



**Reliance Communications
Limited**
Dhirubhai Ambani Knowledge
City
Navi Mumbai - 400 710, India

Tel : +91 022 3038 6286
mca.rocfilling@relianceada.com
www.rcom.co.in

May 09, 2026

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.: Intimation in accordance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Ref.: Letter dated April 28, 2026 bearing reference no. Ref/FRMD/SCN/RTL received from Punjab National Bank ("PNB") by Reliance Telecom Limited ("RTL") on May 08, 2026 ("Letter")

With reference to the above, this disclosure is being made pursuant to sub-clause 6 under Para 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**").

This is to inform you that Reliance Telecom Limited ("**RTL**"), a subsidiary of Reliance Communications Limited ("**RCOM**"), has received the aforementioned letter from PNB, *vide* which, PNB has, *inter alia*, stated that 'Fraud Examination Committee' of PNB has decided to classify the loan account of Reliance Telecom Limited and Smt. Grace Thomas, Non-Executive Non-Independent Director of RCOM (in her capacity as erstwhile director of RTL) as "fraud".

Pursuant to Regulation 30(2) of the Listing Regulations read with SEBI Circular HO/49/14/14(7)2025-CFD-POD2/1/3762/2026 issued on July 11, 2023 (last updated on January 30, 2026), the requisite disclosure with respect to the above, is set out in **Annexure A** to this letter.

A copy of the Letter received by the RTL from PNB is attached herewith as Annexure B, for your ready 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 Niranjnan 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).

Annexure A

Disclosure pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular HO/49/14/14(7)2025-CFD-POD2//3762/2026 issued on July 11, 2023 (last updated on January 30, 2026)

Disclosure regarding the aforementioned Letter received from Punjab National Bank (“PNB”) dated April 28, 2026 and received on May 08, 2026 by Reliance Telecom Limited.

Sr.	Particulars	Details of Reliance Telecom Limited (subsidiary of the Company)	Details of Smt. Grace Thomas, (present director of the Company and in her capacity as erstwhile director of RTL)
1	Nature of fraud/default/arrest	The loan account of RTL, a subsidiary of Reliance Communications Limited, has been classified as “fraud” by PNB vide the Letter.	Smt. Grace Thomas has been classified as fraud in her capacity as erstwhile Director of RTL, by PNB vide the Letter
2	Estimated impact on the listed entity (being the Company)	<p>Both RCOM as well as RTL are undergoing corporate insolvency resolution process (“CIRP”) under the Insolvency and Bankruptcy Code, 2016 (“Code”). The resolution plans in respect of RCOM and RTL, have been approved by the committees of creditors of RCOM and RTL respectively, in accordance with the Code and are presently awaiting approval of the Hon’ble National Company Law Tribunal, Mumbai Bench (“NCLT”).</p> <p>The loan account referred in the Letter pertain to the period prior to the CIRP of RTL, and is required in terms of the Code, to be necessarily resolved as a part of a resolution plan or in liquidation, as the case may be.</p> <p>Further, with respect to certain transactions as identified in the Letter, the resolution professional of RTL has already filed avoidance applications in terms of the provisions of the Code with the NCLT, which are presently sub-judice, and the treatment thereof shall be in accordance with the decision of the NCLT read together with the applicable provisions of the resolution plan of RTL.</p>	<p>Both RCOM and RTL are undergoing corporate insolvency resolution process (“CIRP”) under the Insolvency and Bankruptcy Code, 2016 (“Code”). The resolution plans in respect of RCOM and RTL, have been approved by the committees of creditors of RCOM and RTL respectively, in accordance with the Code and are presently awaiting approval of the Hon’ble National Company Law Tribunal, Mumbai Bench (“NCLT”).</p> <p>RTL is under the control of the resolution professional and Smt. Grace Thomas has ceased to be a director of RTL.</p> <p>The loan account referred in the Letter pertain to the period prior to the CIRP of RTL, and is required in terms of the Code, to be necessarily resolved as a part of a resolution plan or in liquidation, as the case may be.</p> <p>Furthermore, legal advice is being sought on the way forward with respect to this development.</p>

Registered Office:

Reliance Communications Limited. H Block, 1st Floor, Dhirubhai Ambani Knowledge City, Navi Mumbai - 400 710

CIN No.: L45309MH2004PLC147531

		<p>With respect to the impact on the listed entity (being RCOM), please further note that during the CIRP, both RCOM and RTL are <i>inter alia</i> protected from, the institution/ continuation of any suits/ proceedings against RCOM and RTL, including the execution of any judgement, decree or order in any court of law, tribunal, arbitration panel or other authority in light of Section 14(1)(a) of the Code.</p> <p>Section 32A of the Code in any case grants protection to a corporate debtor against any liability for an offence committed by the corporate debtor prior to the commencement of its CIRP, as well as from prosecution of any offence in relation thereto, from the date the resolution plan in respect of such corporate debtor has been approved by the NCLT under Section 31 of the Code (if the resolution plan results in the change in the management or control of the corporate debtor in the manner prescribed under Section 32A of the Code).</p> <p>To that extent, it may be noted that by virtue of the protection made available under Section 32A of the Code, upon the approval of the resolution plan in respect of RCOM as well RTL by the NCLT, both RCOM and RTL shall be deemed to have immunity against any liability for any purported offences committed by RCOM / RTL prior to the commencement of the CIRP (including any liability which may arise as a result of any unlawful transactions identified in the forensic audit report).</p> <p>Further, under Section 238 of the Code, the provisions of the Code override anything inconsistent contained in any other law.</p>	
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CIN No.: L45309MH2004PLC147531

		Furthermore, legal advice is being sought on the way forward with respect to this development.	
3	Time/Date of occurrence	Letter from PNB in the name of RTL dated April 28, 2026, received on May 08, 2026.	Letter from PNB in the name of RTL dated April 28, 2026, received on May 08, 2026.
4	Person(s) involved	NA	Smt. Grace Thomas, (in her capacity as erstwhile director of RTL)
5	Estimated amount involved (if any)	As specified in the Letter annexed at Annexure B	As specified in the Letter annexed at Annexure B
6	Whether such fraud has been reported to appropriate authorities	As specified in the Letter annexed at Annexure B. (Punjab National Bank shall be taking further course of action to report the fraud classification to the Reserve Bank of India (RBI) as per the directions contained in the RBI Master Directions/ circulars issued from time to time, in this regard.)	As specified in the Letter annexed at Annexure B. (Punjab National Bank shall be taking further course of action to report the fraud classification to the Reserve Bank of India (RBI) as per the directions contained in the RBI Master Directions/ circulars issued from time to time, in this regard.)
7	Actual amount involved in the fraud /default (if any)	As specified in the Letter annexed at Annexure B	As specified in the Letter annexed at Annexure B
8	Actual impact of such fraud /default on the listed entity and its financials	RTL and the Company are under CIRP (see response in 2 above)	Company is under CIRP (see response in 2 above)
9	Corrective measures taken by the listed entity on account of such fraud/default.	-	-

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Annexure-B



धोखाधड़ी जोखिम प्रबंधन प्रभाग, प्रधान कार्यालय
 प्लॉट संख्या 4-, सेक्टर 10-, द्वारका, नई दिल्ली 110075-
 FRAUD RISK MANAGEMENT DIVISION, HEAD OFFICE
 PLOT NO.4, SECTOR-10, DWARKA, NEW DELHI-110075
 CONTACT NO : 011-28044512,011-28072000 ;EMAIL ID: frmdho@pnb.bank.in

By Registered Post / Speed Post-Ack. Due)

