Anna Salai branch, Chennai. Further, vide Indenture of Sale in document no. 7293/2003 dated 02.12.2003, registered at the Office of the Sub Registrar of Ambattur, the Property was registered in the name of M/s Reliance Infocomm Limited (*no specific details regarding the mode of payment of remaining purchase consideration are mentioned*).

D) Property at Vadgaon Village Sheri, Pune

- 4.6.** Vide sale deed in Document no. 1028/2000 dated 24 April 2000 registered at the office of the Haveli VII Sub Registrar, Shri Vithal Bala Chandhere and Shri Santosh Vithal Chandhere, sold land admeasuring 8198 Sq. Mts. Situated at Sy. No. 34A/7C/2, Village Vadgaon Sheri, Taluka Haveli, Pune District, Maharashtra, to BSES Limited (*now Reliance Energy Limited*), for a sale consideration of ₹48,81,800. The document records the sale of two layout plots—Plot No. 1 admeasuring 442.979 Sq. Mts and Plot No. 2 admeasuring 428.124 Sq. Mts.—forming part of land under Survey No. 34A/7C/2 at Village Vadgaon Sheri, Pune.
- 4.7.** Later, vide Sale Deed dated 7th November 2007, registered at Office of the Sub Registrar of Haveli VII, the Plot No. 1, admeasuring 442.979 Sq. Mts and Plot No. 2 admeasuring 428.124 Sq. Mts, totally admeasuring 871.10 Sq. Mts. At Sy. No 34A/7C/2, at Village Vadgaon Sheri, Taluka Haveli, Pune District, Maharashtra was sold to Reliance Communications Limited, for a purchase consideration of ₹85,00,000. The sale deed was executed on 7 November 2007 at Pune between Reliance Energy Limited, as the vendor, and Reliance Communications Limited, as the purchaser. The deed pertains to layout plots carved out



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of land bearing Survey No. 34A/7C/2, situated at Vadgaon Sheri, Haveli Taluka, Pune.

Regarding properties of Reliance Infocomm Ltd:

- 4.8.** Investigation made in respect of Reliance Infocomm Ltd. revealed that the Company was amalgamated with Reliance Communications Limited in the year 2006. Further on perusal of the Annual Report of RCOM for the year 2006-07, it is seen that

“Company restructured the telecom businesses by realigning the economic ownership of various businesses into the Company. Under a Scheme of Amalgamation and Arrangement which became effective from 12th September, 2006, inter alia, Reliance Infocomm Limited amalgamated with the Company and Reliance Communications Infrastructure Limited, Reliance Telecom Limited, Flag Telecom Group Limited, Reliance Infocomm Infrastructure Private Limited, Reliable Internet Services Limited and Campion Properties Limited became wholly owned subsidiaries of the Company, making it a fully transparent and integrated telecom operator. In order to further enhance shareholder value, the Company has also initiated demerger and amalgamation processes among its subsidiary companies, the details of which are mentioned in the Directors' Report.”

Thus, all the assets purchased/leased by Reliance Infocomm Ltd. became the assets of RCOM.

Properties of Reliance Realty Ltd. (RRL)

E) Properties at Millennium Business Park, Navi Mumbai:

During investigation, it was identified that 07 buildings situated at iium Business Park, Navi Mumbai, were taken on lease by



[Handwritten Signature]
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नयाँ दिल्ली, भारत सरकार
Ministry of Finance, Dept. of Revenue
New Delhi, India

Reliance Infocomm Infrastructure Private Limited from MIDC, and the details in this regard are discussed hereunder: -

4.9. The Lease Agreement for Building No. 6 (151) was registered vide document no. 4709/2008 dated 24 October 2008, at the Joint Sub Registrar Office, Thane - 11, Maharashtra, between the Maharashtra Industrial Development Corporation (MIDC) as the lessor and Reliance Infocomm Infrastructure Private Limited (now, Reliance Realty Ltd.) as the lessee. The purpose of this agreement was to grant a long-term lease of a property forming part of the Millennium Business Park within the Trans Thane Creek Industrial Area at Mahape, Navi Mumbai, for industrial and commercial use. The property leased consists of Building No. 6 (151) in Sector 2 with a defined built-up area. The duration of the lease is for a period of ninety-five years commencing from 1 December 2004.

