Sr.	Name of Creditor	Address	Amount	Amount
No.			Claimed	Estimated
1	State Tax Department Of Gujarat	Assistant Commissioner of State Tax, 4th floor, Unit - 7 Kuber Bhavan, I-Block,Kothi Compound,Raop ura, Vadodara, Gujarat	29,671,201	29,671,201
2	Mariner Pacific Limited	372 Fifth Avenue, Suite 6F, New York,10018 USA	940,292,257	-
3	Swasti Chem Private Limited	101,Sathy Road, eroad - 638003(Tamilna du)	1,092,166	799,515
4	SBICAP Trustee Company Limited	Corporate Office : Apeejay House, 6th Floor 3 Dinshaw Wachha Road, Churchgate , Mumbai-400020 Registered Office : 202, Maker Tower E, Cuffe Parade, Colaba, Mumbai- 400005	1,888,000	1,888,000
5	Rohit Asudani, Dy. Commissioner of Income Tax	O/o Dy. Commissioner of Income Tax Central Circle 2 (4), Room No. 802, 8th Floor, Old CGO Annexe Bldg, M K Road, Mumbai 400020	3,152,115,29 6	-
6	Axis Trustee Services Limited (ATSL)	Compliance Officer Axis Trustee Services Limited Ground Floor, Axis House Bombay Dyeing Mills Compound Pandurang Budhkar Marg Worli, Mumbai- 400025	1,226,947	1,226,947

List of Operational Creditors' claims as on December 31, 2018:

Sr. No.	Name of Creditor	Address	Amount Claimed	Amount Estimated
7	Shah Pharmachem Co.	A-21, Avinash, 2nd Floor, J.P.Road, Seven Bungalows, Andheri West, Mumbai -400053	145,374	-
8	Madison Pacific Trust Limited	1720,17th floor, Tower One, Admiralty Cenre, 18 Harcourt Road, Admiralty, Hong Kong	5,232,474	5,232,474
9	Godavari Bone Mill	Ainapur, Biloli Dist. Nanded (Maharastra State)	2,461,305	2,461,305
10	Manjeera Bone Mill	Ainapur , Biloli Dist. Nanded (Maharastra State)	2,904,550	2,904,550
11	Indian bone Meal Industries	No. 100, 2nd Main Bannimantap C Layout, Mysore - 570015 Karnataka	9,351,527	9,351,527
12	Ashan Exports and Furnishers	Industrial Development area,Edayar Muppathadam PIN 683110	3,176,010	3,176,010
13	AMA Fisherries	AMA Fisherries Old No. 2A, New No. 9, Co- op. Colony, Gandhi Nagar, Mohanur Road, Namakkal- 637001 India	3,226,706	2,456,686
14	Carmel Crushers & Fertilizers	Kidangazhi, P.O. Thrikkalangode Manjeri-676127	5,656,356	5,656,356
15	Sri Bhuvaneshwari Enterprises	58/6, Near Ayyapan Koil, Venkatesha Colony, Pollachi	364,797	318,007
16	Bajrang Ply & Hardware	GF 7-8 Ananta Trendz, Near Narayan Garden Gotri Vadodara- 390021	104,403	85,721

Sr. No.	Name of Creditor	Address	Amount Claimed	Amount Estimated
17	Proficient Engineers	B-69, Shreedhar Park, Behind Makarpura ST Depot, Vadodara- 390010	587,340	231,104
18	Kalpaka Bone Meal Industries	Industial Estate , Westhill, Calicut-673005	2,236,080	2,236,080
19	Kalyani Industries	Door No. 12- 128,Janapadu Road Piduguralla Guntur DIST	1,459,545	1,459,545
20	DK Transport Agency	Door No. 12- 128,Janapadu Road Piduguralla Guntur DIST	48,195	-
21	Pon Pure Chemical India Private Limited	No.32 , H- Block, 15th Main Road, Anna Nagar, Chennai-600040	666,190	666,190
22	Vijay Minerals - Karkhadi/Padra	12/33, Nandanvan Nagar, Chopasni, JODHPUR- 342008, Rajasthan	2,235,822	2,153,712
23	Vijay Minerals - Masar	12/33, Nandanvan Nagar, Chopasni, JODHPUR- 342008, Rajasthan	106,360	106,260
24	Vijay Minerals - Ooty	12/33, Nandanvan Nagar, Chopasni, JODHPUR- 342008, Rajasthan	556,612	380,045
25	Pooja Logistics - Karkhadi/Padra	12/33, Nandanvan Nagar, Chopasni, JODHPUR- 342008, Rajasthan	701,615	569,927
26	Pooja Logistics - Masar	12/33, Nandanvan Nagar, Chopasni, JODHPUR-	51,975	51,975

Sr. No.	Name of Creditor	Address	Amount Claimed	Amount Estimated
110.		342008, Rajasthan	clained	Estimated
27	Pooja Logistics - Ooty	12/33, Nandanvan Nagar, Chopasni, JODHPUR- 342008, Rajasthan	772,905	558,552
28	Gastek Engineering (P) Ltd.	710 Modi Corp. Tower, 98 Nehru Place, New Delhi - 110019	191,997	191,997
29	Swastik Ceramica	A-38, Yogeshwar Soc., Nr. Shishu Hospital, Nr. H.P.Petrol, Vasana-Iscon Road, Vasana, Vadodara	114,562	-
30	Aditya Construction	A/6, Mrudang Society, Opp P&T Colony, Sama-Savali Road, Vadodara- 390022	396,115	-
31	Dyna Filters Pvt. Ltd.	Plot No.14,15 & 20, Ramtekdi Industrial Estate, Pune-Solapur Road, Hadapsar, Pune - 411028	464,756	340,207
32	Nelkadir Bone Industries	IDA, Muppathadam, Edayar- 683110, Ernakulum Dist. Kerala	2,289,545	2,289,545
33	VK Clean Rooms	740/A, Naliya road, B/h. Gurukrupa farm house, Near prime estate manjusar savli road,Village Manjusar, Dist Vadodara- 391775	265,131	-
34	National Industries	Door No. V/781, IDA,	2,900,610	2,899,630

Sr. No.	Name of Creditor	Address	Amount Claimed	Amount Estimated
110.		Muppathadam, Edayar-683110, Ernakulam Dist. Kerala	Claimed	LStinated
35	M/s Thakur Jawaharsinh	42, Chandravila, Kotar Talawadi, Alwa Naka, Manjalpur, Vadodara-10 9825791866	251,608	251,608
36	Agilent Technologies India Pvt. Ltd.	Ground Floor, Elegance Tower Plot No. 8, Jasola District center, Jasola, New Delhi- 110025, India	1,130,095	544,589
37	Kunj Electricals	At. & Po. Jalalpura, Ta Padra, Dist- Vadodara	740,155	-
38	Sigma Minerals Limited	4, Heavy Industrial Area, Jodhpur-342003 Rajasthan-India	819,713	819,713
39	Dwarkesh Refrigeration & Electrical	F-27, Nandanvan Society, GIDC Vadsar Road, Makarpura, Vadodara 390010	103,662	-
40	Commissioner of Customs,NS- 2,JNCH,Nhava Sheva	Jawaharlal Nehru Custom House, Nhava Sheva, Tal- Uran, Dist Raigad, Maharashtra- 400707	270,791,282	-
41	Commissioner of Customs,NS- 2,JNCH,Nhava Sheva	Jawaharlal Nehru Custom House, Nhava Sheva, Tal- Uran, Dist Raigad, Maharashtra- 400707	246,876,892	-
42	Gee Gee kay chemicals(CBE)	154-A, P.N.Palayam Road, Ganapathy, Coimbatore- 641006.	587,875	587,875
43	Riddhi Siddhi Enterprise	03,Shubham Park, Jafrabad	964,574	737,940

Sr. No.	Name of Creditor	Address	Amount Claimed	Amount Estimated
<u> </u>		Road Rajula- 365560	Claimed	Litillated
44	Lakshmi Sacks	Shed No. B-4, Rural Industrial Estate, Kattukuppam, Podicherry- 607402	862,126	587,846
45	Rudra Engineering	1 A Ami Society, Diwalipura, Old padra Road, Vadodara	1,458,447	1,444,858
46	Squire Patton Boggs (UK) LLP	7 Devonshire Square London EC2M4YH DX No. 136546 Bishopsgate 2 United Kingdom	4,809,179	4,809,179
47	Rajalakshmi Transports	5/581, Rajiv Gandhi Nagar CTC Backside, Mettupalayam- 641301	75,965	75,965
48	E.Rajaram & Co.	17, East Masi Street, Madurai-625001	2,356,293	1,919,976
49	Unitech Heat Exchangers & Fabricators	84, SIDCO Industrial Estate, Malumachampa tti Post, Coimbatore- 641050	75,520	75,520
50	Promas Engineers Pvt. Ltd.	Plot No. R-967, TTC INDL Area, Rabale MIDC, Navi Mumbai- 400701	276,848	143,000
51	GMM Pfaudler Limited	1001, Peninsula Towers, Peninsula Corporate Park, G.K. Marg, Lower Parel, Mumbai - 400 012	308,000	308,000
	Total		4,707,442,9 58	91,669,136

(#) Acceptance of the claim is subject to receipt of certain documents /clarifications from the Financial Creditors in relation to interest, penal charges, agreements, contracts etc. The analysis and findings delineated in this report are specifically subject to information received up to December 31, 2018. The same may change subject to any material information received from the creditors affecting the claim amounts.

The analysis and findings delineated in this report are specifically based on documents and information submitted by the creditors *(subject to further verification of the same)*.

