


**METALS & MINING**

13 September 2024

**ISA Steel Conclave 2024: Peek at medium-term outlook**

- **Industry asking for proactive tariffs protection against a potential surge in imports from China and affordable domestic tax environment**
- **Loss of iron ore advantage, met coal security, acceleration of carbon levy in India with CBAM & decarbonisation are medium-term challenges**
- **Value-added steel, use of AI to enhance margin, green steel exports and mandated public green steel demand offer medium-term opportunities**

**Kirtan Mehta, CFA**  
 research@bobcaps.in

---

**Near-term industry concerns:** These are (a) contraction of steel margins, (b) need for proactive tariffs protection against potential surges in imports from China, (c) government maintaining affordability of taxation vs potential increase in state taxes.

**India steel – a bright spot:** (a) Multi-decade growth potential ahead, (b) industry gearing up for delivery of 230m-240mt capacity by FY30, (c) key challenges are synchronised ramp-up of iron ore (50% capacity increase for 300mt steel production) and logistics infrastructure (4t-5t movement of materials per tonne of steel).

**New margin challenges in medium to long term:** (a) Potential erosion of iron ore advantage as decarbonisation lowers iron ore prices with shift to scrap, (b) pressure on met coal prices with continuing under-investment and India's import dependence.

**CBAM challenge – improving appreciation:** (a) Accelerate levy of carbon taxes in India to keep tax money in India, (b) lower cost advantage against European peers for downstream products, (c) increased import competition in domestic markets for high-carbon steel, (d) need for guarding Indian industry against disadvantages of capital grant, renewable infrastructure, domestic scrap availability, etc.

**Margin-enhancement initiatives:** (i) focus on value-added products, (ii) selective exports, (iii) cost optimisation, (iv) need for improving efficiency of capital projects, (v) more use of shared resources (merchant pellet plants, slurry pipelines).

**AI can aid margins:** CISDI highlighted that it implemented AI/ Big Data at 34 plants in China and has seen margin improve to US\$ 10-40/tcs for blast furnace plants and US\$ 10-20/tcs for mini mills. Indian industry has also started the journey.

**Decarbonisation:** India has begun working to develop an action plan to make the steel industry green. It involves (a) window of opportunity emerging for green steel exports, starting with auto/auto-components exports to Europe, (b) government considering the creation of mandated demand and policy support for implementation, (c) 'Run' scenario envisaging investments of US\$ 1.2tn-1.3tn with US\$ 420bn-430bn of capex.



## Margin – a key focus

### Near-term pressure from higher exports from China

Indian steel producers are facing a margin compression with a pullback in steel prices that has been offset in raw material prices only partially. This emanated from a surplus in China with weak demand transmitting to the rest of world through higher exports, expected at 120mt (million tonnes) by some Indian players.

**Closures needed in China:** The India steel team at McKinsey believes the structural solution for this is closing at least 100mt of capacity in China. We believe the problem could worsen over the medium term with another 100mt of new capacity under construction in ASEAN countries, with significant capacity supported by Chinese investments.

**India facing risk of surge in Chinese imports:** With the Western world as well as several Asian countries working on protection mechanisms for their domestic markets, Indian players are concerned about a surge of imports into India.

### Industry asks India government's support

- **Increase in basic customs duty:** Industry is requesting an increase in basic customs duty from 7.5% to 10-12.5% to leave enough margins on the table for the investment. While the government is receptive in evaluating the same, the steel secretary clarified that the Ministry would balance the needs of both producers and consumers.
- **Proactive trade protection mechanism:** The industry is asking the government to proactively put in place trade protection measures even before industry can prove injury from such surge in imports.

### Near-term comfort on affordable taxation support

We believe industry fears are somewhat allayed by the central government's stance on the reasonableness of taxation for the sector as we did not sense undue concerns about the increase in state taxes on metals and minerals in our talks with industry participants. For context, the recent Supreme Court ruling clarified that the Mines and Minerals (Development and Regulation) Act (MMDRA Act) did not limit the state's right to levy taxes on metals and minerals.

### Medium to long term: New challenges for Indian steel players

With the Western world focusing on decarbonisation, we believe Indian steel players are likely to lose their relative advantage of lower-cost iron ore and are likely to face increasing pressure on coking coal costs with high import dependence.