Ref No. Ref/FRMD/SCN/RTL

Date: 28/04/2026

To,

Reliance Telecom Limited {under the Corporate Insolvency Resolution Process (CIRP)}

1. Reliance Telecom Limited (Borrower)

Address: H Block 1st Floor, A Wing, Dhirubhai Ambani Knowledge City, Koparkh. Airane, Navi Mumbai, Maharashtra, 400710

2. Satyendra Mohanlal Sarupria (erst. Director)

Address: 504 B, Dheeraj Kiran, Chincholi Bunder Road, Malad West Mumbai 400064

3. Grace Thomas (erst. Director)

Address: A-502, Anand Gardens, Anand Park, Complex K Andarpada Link Road, Dahisar West Mumbai 400068

4. Dagdulal Kasturchand Jain (erst. Director)

Address: A4/10, 2nd Floor, Runwal Nagar, Thane Maharashtra 400601

5. Gautam Bhailal Deshi (erst. Director)

Address: 402, Hamilton Court, Tagore Road, Santa Cruz, Mumbai. 400055

6. Sateesh Seth (erst. Director)

Address: Summer Villa, 4th floor, flat no 403, 7th Road, Santacruz, Mumbai 400055

7. Prakash Shenoy (erst. Director)

Address: 1703, Florentina Lodha Paradise, Near Majwad Flyover, Eastern Express Highway, Thane West, Maharashtra, 400601

Madam/Sir

Ref: Our Show Cause Notice (SCN) Ref no Ref: Ref/FRMD/SCN/RTL dated 06.03.2026

Re: Re-examination of fraud angle in the account of Reliance Telecom Limited

We have taken cognizance of your response to our Show Cause Notice and after due examination of the same it is concluded that sufficient reasons have not been provided

by you to explain (i) the non-adherence to the agreed terms and conditions of sanction and (ii) the irregularities observed in the conduct of your account containing element of fraud to the satisfaction of the Bank.

Accordingly, Bank has decided to declare the loan account and erst. Directors (Sh. Sateesh Seth, Sh. Grace Thomas, Sh. Satyendra Mohanlal Sarupriya and Sh. Dagdulal Kasturchand Jain) as 'Fraud' and the order in this regard is attached herewith.

The Bank shall be taking further course of action to report the account/ your name to the Reserve Bank of India (RBI) as per the directions contained in the RBI Master Directions/ Circulars issued time to time, in this regard.

Reasoned order passed by the Competent Authority is attached for your reference

Yours faithfully,



Assistant General Manager

For and on behalf of Head Office Fraud Examination Committee (HOFEC)

Punjab National Bank

Office: Fraud Risk Management Division

Address: Punjab National Bank Corporate Office Plot No-04, Dwarka Sector -10
New Delhi-110075

Email: frmdho@pnb.bank.in

Contact No. 011-28044512



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 प्लॉट संख्या-4, सेक्टर-10, द्वारका, नई दिल्ली-110075
FRAUD RISK MANAGEMENT DIVISION, HEAD OFFICE
PLOT NO.4, SECTOR-10, DWARKA, NEW DELHI-110075

Date: 22.04.2026

**REASONED ORDER OF HEAD OFFICE FRAUD EXAMINATION COMMITTEE FOR
 DECLARING THE ACCOUNT / PERSONS AS FRAUD**

M/s Reliance Telecom Limited
Maintained at SAMB: Mumbai, ZO: Mumbai
Amount involved: ₹ 201.51 crore

In terms of RBI guidelines/Master Circular No. RBI/DOS/2024-25/118/DOS.CO.FMG.SEC.No.5/23.04.001/2024-25 dated 15.07.2024 read with Judgement dated 27.03.2023 of Honourable Supreme Court of India in Civil Appeal No. 7300/2022, Show Cause Notices (SCN) dated 06.03.2026 was/were issued mentioning the Reasons/incidents of fraud, based upon which, Bank perceived the account as fraud and opportunity to make a representation was given to following party(ies)/person(s):

1. M/s Reliance Telecom Limited
2. Sh. Satyendra Mohanlal Sarupria (erst. Director)
3. Sh. Grace Thomas (erst. Director)
4. Sh Dagdulal Kasturchand Jain (erst. Director)
5. Sh. Gautam Bhailal Doshi (erst. Director)
6. Sh Sateesh Seth (erst. Director)
7. Sh Prakash Shenoy (erst. Director)

Vide the Show Cause Notices, the above-named persons/ entities were called upon to show cause and make submissions in writing within 21 days from the date of receipt of notice, as to why the account/ name should not be categorised and reported as fraud to RBI as per extant guidelines.

Fraud was perceived on the following ground(s):

Fraud angle	Factors of fraud angle
Misappropriation of fund and criminal breach of trust	1. Fictitious Debtors: Collections received by RTL (Reliance Telecom Ltd.) from RWSL (Reliance Webstore Limited) amounting to INR 1,110.50 crores were received from Reliance Communications Ltd. i.e. RCOM (as ICD/against outstanding), through a series of transactions. These funds were obtained by RCOM vide intraday limit of INR 100 crore in HDFC A/C 2817 which were then routed to RTL through RWSL and/or RCIL (Reliance Communications Infrastructure). After this cycle of transactions, RTL paid the same amount to RCOM, thus, refurbishing the intraday limit in the books of RCOM and allowing RCOM to make a fresh payment to



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RWSL. (This was repeated multiple times). Such transactions inflated the balance sheet/turnover of the company.

2. RTL transferred Rs. 221.93 crore to RCOM (Reliance Communications Limited) out of the loans received by RTL. Out of these, INR 110 crores were invested by RCOM in Mutual Funds.

- RCOM and its subsidiaries including RTL received Rs.31580 crores by way of advances from member banks. Out of which, Rs.13667.73 crores (44%) were utilised for repayment of loans and other obligations to banks/ FI and Rs.12692.31 crores (41%) were utilised to pay to connected parties.

3. RCOM holds 78.8% share in RTL and RIIL holds 21.2% shares in RTL. Total payment by RTL to RCOM during the Review Period was INR 3,742.47 crores and total receipts were INR 537.83 crores. RTL promoters did not infuse any equity during the Review Period and all the contribution was in the form of short-term loans.

4. There were numerous assignments in the books of RCOM, RTL and RTIL where in high-value receivable and payable balances were transferred to corresponding parties to the assignment. Unusual JV entries in the ledgers of key parties and large amounts were transferred to parties with very weak financial backgrounds or unclear nature of business. The parties analysed were as follows:

Independent TV Limited	Reliance Tech Services Limited
Kunjbihari Developers Private Limited	Sapphire Cable And Services Pvt Ltd
Tenormac Enterprises Private Limited	Reliance Communications Infrastructure Limited
Reliance Ada Group Private Limited	Creative Ashtech Private Limited
Reliance Cleangen Limited	Telebroad Enterprises Pvt Ltd
Reliance Unicorn Enterprises Private Limited	Reliance Bpo Private Limited
Reliance Jio Infocomm Limited	Reliance Globalcom Bv



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5. As per Forensic Auditor's analysis of RTL's transactions with Consortium and Non-Consortium Banks, out of total transactions, 97% of the transactions were with non-consortium banks and the balance 3% of transactions are with consortium banks.

6. Forensic Auditor stated that as per the information provided by the Management, the lenders, and the Resolution Professional till 26 June 2020, the ICDs were used as a mechanism to route money through related parties. For instance, on 10 November 2015, INR 200 crores received from RCOM as ICD were paid to Netizen as capital advance. Such transactions are diversion of funds.