4.10. The Lease Agreement for Building No. A8 was registered vide document no. 4715/2008 dated 24 October 2008, at the Joint Sub Registrar Office, Thane - 11, Maharashtra between MIDC and Reliance Infocomm Infrastructure Private Limited. It conveys leasehold rights over Building No. A8 situated in Sector 1 of the Millennium Business Park within the Trans Thane Creek Industrial Area, Mahape, Navi Mumbai. The agreement's purpose is to enable use of the premises for industrial and business activities permitted by MIDC. The lease is for a period of ninety-five years beginning on 1 December 2004.

4.11. The Lease Agreement for Building No. 42 (MBP-2) was registered vide document no. 4711/2008 dated 24 October 2008, at the Joint Sub Registrar Office, Thane - 11, Maharashtra, between MIDC and Reliance Infocomm Infrastructure Private Limited. It records the grant of




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leasehold rights for Building No. 42 in Sector 3, Millennium Business Park, Mahape, Navi Mumbai, for lawful industrial and commercial purposes. The property covers a defined built-up area and stands within the Trans Thane Creek Industrial Area. The lease term is ninety-five years effective from 1 December 2004.

4.12. The Revised Lease Agreement for Building No. 8 (41) was registered vide document no. 4713/2008 dated 24 October 2008, at the Joint Sub Registrar Office, Thane – 11, Maharashtra, between MIDC and Reliance Infocomm Infrastructure Private Limited. The purpose is to record the revised terms of lease for Building No. 8 (41) located in Sector 3, Millennium Business Park, Mahape, within the Trans Thane Creek Industrial Area. The lease covers a specified built-up area and is granted for industrial and commercial operations. The duration of the lease is ninety-five years commencing from 1 April 2006.

4.13. The Revised Lease Agreement for Building No. 9 was registered vide document no. 4714/2008 dated 24 October 2008, at the Joint Sub Registrar Office, Thane – 11, Maharashtra, between MIDC and Reliance Infocomm Infrastructure Private Limited. It grants leasehold rights over Building No. 9 in Sector 3, Millennium Business Park, Mahape, Navi Mumbai, which includes the superstructure and a basement portion. The lease was made for legitimate industrial and commercial use within the Trans Thane Creek Industrial Area and is valid for ninety-five years starting from 1 April 2006.

4.14. The Revised Lease Agreement for Building No. 43 was registered vide document no. 4710/2008 dated 24 October 2008, at the Joint Sub Registrar Office, Thane – 11, Maharashtra between MIDC and Reliance Infocomm Infrastructure Private Limited. The agreement concerns




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Building No. 43 in Sector 3 of the Millennium Business Park, Mahape, Navi Mumbai, within the Trans Thane Creek Industrial Area. It sets out the lessee's rights to occupy and use the premises for permitted business and industrial purposes. The lease extends for ninety-five years commencing from 1 December 2004.

4.15. The Revised Lease Agreement for Building No. 108 (A) was registered vide document no. 4712/2008 dated 24 October 2008, at the Joint Sub Registrar Office, Thane – 11, Maharashtra between MIDC and Reliance Infocomm Infrastructure Private Limited. The purpose of the agreement is to lease Building No. 108 (A), including the basement portion, in Sector 3 of the Millennium Business Park, Mahape, Navi Mumbai, within the Trans Thane Creek Industrial Area. The lease is granted for the conduct of authorized industrial and commercial operations and remains valid for ninety-five years commencing from 1 April 2006.

F) Buildings at Dhirubhai Ambani Knowledge City, Navi Mumbai

4.16. RRL houses Dhirubhai Ambani Knowledge City spread over approximately 132 acres of land in Navi Mumbai. The same was provisionally vide Provisional Attachment Order (PAO) no. 36/2025 dated 03.11.2025. On the said leased land, RRL had constructed multiple buildings.