**Iron ore advantage to erode.** Focusing on decarbonisation, global industry is likely to increase the use of scrap resulting in lower usage of iron ore and thereby increasing surplus iron ore. This could potentially result in lower global iron ore prices and, in turn, reduce the relative cost advantage for Indian steel players from domestic availability of cheaper iron ore. Some industry participants believe that imported iron ore could

compete against domestic ore by 2030 and India could also start to import some iron ore (~20mt) by 2030.

**Coking coal under-investment to impact supply:** While global demand for coking coal is likely to drop from 1,037mt in CY23 to 870m-900mt by CY35, global seaborne met coal demand could rise from 311mt in CY23 to 340m-370mt by CY35. (Source: McKinsey & Company). New coking coal investments have been significantly impacted with the rising focus on decarbonisation. Even bank funding availability for coking coal projects in the Western world has been impacted. As India targets ramping up steel production, its dependence on seaborne markets for its coking coal requirement will continue to increase. Amid potential under-investment in global markets, Indian players are at a risk of higher coking coal costs over the medium term.

While Indian industry is currently working to improve iron ore security, industry will need to improve its focus on securing coking coal. JSTL has initiated steps with a strategic stake in a couple of global coking coal mines (Illawarra in Australia and pre-development mine in Mozambique), while other Indian producers are looking at strategic agreements (equity, offtake, etc) to work jointly with global miners to encourage investments.

Indian producers have also initiated other steps to get better control over coking coal costs:

- **Diversifying global supplier mix:** Indian industry is looking to source coking coal from multiple geographies to lower its dependence on specific countries and is working on technical aspects to increase flexibility of coking coal blend within blast furnace.
- **Asking for industry collaboration to negotiate better pricing:** While some Indian players are discussing collaborations as buyers to negotiate timing and pricing, this is not easy in our view as coking coal blends as well as requirements vary significantly amid players.
- **Asking for investments in domestic washeries:** To maximise the usage of domestic coking coal in the blend, Indian industry also requests higher investments in washeries within the country. Indian miners are looking to increase capacity from 40m-45mt currently to 70m-80mt over next few years.

### Margin enhancement initiatives underway

Industry initiatives broadly fall in two buckets – (a) to improve realisations and (b) to optimise costs.

#### Improving realisation

- **Focus on value-added products:** Indian industry is working to enhance value-added products through expansion in downstream, and developing new products for Indian industry. Some examples include import substitution products like new automotive grades, head hardened rail, asymmetric rail, electric steel, etc. Even the Indian government is incentivising industry to focus on production of specialty steel and is currently working with the industry to develop a second round of Production-Linked Incentive (PLI) schemes.

- **Export market focus:** Besides the use of export markets to balance demand-supply in India, Indian industry focuses on specific markets for specific products. It targets European markets for downstream and high-end products, and the Middle East and Asian markets for construction steel products.

### Cost optimisation

- **Current focus:** Industry is currently focusing on improving efficiencies in plants, optimising raw materials and energy usage, backward integration into pellets, and improving logistics (rail usage, slurry pipeline).
- **Need for improving efficiency of capital projects:** Indian industry is significantly dependent on global suppliers for equipment as well as installation. To lower capital costs, Industry is requesting government policy support to encourage investments in domestic shops from suppliers in Germany/China.
- **Shared resources could improve optimisation:** While industry is focusing on developing a competitive edge with dedicated spur lines, some of the participants highlight the need to adopt shared resources to improve efficiencies further. This could include merchant manufacturing plants, shared slurry pipelines, etc,

### AI can become a differentiator to improve margins for steel mills

Steel plants have started experimenting with the use of AI (Artificial Intelligence) and Big Data to improve plant efficiency and clock better margins. CISDI, a UK-based consultancy organisation, highlighted that it has installed complete AI and Big Data solutions at 34 plants in China since its first implementation for Baosteel in 2018. CISDI highlighted that the plants had successfully improved margins to US\$ 10-40/tcs (tonne of carbon steel) for the blast furnace-based plants and US\$ 10-20/tcs for mini mill.