7. As on 1st April 2013, Rs.1347.70 crores were receivable from RTL in the books of Reliance Infratel Ltd (RITL). RTL issued preference shares worth Rs.1347.70 crores to RITL in satisfaction of the receivable amount on 31st March, 2014. RITL sold the said preference shares to Reliance Communications Tamilnadu Ltd (RCTNL) on the same date i.e 31.03.2014 for Rs.260.00 crores, thereby incurring a loss of Rs.1087.70 crores and further RCTNL paid the same to RITL for purchase of preference share of RTL. It appears that the receivable balance from RTL was fictitious and this loss was not recorded as buissness loss in the books of RITL but as a loss on sale of investment.

8. Forensic Auditor had stated that based on the findings during the Forensic Audit and to the extent up to which information was made available by the Management, lenders and the Resolution Professional, it was noted that the invoice financing / discounting was used for round-tripping of loans to and/ or from related parties. In the absence of supporting documents from the Management till 26 June 2020, these transactions appear to be misappropriated and can be classified as diversion of loan funds as per the Master Circular issued by the Reserve Bank of India and the same should be read in conjunction with the circular DBS.CO.CFMC.BC.No.1/23.04.001/2016-17 on classification and reporting of Fraud.

9. The companies (RCOM, RTL and RIL (Reliance Infratel Ltd.)) for whom the Forensic Audit was conducted did not provide information like Ageing Analysis – Creditors for the Review Period, Documents related to investments, Stock Count reports for the review period, Documents pertaining to disclosures filed by the Companies with the banks on transactions with non-consortium banks, etc. to the Forensic Auditors.



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As per RBI's Master Directions on Fraud Risk Management in Commercial Banks (including Regional Rural Banks) and All India Financial Institutions dated 15.07.2024, *inter-alia*, prescribes as under:

"2.1.1.2 A reasonable time of not less than 21 days shall be provided to the Persons / Entities on whom the SCN was served to respond to the said SCN."

A reasonable period was provided to the borrower and directors for submitting their responses to the Show-Cause Notice (SCN). In the present case, SCNs were issued to M/s Reliance Telecom Limited and its erstwhile directors via registered post at their respective registered addresses on 07.03.2026. All SCNs were duly delivered, with the last delivery completed on 20.03.2026. However, the SCN addressed to Ms. Grace Thomas was returned undelivered, bearing the remark "Addressee Left without Instructions."

No responses were received from any of the parties, except for Sh. Prakash Shenoy (erst. Director) and Sh. Gautam Bhailal Doshi (erst. Director), who submitted their replies vide letters dated 26.03.2026 and 08.04.2026 respectively. Responses submitted by them are as follows:

Response of Sh. Prakash Shenoy dated 26.03.2026 (received on 01.04.2026):

- A. *"I refer to your letter dated 6th March 2026 received by me on 14th March 2026 in relation to classification of Reliance Telecom Limited (RTW Company) account as Fraud as per the RBI Master Directions on Fraud dated 15, July, 2024 (RBI Master Directons).*
- B. *I reiterate that I was appointed as a Non-Executive Director of RTL on 28th May, 2011 without any powers and resigned on 23rd May 2017. During the above period, I acted only as a Non-Executive Director and as such was not involved in the day-to-day affairs of the Company as competent team of respective field was there.*
- C. *Please note that during aforesaid period, I was simply an employee in the Company Secretary Department of Reliance Communications Limited (Holding Company /RCOM) and I was appointed as a director on 28th May 2011 in the Company for the namesake and compliance purpose only. Decision maker was the top management of holding company. I was compelled to accept the directorship under duress, fearing for my continued employment with the holding company. No separate remuneration I sitting fees was paid to me being director of RTL. Due to resignation of Mr. Sriprakash Shukla (President and CEO of RCOM), the then director of RTL, there was less than three directors in RTL, I compel to be a Director of RTL as per instruction of top management. I was neither occupied any executive position on the Board of RTL, nor has been part of the management at RTL. I was neither a promoter of RTL, nor a member of RTL's Promoter Group. A copy of DIR 52 filed with MCA is enclosed for your immediate reference as Annexure A.*
- D. *RCOM was the holding company and there were three other material subsidiary companies namely; Reliance Communication Infrastructure Limited (RCIL), Reliance Infratel Limited (RITL) and Reliance Telecom Limited (RTL). RCOM had 97 subsidiary companies in 2011. Above corporate structure was created by the top management to comply with various statutory requirements including Telecom Regulations/DoT requirements.*



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E. RTL had license for 7 telecom circles. Due to Regulatory reasons RTL was kept as a separate corporate entity. CEO of RCOM was heading both i.e RCOM and RTL and all functional heads were reporting to him. RTL was never treated as a separate company. In the group, RTL was treated as separate division of RCOM. The CEO of RCOM was reporting to Group Managing Directors (GMDs).

F. Due to big organization, all functions require specialized knowledge as small error may cost heavily to the group. So, there was a separate competent team headed by President / Joint President for all the functions like business verticals, Procurement, Sales, Banking, Treasury, Financing, Accounting, Taxation etc of the RCOM and other companies. The respective heads have to look after their allotted functions related work of not only RCOM but also of all its subsidiaries and other companies. Respective head/s were responsible for their functions. So, in reality, all companies were headed by the top management only. There were no powers to the directors of respective companies. Directors were appointed only for the compliance purpose from the secretarial department.

G. Shri Anil Ambani was the Chairman of Reliance Group Listed Companies including RCOM. Shri Anil Ambani was also the Chairman of Reliance Telecom Limited till 28th April 2009. Shri Amitabh Jhunjunwala, Shri Satish Seth and Shri Gautam Doshi, all Chartered Accountants and well experienced, were the Group Managing Directors (GMD's) of Reliance ADAG and permanent invitees to the Board and other committee meetings of RCOM. Shri Satish Seth and Shri Gautam Doshi GMDs were also Directors on the Board of RTL and member of Audit Committee and other statutory committees of RTL under the Companies Act. CEO of RCOM was reporting to the Chairman and GMD's. Even though the Shri Anil D Ambani, Chairman and non-Executive director of RCOM all Functional Head/CEO and GMDs were directly reporting to him for policy and operational matters.

H. My designation was Vice President in RCOM at that time which was 6 level below the President level hence, I didn't have any powers to take any decision as per my designation. Only I have to follow the instruction given by my higher ups. My salary was Rs.21.56 lac in RCOM when I was appointed as a director of RTL. At that time, CEO (wireless division) of RCOM was drawing salary of Rs. 3.50 crore. The Vice President designation and salary was not commensurate with the director position in the Company. I was told that the position is only for compliance purpose in junior level (also age) and all decisions / implementation will be done by CEO /President who report to GMD's Mr. Gautam Doshi and Mr. Satish Seth who were directors of RTL at that time.

I. My role in RCOM was confined only compliance under the Companies Act and Listing Regulations for the entire group. This full-time job and responsibilities were to complete the compliances for entire RCOM group within the time without any deviation. My role as a Company Secretary performed at the best of my ability.

J. Please note that I was never involved in any financial/ Banking, Business, Regulatory or Accounting matters of the RTL as my work was on secretarial compliance side. I never visited or met an banking officers/ Executives for an discussion/ sanction of Loan or financial matters of the Company. I myself never involved or took any decision on financial or accounting / business matters of RCOM or any of the group companies as due to big organization, there was a separate competent person like Chief Financial Officer (CFO), Banking Department Head and Finance Department Head including their big team. Finance/ Banking/ Accounting functions require special skill and knowledge and are mostly look after by the experienced Chartered Accountants (CA) only.