List of employees/workmen claims as on December 31, 2018:

Sr. No.	Name of Employee	Address	Amount Claimed	Amount Estimate d #
1	Dr. Anand Vardhan	Flat No. 402, Building P-1, Empire Estate Phase-2, old Pune-Mumbai Highway, Chinchwad, Pune -411019, Maharashtra.	796,330	304,207
2	Vijay Darji	B-26 Purshottam, High Tenstion Road, Near Lisa Park, Subhanpura, Vadodara-90023, Gujarat.	83,421	83,421
3	Sanjay Pitamber Ingle	B-202, Synnove Enclave, Vasna Bhayli Road, Near Nilamber Palms, TP-2, Bhayli Vadodara, Gujarat-391410.	325,579	325,579
4	Sanjay K Surana	Sujata Building, Flat No. 12, 27C Juhu Road, Santacruz West Mumbai 400054.	1,952,386	1,952,38 6
5	Chandrakant Belwal	202-Blossom, Meridian Prime, Near ward-11 office, Diwalipura, Vadodara-390007, Gujarat.	173,328	124,809
6	Ansiram Bhagwanrao Harale	I 301, Atri Residency, Odhav S P Ring Road, Ahmedabad.	250,000	202,945
7	Payal Tejas Shah	A/11, 3rd Floor, J-4 Mahavir Nagar CHS Ltd, Dahanukar Wadi, Mahavir Nagar, Near Omkar Hospital Kandivali West, Mumbai - 400067.	109,992	-
8	Tejas Rohitkumar Shah	A/11, 3rd Floor, J-4 Mahavir Nagar CHS Ltd, Dahanukar Wadi, Mahavir Nagar, Near Omkar Hospital Kandivali West, Mumbai - 400067.	944,576	944,576
9	Sunita S Surana	Sujata Building, Flat No. 12, 27C Juhu Road, Santacruz West Mumbai 400054.	690,696	690,696
10	Prashant Shivaji Chaudhari	B-402, Suncrest Soc. Behind Pratham Upvan Soc. 30 Meter Sunpharma Road, Vadodara- 390012, Gujarat.	90,000	63,938
11	Ghanshyam Nayak	202, 2nd Floor Ballmcekund Park Soc. Nr. Sabari School Vara Road, Vadodara.	300,000	159,944
12	Joshi Bhavinkumar Kanubhai	New VIP road, New Karelibaug, Near Khodiyar nagar, Vadodara- 390018.	87,338	87,338
13	Himanshu Shanilal Dedhia	303,Shree Swami samrth bhavan,Dr. R.P.Road, Juna Mulund,Near Sati Sevi	266,892	266,892

Sr. No.	Name of Employee	Address	Amount Claimed	Amount Estimate
		Mandir,Mulund (West), Mumbai- 80.		d #
14	Sagar Premjibhai kothadiya	G-401, Gunatit Residency, opp. Gaytri School Gotri, Vadodara- 390021, Gujarat.	95,664	95,664
15	Chetanbhai Sureshbhai Vaghela	1/134/77, Vaghela Khadki,At Post: Nodhana, TA: Jambusar,Dist : Bharuch, 392150.	35,616	35,616
16	Vijaykumar Pravinchandra Tailor	A/302 Nakshtra Habitat, Opp. Suncity Paradise, Nr. Balaji Party plot, Manjalpur, Vadodara-390012, Gujarat.	100,400	100,393
17	Patel Janakbhai Jashubhai	21/ Narmada Nagar Society No.1, Manjalpur, Vadodara- 390011.	84,091	84,061
18	Ajay J Mistry	12/403, Phase-5, Brahmand,Patlipada, Thane, Maharashtra-400607.	325,452	142,861
19	Mr. Ketulkumar Kirtanbhai Paramar	21, Ambedkar Society, Dabhoi- 391110, Vadodara.	Not Available	-
20	Urveshkumar Chaudhari	LIG E-401, Pandit Dindayal Upadhyay Nagar, baroda Heights, Manjalpur, Varodara, Gujarat-390011.	16,000	8,582
21	Rahul Sahu	175 Meghdhanush Society, Old Padra Road, Vadodara, Gujarat-390020.	20,000	5,179
22	Hariom Yadav	175 Meghdhanush Society, Old Padra Road, Vadodara, Gujarat-390020.	40,000	19,878
23	Jayesh Pravin Patil	Mathuranagri Society, Old Padra Road, Vadodara, Gujarat- 390020.	Not Available	-
24	Dixit V. Patel	B-4-1480,Vakhuth-1, Near Jay Ambe Vidhyala Waghodia Road, Vadodara.	145,354	145,354
25	Ketan Jagdishbhai Thaker	B-7, Surbhipark Society, Near Balajinagar, Behind Samta Flats, P.O. Subhanpura, Vadodara-390023.	77,236	77,236
26	Parmar Rahul Kanubhai	AT-Dabhasa, Near Dasama Temple,TA- Padra, Vadodara-391440.	12,730	12,730
27	Anand Kumar Srivastava	Arihant Abhilasha Abartment, Block B, Flat No.810, Sector 35H (Near Ganpati Mandir), Kharghar, Navi Mumbai-410210	350,000	-
28	Patel Nilesh Kumar Govindbhai	1, darji faliyu, Rabod- 389310, Kalol Dist., Panchmahal, Gujarat	42,469	-
29	Viralkumar Jagdishbhai Patel	sujata Building, Flat No. 12, 27C Juhu Road, Santacruz West Mumbai 400054.	48,000	-

Sr. No.	Name of Employee	Address	Amount Claimed	Amount Estimate d #
30	Kamleshkumar Ramanbhai Muniya	D80, Jankpuri Soc.,Karodiya Road, Madhunagar,Gorwa,Vadodara,3 90016	69,000	-
31	Vaghela Manojkumar Pratapsing	1-66, Mahadev Faliyu, Mahadev Temple, Gavasad, Ta: Padra, Vadodara-391430	35,000	-
32	Umesh JitendraBhai Pandya	11, Shree Yogeshwar Duplex, Behind Janodwadi, New VIP Road, Harni Colony, Vadodara, Gujarat-390022	115,230	-
33	Atishsinh Bharatsinh Raulji	D-48 Vrajdham Society TP-13, Channi Jakat naka, Vadodara- 390024, Gujarat	Not Available	-
33	Parmar Kishan Kumar Rameshbhai	Police Statio Road Near Balmandir, Chock Bagasara Ta: Bagasara, Amreli. 365440	20,000	-
	Total		7,702,780	5,934,2 85

The analysis and findings delineated in this report are specifically based on documents and information submitted by the creditors *(subject to further verification of the same)*.

List of financial claims as on December 31, 2018:

Sr N o.	Financial Creditors Claimant	Participating Bank Branch	Amounts claimed - INR Cr	Admitted amounts of claims - INR Cr
1	JM Financial (Assigned by Federal bank)	India	125.79	125.79
2	JM Financial (Assigned OBC bank)	India	24.93	24.93
3	IOB HONG KONG	Hongkong	15.51	15.51
4	IOB India	India	862.96	638.52
5	Union Bank of India	Hongkong	155.58	155.58
6	Union Bank of India	India	211.72	211.72
7	PNB International	London	62.90	42.03
8	PNB Hongkong	Hongkong	65.73	65.73
9	PNB India	India	1,132.54	386.04
10	Syndicate Bank	India	142.42	142.42
11	Syndicate Bank london branch	London	193.64	193.64
12	Bank of India	India	403.80	402.85
13	Bank of India london branch (CG)	London	129.32	127.15
14	Bank of India london branch (CG)	London	604.92	-
15	Punjab & Sind Bank	India	99.57	57.58
16	Bank of Maharashtra	India	32.15	32.15
17	Oriental Bank of Commerce	India	47.77	47.77
18	LIC	India	730.13	730.03
19	IDBI Bank	India	63.05	63.05
20	UCO Bank	India	2,247.08	867.49
21	UCO Bank Singapore Branch	Singapore	46.00	46.00
22	UCO Bank Hongkong Branch	Hongkong	92.94	92.94

LIST	OF	CRED	ITORS
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Sr N o.	Financial Creditors Claimant	Participating Bank Branch	Amounts claimed - INR Cr	Admitted amounts of claims - INR Cr
23	Laxmi Vilas Bank	India	15.83	15.83
24	Vijaya Bank	India	153.74	82.60
25	Catholic Syrian Bank	India	25.93	25.93
26	Exim Bank	India	29.21	29.21
27	Allahabad bank	India	1,093.19	558.97
28	State bank of India	India	1,654.05	732.28
29	Bank of Baroda	India	1,082.73	520.21
30	Bank of Baroda	UAE	30.46	30.46
31	Bank of Baroda	London	126.48	126.48
32	Andhra Bank	India	1,333.02	465.54
33	HDFC Bank	India	17.84	17.84
34	J P Morgan Chase	London	73.86	73.86
35	Madison Pacific Trust Limited	Hongkong	1,354.51	1,354.51
36	SREI	India	274.26	201.87
37	ILOG Port Dahej Pvt. Ltd. Total	India	258.17 15,013.73	258.17 8,962.69

* Madison Pacific Claims are admissible in full. However, The Voting rights shall be assigned only to the extent of Bondholding Information and Undertaking pertaining to the Bondholders made available by the Madison Pacific Trustee

The analysis and findings delineated in this report are specifically based on documents and information submitted by the creditors *(subject to further verification of the same)*.