- **AI across value chain:** AI can play a role in improving the entire steel mill value chain, including operations, predictive maintenance, coal/ fuel/ energy optimisation, market sentiment analysis for coal costs, safety, environment and customer engagement.
- **AI implementation at steel plants means a big culture change:** AI implementation needs level 1 and level 2 sensors to capture all process parameters as it needs to replace experienced operators. AI looks at the whole plant holistically, and not at separate units within the plant, to be effective. In the implementations that CISDI has been driving, it has replaced 40 different control centres with a single and common control centre. This is a big culture change for the steel plant as usually every sub unit operates independently.
- **GenAI is coming up in India:** Indian steel players have indicated that they have started to utilise Analytics AI to Generative AI in parts at this point. It has been used to improve operations efficiency, to identify right material specifications, for customer engagement, for employee engagement as well as for support functions. While JSP has developed J.AI, SAIL has implemented Saarthi in customer engagement.

## Long growth runway

### Indian steel industry is a bright spot

The Indian steel market is one of few large markets entering a growth phase, besides some markets in South East Asia. It is exactly in the opposite phase of China, which is coming to the end of its growth phase and is attempting to stabilise. Indian steel industry is excited about strong growth momentum ahead which was aptly summarised by equating steel growth with that of civilization, by Amrendu Prakash, chairman of SAIL during the Inaugural Session at the conclave. McKinsey & Company estimates Indian steel demand to grow from 139mt in FY24 to 195m-215mt by FY30 at a CAGR of 6-7%.

**Infrastructure development is the key demand driver:** Infrastructure pipeline of Rs 1.11tn, identified by Central Government is key to underpin 7-8% of annual demand growth expectations by the steel industry. As India is in a phase of nation building, industry sees growth trajectory as a multi-decade growth runway. Construction and energy are likely to remain as dominant end-use sectors and steel usage is likely to be front loaded.

**Long growth runway:** Need for infrastructure development is likely to span a long period with requirements to connect rural India to mainstream, and closing gaps with the developed world. This is visible in several indicators.

- **Scaling up per capita consumption:** India's current per capita steel usage of 100kg is significantly below the global average of 230kg. India aims to ramp up usage to 160kg by 2030.
- **Scope to increase steel intensity in construction:** The steel industry believes that steel usage in construction can increase by 30-40% with more steel-intensive construction. Currently India uses a higher proportion of cement in construction – 3t vs the global average of 2.2t for every tonne of steel.
- **Increase in urbanisation:** India aims to raise urbanisation from 36% in FY22 to more than 50% of 1.7bn population by FY35. As steel usage intensity is significantly higher in urban India, this is another driver to underpin steel demand growth ahead.

### Key challenges for growth

To support infrastructure development and ramp up steel usage to 160kg per capita, the Indian government wants the steel industry to ramp up capacity from 180mt in FY24 to 300mt by FY30. We understand from interactions that Indian industry is positioning itself to deliver at least 230m-240mt of capacity, with the announced plans to add steel capacity of 60m-80mt over the next decade. The key challenges that the steel industry sees for delivering on this growth runway are skilled manpower, raw materials, and logistics.

### Iron ore ramp-up needs to synchronise

According to the discussions during the Conclave, Indian industry is currently self-sufficient for its iron ore requirement and could see this self-sufficiency extend to FY35 if most of the auctioned mines come under operation.

Participants highlighted that to deliver Indian steel industry's growth requirements of 300m-500mt over the next couple of decades, iron ore production will have to increase by 50-150% to 500m-800mt. Key requirements to deliver on this growth include:

- **Need for exploration:** While India has 6.4bn tonnes (bnt) of economically minable reserves today, or the equivalent of more than 20 years of reserve life and a resource base of 35mt, the reserves base needs to be expanded. As India has not fully explored potential even for prolific areas, there is a good possibility to expand needed resource base with focused exploration.
- **Beneficiation:** While India's iron ore industry has the necessary resource base, only 23% of resources are of adequate grade for direct use in blast furnaces. While Indian industry is currently relying on high-grade ores, the industry will have to move towards the use of beneficiation to upgrade ore grade and lower impurities (current alumina content at 5-7% is significantly higher than under 2% requirement for usage in blast furnace). It is important to note that a 1% increase in alumina leads to 2-2.5% increase in coke rate and loss of 1-1.5% productivity.

Indian industry is planning to grow its beneficiation capacity from 135mt-140mt currently to 170mt by 2030. Current capacity is not fully utilised. Conventional beneficiation has had limited success in India so far with specific challenges with the use of Indian quality of iron ore. Industry needs to use more slurry pipeline and pelletisation capacity and evolve the right technical solutions to succeed in using beneficiation technology.