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K. I further reiterated that the Board of RTL was accustomed to act as per the directions/ instructions of Promoters of holding company, who were the persons wielding authority behind the scene in a clandestine manner. Actually they were deemed and real Directors of RTL. All official instructions to run RTL were flowing from them behind the scenes as to the decisions to be taken by the board it would be a "no brainer" to conclude that the Board was accustomed to act as per their directions only. In short, these persons had acted as a shadow Director who had complete control over the affairs of the RTL. Shadow Directors who operate behind the cloak of obscurity shall be treated on par with the Directors of the company in respect of any defaults committed by the company. Fiduciary duties shall also apply to such persons. Consequently, any action for wilful default or fraud should be directed against these shadow directors and the promoters of the holding company, not against nominal non-executive directors without any powers such as myself in RTL.

L.I further reiterate that in RTL there was specific competent team of persons who were directly reporting to holding company's finance team who were fully involved in lending and borrowing activities of RTL and overall whole group. These functions are of Chief Financial Officer and not of any Secretarial person. Such financial matters also never came to Board of RTL for any matter for any decision. I never have/ had any information about borrowing or diversion of funds of the RTL to any company or persons. But as requirements under the Companies Act, 2013, I, as a Director, need to sign various papers from time to time.

M. Further State Bank of India, Consortium Lead Bank vide their letter dated 29th April 2025 and IDBI Bank vide their letter dated 8th January, 2026 withdrawn Fraud related proceedings against me as I was not an executive director and had not played any role to run RTL. A copy of letters from SBI and IDBI is enclosed as Annexure B.

N. Summary:

- i. The financial powers were actually exercised by business, treasury, finance and accounts department under delegation of authority approved by concerned functional heads (HOD's). No powers were exercised by me being a director of RTL.
- ii. Never attended any review / business meeting called by Chairman / GMD's / CEO's and no one was reported to me other than secretarial staff.
- iii. Two well experienced Group Managing Directors namely Shri Satish Seth and Shri Gautam Doshi were also Directors of RTL whom President and CEO's of RCOM are reporting day to day.
- iv. Never part of any discussion with Bank, Financial Institutions for borrowing or lending funds of the Company.
- v. Never part of discussion with Statutory Auditors for finalization of accounts or results as it was done by CFO.
- vi. No discussion with internal auditors. Actually internal auditor was reporting to CFO of RCOM.
- vii. No financial authority given to me. It can be checked in SAP system of the Company.
- viii. Never had any authority to question anything in the Company. I need to follow the instructions from higher ups.



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- ix. The position of director was taken by me only under duress without any additional remuneration / sitting fee to continue my employment.

O. I wish to place on record certain preliminary issues pertaining to the SCN which renders the SCN is bad in law and devoid of merits:

1. No Identification of the Circular of Reserve Bank of India under which the SCN has been issued:

Though the SCN issued to undersigned calls upon undersigned to show cause why the account of Reliance Communications Ltd (RCOM) name of undersigned should not be categorized and reported as fraud as per the Reserve Bank of India guidelines, the SCN is silent and makes no reference to the Circular/s and/or the Guidelines that have been issued by the Reserve Bank of India on fraud under which the SCN has been purportedly issued. There is no identification of the circular/s and/or guidelines for undersigned to make a reference to while addressing the allegations made in the SCN. This limits undersigned's ability to deal with the allegations substantially. You will appreciate that it is vital that undersigned is informed of the Circular/ Guideline which the bank is penalizing undersigned under. The issuance of the SCN is therefore fundamentally flawed as the bank whilst making the allegations has not been able to show the relevance of the said allegations under a law in force. Undersigned thus reserves its right to supplement the present response to the SCN once undersigned is put to notice of the provisions under which the bank has issued the SCN. In support of this proposition undersigned relies upon the judgment delivered by the Hon'ble Supreme Court in the matter of State of India v. Jah Developers P. Ltd. (2019) 6 SCC 787 where the Hon'ble Supreme Court in no uncertain terms has observed that the right to make a representation includes a right to make a full representation on facts and law as well. It is thus necessary that on this ground alone the SCN is bad and basis thereon undersigned cannot be called upon to show cause to the allegations of fraud.

2. Without prejudice to the above and in addition thereto, you would also appreciate that under the existing Circulars/ Guidelines of the Reserve Bank of India on the topic of Fraud, a set mechanism has been provided which requires every institution to follow for all purposes beginning from the identification of an account and up to declaration of the account as fraudulent. Thus, the process envisaged in these Circular/s/ Guidelines must be complied with before declaring an account fraudulent. Consequently, the SCN though does not identify the circular and/or the guideline, cannot be given effect to as the contents of the SCN do not disclose, if the process under the existing circular/ guidelines have been followed. For instance, the Circular/ Guidelines on fraud issued by the Reserve Bank of India provide for detection of Early Warning Signals which is a system that is to be developed by the banks so as to enable the banks to necessarily monitor signals of fraud at the threshold, investigate, examine such accounts which need red flagging and it is only upon such identification that potential fraud angle can be developed for declaring of an account to be classified as fraudulent under the RBI Circulars/Guidelines. The procedure therefore is to ensure early signals are caught and dealt with are allowed to be dealt with in an effective manner. The purport of having this system in place is to identify unusual patterns and activities which would alert the bank in timely manner in order to prevent a fraudulent activity, if any. This system as you know is to effectively ensure that timely action is taken, if necessary. It is therefore critical for undersigned to be appraised of the steps that have been taken by your bank in this regard, before issuing the SCN, as undersigned has never been intimated by your bank of any red flags being exhibited in respect of the lending. In fact Bank has not mentioned the period under review for which



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the present SCN has been issued. In addition, to the same, we also request your bank to provide undersigned with the Board Approved Policy that has been framed by Bank on Fraud Risk Management delineating the roles and responsibilities of Board / Board Committees and Senior Management of the bank. The essence of a Board Approval Policy is inter alia to contain the measures towards prevention, early detection, investigation and reporting of fraud. The requirement therefore to have a Board Approved Policy is vital and fundamental in order to take any steps under the RBI Circulars/ Guidelines for the time being in force. Undersigned believes that the SCN has been issued to undersigned on the strength of a duly Board Approved Policy being in force and in existence.

3. Non-Disclosure of documents, insufficient material and lack of independent analysis:

(a) *The SCN has been issued purely relying upon the Forensic Audit Report of July 2020 prepared by BDO India LLP ("BDO Report"). As noticed, a single Report has been prepared by BDO India LLP for RCOM and also for Reliance Telecom Limited and Reliance Infratel Limited as well. The exercise of preparing a composite Report for different companies dissimilar to each other in their operations and functions, thus joining multiple causes in one Report cannot be the basis to pinpoint an alleged fraud angle qua one particular Company, in the present case RCOM. There is therefore no independent study and/or analysis of the account of RCOM to give the bank a cause to issue the present SCN. The entire genesis of the SCN is thus bad and ill founded. No action whatsoever can be taken by the bank by placing reliance on the BDO Report which has been prepared joining multiple unrelated causes. For issuing a SCN alleging such aggravated and serious imputations, the bank ought to have examined the causes independently and self-sufficiently. Undersigned expressly reserves the right to make further submissions in this regard.*