4.17. The valuation of all the properties leased/owned by RRL and RCOM, mentioned above, was done and the combined value of all the said assets is ₹ 1452.51 crores as on the date of predicate agency's FIR.

4.18. Regarding Effective ownership of Reliance Realty Limited:

4.18.1. Based on the above information, a detailed profiling of Reliance Realty Limited was conducted. It was found that RRL is one of the wholly




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owned subsidiaries of RCOM, having CIN as U45300MH1993PLC173775 and is involved in sale of motor vehicle parts and accessories. However, RRL is primarily in the business of providing business centre facilities.

4.18.2. The company was incorporated as Reliance Infocomm Infrastructure Private Limited and the name of company was later changed to Reliance Realty Limited. As per filings available with the Ministry of Corporate Affairs, it is seen that the company has an authorized share capital of ₹10,00,00,000 divided into 1,00,00,000 equity shares of face value ₹10 each. The issued paid-up share capital of the company is ₹5,00,00,000 divided into 50,00,000 equity shares of ₹10 each. As per its audited financials, the company has been formed to carry on business of providing infrastructure / real estate services. It is a wholly owned subsidiary of RCOM and its shareholding over time is as follows:

Table No.15: Shareholding of Reliance Realty Limited

F.Y.	Shares Held	Shares Held by
2024-25	50,00,000	Reliance Communications Limited and its nominees
2023-24	50,00,000	
2022-23	50,00,000	
2021-22	50,00,000	
2020-21	50,00,000	
2019-20	50,00,000	
2018-19	50,00,000	
2017-18	50,00,000	
2016-17	50,00,000	
2015-16	50,00,000	
2014-15	50,00,000	
2013-14	50,00,000	
2012-13	50,00,000	
2011-12	50,00,000	
2010-11	50,00,000	
2009-10	50,00,000	




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 Ministry of Finance, Deptt. of Revenue
 भारत सरकार, नई दिल्ली / Govt. of India, New Delhi

2008-09	50,00,000	
2007-08	50,00,000	
2006-07	50,00,000	

4.18.3. As can be seen from the table above, RRL has effectively been a wholly owned subsidiary (WOS) of RCOM since 2006. Therefore, the effective owner of RRL is RCOM. Thus, it is evident that RCOM holds 100% of the shareholding of RRL.

4.18.4. In this regard, to enquire the company regarding the assets in possession of the company, its effective owner and the source of funds for the day-to-day business of the company, summonses were issued to the Authorized person of RRL. However, no one had appeared in response to the summonses.

5. Recording of Reasons to Believe:

5.1. I have considered the above facts and circumstances of the case and evidence available on record including the following materials placed before me:

Table No. 16: Enumeration of Records	
Sr.	Particulars of Document
1.	FIR no. RC0742025E0005 dated 21.08.2025 registered by CBI, BSFB, New Delhi
2.	Enforcement Case Information Report (ECIR) no. STF/26/2025 dated 26.08.2025
3.	Statement of Mr. KG Krishnamoorthi, Chief Manager, Bank of Maharashtra, under section 50 of PMLA, 2002 on 03.10.2025
4.	Statement of Mr. Niranjana Kumar, Senior Manager, UCO Bank, recorded under section 50 of PMLA, 2002, on 06.10.2025 and 10.10.2025
5.	Statement of Mr. Shakti Kumar Sharma, Chief Manager, Canara Bank, recorded under section 50 of PMLA, 2002, on 08.10.2025 and 09.10.2025
6.	Statement of Mr. Mohit Inamdar, Senior Vice President, Yes Bank, recorded under section 50 of PMLA, 2002 recorded on 16.10.2025
7.	Statement of Mr. Prabhat Kumar Ambastha, Chief Manager, Union bank of India, under section 50 of PMLA, 2002 recorded on 30.09.2025