SECURITY DESCRIPTIONS OF FINANCIAL CREDITORS¹

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
1.	Allahabad Bank ²	Stand - by letter of credit ("ANZ SBLC") facility for the financing of the 'Anieze' oilfields in Nigeria	 A. First ranking charge on movable and immovable assets of Sterling Exploration and Energy Production Company Limited - Nigeria ("SEEPCO - Nigeria"), both present and future; B. First ranking pledge of 100% of the shareholding of Sterling Oil Private Limited ("SOPL") as held by Sterling Global Oil Resources Private Limited ("SGORPL"); C. First ranking pledge of 92.464% shareholding of Sterling Exploration and Energy Production Company Limited - British Virgin Islands ("SEEPCO - BVI") as held by SOPL; D. First ranking pledge of 90% of the shareholding of SEEPCO - BVI;

¹ <u>Comment</u>: It is pertinent to note that the details of security interest and the details of the facilities sanctioned by various financial creditors have been prepared on the claims filed by such financial creditors, the supporting documents / information provided in support of such claims and the follow - up information as provided from time to time. Therefore, the details of security interest and the details of the facilities sanctioned by various financial creditors as enumerated herein are subject to further determination / verification and further information / documents as provided by such financial creditors from time to time in response to our queries / clarifications sought, during the corporate insolvency resolution process, as per the provisions of the Insolvency and Bankruptcy Code, 2016.

² <u>Comment</u>: It is pertinent to note that Allahabad Bank has not provided the details of the facilities sanctioned by Allahabad Bank to the Company and / or the break - up of the amounts claimed under the facilities sanctioned and the details of security interest and the details of the facilities provided by Allahabad Bank have been prepared on the basis of the documents provided by Allahabad Bank and / or other financial creditors of the Company. Therefore, the same is subject to further determination / verification and further information / documents as provided by Allahabad Bank from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			E. First ranking pledge of 10% of the shareholding of SEEPCO - Nigeria held by Mr. Nitin J. Sandesara;
			F. Personal guarantee of Mr. Nitin J. Sandesara;
			G. First ranking charge on oil receivables of SEEPCO - Nigeria in respect of the project ("ANZ Project") for development and exploration of the oilfields in the 'Anieze' field forming part of the OPL - 280 block in the Niger Delta region of Nigeria and the offshore trust and retention account(s) into which such receivables will be deposited and all other such bank account(s);
			H. First ranking charge on receivables of SEEPCO - BVI, SOPL and SGORPL;
			 First ranking charge on the bank account(s) / trust retention account(s) of Sterling Biotech Limited (the "Company"), PMT Machines Limited ("PMT"), Sterling SEZ and Infrastructure Limited ("SSIL") and SGORPL;
			J. Non - disposal undertaking in respect of 100% of the shareholding in SORL by the

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			shareholders of Sterling Oil Resources Limited (" SORL ");
			 K. Non - disposal undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by Sterling International Enterprises Limited ("SIEL");
			L. Non - disposal undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SORL;
			 M. Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by the Company;
			 Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by PMT;
			O. Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by SSIL;
			 P. Non - disposal undertaking by SORL in respect of its 100% of the shareholding in SGORPL;
			Q. Non - disposal undertaking by SEEPCO - Nigeria in respect of its assets;
			R. Corporate guarantee by SEEPCO - Nigeria;

LIST	OF	CREDI	TORS
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d in relation to the Facility
ranking charge on all tangible and ible movable and immovable assets of ompany, PMT and SSIL, both present ture;
anking pledge of all the fully paid and issued equity shares of the any, as held by the promoters of the any;
anking pledge of all the fully paid nd issued equity shares of PMT, as held promoters of PMT;
anking pledge of all the fully paid nd issued equity shares of SSIL, as held promoters of SSIL; and
al guarantee of Mr. Chetan J. Sara.
charge on all present and future
le / intangible movable assets of the any, PMT and SSIL;
charge on all present and future vable assets of the Company including movable properties of the Company as ped in Schedule - I hereto and all at and future immovable properties of
ov m ril

LIST	OF	CRED	ITORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			C. First <i>pari</i> - <i>passu</i> charge on the trust and retention account of the Company, PMT and SSIL and any other bank accounts of the Company, PMT and SSIL;
			D. First charge by way of pledge over the entire shareholding of the promoter group in the Company, PMT, SSIL and Sterling Port Limited ("SPL");
			E. First charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of SSIL;
			F. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of the Company and PMT; and

LIST OF CREDITORS

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
	the Financial	the Facility	
No.	Creditor	the Facility	created in relation to the Facility
			G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Working capital consortium facility	 A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Term loan consortium facility	A. First <i>pari</i> - <i>passu</i> charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future;

LIST OF CREDITORS

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
		External commercial borrowings ("ECB") consortium facility	 B. Second pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara. A. First ranking mortgage and charge over all the immovable properties as described in Schedule - I hereto and movable properties and assets, both present and future, of the Company; B. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc. of the Company; C. First ranking charge or assignment or security interest of the rights of the Company under each of the documents pertaining to project (the "Project") for expansion of the existing infrastructure facilities for manufacture

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 of gelatin at a notified special economic zone in Bharuch, Gujarat; D. First ranking charge or assignment on the rights of the Company under each of the insurance contracts pertaining to the Project; and E. First ranking charge or assignment on all bank accounts of the Company including the debt service reserve account and the designated (overseas) account.
		Term loan facility	 A. First charge over factory land and buildings of the Company at Karkhadi including plant and machinery and all moveable fixed assets, both present and future; B. First charge over all current assets of the Company in Vadodara, Gujarat, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.

Sr. No.	Particulars of the Financial Creditor	Particulars of the Facility	Brief Details of the Security Interest created in relation to the Facility
2.	Andhra Bank ³	ANZ SBLC facility	 A. First ranking charge on movable and immovable assets of SEEPCO - Nigeria, both present and future; B. First ranking pledge of 100% of the shareholding of SOPL as held by SGORPL; C. First ranking pledge of 92.464% shareholding of SEEPCO - BVI as held by SOPL; D. First ranking pledge of 90% of the shareholding of SEEPCO - Nigeria as held by SEEPCO - BVI; E. First ranking pledge of 10% of the shareholding of SEEPCO - Nigeria held by Mr. Nitin J. Sandesara; F. Personal guarantee of Mr. Nitin J. Sandesara; G. First ranking charge on oil receivables of SEEPCO - Nigeria in respect of the ANZ Project and the offshore trust and retention account(s) into which such

³ <u>Comment</u>: It is pertinent to note that Andhra Bank has not provided the details of the facilities sanctioned by Andhra Bank to the Company and / or the break - up of the amounts claimed under the facilities sanctioned and the details of security interest and the details of the facilities provided by Andhra Bank have been prepared on the basis of the documents provided by Andhra Bank and / or other financial creditors of the Company. Therefore, the same is subject to further determination / verification and further information / documents as provided by Andhra Bank from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			receivables will be deposited and all other such bank account(s);
			H. First ranking charge on receivables of SEEPCO - BVI, SOPL and SGORPL;
			 First ranking charge on the bank account(s) / trust retention account(s) of the Company, PMT, SSIL and SGORPL;
			 J. Non - disposal undertaking in respect of 100% of the shareholding in SORL by the shareholders of SORL;
			 K. Non - disposal undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SIEL;
			L. Non - disposal undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SORL;
			 M. Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by the Company;
			 Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by PMT;
			 Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by SSIL;

LIST	OF	CRED	ITORS
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Sr. No.	Particulars of the Financial Creditor	Particulars of the Facility	Brief Details of the Security Interest created in relation to the Facility
			 P. Non - disposal undertaking by SORL in respect of its 100% of the shareholding in SGORPL; Q. Non - disposal undertaking by SEEPCO -
			Nigeria in respect of its assets;
			R. Corporate guarantee by SEEPCO - Nigeria;
			S. First ranking charge on all tangible and intangible movable and immovable assets of the Company, PMT and SSIL, both present and future;
			 First ranking pledge of all the fully paid up and issued equity shares of the Company, as held by the promoters of the Company;
			 U. First ranking pledge of all the fully paid - up and issued equity shares of PMT, as held by the promoters of PMT;
			 V. First ranking pledge of all the fully paid - up and issued equity shares of SSIL, as held by the promoters of SSIL; and
			W. Personal guarantee of Mr. Chetan J. Sandesara.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
		Rupee term	A. First charge on all present and future
		loan facility	tangible / intangible movable assets of the
		tour rucitity	Company, PMT and SSIL;
			company, rmt and ssic,
			B. First charge on all present and future
			immovable assets of the Company including
			the immovable properties of the Company as
			described in Schedule - I hereto and all
			present and future immovable properties of
			PMT and SSIL;
			C. First pari - passu charge on the trust and
			, , , , ,
			retention account of the Company, PMT and SSIL and any other bank accounts of the
			Company, PMT and SSIL;
			company, risk and ssic,
			D. First charge by way of pledge over the
			entire shareholding of the promoter group
			in the Company, PMT, SSIL and SPL;
			E. First charge on all current assets, including
			tools and spares and all the stock of finished
			goods, semi - finished goods, work - in -
			progress, raw materials etc., all such trade
			receivables and charge on the receivables,
			trade debts and all monies credited /
			deposited and / or to be credited /
			deposited therein, of SSIL;
			F. Second charge on all current assets,
			including tools and spares and all the

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of the Company and PMT; and G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Term loan consortium facility	 A. First pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future;
			B. Second pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; and
			C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
		Working capital consortium facility	 A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and
			C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
3.	Bank of Baroda, London	ECB Consortium facility	 First ranking mortgage and charge over all the immovable properties as described in Schedule - I hereto and movable properties and assets, both present and future, of the Company;
			B. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc. of the Company;

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			C. First ranking charge or assignment or security interest of the rights of the Company under each of the documents pertaining to the Project;
			D. First ranking charge or assignment on the rights of the Company under each of the insurance contracts pertaining to the Project; and
			E. First ranking charge or assignment on all bank accounts of the Company including the debt service reserve account and the designated (overseas) account.
4.	Bank of Baroda, India⁴	Rupee term loan facility	A. First charge on all present and future tangible / intangible movable assets of the Company, PMT and SSIL;
			 B. First charge on all present and future immovable assets of the Company including the immovable properties of the Company as described in Schedule - I hereto and all present and future immovable properties of PMT and SSIL;

⁴ <u>Comment</u>: It is pertinent to note that Bank of Baroda has not provided the details of the facilities sanctioned by Bank of Baroda to the Company and / or the break - up of the amounts claimed under the facilities sanctioned and the details of security interest and the details of the facilities provided by Bank of Baroda have been prepared on the basis of the documents provided by Bank of Baroda and / or other financial creditors of the Company. Therefore, the same is subject to further determination / verification and further information / documents as provided by Bank of Baroda from time to time.