(b) *Additionally, the BDO Report does not disclose any details let alone complete details of the transaction and/or events which are fundamental and the basis the bank to report fraud. Non-disclosure of events and the information basis which a SCN has been issued infringes the right of undersigned to effectively deal with the allegations contained in the SCN. The bank has therefore not provided undersigned, complete copies of the documents/information that the bank has relied upon to give it a cause to issue the SCN. As you are aware, Courts in India have repeatedly held that material and information in question for disclosure to the noticee would be all "relevant" material and not just information that is "relied upon" or "referred to" in the SCN. Given that the only documents that were provided to undersigned was an incomplete copy of the BDO Report and stray documents, does not satisfy the requirement for providing 'all relevant information and material'. Further, merely relying upon the 'Factors of Fraud angle' is ex facie evidence that only the material 'referred to' has been furnished and not all 'relevant material'. It is thus imperative that on this ground also undersigned cannot be declared as and be reported as fraud in respect of the account of RCOM.*

(c) *The undersigned is not in possession of any documents of RCOM, as RCOM is undergoing Corporate Insolvency Process under the aegis of the Insolvency and Bankruptcy Code, 2016. In the said proceedings, a Resolution Professional has already been appointed and has control over not only the affairs of the company but also exercises control and has custody over the information and documents concerning the company. Undersigned, not in possession of the documents / information to deal with the allegations of fraud had requested the bank to share all such information and documents relevant to and necessary for undersigned to effectively deal with SCN, however undersigned has not been provided with complete documentation and information, thus limiting undersigned's ability to respond satisfactorily. In view of the same, undersigned*



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reserves the right to supplement the present response upon being provided with all information.

In support of the submission, may we draw your attention to the case of T. Takano v. Securities and Exchange Board of India (2022) 8 SCC 162, wherein the Hon'ble Supreme Court of India has observed that:

"C. 2. Duty to disclose investigation material

22. *While the respondents have submitted that only materials that have been relied on by the Board need to be disclosed, the appellant has contended that all relevant materials need to be disclosed. While trying to answer this issue, we are faced with a multitude of other equally important issues. These issues, all paramount in shaping the jurisprudence surrounding the principles of access to justice and transparency, range from identifying the purpose and extent of disclosure required, to balancing the conflicting claims of access to justice and grounds of public interest such as privacy, confidentiality and market interest. An identification of the purpose of disclosure would lead us closer to identifying the extent of required disclosure. There are three key purposes that disclosure of information serves:*

- (i) *Reliability: The possession of information by both the parties can aid the COUNS in determining the truth of the contentions. The role of the court is not restricted to interpreting the provisions of law but also determining the veracity and truth of the allegations made before it. The court would be able to perform this function accurately only if both parties have access to information and possess the opportunity to address arguments and counter arguments related to the information;*
- (ii) *Fair trial: Since a verdict of the coun has far reaching repercussions on the life and liberty of an individual, it is only fair that there is a legitimate expectation that the parties are provided all the aid in order for them to effectively participate in the proceedings;*
- (iii) *Transparency and accountability: The investigative agencies and the judicial institution are held accountable through transparency and not opaqueness of proceedings. Opaqueness furthers a culture of prejudice, bias, and impunity—principles that are antithetical to transparency. It is of utmost importance that in a country grounded in the rule of law, the institutions adopt those procedures that further the democratic principles of transparency and accountability. The principles of fairness and transparency of adjudicatory proceedings are the cornerstones of the principle of open justice. This is the reason why an Adjudicatory Authority is required to record its reasons for every judgment or order it passes. However, the duty to be transparent in the adjudicatory process does not begin and end at providing a reasoned order. Keeping a party bereft of the information that influenced the decision of an authority undertaking an adjudicatory function also undermines the transparency of the judicial process. It denies the patty concerned and the public at large the ability to effectively scrutinise the decisions of the authority since it create an information asymmetry.*

23. *The purpose of disclosure of information is not merely individualistic, that is to prevent errors in the verdict but is also towards fulfilling the larger institutional purpose of fair trial and transparency. Since the purpose of disclosure of information targets both the outcome (reliability) and the process (fair trial and transparency), it would be insufficient if only the material relied on is disclosed.*



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Such a rule of disclosure, only holds nexus to the outcome and not the process. Therefore, as a default rule, all relevant material must be disclosed. "

- (d) *Moreover, in a recent case of Milind Patel v. Union Bank of India & Ors. (2024 SCC OnLine Bom 745) which though deals with the subject matter falling under and pertaining to declaration of Wilful Defaulter by a bank, the Hon'ble Bombay High Court has reaffirmed the basic cardinal principle that had been laid down in the case of T. Takano v. Securities and Exchange Board of India (supra) that access to the record is a vital element of complying with principles of natural justice.*
- (e) *Further, recently, in a case of Dineshchandra Patel and Another v. Resenre Bank of India & Ors. (2024 SCC Online Guj 668) decided by the Hon'ble Gujarat High Court, the Hon'ble Court has reaffirmed the principle of Natural Justice decided by the Hon'ble Supreme Court in the matter of State Bank of India v. Rajesh Agarwal (2023) 6 SCC 1 that an entity against whom evidence is collected must be provided with an opportunity to explain the evidence against it; be informed of the proposed action and be allowed to represent why the proposed actions should not be taken. The decision therefore to classify an account as fraud involves due application of mind to the facts and law by the lender banks. It is therefore that the principles of Natural Justice demand that not only Show Cause Notice be served, but the borrower be given an opportunity to explain not only the findings in the forensic audit report but also explain if it is a fit case under the law for the time being in force.*
- (f) *Additionally, the Hon'ble Bombay High Court in the matter of Anil D. Ambani v. Canara Bank Writ Petition (L) No. 3098 of 2025 — Order dated February 7, 2025 whilst considering the actions taken by Canara Bank declaring the account as fraud, has stayed the effect and implementation of order impugned therein on the grounds that the mandate under the RBI Master Directions on fraud requiring the bank to adhere to the principles of natural justice has not been met which have been considered in the judgment passed by the Apex Court in the matter of Rajesh Agarwal (supra).*
- (g) *The Hon'ble Bombay High in the matter of Ankit Bhuwalka. IDBI Bank Limited (2025 SCC OnLine Bom 96), has observed that;*

"29. In the case of Milind Patel (Supra) this court held that not only must information that is referred to and relied upon in the SCN be supplied but also information that may undermine the allegations contained in the SCN must be supplied only to ensure that everything relevant to arrive at the truth is available to both the parties. The objective of the proceedings initiated by issuance of a SCN is not to somehow find the noticee guilty of wilful default on the terms as alleged. Instead the objective is to arrive at the truth as to whether or not an individual in question is to subjected to 'penal' consequences.

- (h) *Recently the Hon'ble Bombay High Court in the matter of Anil D. Ambani v. Bank of Baroda & others Interim Application No. 35924 & 35925 of 2025 Order dated December 24 2025 has observed that ,*

"80. Having prima facie being satisfied for grant of interim relief on the basis of the above observations and findings, the FAR i.e. Forensic Audit Report dated 15.10.2020 appended at Exhibit 'A' to the 3 Suit plaints not being in consonance with the RBI Master Directions and for the aforementioned reasons, interim relief



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is granted to Plaintiff in terms of prayer clause (i) in Suit (L) No.35923 of 2025 and suit (L) No.37573 of 2025. "

In one of celebrated case on Administrative Law, the Hon'ble Supreme Court in the matter of Oryx Fisheries Private Limited v. Union of India & Ors (2010) 13 SCC 427 has observed that:

'24.... It is well settled that a quasi judicial authority, while acting in exercise of its statutory power must act fairly and must act with an open mind while initiating a show cause proceeding. A show proceeding is meant to give the person proceeded against a reasonable opportunity of making its objections against the proposed charges indicated in the notice.