- **Clarity on mining auction calendar:** India needs to define the mining auction calendar for the next five years or so to give industry enough visibility on available mining areas and allow it to choose the right mines without undue competition.
- **Mining clearances:** Industry needs to obtain requisite mine clearances to expand production capacity. The process takes significant time to complete public consultation processes. While industry participants expect the Odisha Mining Corporation to increase the production limit to 45m-50mt (from 36mt) for its existing 11 mines, we see the need for NMDC to increase the production limit to 100mt by FY30 (from c52mt currently).
- **Mechanisation:** The Indian mining industry needs to improve the use of automation and mechanisation in mines to deliver more consistent production even through monsoons and lower the cost of production.
- **Evacuation infrastructure:** Some of the challenges that need to be addressed are connectivity of rail infrastructure to mines, connectivity of state roads between mines, and the nearest rail tracks. Industry is asking for more

coordinated approaches between the Centre and States to address these challenges.

### **Logistics development needs to accelerate**

Logistics costs in India at 16-18% of steel prices is significantly higher than the global average of 10%. Logistics development needs to optimally connect more than 2,000 steel plants with 275 iron ore and manganese mines. Further logistics requirements are likely to grow significantly as the industry grows steel production with close to 4.5t of total material movement for every tonne of steel production.

Industry is looking to the government for support to improve logistics particularly improving evacuation infrastructure at mines and the availability of multi-modal infrastructure (road, ports, waterways, slurry pipelines). While PM Gati Shakti has improved clearances for logistics projects, the next ask from industry is to improve execution of these projects. Industry also sees the need to improve the availability of skilled manpower.

Industry also needs to specifically work on optimising outbound logistics costs, which is currently as high as inbound logistics costs despite being a third of volume. Industry is currently impacted by mismatches in transportation capacity with product mix. Industry needs to move to integrated planning of inbound and outbound logistics for further optimisation.

## **CBAM challenge – improving appreciation**

### **CBAM likely to advance levy of carbon taxes by other countries as well**

The Carbon Border Adjustment Mechanism (CBAM) in Europe is expected to levy a differential tax to equalise the cost of carbon. Specific points which have a potential to impact Indian steel industry include:

- **Can accelerate implementation of carbon taxes even in India:** The CBAM is likely to advance implementation of carbon taxes, particularly for exporting countries to keep benefit of taxes paid in exporting country.
- **Potential to impact exports of value-added steel products:** The Indian steel industry has been focusing on European markets for the export of downstream and value-added products. This accounted for nearly half of India's exports in FY24. As CBAM is attempting to levellise costs on the grounds of carbon content, Indian exporters may lose their cost advantage.
- **Higher import competition from high-carbon steel products:** As European markets close their borders for high-carbon products, there could be potential leaks to nearby countries not having similar border taxes. This could potentially increase imports into India from Asian exporters.
- **India needs to guard industry against several disadvantages:** European players now have relative advantages for transition – (a) capex funding grant of 40-70%, (b) renewable infrastructure development, (c) green hydrogen development, (d) high availability of domestic scrap, and (e) policy support.

- **Scrap equalisation mechanism is important:** Scrap availability as a percentage of steel demand is high in Europe (50%) and US (70%) and can become a source of relative disadvantage for level playing fields. ResponsibleSteel production standards suggest that scrap equalisation should be done on different weights across different countries to ensure level playing fields. Scrap generated out of high carbon route should have some form of penalty for embedded carbon. Equalisation weight should differentiate between pre and post consumer scraps.

## Decarbonisation

India is targeting net zero for its steel industry by 2047. H. D. Kumaraswamy, Union Minister of Steel and Heavy Industries, in his address at the event 'Greening Steel' pathway to sustainability, emphasised that the need for sustainable, low-carbon development in the steel sector is no longer a choice but an essential obligation. The conference highlighted the following considerations to support decarbonisation of the industry.

### Learnings from the Western world

- **Key investment drivers for industry:** Market demand and renewable energy infrastructure to support decarbonisation, technology funding, policy support and raw material availability.
- **Support of all stakeholders:** Decarbonisation is not the problem of the steel industry alone, all stakeholders need to come together to find a balanced solution.

### Government support is essential

India recently prepared a report to develop an action plan to decarbonise the steel industry based on the recommendations of 14 task forces involving industry participants. The government is conscious of several requirements – (a) creating a mandated demand, (b) supporting public procurement incentives, (c) supporting decarbonising technology, (d) enabling/supporting the development of renewable infrastructure including green hydrogen, biochar, etc, (e) developing scrap collection infrastructure, (f) incentivising steel plants to move towards green steel implementation, and (g) developing standards for implementation.