Particulars of	Particulars of	Brief Details of the Security Interest
the Financial Creditor	the Facility	created in relation to the Facility
the Financial		
		receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of the Company and
	the Financial	the Financial the Facility

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Working capital consortium facility	 A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Facility provided to British Oil and Gas Exploration Limited, British Virgin Islands ("BOGEL")	 A. Pledge on 91.7% of the issued shares of British Oil and Gas Exploration Nigeria Limited. B. First charge on the debt service reserve account of BOGEL bearing number 94100292000982 and the escrow

LIST OF CREDITORS

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
			account of BOGEL bearing number 94100292000983. C. First charge on the construction insurances
			and the existing fixed asset insurances obtained in connection with the rigs.
			D. First charge on project agreements entered into with respect to the rigs.
			 First charge on BOGEL's interest in two rigs (i.e. Durga 1 and Durga 2) as described in Schedule - II hereto.
			 F. First charge on BOGEL's interest in third rig (i.e. Durga 3) as described in Schedule - II hereto.
			 G. First charge on BOGEL's interest in fourth rig (i.e. Durga 4) as described in Schedule - II hereto.
			H. Personal guarantee of Mr. Nitin Sandesara.
5.	Bank of India, London	ECB Consortium facility	 A. First ranking mortgage and charge over all the immovable property as described in Schedule - I hereto and movable properties and assets, both present and future, of the Company;

LIST OF CREDITORS

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 B. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc. of the Company; C. First ranking charge or assignment or security interest of the rights of the Company under each of the documents pertaining to the Project; D. First ranking charge or assignment on the rights of the Company under each of the insurance contracts pertaining to the Project; and E. First ranking charge or assignment on all bank accounts of the Company including the debt service reserve account and the designated (overseas) account.
		Facility provided to Atlantic Blue Water Services Limited ("ABWSL")	 A. A first preferred mortgage dated August 24, 2012 for mortgage of all the shares of the ship MV 'BRAHMNI' which was registered in 2011 in Moroni as evidenced by the Certificate of Registration of Charge dated September 5, 2012 bearing Charge ID: F4NN9A issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands.

LIST OF CREDITORS

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 B. A first preferred mortgage datedAugust 24, 2012 for mortgage of all the shares of the ship MV 'AMBE' which was registered in 2012 in Moroni as evidenced by the Certificate of Registration of Charge dated September 5, 2012 bearing Charge ID: Y4YW5K issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands.
			C. A first preferred mortgage datedAugust 24, 2012 for mortgage of all the shares of the ship MV 'BHAVVYA' which was registered in 2012 in Moroni as evidenced by the Certificate of Registration of Charge dated September 5, 2012 bearing Charge ID: SUT7VE issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands.
			D. A first preferred mortgage datedAugust 24, 2012 for mortgage of all the shares of the ship MV 'ANANTA' which was registered in 2012 in Moroni as evidenced by the Certificate of Registration of Charge dated September 5, 2012 bearing Charge ID: 1QOHYT issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 E. A first preferred Panamanian Mortgage dated October 2, 2012 for mortgage of all its rights title and interest on the vessel 'VRINDA' which was registered in the Republic of Panama as evidenced by the Certificate of Registration of Charge dated October 8, 2012 bearing Charge ID: 7ZNRD5issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands and also as evidenced by Certificate of Preliminary Registration of Ship's Mortgage bearing IPHN NO. 7934 dated 03/10/2012 issued by Public Registry of Panama.
			 F. A first preferred Panamanian Mortgage dated October 2, 2012 for mortgage of all its rights title and interest on the vessel 'TULJA' which was registered in the Republic of Panama as evidenced by the Certificate of Registration of Charge dated October 8, 2012 bearing Charge ID: EMNEX6 issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands and also as evidenced by Certificate of Preliminary Registration of Ship's Mortgage bearing IPHN NO. 7933 dated 03/10/2012 issued by Public Registry of Panama. G. A first preferred Panamanian Mortgage dated December 4, 2014 for mortgage of the preliminary Registration of Panama.
			dated December 4, 2014 for mortgage of all its rights, title and interest on the

Particulars of	Particulars of	Brief Details of the Security Interest
the Financial Creditor	the Facility	created in relation to the Facility
		 vessel 'TULJA BHAVANI' which was registered in the Republic of Panama as evidenced by the Certificate of Registration of Charge dated October 4, 2014 bearing Charge ID: BME2NS issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands and also as evidenced by Certificate of Preliminary Registration of Ship's Mortgage bearing IPHN NO. 7934 dated 03/10/2012 issued by Public Registry of Panama. H. A mortgage dated June 23, 2015 for mortgage of all the vessel 'Atlantic-1' as evidenced by the Certificate of Registration of Charge dated July 16, 2015 bearing Charge ID: FJXAZO issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands. I. A mortgage dated June 23, 2015 for mortgage of all the vessel 'Atlantic-2' as evidenced by the Certificate of Registration of Charge dated July 16, 2015 bearing Charge ID: AOROYP issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands. J. A mortgage dated June 23, 2015 for mortgage of all the vessel 'Atlantic-2' as evidenced by the Certificate of Registration of Charge dated July 16, 2015 bearing Charge ID: AOROYP issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands. J. A mortgage dated June 23, 2015 for mortgage of all the vessel 'Atlantic-3' as evidenced by the Certificate of Registration of Charge dated July 16, 2015 bearing Charge ID: AOROYP issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands. J. A mortgage dated June 23, 2015 for mortgage of all the vessel 'Atlantic-3' as evidenced by the Certificate of Registration of Charge dated July 16,
	the Financial	the Financial the Facility

Sr.	Particulars of the Financial	Particulars of	Brief Details of the Security Interest
No.	Creditor	the Facility	created in relation to the Facility
			2015 bearing Charge ID: RXZHH7 issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands.
			K. A mortgage dated June 23, 2015 for mortgage of all the vessel 'Atlantic-4' as evidenced by the Certificate of Registration of Charge dated July 16, 2015 bearing Charge ID: TX4ZLI issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands.
			L. A mortgage dated June 23, 2015 for mortgage of all the vessel 'Atlantic-5' as evidenced by the Certificate of Registration of Charge dated July 16, 2015 bearing Charge ID: 03M75Y issued by Registrar of Corporate Affairs, Territory of the British Virgin Islands.
			M. First charge on the debt service reserve account of BOGEL bearing number 0273010080 and the escrow account of BOGEL bearing number 0272010080.
			N. First charge on the insurances of all secured assets.
			O. First charge on:
			(a) ABWSL's movable properties including fixed and current assets plan and machinery, receivables,

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			earnings, claims against third parties and revenues of ABWSL of whatever natures and however described including vessels which are not registered in Nigeria and/or in any other Country (both tangible and intangible), present and future, by way of hypothecation of the same including the following:
			(i) Plant and machinery for evacuation and logistics terminal;
			 (ii) Jetty for barge operation equipped with loading hoses, bollards, fenders, fire - fighting and security systems, loading/unloading arms, etc.
			(iii) Tank farm consisting of crude storage tanks, pump houses, pipelines, loading hoses, valves, control rooms, metering facilities, fire and security systems, shipping office, security towers, warehouses and other ancillaries.

LIST	OF	CRED	ITORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor	-	
		Facility	A. Pledge on 91.7% of the issued shares of
		provided to	British Oil and Gas Exploration Nigeria
		BOGEL	Limited.
			B. First charge on the debt service reserve
			account of BOGEL bearing number
			94100292000982 and the escrow account of
			BOGEL bearing number 94100292000983.
			C. First charge on the construction insurances
			and the existing fixed asset insurances
			obtained in connection with the rigs.
			D. First charge on project agreements entered
			into with respect to the rigs.
			E. First charge on BOGEL's interest in two rigs
			5 5
			(i.e. Durga 1 and Durga 2) as described in Schedule - II hereto.
			F. First charge on BOGEL's interest in third rig
			(i.e. Durga 3) as described in Schedule - II
			hereto.
			G. First charge on BOGEL's interest in fourth
			rig (i.e. Durga 4) as described in Schedule -
			ll hereto.
			H. Personal guarantee of Mr. Nitin Sandesara.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
6.	Bank of India, India⁵	ANZ SBLC facility	A. First ranking charge on movable and immovable assets of SEEPCO - Nigeria, both present and future;
			 First ranking pledge of 100% of the shareholding of SOPL as held by SGORPL;
			C. First ranking pledge of 92.464% shareholding of SEEPCO - BVI as held by SOPL;
			D. First ranking pledge of 90% of the shareholding of SEEPCO - Nigeria as held by SEEPCO - BVI;
			E. First ranking pledge of 10% of the shareholding of SEEPCO - Nigeria held by Mr. Nitin J. Sandesara;
			F. Personal guarantee of Mr. Nitin J. Sandesara;
			G. First ranking charge on oil receivables of SEEPCO - Nigeria in respect of the ANZ Project and the offshore trust and retention account(s) into which such