26. S.R. Das, CJ speaking for the unanimous Constitution Bench in Khem Chand held that the concept of "reasonable opportunity" includes various safeguards and one of them, in the words of the learned Chief Justice is: (IR p. 307, para 19) "(a) An opportunity to deny his guilt and establish his innocence, which he can only do if he is told what the charges levelled against him are and the allegations on which such charges are based"

27, It is no doubt true that at the stage of show cause, the person proceeded against must be told the charges against him so that he can take his defence and prove his innocence. It is obvious that at that stage the authority issuing the charge-sheet, cannot, instead of telling him the charges, confront him with definite conclusions of his alleged guilt. If that is done, as has been done in this instant case, the entire proceeding initiated by the show cause notice gets vitiated by unfairness, and bias and the subsequent proceedings become an idle ceremony.

31. It is of course true that the show cause notice cannot be read hyper technically and it is well settled that it is to be read reasonably. But one thing is clear that while reading a show cause notice the person who is subject to it must get an impression that he will get an effective opportunity to rebut the allegations contained in the show cause notice and prove his innocence. If on a reasonable reading of a show cause notice a person of ordinary prudence gets the feeling that his reply to the show cause notice will be any empty ceremony and he will merely knock his head against the impenetrable wall of prejudged opinion, such a show cause notice does not commence a fair procedure especially when it is issued in a quasi judicial proceeding under a statutory regulation which promises to give the person proceeded against a reasonable opportunity of defence.

32. Therefore, while issuing a show-cause notice, the authorities must take care to manifestly keep an open mind as they are to act fairly in adjudging the guilt or otherwise of the person proceeded against and specially when he has the power to take a punitive step against the person after giving him a show cause notice. '

(j) In the case of Shantanu Prakash v. State Bank of India and Ors.(2024 SCC OnLine Del 3780), the Hon'ble Delhi High Court has observed that:

"9. It is settled law that fair procedure and the Principles of Natural Justice require that the requisite documents, which form the basis of a SCN, ought to be provided to the concerned party in order to enable such party to submit a proper reply to answer all the allegations raised against it. If the relevant documents are not provided to a party, then, the whole procedure of issuance of a SCN and filing a reply thereto, would be reduced to an empty formality No party can be expected to respond to a SCN in an effective manner, in the absence of the underlying documents, which form the basis of the said SCN. Thus, Supreme Court in the case of Natwar Singh v. Director of Enforcement, has held as follows:



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31. The concept of fairness may require the adjudicating authority to furnish copies of those documents upon which reliance has been placed by him to issue show-cause notice requiring the noticee to explain as to why an inquiry under Section 16 of the Act should not be initiated. To this extent, the principles of natural justice and concept of fairness are required to be read into Rule 4(1) of the Rules. Fair procedure and the principles of natural justice are in-built into the Rules. A noticee is always entitled to satisfy the adjudicating authority that those very documents upon which reliance has been placed do not make out even a prima facie case requiring any further inquiry. In such view of the matter, we hold that all such documents relied on by the authority are required to be furnished to the noticee enabling him to show a proper cause as to why an inquiry should not be held against him though the Rules do not provide for the same. Such a fair reading of the provision would not amount to supplanting the procedure laid down and would in no manner frustrate the apparent purpose of the statute.

11. In view of the aforesaid, it is imperative that the relevant documents that form the basis of issuance of a SCN, ought to be provided to the concerned party in order to enable such a party to raise its defense effectively. Such fundamental right of a party cannot be taken away by denying a proper opportunity to submit an efficacious reply, which would not be feasible in the absence of requisite documents that form the core foundation of a SCN. This assumes all the more importance, as on the basis of the defense raised by such a party, proceedings thereto, against the said party, may be dropped in appropriate cases." (emphasis supplied)."

4. Detailed particulars alleging fraud are absent:

- (a) You would appreciate that the requirement of providing all elements that qualifies to be a classification of fraud, is to enable the person against whom a serious allegation of fraud has been made is to be able to meet with the same to its fullest extent. The SCN does not contain any such details or particulars which can be directed to undersigned to have participated in fraudulent activities as alleged. Undersigned also wishes to state that the SCN is rather vague and ambiguous in identifying the fraud angle and the factors of fraud angle. In the SCN what the pleaded case of the bank is that due to certain irregularities seen in the account of RCOM, it led the bank to "have a suspicion fraudulent activity in the account" According to the bank, after due examination of the conduct of the account and utilization of the credit facilities the bank is prima facie satisfied that there are signals of fraud which have been investigated and thereafter the account has been marked as 'Suspected Fraud Account'. There is no record that has been disclosed or relied upon by the bank to show that undersigned has ever been notified of these signals. The classification of fraud is vague. The SCN does not set out the specific facts establishing the angle of fraud against undersigned. It is therefore not suspicion but proof which could result in implicating a fraudulent act. Law is well settled that a proceeding cannot be decided on assumption and suspicion, however strong, cannot take the place of proof. The SCN does not set out any detail with specificity the role played by undersigned in the fraudulent activities for which the SCN has been issued. No proof or evidence has been placed by the bank in the SCN which warrants undersigned's to be called upon to provide an explanation to the bank. The bank has failed to provide any specific details that would implicate undersigned to show cause as to why the account / name should be categorized and reported as fraud as per the Reserve Bank of India guidelines. This alone is a cause for your bank to withdraw the SCN which on the face of it does not at all with specificity set out the role/part played by undersigned in the alleged acts of fraud.



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- (b) *In support of the above submission undersigned places reliance upon a well settled principle for proving fraud considered in the judgment of the Hon'ble Supreme Court in the matter of Bishundeo Narain and Anr. v. Seogeni Rai and Anr. (1951 SCC 447) where it has been held that:*

"... 22. In cases of fraud, undue influence and coercion, the parties pleading it must set forth full particulars and the case can only be decided on the particulars as laid. There can be no departures from them in evidence. General allegations are insufficient even to amount to an averment of fraud of which any Court ought to take notice however strong the language in which they are couched may be"

- (c) *The said judgment has also been affirmed by the Hon'ble Supreme Court in the matter of Ramesh B. Desai and Others v. Bipin Vadilal Mehta and Others (2006) 5 SCC 638. In the said matter, the Hon'ble Supreme Court reiterated the said principle that full particulars of fraud are to be given, mere using the term "fraud", "fraud on the company, "fraud on the shareholders" are used more than once and absolutely no particulars in relation thereto are given cannot be said to be an averment of fraud in the eyes of the law.*

- (d) *Recently, in the judgment of Electrosteel Casting Limited v. UV Asset Reconstruction Company. Limited & Ors. (2022)2 SCC 573, the Hon'ble Supreme Court while examining the provisions of the Code of Civil Procedure, 1908 and SARFAESI Act, 2002 in the proceedings before them, involving the issue of 'fraud' has reiterated the well settled proposition of law that without material particulars would not tantamount to a plea/ pleading of fraud. Further, the Hon'ble Supreme Court has once again reiterated that settled proposition that mere mentioning and using the word "fraud"/ "fraudulent" is not sufficient to satisfy the test of "fraud".*

- (e) *The entire SCN is silent and does not delineate undersigned's involvement in having committed the fraud as alleged. Though undersigned has been issued the SCN in his capacity as director, there is no evidence against undersigned (being named as director) of his role and participation either directly and/or indirectly in the alleged commission of the acts of fraud or that such commissions and omissions have been done at the behest of, to the knowledge, with consent or in connivance and with the involvement of undersigned. Also, it is also worth noting that though undersigned (named as a director) was not involved in the day-to-day affairs and management of Reliance Telecom Limited. The allegation therefore of impugning undersigned being a part of the fraudulent activity and is therefore answerable to the SCN is wholly misfounded and hence denied by undersigned in toto.*