### Drivers of green steel demand in India

Initial industry estimates suggest a small 4m-5mt of low-emissions or green steel demand by 2030.

#### Export-oriented green-steel demand

We believe the initial trigger for green-steel demand is from exporters to Europe, particularly in auto and auto-component industry trying to capitalise on 'green' premium. Industry participants indicated 'green' premium of 20%-30% over steel prices at this point. If India advances its decarbonisation, India could capitalise and lead on emerging windows of opportunity. Potential demand drivers for green steel are as follows:



- **Auto industry:** Global auto manufacturers with plants in India will require green steel to meet their net zero commitments. For example, Volvo recently announced its plan to set up a truck plant, which would be the second largest in its global portfolio. Volvo has committed to having 50% of trucks with zero carbon emissions by 2030 and net zero by 2040.
- **Bearings industry:** With the decarbonisation of the steel industry, the bearings industry will likely be dependent on the steel industry to continue its exports to Europe. As 80% of emissions for bearings depends on the use of steel, the availability of green steel in India is important for them.

### Potential for developing domestic green steel demand

While initial higher costs during the adoption phase could limit the use of green steel by private players in the short to medium term, there would be a need to create mandated demand to develop the ecosystem.

- **Green public procurement mandate** for key infrastructure projects if adopted could help stimulate demand and develop the ecosystem. Government procurement accounts for 40% of steel demand in India.
- **Electric 4Ws** with initial adoption from mid-premium segment (Sports/ SUV/ Sedan).
- **Automotive markets** may adopt low carbon steel solutions to lower the usage of high-carbon aluminium.
- **Premium white goods** with energy-efficient ratings and advanced makes.
- **Renewables and storage** are likely to be in a position to afford high premium with low steel intensity and positioning with green attributes. Wind turbine manufacturing can adopt green steel as well.
- **Luxury real-estate projects:** The adoption of major real estate projects in the luxury segment and commercial offices, with high green building ratings.

### Decarbonisation investments

The Indian steel industry accounts for 12% of carbon generation in India. The steel industry generates 50-55% of its carbon emissions manufacturing iron and 20-25% making steel. The industry aims to become net zero by 2070. The Indian Steel Association has appointed AT Kearney as consultants to suggest how to transition to green steel. AT Kearney has developed the 'Run' pathway, which minimises the cost of transition while delivering on India's commitment to net zero by 2047.

**Emission reduction path:** The scenario envisages emission reduction of 10-15% by 2030, 75-85% over 2040-50 and 100% by 2070.

**Cost of transition:** The estimate of US\$ 1.2tn-1.3tn, includes capex of US\$ 420bn-470bn and balance as opex.

**Increase in steel production cost:** The report highlights potential 25-28% increase in levelled cost of steel production.

**Evolution of capacity mix and investment focus to drive decarbonisation** under the ‘Run’ scenario, as developed in the report, is captured in the tables below.

**Fig 1 – Evolution of capacity mix under 'Run' scenario**

Years	Steel capacity	Capacity mix (%)			
	Million tonnes	BF-BOF	DRI-EAF (Coal)	DRI-EAF (Natural gas)	Scrap based EAF/ EIF
2024	162	48%	33%	6%	11%
2030	270-280	50%	21%	12%	17%
2050	500-510	48%	20%	13%	20%
2070	780-790	42%	13%	19%	27%

Source: Indian Steel Association, BOBCAPS Research, Notes: BF: Blast Furnace, BOF: Basic Oxygen Furnace, DRI: Direct Reduced Iron, EAF: Electric Arc Furnace, EIF: Electric Induction Furnace

**Fig 2 – Decarbonisation investment focus for steel industry**

Period	Decarbonisation investment focus
Till 2030	Focus on efficiency and renewables
2030-50	Uptake in injection of green hydrogen in BF-BOF and DRI-EAF (natural gas)
2030-50	Initiation of CCU with options to utilise in green methanol, urea
2050-70	Continued focus on CCS beyond 2050

Source: Company, BOBCAPS Research, Notes: BF: Blast Furnace, BOF: Basic Oxygen Furnace, DRI: Direct Reduced Iron, EAF: Electric Arc Furnace, CCU: Carbon Capture and Use, CCS: Carbon Capture and Storage