⁵ <u>Comment</u>: It is pertinent to note that Bank of India has not provided the details of the facilities sanctioned by Bank of India to the Company and / or the break - up of the amounts claimed under the facilities sanctioned and the details of security interest and the details of the facilities provided by Bank of India have been prepared on the basis of the documents provided by Bank of India and / or other financial creditors of the Company. Therefore, the same is subject to further determination / verification and further information / documents as provided by Bank of India from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
			receivables will be deposited and all other
			such bank account(s);
			H. First ranking charge on receivables of SEEPCO - BVI, SOPL and SGORPL;
			 First ranking charge on the bank account(s) / trust retention account(s) of the Company, PMT, SSIL and SGORPL;
			J. Non - disposal undertaking in respect of 100% of the shareholding in SORL by the shareholders of SORL;
			 K. Non - disposal undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SIEL;
			 Non - disposal undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SORL;
			 Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by the Company;
			N. Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by PMT;
			 Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by SSIL;

LIST C	OF CRE	DITORS
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Sr. No.	Particulars of the Financial Creditor	Particulars of the Facility	Brief Details of the Security Interest created in relation to the Facility
			P. Non - disposal undertaking by SORL in respect of its 100% of the shareholding in SGORPL;
			Q. Non - disposal undertaking by SEEPCO - Nigeria in respect of its assets;
			R. Corporate guarantee by SEEPCO - Nigeria;
			S. First ranking charge on all tangible and intangible movable and immovable assets of the Company, PMT and SSIL, both present and future;
			 First ranking pledge of all the fully paid up and issued equity shares of the Company, as held by the promoters of the Company;
			 U. First ranking pledge of all the fully paid - up and issued equity shares of PMT, as held by the promoters of PMT;
			 V. First ranking pledge of all the fully paid - up and issued equity shares of SSIL, as held by the promoters of SSIL; and
			W. Personal guarantee of Mr. Chetan J. Sandesara.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor	,	,
	Ci cuitor		
		Rupee term	A. First charge on all present and future
		loan facility	tangible / intangible movable assets of the
			Company, PMT and SSIL;
			B. First charge on all present and future
			immovable assets of the Company including
			the immovable properties of the Company
			as described in Schedule - I hereto and all
			present and future immovable properties of
			PMT and SSIL;
			C. First pari - passu charge on the trust and
			retention account of the Company, PMT and
			SSIL and any other bank accounts of the
			Company, PMT and SSIL;
			D. First charge by way of pledge over the
			entire shareholding of the promoter group
			in the Company, PMT, SSIL and SPL;
			E. First charge on all current assets, including
			tools and spares and all the stock of finished
			goods, semi - finished goods, work - in -
			progress, raw materials etc., all such trade
			receivables and charge on the receivables,
			trade debts and all monies credited /
			deposited and / or to be credited /
			deposited therein, of SSIL;
			F. Second charge on all current assets,
			including tools and spares and all the

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of the Company and PMT; and G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Working capital consortium facility	A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein;
			B. Second <i>pari - passu</i> charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and
			C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
7.	Bank of Maharashtra	Working capital consortium facility	 A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
8.	Catholic Syrian Bank	Working capital consortium facility	A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein;

LIST OF CRED	ITORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
110.	Creditor	the Fueling	
			 B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
9.	Export Import Bank	Facility provided to BOGEL	 A. Pledge on 91.7% of the issued shares of British Oil and Gas Exploration Nigeria Limited. B. First charge on the debt service reserve account of BOGEL bearing number 94100292000982 and the escrow account of BOGEL bearing number 94100292000983. C. First charge on the construction insurances and the existing fixed asset insurances obtained in connection with the rigs. D. First charge on project agreements entered into with respect to the rigs. E. First charge on BOGEL's interest in two rigs (i.e. Durga 1 and Durga 2) as described in Schedule - II hereto.

LIST	OF	CRED	ITORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
			 F. First charge on BOGEL's interest in third rig (i.e. Durga 3) as described in Schedule - II hereto. G. First charge on BOGEL's interest in fourth
			rig (i.e. Durga 4) as described in Schedule - II hereto.
			H. Personal guarantee of Mr. Nitin Sandesara.
10.	HDFC Bank	Derivatives	These are unsecured in nature.
11.	IDBI Bank	Term loan facility	 A. First pari - passu mortgage and charge in favour of IDBI Bank of all the Company's immovable properties described in Schedule - I hereto, both present and future; B. First pari - passu charge by way of hypothecation on all movables (save and except book debts), including movable machinery, machinery spares, tools and accessories, present and future, subject to prior charges created and/or to be created; C. Unconditional and irrevocable guarantee of Nitin J. Sandesara and Chetan J. Sandesara.
12.	Indian Overseas	ECB Consortium	A. First ranking mortgage and charge over
12.	Bank, Hong Kong	facility	all the immovable property as described
		identity	and the minorable property as described

Sr. No.	Particulars of the Financial Creditor	Particulars of the Facility	Brief Details of the Security Interest created in relation to the Facility
			 in Schedule - I hereto and movable properties and assets, both present and future, of the Company; B. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc. of the Company; C. First ranking charge or assignment or security interest of the rights of the Company under each of the documents pertaining to the Project; D. First ranking charge or assignment on the rights of the Company under each of the herights of the Project; and E. First ranking charge or assignment on all bank accounts of the Company including the debt service reserve account and the designated (overseas) account.
		Facility provided to BOGEL	 A. Pledge on 91.7% of the issued shares of British Oil and Gas Exploration Nigeria Limited. B. First shares on the debt service reserve.
			 First charge on the debt service reserve account of BOGEL bearing number 94100292000982 and the escrow

LIST OF CREDITORS

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest	
No.	the Financial Creditor	the Facility	created in relation to the Facility	
			 account of BOGEL bearing number 94100292000983. C. First charge on the construction insurances and the existing fixed asset insurances obtained in connection with the rigs. D. First charge on project agreements entered into with respect to the rigs. E. First charge on BOGEL's interest in two rigs (i.e. Durga 1 and Durga 2) as described in Schedule - II hereto. F. First charge on BOGEL's interest in third rig (i.e. Durga 3) as described in Schedule - II hereto. G. First charge on BOGEL's interest in fourth rig (i.e. Durga 4) as described in Schedule - II hereto. H. Personal guarantee of Mr. Nitin Sandesara. 	
13.	Indian Overseas Bank, India	Rupee term loan facility	A. First charge on all present and future tangible / intangible movable assets of the Company, PMT and SSIL;	
			B. First charge on all present and future immovable assets of the Company including the immovable properties of the Company as described in Schedule -	

LIST	OF	CREDI	TORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
			I hereto and all present and future
			immovable properties of PMT and SSIL;
			C. First pari - passu charge on the trust and
			retention account of the Company, PMT and
			SSIL and any other bank accounts of the
			Company, PMT and SSIL;
			D. First charge by way of pledge over the
			entire shareholding of the promoter group in the Company, PMT, SSIL and SPL;
			E. First charge on all current assets, including
			tools and spares and all the stock of finished
			goods, semi - finished goods, work - in -
			progress, raw materials etc., all such trade
			receivables and charge on the receivables,
			trade debts and all monies credited /
			deposited and / or to be credited /
			deposited therein, of SSIL;
			F. Second charge on all current assets,
			including tools and spares and all the stock
			of finished goods, semi - finished goods,
			work - in - progress, raw materials etc., all
			such trade receivables and charge on the
			receivables, trade debts and all monies
			credited / deposited and / or to be credited
			/ deposited therein, of the
			Company and PMT; and

LIST O	F CREDITORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
110.	Creditor	the Facility	
			G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Working capital consortium facility	A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein;
			B. Second <i>pari</i> - <i>passu</i> charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and
			C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
14.	JM Financial Asset Reconstruction Company Limited	Term loan consortium facility	A. First <i>pari</i> - <i>passu</i> charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future;

Sr. No.	Particulars of the Financial Creditor	Particulars of the Facility	Brief Details of the Security Interest created in relation to the Facility
			 B. Second pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Working capital consortium facility	A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein;
			B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Working capital consortium facility provided to PMT ⁶	A. First charge by way of hypothecation and / or pledge over the current assets including stocks, raw materials, semi - finished and finished goods, stores and spares not relating to plant and machinery, bills receivable and book debts and other movables of PMT both present and future;
			B. Second charge by way of mortgage and charge over the immovable and movable properties (other than current assets) of PMT, both present and future; and
			C. Corporate guarantee issued by the Company.
15.	JP Morgan Chase Bank	Derivatives	This is unsecured in nature.
16.	Lakshmi Vilas Bank	Term loan facility	A. First <i>pari - passu</i> charge over all the fixed assets of the Company including