(f) *In support of the above contention, undersigned seeks to draw your attention to a judgment rendered by the Hon'ble Apex Court in the matter of Hitesh Verma v. M/S. Health care at Home India Pvt. Ltd & Ors — Order dated January 29, 2025 whilst deciding a Criminal Appeal arising out of the proceedings of the Negotiable Instruments Act, 1881 when offences by the companies and its penal consequences under the said Act were being considered. The Apex Court held that "5.... In a complaint, it must be alleged that the person who is sought to be held liable by virtue of vicarious liability, at the time when the offence was committed, was in charge of, and was responsible to the company for the conduct of the business. A Director who is in charge of the company and a Director who was responsible to the company for the conduct of the business, are two different aspects... Admittedly, there is no assertion in the complaints that the Appellant, at the time of commission of the offence, was in charge of the business of the*



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company. Therefore on a plain reading of the complaints, the appellant cannot be prosecuted with the aid of sub — section (1) of section 141 of the 1881 Act. "

In the present case, also if the bank has not made any assertion nor any evidence has been produced to show cause, as to why, undersigned is to be reported to the Reserve Bank of India as fraud in respect of the account of RCOM for allegations under the SCN. It is reiterated that undersigned was neither in charge of nor was responsible to the company for conducting the business of the company. The SCN notice directed undersigned is bad, devoid of merits and requires to be quashed and set aside,

5. No due diligence by the bank and sole reliance on BDO Report.

(a) As already elaborated above, and as is ex facie evident from the SCN that the only 'Factors of Fraud as mentioned in the SCN is merely a summarization of certain major observations pointed out by BDO in its Report. There is no attempt made to independently undertake due diligence by the bank to ascertain whether or not there is a prima facie case of 'considering the possibility of reporting the name of undersigned to Reserve Bank of India as fraud. Thus, the only 'Factors of Fraud is a summary of the observations made in BDO Report which is identical to the summary made in the SCN. It is thus ex facie evident that there is no application of mind by the bank in issuing the SCN to determine in its own judgement whether a case at all is made out to categorize undersigned as fraud in respect of the account of RCOM.

(b) Evidently, there is nothing in the SCN which even remotely indicates that there is any independent due diligence or verification or judgement (based on objective facts) of the bank and rather it is ex facie evident that the bank is solely relying upon certain major observations made in the BDO Report. The BDO Report itself is subjective, based on various assumptions and disclaimers including as to the conclusions arrived at therein and thus the requirement for your bank having placed reliance on 'objective' facts is not met.

(c) We may draw your attention to the following observations made by the Hon'ble Calcutta High Court in the case of Prashant Bothra &Anr. v. Bureau of Immigration & Ors.2023 SCC Online Cal 2643:

"21. The very premise of the request was a forensic audit report allegedly authored by a particular concern. The said report, at best, is a piece of evidence in the liquidation proceeding and is in no manner conclusive proof of evidence of any illegality committed by any entity. In fact, it is common experience that each and every such forensic audit report contains several disclaimers, restricting the operation of the same to the proceeding in which they are filed, as well as confined to the impression of the authors thereof on the basis of the documents which are available to them.

22. Under no stretch of imagination can such a report be conclusive proof of the allegations against the petitioners. "

6. Thus, in the absence of there not being any objective examination on the part of the bank to show evidence holding undersigned accountable and showing undersigned's involvement in the SCN to identify undersigned's involvement or even making an averment to that effect that undersigned shall not and cannot be declared as fraud in respect of the account of RCOM. The absence of SCN not even suggesting, let alone justifying or reasoning the requiring of reporting the name of undersigned as a fraud in respect of the account of RCOM, the allegations made in the SCN do not survive.



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7. In order to effectively deal with and answer each of the allegations made in the SCN you will be satisfied that the BDO Report cannot be a basis for inferring the alleged omissions and commissions pointed out in the said SCN and cannot be relied upon at all for the purpose of requiring undersigned to answer the allegations made in the SCN in respect of the account of RCOM. The BDO Report, in effect demonstrates inter alia that:
- (a) There were multiple instances wherein BDO had either not carried out the required procedure to conclude any finding or performed procedures that were not covered in the scope of work as indicated in the relevant places;
 - (b) The limitations on data availability highlighted by BDO have a material impact on the work procedures. The consequent effects on the observations and conclusions are not highlighted transparently in the BDO Report; and
 - (c) The BDO Report does not establish possible fraudulent intent or identify potential fraud suspects as required as per the Forensic Accounting and Investigation Standard No 1 10; and
 - (d) BDO's conclusions were not definitive and cannot be relied upon since they were not based on conclusive evidence; and
 - (e) BDO confirmed that the information in the BDO Report had not been presented to Management for comments, and they did not make any representation regarding the accuracy of the motives and intentions behind the transactions, which is a significant impairment in evaluating whether or not there has been 'Fraud'
 - (f) The BDO Report is unfit and cannot be relied upon for the purpose of declaration of Fraud
8. You need not be reminded of the serious and adverse ramifications that will follow for undersigned in case undersigned is reported as fraud in respect of the account of RCOM. Once a final order classifying an account as fraud is passed, it not only results in reporting the crime to the investigating agencies but also has other penal and civil consequences. Such orders, once passed, debar the person from accessing institutional finance resulting in serious civil consequences. It is thus akin to backlisting the person for being untrustworthy and unworthy of credit by banks. In other words, grave and irreparable harm, loss and prejudice will be caused to undersigned whose role has not even been remotely established in the SCN to be implicated for the acts of which undersigned has not been put to notice of.
9. In view of the above and as set out in the previous correspondence addressed by undersigned, which is deemed to be reiterated herein in extenso, it is clear that the SCN is unjustifiable, unreasonable, arbitrary, and bad in law.
10. In the circumstances, undersigned calls upon you which we hereby do, to not only provide undersigned with an explanation of the extent of compliances made by you and through you by BDO of the various guidelines and directions issued by the Reserve Bank of India in relation to declaration of the account as Fraud: procedures followed to initiate proceedings, basis of the BDO Report, but also calls upon you to forthwith unconditionally recall and withdraw. in relation to undersigned, the SCN and the allegations contained therein which are of such a serious nature, failing which undersigned will adopt such proceedings, for the costs and consequences that shall be solely borne by you. In the event you choose to proceed with the SCN, undersigned reserves his right to avail the opportunity for a personal hearing from Mumbai.
11. For the multitude of reasons stated above, including the fundamental flaws in the SCN the violation of natural justice I hereby demand that the Show Cause Notice dated 6 March, 2026 be immediately withdrawn and cancelled in its entirety as it pertains to me.



**धोखाधड़ी जोखिम प्रबंधन प्रभाग, प्रधान कार्यालय
प्लॉट संख्या-4, सेक्टर-10, द्वारका, नई दिल्ली-110075
FRAUD RISK MANAGEMENT DIVISION, HEAD OFFICE
PLOT NO.4, SECTOR-10, DWARKA, NEW DELHI-110075**

12. *This letter is addressed without prejudice to all undersigned's rights, remedies, and contentions, all of which are hereby expressly reserved, including the right to provide further responses, explanations, and submissions in response to the SCN and documents and information referred to and relied upon in the SCN.*

Response of Sh. Gautam Doshi dated 08.04.2026 (received on 20.04.2026):

"I, Noticee No. 5, (Gautam Doshi), refer to the captioned Show Cause Notice dated 06.03.2026 issued by the Punjab National Bank ("Bank"), (the SCN) calling for submissions of erstwhile directors of Reliance Telecom Limited to show cause why "the" myna me/ my account should not be categorised and reported as "fraud" to RBI as per the extant guidelines. In this connection, I have to inform and confirm that I was a non-whole time and a non- executive director at Reliance Telecom limited. Hence, I was neither involved in the management of Reliance Telecom limited nor in the transactions referred to in the Investigation report. Also, the Investigation report or the Annexures to such report does not indicate that I was involved in the transactions referred therein.

