



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

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October 24, 2026

The General Manager
Corporate Relationship Department
BSE Limited
PhirozeJeejeebhoy Towers
Dalal Street, Fort,
Mumbai 400 001

The Manager
National Stock Exchange of India Ltd.
Exchange Plaza, C/1, Block G
Bandra - Kurla Complex, Bandra (East)
Mumbai 400 051

BSE Scrip Code: 532712

NSE Symbol: RCOM

Sub.: Disclosure under Regulation 30 read with Para A of Part A of Schedule III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 – Order passed by the Hon'ble National Company Law Tribunal, Mumbai Bench, in relation to extension of time for convening the Annual General Meeting for FY 2025–26.

Dear Sir/Madam,

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended from time to time) ("SEBI Listing Regulations"), read with sub-clause 20 under Para A of Part A of Schedule III of the SEBI Listing Regulations 2015, including the applicable provisions relating to orders passed by judicial and quasi-judicial authorities, we wish to inform you that an application bearing IA(I.B.C)/4489(MB)2026 in C.P. (IB)/1387(MB)2017 ("**Application**") titled 'Anish Niranjan Nanavaty, Resolution Professional of Reliance Communications Limited ("**RCOM**" / "**Company**") v. Registrar of Companies Mumbai II, Ministry of Corporate Affairs ("**ROC**")' had been filed by the RP before the Hon'ble National Company Law Tribunal, Mumbai Bench ("**NCLT**"), seeking direction against the ROC to enable and permit the filing of Form GNL-1, together with other forms on the Ministry of Corporate Affairs ("**MCA**") V3 portal notwithstanding the 'Under CIRP' categorization of RCOM or in alternative, directions against the ROC, to consider and decide the physical application dated 01 September 2026 for extension of Annual General Meeting ("**AGM**"), without rejecting the same solely on account of the technical difficulties arising from RCOM's status as 'Under CIRP'.

The Hon'ble NCLT, vide its order dated 16th October 2026 (uploaded on 23rd October 2026), while allowing the Application *inter-alia* observed that the Company was unable to file Form GNL-1 electronically on the MCA portal to seek an extension of time for convening and holding its AGM for the financial year ended 31 March 2026, owing to the system limitation arising from the Company's status as "Under CIRP". The physical application submitted by the Company to ROC on 1 September 2026 had also not been processed.

With these observations, the Hon'ble NCLT has, *inter-alia*, directed as follows:

1. The ROC shall process the Company's physical application seeking extension of time for convening and holding the AGM for the financial year ended 31 March 2026, so as to enable the Company to obtain the requisite extension.
2. In the event that processing of the physical application is not permissible, the application shall be uploaded through the backend of the MCA system and processed accordingly.
3. The aforesaid directions shall also apply to the filing of other statutory forms (i.e. DPT-3, MSME-1 and IEPF-5) that cannot be uploaded due to the change in the Company's status arising from the CIRP.
4. No coercive or penal action under Section 99 of the Companies Act, 2013 or related provisions concerning non-filing of financial statements or annual returns, be taken against the Company or the RP for the delay attributable to the portal impediment during the pendency of the proceedings.
5. The MCA has been requested to examine the practical difficulties faced by Resolution Professionals in convening AGMs and seeking extensions for companies undergoing CIRP where the electronic portal does not permit the filing of the requisite applications.
6. Accordingly, the application filed by the Resolution Professional has been allowed and disposed of by the Hon'ble NCLT.

The Company will take the necessary steps to comply with the directions contained in the aforesaid order and undertake the requisite statutory compliances in accordance with applicable law.

Registered Office:

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



The details required to be disclosed pursuant to Regulation 30 of the Listing Regulations read with SEBI Circular No. HO/49/14/14(7)2025-CFD-POD2/I/3762/2026 dated January 30, 2026 are enclosed herewith as **Annexure A**.

A copy of the order dated 16 October 2026 is enclosed as **Annexure B** herewith for your information and records.

You are requested to take the above information on record.

Thanking you.