⁶ <u>Comment</u>: It is pertinent to note that as per Form - C dated July 09, 2018, JM Financial Asset Reconstruction Company Limited has raised certain claims with regard to outstanding amounts owed by PMT, pursuant to a corporate guarantee issued by the Company. However, JM Financial Asset Reconstruction Company Limited has not provided the copy of the invocation / recall / enforcement notice issued by JM Financial Asset Reconstruction Company Limited / Oriental Bank of Commerce against the Company for invocation of the said corporate guarantee. Therefore, the details of the security interest and the amounts claimed by JM Financial Asset Reconstruction Company Limited in relation to the outstanding amounts owed by PMT, is subject to further determination / verification and further information / documents as provided by JM Financial Asset Reconstruction Company Limited from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
			the immovable properties of the Company
			as described in Schedule - I hereto including
			land and buildings, both present and future,
			and the moveable fixed assets of the
			Company, both present and future; and
			B. Personal Guarantee by Mr. Nitin J.
			Sandesara.
17.	Life Insurance	Issuance of non	A. First pari - passu charge over all of the
17.	Corporation of	- convertible	immovable properties of the Company
	India	debentures by	described in Schedule - I hereto including
		the Company	land and buildings, both present and future;
			and
			B. First <i>pari - passu</i> charge over all moveable
			fixed assets, both present and future.
18.	Madison Pacific	Issuance of	This is unsecured in nature.
	Trust Limited	foreign	
		currency	
		convertible	
		bonds by the	
		Company	
19.	Oriental Bank of	Working	A. First pari - passu charge over all current assets,
	Commerce	capital	including tools and spares and all the stock of
		consortium	finished goods, semi - finished goods, work -
		facility	in - progress, raw materials etc., all
			such trade
			receivables and charge on the

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest		
No.	the Financial	the Facility	created in relation to the Facility		
	Creditor				
			 receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; B. Second <i>pari - passu</i> charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara. 		
20.	Punjab and Sind Bank	Term loan facility provided to PMT	 A. First mortgage and / or charge on all movable and immovable assets (both present and future and including tangible and intangible assets) of PMT; B. First charge on all revenues / receivables accruing to PMT and all the accounts pertaining to the project ("SEZ Project") for development of a multi - product special economic zone in Jambusar Taluka, Bharuch District, Gujarat and any other bank accounts, including but not limited to the trust and retention account; C. Assignment of and / or charge over all insurance policies of PMT; 		

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest		
No.	the Financial Creditor	the Facility	created in relation to the Facility		
			 Non - disposal undertaking for 51% of the paid - up and issued equity share capital of PMT; 		
			E. First mortgage and / or charge and / or assignment over all the leasehold and other rights accruing to PMT arising out of or under the lease deed and sub - leases, if any thereunder, including the right to collect sub - lease rentals from sub - leases, if any;		
			 F. Assignment of and / or charge over all documents pertaining to the SEZ Project of value in excess of INR 50,00,00,000 and all other material contracts, approvals / clearances / permits / insurance policies relating to all the assets of the SEZ Project, rights, titles, permits / approvals, clearances and interests of PMT; and G. Deed of sponsor's undertaking issued by the Company. 		
21.	Punjab National Bank, Hong Kong	ECB Consortium facility	A. First ranking mortgage and charge over all the immovable property as described in Schedule - I hereto and movable properties and assets, both present and future, of the Company;		
			B. Second charge on all current assets, including tools and spares and all the		

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest		
No.	the Financial Creditor	the Facility	created in relation to the Facility		
			stock of finished goods, semi - finished goods, work - in - progress, raw materials etc. of the Company;		
			C. First ranking charge or assignment or security interest of the rights of the Company under each of the documents pertaining to the Project;		
			D. First ranking charge or assignment on the rights of the Company under each of the insurance contracts pertaining to the Project; and		
			E. First ranking charge or assignment on all bank accounts of the Company including the debt service reserve account and the designated (overseas) account.		
22.	Punjab National Bank, India ⁷	ANZ SBLC facility	 First ranking charge on movable and immovable assets of SEEPCO - Nigeria, both present and future; 		
			B. First ranking pledge of 100% of the shareholding of SOPL as held by SGORPL;		

⁷ <u>Comment</u>: It is pertinent to note that Punjab National Bank has not provided the details of the facilities sanctioned by Punjab National Bank to the Company and / or the break - up of the amounts claimed under the facilities sanctioned and the details of security interest and the details of the facilities provided by Punjab National Bank have been prepared on the basis of the documents provided by Punjab National Bank and / or other financial creditors of the Company. Therefore, the same is subject to further determination / verification and further information / documents as provided by Punjab National Bank from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest		
No.	the Financial Creditor	the Facility	created in relation to the Facility		
			C. First ranking pledge of 92.464% shareholding of SEEPCO - BVI as held by SOPL;		
			D. First ranking pledge of 90% of the shareholding of SEEPCO - Nigeria as held by SEEPCO - BVI;		
			 First ranking pledge of 10% of the shareholding of SEEPCO - Nigeria held by Mr. Nitin J. Sandesara; 		
			F. Personal guarantee of Mr. Nitin J. Sandesara;		
			G. First ranking charge on oil receivables of SEEPCO - Nigeria in respect of the ANZ Project and the offshore trust and retention account(s) into which such receivables will be deposited and all other such bank account(s);		
			H. First ranking charge on receivables of SEEPCO - BVI, SOPL and SGORPL;		
			 First ranking charge on the bank account(s) / trust retention account(s) of the Company, PMT, SSIL and SGORPL; 		
			J. Non - disposal Undertaking in respect of 100% of the shareholding in SORL by the shareholders of SORL;		

LIST C	OF CRE	DITORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			K. Non - disposal Undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SIEL;
			 Non - disposal Undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SORL;
			 M. Non - disposal Undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by the Company;
			 Non - disposal Undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by PMT;
			 Non - disposal Undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by SSIL;
			 P. Non - disposal Undertaking by SORL in respect of its 100% of the shareholding in SGORPL;
			Q. Non - disposal Undertaking by SEEPCO - Nigeria in respect of its assets;
			R. Corporate guarantee by SEEPCO - Nigeria;
			S. First ranking charge on all tangible and intangible movable and immovable

LIST OF CREDITORS

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 assets of the Company, PMT and SSIL, both present and future; T. First ranking pledge of all the fully paid up and issued equity shares of the Company, as held by the promoters of the Company; U. First ranking pledge of all the fully paid up and issued equity shares of PMT, as held by the promoters of PMT; V. First ranking pledge of all the fully paid up and issued equity shares of SSIL, as held by the promoters of SSIL; and W. Personal guarantee of Mr. Chetan J. Sandesara.
		Rupee term loan facility	 A. First charge on all present and future tangible / intangible movable assets of the Company, PMT and SSIL; B. First charge on all present and future immovable assets of the Company including the immovable properties of the Company as described in Schedule - I hereto and all present and future immovable properties of PMT and SSIL; C. First <i>pari - passu</i> charge on the trust and retention account of the Company, PMT

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 and SSIL and any other bank accounts of the Company, PMT and SSIL; D. First charge by way of pledge over the entire shareholding of the promoter group in the Company, PMT, SSIL and SPL;
			E. First charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of SSIL;
			F. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of the Company and PMT; and
			G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
		Working capital consortium facility	A. First <i>pari</i> - <i>passu</i> charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein;
			B. Second <i>pari - passu</i> charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and
			C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
23.	Punjab National Bank (International) Limited, London	ECB Consortium facility	 First ranking mortgage and charge over all the immovable property as described in Schedule - I hereto and movable properties and assets, both present and future, of the Company;
			 B. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc. of the Company;

LIST (OF CI	REDIT	ORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
110.	Creditor	,	
			C. First ranking charge or assignment or security interest of the rights of the Company under each of the documents pertaining to the Project;
			D. First ranking charge or assignment on the rights of the Company under each of the insurance contracts pertaining to the Project; and
			E. First ranking charge or assignment on all bank accounts of the Company including the debt service reserve account and the designated (overseas) account.
		Issuance of foreign currency convertible bonds by the Company	This is unsecured in nature.
24.	State Bank of India	ANZ SBLC facility	A. First ranking charge on movable and immovable assets of SEEPCO - Nigeria, both present and future;
			B. First ranking pledge of 100% of the shareholding of SOPL as held by SGORPL;
			C. First ranking pledge of 92.464% shareholding of SEEPCO - BVI as held by SOPL;

LIST	OF	CREDI	TORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			D. First ranking pledge of 90% of the shareholding of SEEPCO - Nigeria as held by SEEPCO - BVI;
			E. First ranking pledge of 10% of the shareholding of SEEPCO - Nigeria held by Mr. Nitin J. Sandesara;
			F. Personal guarantee of Mr. Nitin J. Sandesara;
			G. First ranking charge on oil receivables of SEEPCO - Nigeria in respect of the ANZ Project and the offshore trust and retention account(s) into which such receivables will be deposited and all other such bank account(s);
			H. First ranking charge on receivables of SEEPCO - BVI, SOPL and SGORPL;
			 First ranking charge on the bank account(s) / trust retention account(s) of the Company, PMT, SSIL and SGORPL;
			J. Non - disposal undertaking in respect of 100% of the shareholding in SORL by the shareholders of SORL;
			 K. Non - disposal undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SIEL;

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			L. Non - disposal undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SORL;
			 M. Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by the Company;
			 Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by PMT;
			 Non - disposal undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by SSIL;
			P. Non - disposal undertaking by SORL in respect of its 100% of the shareholding in SGORPL;
			Q. Non - disposal undertaking by SEEPCO - Nigeria in respect of its assets;
			R. Corporate guarantee by SEEPCO - Nigeria;
			S. First ranking charge on all tangible and intangible movable and immovable assets of the Company, PMT and SSIL, both present and future;

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 First ranking pledge of all the fully paid up and issued equity shares of the Company, as held by the promoters of the Company;
			 U. First ranking pledge of all the fully paid - up and issued equity shares of PMT, as held by the promoters of PMT;
			 V. First ranking pledge of all the fully paid - up and issued equity shares of SSIL, as held by the promoters of SSIL; and
			W. Personal guarantee of Mr. Chetan J. Sandesara.
		Rupee term loan facility ⁸	A. First charge on all present and future tangible / intangible movable assets of the Company, PMT and SSIL;
			B. First charge on all present and future immovable assets of the Company including the immovable properties of the Company as described in Schedule - I hereto and all present and future immovable properties of PMT and SSIL;
			C. First <i>pari - passu</i> charge on the trust and retention account of the Company, PMT