### Near-term steps to reduce carbon footprint gradually

- Use of scrap and renewable energy in combination with storage.
- Use of coke oven gas for injection in blast furnace instead of power generation. This is a viable alternative for both BF-BOF and DRI-EAF, reducing carbon emissions by 8% and increasing productivity by 20%. In future, even top gas can be introduced in blast furnace.
- Hydrogen-rich injection into BF can reduce coke usage by 0.45-1.1kg per thm (tonne of hot metal)
- Coal-based DRI improves readiness to go towards increase in hydrogen usage as syngas contains 48% hydrogen.
- Small-scale DRI plants need to shift from rotary to vertical shaft to allow the switch to natural gas. At natural gas’s cost of US\$ 7-8/MMBtu delivered at the plant, these DRI plants can switch to natural gas instead of coal.
- Natural gas is not an easy substitution for coal decarbonisation given high capex and associated geopolitical uncertainties.

### Breakthrough technologies to take time to implement

While global industry is working on breakthrough technologies, the key question at this stage is the timeline of its commercial viability. At this point, the use of hydrogen can increase steel production costs by Rs 15k/t, which is not affordable for consumers.

**NOT FOR DISTRIBUTION, DIRECTLY OR INDIRECTLY, IN OR INTO THE UNITED STATES OF AMERICA (“US”) OR IN OR INTO ANY OTHER JURISDICTION IF SUCH AN ACTION IS PROHIBITED BY APPLICABLE LAW.**

## Disclaimer

Name of the Research Entity: **BOB Capital Markets Limited**

Registered office Address: **1704, B Wing, Parinee Crescenzo, G Block, BKC, Bandra East, Mumbai 400051**

SEBI Research Analyst Registration No: **INH000000040 valid till 03 February 2025**

Brand Name: **BOBCAPS**

Trade Name: **www.barodaetrade.com**

CIN: **U65999MH1996GOI098009**



Investments in securities market are subject to market risks. Read all the related documents carefully before investing.

Registration granted by SEBI and certification from NISM in no way guarantee performance of the intermediary or provide any assurance of returns to investors.

### Recommendation scale: Recommendations and Absolute returns (%) over 12 months

**BUY** – Expected return >+15%

**HOLD** – Expected return from -6% to +15%

**SELL** – Expected return <-6%

**Note:** Recommendation structure changed with effect from 21 June 2021

Our recommendation scale does not factor in short-term stock price volatility related to market fluctuations. Thus, our recommendations may not always be strictly in line with the recommendation scale as shown above.

### Analyst certification

The research analyst(s) authoring this report hereby certifies that (1) all of the views expressed in this research report accurately reflect his/her personal views about the subject company or companies and its or their securities, and (2) no part of his/her compensation was, is, or will be, directly or indirectly, related to the specific recommendation(s) or view(s) in this report. Analysts are not registered as research analysts by FINRA and are not associated persons of BOB Capital Markets Limited (BOBCAPS).

### General disclaimers

BOBCAPS is engaged in the business of Stock Broking and Investment Banking. BOBCAPS is a member of the National Stock Exchange of India Limited and BSE Limited and is also a SEBI-registered Category I Merchant Banker. BOBCAPS is a wholly owned subsidiary of Bank of Baroda which has its various subsidiaries engaged in the businesses of stock broking, lending, asset management, life insurance, health insurance and wealth management, among others.

BOBCAPS's activities have neither been suspended nor has it defaulted with any stock exchange authority with whom it has been registered in the last five years. BOBCAPS has not been debarred from doing business by any stock exchange or SEBI or any other authority. No disciplinary action has been taken by any regulatory authority against BOBCAPS affecting its equity research analysis activities.

BOBCAPS is also a SEBI-registered intermediary for the broking business having SEBI Single Registration Certificate No.: INZ000159332 dated 20 November 2017.

BOBCAPS prohibits its analysts, persons reporting to analysts, and members of their households from maintaining a financial interest in the securities or derivatives of any companies that the analysts cover. Additionally, BOBCAPS prohibits its analysts and persons reporting to analysts from serving as an officer, director, or advisory board member of any companies that the analysts cover.

Our salespeople, traders, and other professionals may provide oral or written market commentary or trading strategies to our clients that reflect opinions contrary to the opinions expressed herein, and our proprietary trading and investing businesses may make investment decisions that are inconsistent with the recommendations expressed herein. In reviewing these materials, you should be aware that any or all of the foregoing, among other things, may give rise to real or potential conflicts of interest. Additionally, other important information regarding our relationships with the company or companies that are the subject of this material is provided herein.