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8.	Statement of Mr. Sanjiv Kumar, Assistant General Manager, SBI, recorded under section 50 of PMLA, 2002 on 18.09.2025 and 19.09.2025
9.	Statement of Mr. Shravan Kumar Bhandekar, Deputy Vice President, HDFC Bank, recorded under section 50 of PMLA, 2002, on 29.09.2025
10.	Statement of Mr. Prashant Pandian, Chief Manager, Bank of Baroda, recorded u/s 50 of PMLA, 2002, on 16.10.2025.
11.	Statement of Mr. Shashank Vijayakar, Key Managerial Person of M/s VB Desai Financial Services Ltd. and its group companies, recorded under section 50 of PMLA, 2002 on 16.09.2025
12.	Statement of Mr. Anish Niranjan Nanavaty, Resolution Professional of RCOM, recorded under section 50 of PMLA, 2002 on 06.11.2025
13.	Statement of A/c no. 0032400964043 of RCOM with SBI
14.	Statement of A/c no. 0032611725165 of RCOM with SBI
15.	Statement of A/c no. 0032747748915 of RCOM with SBI
16.	Statement of A/c no. 11083979734 of RCOM with SBI
17.	Statement of A/c no. 11083980092 of RTL with SBI
18.	Statement of A/c no. 36042078347 of RITL with SBI
19.	Statement of A/c no. 12103000001304 of RTL with IDBI Bank
20.	Statement of A/c no. 4103000010821 of RCOM with IDBI Bank
21.	Statement of A/c no. 4103000055286 of RITL with IDBI Bank
22.	Statement of A/c no. 701655100000170 of RCOM with IDBI Bank
23.	Statement of A/c no. 701671200002523 of RTL with IDBI Bank
24.	Statement of A/c no. 701671200002578 of RCOM with IDBI Bank
25.	Statement of A/c no. 701673200000888 of RTL with IDBI Bank
26.	Statement of A/c no. 701673200000897 of RCOM with IDBI Bank
27.	Statement of A/c no. 016065410000217 of RCOM with Bank of India
28.	Statement of A/c no. 016065410000310 of RCOM with Bank of India
29.	Statement of A/c no. 29100600001709 of RCOM with Bank of Baroda
30.	Statement of A/c no. 2400310001002 of RCIL with HDFC Bank
31.	Statement of A/c no. 2400310001115 of RTL with HDFC Bank
32.	Statement of A/c no. 2400310001400 of RCOM with HDFC Bank
33.	Statement of A/c no. 540310001397 of RITL with HDFC Bank
34.	Statement of A/c no. 600310001874 of RCOM with HDFC Bank
35.	Statement of A/c no. 600310002807 of RCIL with HDFC Bank
36.	Statement of A/c no. 600310001857 of RCIL with HDFC Bank
37.	Statement of A/c no. 600310002817 of RCOM with HDFC Bank
38.	Statement of A/c no. 600310003056 of RWSL with HDFC Bank
39.	Statement of A/c no. 600310003540 of RCOM with HDFC Bank
40.	Statement of A/c no. 600310005511 of RITL with HDFC Bank
41.	Statement of A/c no. 600310005596 of RCOM with HDFC Bank