⁸ <u>Comment</u>: It is pertinent to note that as per Form - C dated July 07, 2018, State Bank of India has raised certain claims with regard to outstanding amounts owed by SSIL. However, State Bank of India has not provided the details of the loan agreement and other facility documents pursuant to which such claims have been raised by State Bank of India against the Company. Therefore, the details of the security interest and the amounts claimed by State Bank of India in relation to the outstanding amounts owed by SSIL, is subject to further determination / verification and further information / documents as provided by State Bank of India from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			and SSIL and any other bank accounts of the Company, PMT and SSIL;
			D. First charge by way of pledge over the entire shareholding of the promoter group in the Company, PMT, SSIL and SPL;
			E. First charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of SSIL;
			F. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of the Company and PMT; and
			G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
		Working conital	
		Working capital	A. First <i>pari</i> - <i>passu</i> charge over all current
		consortium	assets, including tools and spares and all the
		facility	stock of finished goods, semi - finished
			goods, work - in - progress, raw materials
			etc., all such trade receivables and charge on the receivables, trade debts and all
			monies credited / deposited and / or to be
			credited / deposited therein;
			created / deposited therein,
			B. Second pari - passu charge over all of the
			immovable properties of the Company as
			described in Schedule - I hereto including
			land, buildings, plant and machinery and all
			moveable fixed assets, both present and
			future; and
			C. Personal Guarantee issued by Mr. Nitin
			J. Sandesara and Mr. Chetan J.
			Sandesara.
			Sundesura.
		External	A. First ranking <i>pari - passu</i> charge over all of
		commercial	the immovable assets of the Company
		borrowings	including as described in Schedule - I
		facility	hereto;
			B. First ranking <i>pari - passu</i> charge by way of
			hypothecation of all the movable assets
			including plant and machinery, machinery
			spares, tools and accessories, but excluding
			current assets; and

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			C. Second ranking <i>pari - passu</i> charge over the Current assets of the Company.
		Working capital facilities provided to PMT ⁹	 A. First pari - passu charge by way of hypothecation over the current assets including stocks and receivables of PMT; B. Unconditional and irrevocable guarantee of Nitin J. Sandesara and Chetan J. Sandesara; and C. Letter of Comfort issued by the Company for the facilities availed of by PMT from State Bank of India.
25.	Syndicate Bank, London	ECB Consortium facility	 A. First ranking mortgage and charge over all the immovable property as described in Schedule - I hereto and movable properties and assets, both present and future, of the Company; B. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc. of the Company;

⁹ <u>Comment</u>: It is pertinent to note that as per Form - C dated July 07, 2018, State Bank of India has raised certain claims with regard to outstanding amounts owed by PMT, pursuant to a letter of comfort issued by the Company. However, State Bank of India has not provided the copy of the invocation / recall / enforcement notice issued by State Bank of India against the Company for invocation of the said letter of comfort. Therefore, the details of the security interest and the amounts claimed by State Bank of India in relation to the outstanding amounts owed by PMT, is subject to further determination / verification and further information / documents as provided by State Bank of India from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 C. First ranking charge or assignment or security interest of the rights of the Company under each of the documents pertaining to the Project; D. First ranking charge or assignment on the rights of the Company under each of the insurance contracts pertaining to the Project; and E. First ranking charge or assignment on all bank accounts of the Company including the debt service reserve account and the designated (overseas) account.
26.	Syndicate Bank, India	Working capital consortium facility	 A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and

Sr. No.	Particulars of the Financial Creditor	Particulars of the Facility	Brief Details of the Security Interest created in relation to the Facility
			C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
27.	UCO Bank ¹⁰	ANZ SBLC facility	 A. First ranking charge on movable and immovable assets of SEEPCO - Nigeria, both present and future; B. First ranking pledge of 100% of the shareholding of SOPL as held by SGORPL; C. First ranking pledge of 92.464% shareholding of SEEPCO - BVI as held by SOPL; D. First ranking pledge of 90% of the shareholding of SEEPCO - Nigeria as held by SEEPCO - BVI; E. First ranking pledge of 10% of the shareholding of SEEPCO - Nigeria held by Mr. Nitin J. Sandesara; F. Personal guarantee of Mr. Nitin J. Sandesara;

¹⁰ <u>Comment</u>: It is pertinent to note that UCO Bank has not provided the details of the facilities sanctioned by UCO Bank to the Company and / or the break - up of the amounts claimed under the facilities sanctioned and the details of security interest and the details of the facilities provided by UCO Bank have been prepared on the basis of the documents provided by UCO Bank and / or other financial creditors of the Company. Therefore, the same is subject to further determination / verification and further information / documents as provided by UCO Bank from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 G. First ranking charge on oil receivables of SEEPCO - Nigeria in respect of the ANZ Project and the offshore trust and retention account(s) into which such receivables will be deposited and all other such bank account(s);
			H. First ranking charge on receivables of SEEPCO - BVI, SOPL and SGORPL;
			 First ranking charge on the bank account(s) / trust retention account(s) of the Company, PMT, SSIL and SGORPL;
			J. Non - disposal Undertaking in respect of 100% of the shareholding in SORL by the shareholders of SORL;
			 K. Non - disposal Undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SIEL;
			 Non - disposal Undertaking in respect of 2.312% of the shareholding in SEEPCO - BVI as held by SORL;
			 M. Non - disposal Undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by the Company;
			 Non - disposal Undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by PMT;

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			O. Non - disposal Undertaking in respect of 0.971% of the shareholding in SEEPCO - BVI as held by SSIL;
			P. Non - disposal Undertaking by SORL in respect of its 100% of the shareholding in SGORPL;
			Q. Non - disposal Undertaking by SEEPCO - Nigeria in respect of its assets;
			R. Corporate guarantee by SEEPCO - Nigeria;
			S. First ranking charge on all tangible and intangible movable and immovable assets of the Company, PMT and SSIL, both present and future;
			 First ranking pledge of all the fully paid up and issued equity shares of the Company, as held by the promoters of the Company;
			 U. First ranking pledge of all the fully paid - up and issued equity shares of PMT, as held by the promoters of PMT;
			 V. First ranking pledge of all the fully paid - up and issued equity shares of SSIL, as held by the promoters of SSIL; and

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
			W. Personal guarantee of Mr. Chetan J.
			Sandesara.
		ECB Consortium	A. First ranking mortgage and charge over all
		facility	the immovable property as described in
			Schedule - I hereto and movable properties
			and assets, both present and future, of the
			Company;
			B. Second charge on all current assets,
			B. Second charge on all current assets, including tools and spares and all the stock
			of finished goods, semi - finished goods,
			work - in - progress, raw materials etc. of
			the Company;
			C. First ranking charge or assignment or security interest of the rights of the
			Company under each of the documents
			pertaining to the Project;
			D. First ranking charge or assignment on the
			rights of the Company under each of the
			insurance contracts pertaining to the Project; and
			E. First ranking charge or assignment on all
			bank accounts of the Company including the
			debt service reserve account and the
			designated (overseas) account.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial	the Facility	created in relation to the Facility
	Creditor		
		Rupee term	A. First charge on all present and future
		loan facility ¹¹	5 1
		toan ractify	tangible / intangible movable assets of the
			Company, PMT and SSIL;
			B. First charge on all present and future
			immovable assets of the Company including
			the immovable properties of the Company
			as described in Schedule - I hereto and all
			present and future immovable properties of
			PMT and SSIL;
			C. First pari - passu charge on the trust and
			retention account of the Company, PMT and
			SSIL and any other bank accounts of the
			Company, PMT and SSIL;
			D. First charge by way of pledge over the
			entire shareholding of the promoter group
			in the Company, PMT, SSIL and SPL;
			E. First charge on all current assets, including
			tools and spares and all the stock of finished
			goods, semi - finished goods, work - in -
			progress, raw materials etc., all such trade
			receivables and charge on the

¹¹ <u>Comment</u>: It is pertinent to note that as per Form - C dated July 08, 2018, UCO Bank has raised certain claims with regard to outstanding amounts owed by PMT in relation to certain cash credit facilities. However, UCO Bank has not provided the details of the loan agreement and other facility documents pursuant to which such claims have been raised by UCO Bank against the Company. Therefore, the details of the security interest and the amounts claimed by UCO Bank in relation to the outstanding amounts owed by PMT pertaining to such cash credit facilities, is subject to further determination / verification and further information / documents as provided by UCO Bank from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of SSIL; F. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of the Company and PMT; and G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Working capital consortium facility	 A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest	
No.	the Financial Creditor	the Facility	created in relation to the Facility	
		Term loan facility	 and machinery and all moveable fixed assets, both present and future; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara. A. Personal guarantees of Nitin J. Sandesara and Chetan J. Sandesara; and B. Subservient charge by way of hypothecation on current assets and movable fixed assets of the Company, both present and future including as located at: (i) ECP Road, Village Karkhadi, Taluka Padra District, Vadodara; (ii) Jambusar State Highway, Village, Masar, 	
28.	Union Bank,	Facility	 Taluka Padra, District Vadodara; and (iii) Sholur Gram Panchayat, Post: Sandyanall, Ootacamund, Nilgiris, Tamil Nadu. A. Pledge on 91.7% of the issued shares of 	
	Hong Kong	provided to BOGEL	British Oil and Gas Exploration Nigeria Limited.	
			 B. First charge on the debt service reserve account of BOGEL bearing number 94100292000982 and the escrow account of BOGEL bearing number 94100292000983. 	