This material should not be construed as an offer to sell or the solicitation of an offer to buy any security in any jurisdiction. We are not soliciting any action based on this material. It is for the general information of BOBCAPS's clients. It does not constitute a personal recommendation or take into account the particular investment objectives, financial situations, or needs of individual clients. Before acting on any advice or recommendation in this material, clients should consider whether it is suitable for their particular circumstances and, if necessary, seek professional advice. BOBCAPS research reports follow rules laid down by Securities and Exchange Board of India and individuals employed as research analysts are separate from other employees who are performing sales trading, dealing, corporate finance advisory or any other activity that may affect the independence of its research reports.

The price and value of the investments referred to in this material and the income from them may go down as well as up, and investors may realize losses on any investments. Past performance is not a guide for future performance, future returns are not guaranteed and a loss of original capital may occur. BOBCAPS does not provide tax advice to its clients, and all investors are strongly advised to consult with their tax advisers regarding any potential investment in certain transactions — including those involving futures, options, and other derivatives as well as non-investment-grade securities — that give rise to substantial risk and are not suitable for all investors. The material is based on information that we consider reliable, but we do not represent that it is accurate or complete, and it should not be relied on as such. Opinions expressed are our current opinions as of the date appearing on this material only. We endeavour to update on a reasonable basis the information discussed in this material, but regulatory, compliance, or other reasons may prevent us from doing so.

We and our affiliates, officers, directors, and employees, including persons involved in the preparation or issuance of this material, may from time to time have “long” or “short” positions in, act as principal in, and buy or sell the securities or derivatives thereof of companies mentioned herein and may from time to time add to or dispose of any such securities (or investment). We and our affiliates may assume an underwriting commitment in the securities of companies discussed in this document (or in related investments), may sell them to or buy them from customers on a principal basis, and may also perform or seek to perform investment banking or advisory services for or relating to these companies and may also be represented in the supervisory board or any other committee of these companies.

For the purpose of calculating whether BOBCAPS and its affiliates hold, beneficially own, or control, including the right to vote for directors, one per cent or more of the equity shares of the subject company, the holdings of the issuer of the research report is also included.

BOBCAPS and its non-US affiliates may, to the extent permissible under applicable laws, have acted on or used this research to the extent that it relates to non-US issuers, prior to or immediately following its publication. Foreign currency denominated securities are subject to fluctuations in exchange rates that could have an adverse effect on the value or price of or income derived from the investment. In addition, investors in securities such as ADRs, the value of which are influenced by foreign currencies, effectively assume currency risk. In addition, options involve risks and are not suitable for all investors. Please ensure that you have read and understood the Risk disclosure document before entering into any derivative transactions.

No part of this material may be (1) copied, photocopied, or duplicated in any form by any means or (2) redistributed without BOBCAPS's prior written consent.

**Company-specific disclosures under SEBI (Research Analysts) Regulations, 2014**

The research analyst(s) or his/her relatives do not have any material conflict of interest at the time of publication of this research report.

BOBCAPS or its research analyst(s) or his/her relatives do not have any financial interest in the subject company. BOBCAPS or its research analyst(s) or his/her relatives do not have actual/beneficial ownership of one per cent or more securities in the subject company at the end of the month immediately preceding the date of publication of this report.

The research analyst(s) has not received any compensation from the subject company or third party in the past 12 months in connection with research report/activities. Compensation of the research analyst(s) is not based on any specific merchant banking, investment banking or brokerage service transactions.

BOBCAPS or its research analyst(s) is not engaged in any market making activities for the subject company.

The research analyst(s) has not served as an officer, director or employee of the subject company.

BOBCAPS or its associates may have material conflict of interest at the time of publication of this research report.

BOBCAPS's associates may have financial interest in the subject company. BOBCAPS's associates may hold actual / beneficial ownership of one per cent or more securities in the subject company at the end of the month immediately preceding the date of publication of this report.

BOBCAPS or its associates may have managed or co-managed a public offering of securities for the subject company or may have been mandated by the subject company for any other assignment in the past 12 months.