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42.	Statement of A/c no. 600310009223 of Netizen Engineering Private Limited with HDFC Bank
43.	Statement of A/c no. 600310012590 of RTSL with HDFC Bank
44.	Statement of A/c no. 600310016718 of RITL with HDFC Bank
45.	Statement of A/c no. 600310022224 of RTL with HDFC Bank
46.	Statement of A/c no. 600310024565 of RCOM with HDFC Bank
47.	Statement of A/c no. 600350020182 of RCOM with HDFC Bank
48.	Statement of A/c no. 602220009002 of RCOM with HDFC Bank
49.	Statement of A/c no. 39305002654 of RITL with ICICI Bank
50.	Statement of A/c no. 405004799 of RCOM with ICICI Bank
51.	Statement of A/c no. 405007647 of RCIL with ICICI Bank
52.	Statement of A/c no. 405010319 of RIL with ICICI Bank
53.	Statement of A/c no. 405033439 of Reliance Infocomm Engineering Pvt Ltd with ICICI Bank
54.	Statement of A/c no. 451000231 of RIL with ICICI Bank
55.	Statement of A/c no. 19080610004036 of RCOM with UCO Bank
56.	Statement of A/c no. 19080610004142 of RCOM with UCO Bank
57.	Statement of A/c no. 6281400000177 of RITL with Yes Bank
58.	Statement of A/c no. 6281400000165 of RCOM with Yes Bank
59.	Statement of A/c no. 002-466019-002 of RCOM with HSBC Bank
60.	Summonses dated 10.10.2025 & 04.11.2025 issued to the authorised representative of M/s Reliance Realty Limited
61.	Audited Annual Financials of Reliance Communication Limited for the Financial Year 2006-07.
62.	Annual Returns of Reliance Realty Limited, from the Financial Year 2006-07 to 2024-25.
63.	Mail dated 12.11.2025, received from Kedar Chikodi, Registered valuer, forwarding valuation report dated 10.11.2025.
64.	Mail dated 11.11.2025 received from CA Rajeev Bansal, Director, Apaar Valuations Professionals Private Limited forwarding valuation report dated 10.11.2025.
65.	Mail dated 10.11.2025, received from Hi Tech Valuers LLP, Chennai, Registered Valuers, forwarding valuation reports dated 10.11.2025.
66.	Deed of Conveyance dated 07.11.2007 registered in document 8350/2007 at the office of the Joint Sub Registrar, Haveli No. 7, Pune, Maharashtra.
67.	Agreement for Lease of Space in Fortune Towers on Outright payment, dated 17.04.2003, registered with the District Sub Registrar, Khurda at Bhubaneswar, Orissa
68.	Indenture of Sale dated 02.12.2003, registered in document no. 7293/03, at the Ambattur Sub Registrar Office, Ambattur, Tamil Nadu
69.	Indenture of Absolute Sale dated 10.01.2003, registered in document no. 30/2003, at the Chennai Central Joint II Sub Registrar Office, Chennai, Tamil Nadu.




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70.	Lease deed registered vide document No. 4709/2008 dated 24.10.2008, registered at the office of the Joint Sub Registrar, Thane - 11.
71.	Revised Lease deed registered vide document No. 4710/2008 dated 24.10.2008, registered at the office of the Joint Sub Registrar, Thane - 11.
72.	Lease deed registered vide document No. 4711/2008 dated 24.10.2008, registered at the office of the Joint Sub Registrar, Thane - 11.
73.	Revised Lease deed registered vide document No. 4712/2008 dated 24.10.2008, registered at the office of the Joint Sub Registrar, Thane - 11.
74.	Revised Lease deed registered vide document No. 4713/2008 dated 24.10.2008, registered at the office of the Joint Sub Registrar, Thane - 11.
75.	Revised Lease deed registered vide document No. 4714/2008 dated 24.10.2008, registered at the office of the Joint Sub Registrar, Thane - 11.
76.	Lease deed registered vide document No. 4715/2008 dated 24.10.2008, registered at the office of the Joint Sub Registrar, Thane - 11.

5.2. The investigation under PMLA, 2002 as discussed above has revealed that RAAG had availed loans from various banks and has utilized the said funds for purposes other than what has been declared before the banks and has defaulted on the same. Further, the Group was also found to be non-compliant with the terms and conditions based on which the loans were sanctioned to the Group and the various instances in this regard have been discussed in detail *supra*. In certain cases, the dissipation and diversion of the securities pledged by RAAG backing these loans has been identified. Further, these funds were utilized by RAAG for repayment of loans availed by the companies from entities situated outside India. By indulging in the above-mentioned actions, RAAG has dissipated the loan amounts received by the company from the banks.

5.3. Investigation has revealed assets of RCOM and RRL as detailed in schedule of property given below. While RRL is a separate legal entity, RCOM is the owner of all the shares of RRL and has significant financial transactions with it. RCOM is the effective owner of the assets of RRL. Thus, it is evident that RCOM is the owner of RRL and




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all the assets of the company, and thereby, is also the effective owner of the properties in the name of RRL.