I also draw your attention to RBI Master Directions on Fraud Risk Management in Commercial Banks (including Regional Rural Banks) and All India Financial Institutions dated 15 July, 2024 ("RBI Directions). Paragraph 2.1.1.1 of the RBI Directions specifies the list of persons to whom show cause notice is to be issued by Banks for fraud risk management. The said paragraph is reproduced below:

"2.1.1.1 Issuance of a detailed Show Cause Notice (SCN) to the Persons, Entities and its Promoters / Whole-time and Executive Directors against whom allegation of fraud is being examined." Further, the foot note 7 relating to paragraph 2.1.1.1 specifies as follows: "As non-whole-time directors (like nominee directors and independent directors) are normally not in charge of, or responsible to the company for the conduct of business of the company, banks may take this into consideration before proceeding against such directors under these Directions."

Therefore, the RBI directions specifically, mention that the banks should consider the fact that non-whole-time directors are not responsible for the conduct of business of the company before issuing a show cause notice to a non-whole time director. Apparently, the issuance of SCN in such cases can only be when the Bank has information that the concerned non-whole time director was involved in the actual conduct of the Company's business. It would therefore, appear that the issuance of SCN to me, a non-whole time director who was not involved in the actual conduct of the Company's business, is an error.

Attention is also drawn to paragraph 6.3.5 of the RBI directions which state as follows:

"6.3.5 While reporting frauds, banks shall ensure that persons / entities who are not involved / associated with the fraud are not reported in the FMR."

Hence, relying on the above paragraph of the RBI Directions, I should not have been issued a SCN and I cannot be reported as I am not associated/ involved in the conduct of the business of Reliance Telecom Limited.

In any case, I, being a Non-whole time and a non-executive director in Reliance Telecom limited was not concerned with its day-to-day management and its affairs. Hence, it would not be possible for me to give any information/ explanation in relation to the transactions referred to in the notices under reply.

Further, in similar proceedings arising from the same forensic audit report, State Bank of India (SBI) and Bank of India (BoI) has dropped action against independent/non-executive directors (including me). In fact, Punjab National Bank (PNB) itself has also withdrawn their Show Cause



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Notice against me in the case of Reliance Home Finance Limited for the same reasons as are set out above - namely, that I was a non-executive director and had no involvement in the transactions alleged to have caused loss to the Bank. Attaching the communications dated 29th April 2025, 15th September 2025 and 25th March 2025 from SBI, 801 and PNB respectively herewith (Annexures A, B & C).

In view of the above, I respectfully, request that the SCN issued to me be withdrawn.

This reply is submitted without any prejudice to my rights and other contentions which are hereby expressly reserved.

If, for any reason, the Bank decides to continue the proceedings against me I shall be obliged if I am given an opportunity of being heard when I could explain the facts and elaborate/clarify the reasons why the Bank should withdraw the Notice."

Committee views:

SCNs dated 06.03.2026 were issued to the borrower and its directors. In response to the SCNs issued, only the replies of Sh. Prakash Shenoy and Sh. Gautam Doshi were received.

- Sh. Prakash Shenoy submitted a copy of Form 32 submission to MCA wherein his designation is given as "Additional Director" under "Independent" category. Additionally, he has also submitted communications issued to him by SBI and IDBI Bank, therein withdrawing the proceedings of fraud examination against him with respect to the account of Reliance Telecom Limited. Further, as per MC sanction note (MC meeting dated 19.07.2016), he was an independent director. **In view of this, committee decided to not perceive fraud against Prakash Shenoy.**
- Sh. Gautam Doshi submitted communications issued to him by SBI and Bank of India, therein conveying the withdrawal of fraud examination proceedings (SBI) and withdrawal of his name from CFR portal of RBI (Bank of India). Further, as per Form 32 submission to MCA (obtained from the Save Risk portal) he was a director under "Independent" category. Further, as per MC sanction note (MC meeting dated 19.07.2016), he was an independent director. **In view of this, committee decided to not perceive fraud against Gautam Doshi.**
- As per information obtained from MC sanction note (MC meeting dated 19.07.2016) Sateesh Seth was an independent director. However, as per information obtained from SaveRisk website and MCA website, he was a director from 11.04.1997 – 15.11.2019. Further, no response to the Show Cause Notice was received from his side. **In view of this, committee decided to perceive fraud against Sateesh Seth.**
- As per information obtained from SaveRisk website, MCA website and MC sanction note (MC meeting dated 19.07.2016), Grace Thomas and Satyendra Mohanlal Sarupriya were Directors in the company. It is also pertinent to mention here that PNB had reported the names of Grace Thomas and Satyendra Mohanlal Sarupriya as fraud in the previous fraud filing done with RBI on 22.02.2021. Also, no response to the SCNs have been received from them. **In view of this, committee decided to perceive fraud against Grace Thomas and Satyendra Mohanlal Sarupriya.**



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- As per information obtained from Save Risk website and MCA website, Dagdulal Kasturchand Jain was an Additional Director from 25.03.2015 to 29.09.2015 and Director from 29.09.2015 to 05.08.2017. The review period of the Forensic Audit was from 01.04.2013 to 31.03.2017 and the period of directorship falls under this period. Further, no response to the SCN has been received from him. **In view of this, committee decided to perceive fraud against Dagdulal Kasturchand Jain.**

Upon perusal of the factors of fraud as observed in the Show Cause Notice and in the light of no response received from Sateesh Seth, Grace Thomas, Satyendra Mohanlal Sarupriya and Dagdulal Kasturchand Jain, the committee proceeded to pass the ex-parte order as under:

ORDER

The competent authority, after due consideration of the above-mentioned facts and examining the evidences on record, found that the borrower(s), **M/s Reliance Telecom Limited and its erst. directors, Sh. Sateesh Seth, Sh. Grace Thomas, Sh. Satyendra Mohanlal Sarupriya and Sh. Dagdulal Kasturchand Jain** are responsible for above event(s) of fraud and hence the aforesaid persons are hereby declared as "**fraud**" on the grounds of "**Misappropriation of funds and criminal breach of trust**" which constitute cogent ground(s) for the account(s) being classified as '**fraud**' in terms of extant Bank guidelines issued in consonance with the RBI guidelines/ Master Directions on Fraud read with Judgement dated 27.03.2023 of Honorable Supreme Court of India in Civil Appeal No. 7300/2022.



(Authorized Officer)

For

(For Head Office Fraud Examination Committee)

Punjab National Bank



7090



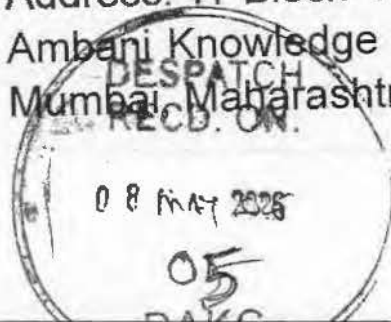
To: Sh. Sanjay Rahaqa



Reliance Telecom Limited (Borrower)

ਪੰਜਾਬ ਨੈਸ਼ਨਲ ਬੈਂਕ punjab national bank

Address: H Block 1st Floor, A Wing, Dhirubhai Ambani Knowledge City, Koparkh, Airane, Navi Mumbai, Maharashtra, 400710



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