BOBCAPS may have received compensation from the subject company in the past 12 months. BOBCAPS may from time to time solicit or perform investment banking services for the subject company. BOBCAPS or its associates may have received compensation from the subject company in the past 12 months for services in respect of managing or co-managing public offerings, corporate finance, investment banking or merchant banking, brokerage services or other advisory services in a merger or specific transaction. BOBCAPS or its associates may have received compensation for products or services other than investment banking or merchant banking or brokerage services from the subject company in the past 12 months.

**Other disclaimers**

BOBCAPS and MAYBANK (as defined below) make no representation or warranty, express or implied, as to the accuracy or completeness of any information obtained from third parties and expressly disclaim the merchantability, suitability, quality and fitness of this report. The information in this report has not been independently verified, is provided on an "as is" basis, should not be relied on by you in connection with any contract or commitment, and should not be used as a substitute for enquiries, procedures and advice which ought to be undertaken by you. This report also does not constitute an offer or solicitation to buy or sell any securities referred to herein and you should not construe this report as investment advice. All opinions and estimates contained in this report constitute BOBCAPS's judgment as of the date of this report and are subject to change without notice, and there is no obligation on BOBCAPS or MAYBANK to update this report upon issuance. This report and the information contained herein may not be reproduced, redistributed, disseminated or copied by any means without the prior consent of BOBCAPS and MAYBANK.

To the full extent permitted by law neither BOBCAPS, MAYBANK nor any of their respective affiliates, nor any other person, accepts any liability howsoever arising, whether in contract, tort, negligence, strict liability or any other basis, including without limitation, direct or indirect, special, incidental, consequential or punitive damages arising from any use of this report or the information contained herein. By accepting this report, you agree and undertake to fully indemnify and hold harmless BOBCAPS and MAYBANK from and against claims, charges, actions, proceedings, losses, liabilities, damages, expenses and demands (collectively, the "Losses") which BOBCAPS and/or MAYBANK may incur or suffer in any jurisdiction including but not limited to those Losses incurred by BOBCAPS and/or MAYBANK as a result of any proceedings or actions brought against them by any regulators and/or authorities, and which in any case are directly or indirectly occasioned by or result from or are attributable to anything done or omitted in relation to or arising from or in connection with this report.

**Distribution into the United Kingdom ("UK"):**

This research report will only be distributed in the United Kingdom, in accordance with the applicable laws and regulations of the UK, by Maybank Securities (London) Ltd ("MSL") who is authorised and regulated by the Financial Conduct Authority ("FCA") in the United Kingdom (MSL and its affiliates are collectively referred to as "**MAYBANK**"). BOBCAPS is not authorized to directly distribute this research report in the UK.

This report has not been prepared by BOBCAPS in accordance with the UK's legal and regulatory requirements.

This research report is for distribution only to, and is solely directed at, selected persons on the basis that those persons: (a) are eligible counterparties and professional clients of MAYBANK as selected by MAYBANK solely at its discretion; (b) have professional experience in matters relating to investments falling within Article 19(5) of the Financial Services and Markets Act 2000 (Financial Promotion) Order 2005, as amended from time to time (the "Order"), or (c) fall within Article 49(2)(a) to (d) (high net worth companies, unincorporated associations, etc. as mentioned in the stated Article) of the Order; (all such persons together being referred to as "relevant persons").

This research report is directed only at relevant persons and must not be acted on or relied on by any persons who are not relevant persons. Any investment or investment activity to which this material relates is available only to relevant persons and will be engaged in only with relevant persons.

The relevant person as recipient of this research report is not permitted to reproduce, change, remove, pass on, distribute or disseminate the data or make it available to third parties without the written permission of BOBCAPS or MAYBANK. Any decision taken by the relevant person(s) pursuant to the research report shall be solely at their costs and consequences and BOBCAPS and MAYBANK shall not have any liability of whatsoever nature in this regard.

**No distribution into the US:**

This report will not be distributed in the US and no US person may rely on this communication.

**Other jurisdictions:**

This report has been prepared in accordance with SEBI (Research Analysts) Regulations and not in accordance with local regulatory requirements of any other jurisdiction. In any other jurisdictions, this report is only for distribution (subject to applicable legal or regulatory restrictions) to professional, institutional or sophisticated investors as defined in the laws and regulations of such jurisdictions by Maybank Securities Pte Ltd. (Singapore) and / or by any broker-dealer affiliate or such other affiliate as determined by Malayan Banking Berhad.

If the recipient of this report is not as specified above, then it should not act upon this report and return the same to the sender.

By accepting this report, you agree to be bound by the foregoing limitations.