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest	
No.	the Financial Creditor	the Facility	created in relation to the Facility	
			C. First charge on the construction insurances and the existing fixed asset insurances obtained in connection with the rigs.	
			D. First charge on project agreements entered into with respect to the rigs.	
			 First charge on BOGEL's interest in two rigs (i.e. Durga 1 and Durga 2) as described in Schedule - II hereto. 	
			F. First charge on BOGEL's interest in third rig (i.e. Durga 3) as described in Schedule - II hereto.	
			 G. First charge on BOGEL's interest in fourth rig (i.e. Durga 4) as described in Schedule - II hereto. 	
			H. Personal guarantee of Mr. Nitin Sandesara.	
29.	Vijaya Bank ¹²	Rupee term loan facility	 First charge on all present and future tangible / intangible movable assets of the Company, PMT and SSIL; 	
			B. First charge on all present and future immovable assets of the Company including the immovable properties of	

¹² <u>Comment</u>: It is pertinent to note that Vijaya Bank has not provided the details of the facilities sanctioned by Vijaya Bank to the Company and the details of security interest and the details of the facilities provided by Vijaya Bank have been prepared on the basis of the documents provided by Vijaya Bank and / or other financial creditors of the Company. Therefore, the same is subject to further determination / verification and further information / documents as provided by Vijaya Bank from time to time.

Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			 the Company as described in Schedule - I hereto and all present and future immovable properties of PMT and SSIL; C. First <i>pari</i> - <i>passu</i> charge on the trust and retention account of the Company, PMT and SSIL and any other bank accounts of the
			Company, PMT and SSIL;D. First charge by way of pledge over the entire shareholding of the promoter group in the Company, PMT, SSIL and SPL;
			E. First charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein, of SSIL;
			F. Second charge on all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be

LIST	OF	CRED	ITORS
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Sr.	Particulars of	Particulars of	Brief Details of the Security Interest
No.	the Financial Creditor	the Facility	created in relation to the Facility
			credited / deposited therein, of the Company and PMT; and G. Irrevocable personal guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.
		Working capital consortium facility	 A. First pari - passu charge over all current assets, including tools and spares and all the stock of finished goods, semi - finished goods, work - in - progress, raw materials etc., all such trade receivables and charge on the receivables, trade debts and all monies credited / deposited and / or to be credited / deposited therein; B. Second pari - passu charge over all of the immovable properties of the Company as described in Schedule - I hereto including land, buildings, plant and machinery and all moveable fixed assets, both present and future; and C. Personal Guarantee issued by Mr. Nitin J. Sandesara and Mr. Chetan J. Sandesara.

SCHEDULE - I

DESCRIPTION OF THE MORTGAGED IMMOVABLE PROPERTIES OF THE COMPANY

A. Property situated in Karkhadi, Taluka Padra, District Vadodara, and State of Gujarat

All that freehold land admeasuring 2,05,772 square meters or thereabout designated as land bearing Revenue Block Nos. 703, 7004, 707, 708, 711, 712, 713,714, 715, 716, 717, 718, 719,729,721, 722, 723, 724, 725, 726, 728, 729, 730, 731, 732, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744 and 752 respectively of Village Mouje, Karkhadi, Taluka, Padra District Vadodara and land hearing Block No-733 of the Government grant land of Village Mouje Karkhadi, Taluka Padra District Vadodara in the Registration District Baroda, Sub District Padra, Mouje Karkhadi, Taluka Padra and District Vadodara and bounded as under:

On or towards North: By Affluent Canal and Road On or towards South: By Nalia On or towards East: By Property of Bharat Starch Industries Ltd. On or towards West: By Nalia and Part of Revenue Survey No. 752.

AND together with buildings and other structures standing thereon including all plant and machinery attached to the earth or permanently fastened to anything attached to the earth and fixtures and fittings lying therein.

B. Property at Village Masar, Taluka Padra District Vadodara, State of Gujarat

All that freehold land admeasuring Hector: Are: Sq: Mts: 16-18-83 (Original: Land conveyed by Torrent Biotech Ltd. in favour of Sterling Biotech Ltd. Hector: Are: Mts: 16-95-69 - Land Conveyed by Sterling Biotech in terms of Sale Indenture dated 06.03.2007 under Volume No. 331 Hector : Are: Mts: 0.76.86 - Hector : Are: Mts:16- 18-83 equivalent to 161883 sq.mtrs or 39.99 acres) or thereabout designated land bearing Old Revenue Block Nos. 1097 (admeasuring H.R.A. 15-16-12), Old Revenue Block Number 1342 Now Consolidated Block No 1094 (admeasuring H.R.A. 1-11-78) and Old Revenue Block Number 1398 Consolidated Block No. 1144 (admeasuring

H.R.A. 0-61-84) respectively of Village Mouje Masar, Taluka Padra District Vadodara

in the Registration district Baroda, Sub District Padra, Mouje Masar, Talika Padra and District Vadodara and bounded as under:

On or towards North: By Lands Bearing Survey Nos. 1136 and 1157 On or towards South: By Boundary of Kanjat village On or towards East: By State Highway On or towards West: By Boundary of Village Abhor and Nel

AND together with buildings and other structures standing thereon including all plant and machinery attached to the earth or permanently fastened to anything attached to the earth and fixtures and fittings lying therein.

C. Property at Village Kanjat, Taluka, Padra, District Vadodara, State of Gujarat

All that freehold land admeasuring Are: Sq: Mts: 13-28-43 (Original Land Conveyed by Torrent Biotech Ltd. Hector : Are : Mts: 13-84-72 - Land Conveyed by Sterling Biotech in terms of Sale Indenture dated 06.03.2007 under Volume No. 330 Hector: Are: Mts: 0-56-29 - Hector: Are: Sq. Mts. 13-28-43 equivalent to 132843 Sq. Mts or

32.81 Acres) bearing Old Revenue Block Nos. 106, 107, 128, 130, 132, 133 and 136 Now Consolidated Block No. 137, Old Revenue Block No.132, 130, 122/1, 139, 141 Consolidated Block No. 139, Old Revenue Block No. 122/2A Consolidated Block no. 144, Old Revenue Block No.122/1, 123/1, 123/2 Consolidated Revenue Block No.146, Old Revenue Block No.124/1 Consolidated Block No. 148, Old Revenue Block No.125 Consolidated block No. 149, Old Revenue Block No.133, 129 Consolidated Block No. 153, Old Revenue Block No.1141/1, 1126, 1127 and 1128 Consolidated Block No. 1136 respectively of Village Mouje Kanjal, Taluka Padra, District Vadodara in the registration district Vadodara, Sub district Padra, Mouje Kanjat, Taluka Padra and District Vadodara and bounded as under

On or towards North: By boundary of Mesar Village

On or towards South: By Survey No. 154 and 156 of Village Kanjat

On or towards East: By Boundary of Abhor Village and Survey Nos. 451, 452, 453 etc.

On or towards West: By Survey Nos. 1095 and 1125 and thereafter road

AND together with buildings and other structures standing thereon including all plant and machinery attached to the earth or permanently fastened to anything attached to the earth and fixtures and fittings lying therein.

D. Property at Village Sholur, District Niligiris, State Tamil Nadu

All that freehold land owned land are admeasuring 10.18.1/16 Acres designated as revenue Survey No. 260 together with factory thereon bearing door No. 9/222 to 9/243 and assessment Nos. 1780 to 1801 of Sholur Panchayat, and all that freehold land area admeasuring 3 Acres or thereabout designated as Survey No. 315/13 totally aggregating 13.15.1/16 Acres consolidated designated as land bearing Survey Nos. 260 and 315/13 of Village Sholur, Ootacamund, District Nilgiris, State Tamil Nadu and bounded as under:

On or towards North: KamrajSahar Dam and Pycara Flumb Canal On or towards South: Old Ooty-Mysore Road and Nanjanad Village On or towards East: Survey No. 260 and Kamraj Sahar Dam and Back Water On or towards West: Old Ooty-Mysore Road and Nanjanad Village

AND together with buildings and other structures standing thereon including all the plant machinery attached to the earth or permanently fastened to anything attached to the earth and fixtures and fittings lying therein.

SCHEDULE - II

DESCRIPTION OF THE RIG ASSETS

'Durga 1'	'Durga 2'
Type: 1500 HP Land Rig	Type: BOMCO ZJ70/4500060HZ Drilling Rig
Registration authority Department of	Registration authority: Department of
Petroleum Resources, Nigeria	Petroleum Resources, Nigeria
Owner: BOGEL	Owner: BOGEL
Residence of Owner: British Virgin Islands	Residence of Owner: British Virgin Islands Built
Built by: ECCO Petroleum	by: Baoji Oilfield Machinery Co., Ltd Place
Place built: Houston, Texas, USA	built: Baoji, Shaanxi, China
Year built: 2007	Year built: 2008
'Durga 3'	'Durga 4'
Type: 2000 HP-VFD ZJ70DBS Land Rig	Type: ZJ70
Registration authority: Department of	Registration authority: Department of
Petroleum Resources, Nigeria	Petroleum Resources, Nigeria
Owner: BOGEL	Owner: BOGEL
Residence of Owner: British Virgin Islands Built	Residence of Owner: British Virgin Islands Built
by: HOUNGHUA International Company Ltd.	by: HOUNGHUA International Company Ltd.
Place built: Sichuan, China	Place built: Sichuan, China
Year built: 2012	Year built: 2013

SUNDARESH BHAT

Resolution Professional in the matter of CIRP of Sterling Biotech Limited Coomunication Email IDs: <u>irp.sterling@bdo.in</u> ; <u>sundareshbhat@bdo.in</u>

Insolvency Professional Entity supporting Resolution Professional:

BDO Restructuring Advisory LLP

Level 9, The Ruby, North West Wing, Senapati Bapat Road,

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