5.4. Further, investigation has also revealed that the Resolution Plan in respect of RCOM is yet to be approved by the Hon'ble National Company Law Tribunal, on account of the questions framed by the Supreme Court in judgement dated 01-SEPT-2020 (*Civil Appeal Nos. 6328-6399 of 2015*) regarding the insolvency of telecom companies initially before the Hon'ble NCLAT and now before the Hon'ble Supreme Court.

5.5. Investigation has further revealed that even before the initiation of CIRP of RCOM, Reliance group was aware of this eventuality and had effected a mechanism to influence the Resolution process of these companies (RCOM, RITL and RTL) by way of acquisition of outstanding loans of these companies by related party NBFCs so as to become a part of the Committee of Creditors. Thus, it is likely that the Reliance group is further likely to make attempts to alienate assets of RAAG, with an intention to keep the properties outside the ambit of not just investigation under PMLA, 2002, but also other statutory procedures, such as Corporate Insolvency Resolution Process etc. Further, statement recorded from the Resolution Professional of RCOM also revealed that the erstwhile management of RCOM were actively involved in alienation of the assets of the company.

5.6. Further, assets of Bonn Investment Inc., a step-down subsidiary of RCOM, were dissipated by the earlier management in 2023 despite the initiation of CIRP. This was done without the knowledge or consent of the Resolution Professional and conclusively establishes




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the dissipation of assets, which formed the consolidated basis of assets of RCOM group. The possibility of similar dissipation cannot be ruled out.

- 5.7. Thus, on the basis of material placed before me, I have reasons to believe that the properties/lease of properties as mentioned in the schedule of properties below, effectively owned by RCOM (*which was involved in generation of proceeds of crime by utilizing the loan amounts received from various banks for unintended purposes and routing of funds outside India*) are required to be provisionally attached under the provisions of Section 5(1) of PMLA, 2002, as equivalent value of the proceeds of crime generated by RAAG, to safeguard the same from alienation and if the said properties/lease of properties are not attached immediately, the accused persons may further attempt to alienate the property, and the same is likely to frustrate further proceedings under PMLA, 2002 in the instant case.

ORDER

- 5.8. NOW, THEREFORE, I order that the scheduled properties (*mentioned in table below*) valued at **₹1452,51,69,000 (One Thousand Four Hundred Fifty Two Crores Fifty One Lakhs Sixty Nine Thousand Rupees only)** are attached provisionally in terms of the Section 5(1) of PMLA, 2002 for a period of 180 days (One Hundred and Eighty Days) and further order that the same shall not be transferred, disposed off, removed, parted with or otherwise dealt with in any manner whatsoever, until or unless specifically permitted to do so by the undersigned. This order of attachment may cease to be effective after the expiry of the specified period of 180 days under Section 5(1) of the Act, or on the date of an order made under Section 8(3) of the Act, whichever is earlier.



J 19/11
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Ministry of Finance, Deptt. of Revenue
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SCHEDULE OF PROPERTY

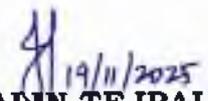
Sl No.	Description of the property	Name of the Owner / Lessee	Sale/ Lease Deed Particulars	Market Value as on 21.08.2025 (₹)	Nature of POC
1	6th Floor in Fortune Tower, C-Wing, Maitri Vihar, Chandrasekharpur, Bhubaneswar, District-Khurda, Odisha-751023	Reliance Communications Limited (Lessee)	Lease deed dated 17.04.2003 between Orrisa Industrial Infrastructure Development Corporation and Reliance Infocomm Limited (now Reliance Communications Limited)	51,85,00,000	Value Thereof
2	Commercial Land admeasuring 53,657 Sq. ft. along with building constructed thereon, admeasuring 2,51,200 Sq. ft. comprised in T S No.83/3 Block No.15 of Nungambakkam Town, Egmore Taluk, Chennai District	Reliance Communications Limited	Sale deed dated 10.01.2003 between Philips India Limited and Reliance Infocomm Limited (now Reliance Communications Limited)	274,50,00,000	Value Thereof
3	Industrial Plot No. 40-A (North Phase) 3 rd Main Road, Ambattur Industrial Estate, Ambattur, Chennai	Reliance Communications Limited	Sale Deed dated 02.12.2003 between Stewarts & Lloyds of India Limited and Reliance Infocomm Limited (now Reliance Communications Limited)	103,52,00,000	Value Thereof
4	07 Buildings no. A8, 42, 6(151), 8(41), 108 (A), 09 and 43 situated at Sector-I, Plot No. MBP/2 in Trans Thane Creek Industrial Area within village limits of Mahape Taluka, District Thane, Navi Mumbai. (Also Known as Millennium Business Park)	Reliance Realty Limited	07 lease deeds all dated 08.10.2008 registered on 24.10.2008 for each of the buildings no. A8, 42, 6(151), 8(41), 108 (A), 09 and 43 situated at Sector-I, Plot No. MBP/2 in Trans Thane Creek Industrial Area within village limits of Mahape Taluka, District Thane, Navi Mumbai.	219,38,76,000	Value Thereof
5	Land Parcel bearing S. No. 34/A/7/C/2, Plot No. 1 admeasuring 442.975 sq. Mtr. & plot no. 2 admeasuring	Reliance Communications Limited	Sale deed dated 07.11.2007 between Reliance Energy Limited (formerly BSES) and	6,25,93,000	Value Thereof




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	428.124 sq.mtr., Village Wadgaon Sheri, Pune-land with only RCC structure frame of G+2 construction done.		Reliance Communications Limited.		
6	Buildings and infrastructure situated over Dhirubhai Ambani Knowledge City, Navi Mumbai, Maharashtra.	Reliance Realty Limited	As per books of account of RRL	797,00,00,000	Value Thereof

DATED AT DELHI, THIS 19th DAY OF NOVEMBER TWO THOUSAND AND TWENTY-FIVE.


[JVALIN TEJPAL]
DEPUTY DIRECTOR
 जवलिन तेजपाल / JVALIN TEJPAL
 उप निदेशक / Deputy Director
 प्रशासन विभाग / Directorate of Enforcement
 वित्त विभाग, भारत सरकार
 Ministry of Finance, Dept. of Revenue
 पंच सदन, नई दिल्ली / Govt. of India, New Delhi

To,

- ✓ 1) **M/s Reliance Communication Limited**, B-Block, Dhirubhai Ambani Knowledge Centre (DAKC), Navi Mumbai, Maharashtra- 400 710. Represented by its Resolution Professional, Sh. Anish Nanavaty.
- 2) **M/s Reliance Realty Limited**, B-Block, Dhirubhai Ambani Knowledge Centre (DAKC), Navi Mumbai, Maharashtra- 400 710.

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1. **The Chairperson, Adjudicating Authority (Under PMLA)**, Room No-25, 4th Floor, Jeevandeep Building, Parliament Street, New Delhi – 110 001, India.
2. **Maharashtra Industrial Development Corporation**, "Udyog Sarathi", Marol Industrial Area, Mahakali Caves Road, Andheri (East), Mumbai – 400 093.
3. **The Managing Director, Orissa Industrial Infrastructure Development Corporation**, IDCO Tower, Janpath, Bhubaneswar – 751 022.



4. **The District Sub Registrar, Khurda At Bhubaneswar**, Nageswar Tangi, Old Town Kalpana Square, PO - BJB Nagar, Bhubaneswar, District Khurda, Orissa - 751014.
5. **The Chennai Central Joint II Sub Registrar Office**, No. 5/9, Kavigar Bharathidasan Salai, Seethamal Colony, Crescent Street, Alwarpet, Chennai - 600018.
6. **The Ambattur Sub Registrar Office**, Villivakkam Panchayat Union Board, Office Compound, Dunlop Bus Stop, Ambattur - 600 053.
7. **The Office of the Joint Sub Registrar, Haveli No. 7**, Pune, Pathare Complex, Chandan Nagar, Pune 400 014.

[JVALIN TEJPAL]
DEPUTY DIRECTOR