Yours faithfully,
For **Reliance Communications Limited**

RAKESH Digitally signed
by RAKESH
GUPTA
GUPTA Date: 2026.10.24
00:51:30 +05'30'

Rakesh Gupta
Company Secretary

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

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Annexure A

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

Sr.	Particulars	Details
1	Name of the authority	National Company Law Tribunal, Mumbai Bench (NCLT).
2	Nature and details of the action (s) taken, or order (s) passed	The Hon'ble NCLT, vide its order dated October 16, 2026, allowed the application filed by the Resolution Professional of Reliance Communications Limited ("Company"), directing the Registrar of Companies, Mumbai-II, to process the Company's application for extension of time to convene the AGM for FY 2025–26, either physically or through the backend of the MCA portal. The directions also cover other statutory forms affected by the Company's "Under CIRP" status. Further, no coercive or penal action shall be taken against the Company or the Resolution Professional for delays attributable to the portal-related impediment during the pendency of the proceedings.
3	Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority	Date of receipt of Order : October 23 2026
4	Details of the violation(s)/contravention(s) committed or alleged to be committed	No specific violation or contravention has been determined against the Company in the aforesaid order. The proceedings concern difficulties in filing the requisite statutory forms on the MCA portal due to the Company's status as "Under CIRP".
5	Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible	The financial impact, if any, is presently not quantifiable. The extension of time for convening and holding the AGM remains subject to processing of the application by the Registrar of Companies in accordance with the order.

Registered Office:

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CIN No.: L45309MH2004PLC147531



Annexure-B

NATIONAL COMPANY LAW TRIBUNAL

COURT ROOM NO. 1,

MUMBAI BENCH

Item No. 03

(NEW IA/CA) IA(I.B.C)/4489(MB)2026 In C.P. (IB)/1387(MB)2017

CORAM:

SH. PRABHAT KUMAR SH. SUSHIL MAHADEORAO KOCHEY
HON'BLE MEMBER (TECHNICAL) HON'BLE MEMBER (JUDICIAL)

ORDER SHEET OF THE HEARING ON 16.10.2026

NAME OF THE PARTIES: **IA(I.B.C)/4489(MB)2026**

**Anish Niranjana Nanavaty VS Registrar of
Companies Mumbai II Ministry Of
Corporate Affairs.**

IN THE MATTER OF

**Ericsson India Private Limited VS Reliance
Communications Limited**

Section 9 & 60(5) of the Insolvency and Bankruptcy Code, 2016

ORDER

IA(I.B.C)/4489(MB)2026

- 1) Adv. Saurav, Adv. Abhilash Chaudhary and Adv. Arjit Mishra for the Resolution Professional are present.
- 2) The present Application is filed by Mr. Anish Niranjana Nanavaty, Resolution Professional ("RP"/ "Applicant") of Reliance Communications Limited ("Corporate Debtor"), under Section 60(5) of the Insolvency and Bankruptcy Code, 2016 ("the Code") read with Rule 11 of the National Company Law Tribunal Rules, 2016, seeking following reliefs:-



- a. *Allow the present Application;*
 - b. *Direct Respondent i.e., Registrar of Companies-II, Mumbai to enable and permit the filing of Form GNL-1, together with Forms DPT-3, MSME-1 and IEPF-5, on the MCA V3 portal notwithstanding the "Under CIRP" categorisation of the Corporate Debtor;*
 - c. *In the alternative, direct Respondent i.e., Registrar of Companies-II, Mumbai, to consider and decide the physical application dated 01.09.2026 for extension of AGM, in accordance with law, without rejecting the same solely on account of the technical difficulties arising from the Corporate Debtor's status as "Under CIRP";*
 - d. *Direct as an ad-interim measure that no coercive or penal action under Section 99 of the Companies Act, or related provisions concerning non-filing of financial statements or annual returns, be taken against the Corporate Debtor or the RP for the delay attributable to the portal impediment during the pendency of these proceedings;*
 - e. *Pass such other and further orders as this Hon'ble Adjudicating Authority may deem fit in the facts and circumstances of the present case.*
- 3) The present Application is filed before this Adjudicating Authority under Section 60(5) of the Insolvency and Bankruptcy Code, 2016 ("Code"), by Mr. Anish Niranjan Nanavaty, in his capacity as the Resolution Professional



("RP"/ "Applicant") of Reliance Communications Limited ("Corporate Debtor"), seeking necessary directions against the Registrar of Companies, Mumbai-11 ("ROC Mumbai"/ "Respondent"), to enable the Corporate Debtor to obtain an extension of three months, i.e., up to 31.12.2026, for convening its Annual General Meeting ("AGM") for Financial Year 2025-2026 under the third proviso to Section 96(1) of the Companies Act, 2013 ("Companies Act").

- 4) The Corporate Debtor was admitted into corporate insolvency resolution process ("CIRP") by order dated 15.05.2018 passed by this Adjudicating Authority on a petition filed by Ericsson India Private Limited, an operational creditor. Upon revival of the CIRP, claims were invited from creditors as on 07.05.2019 ("Cut-Off Date"). On 04.03.2020, the committee of creditors ("CoC") approved the resolution plan submitted by UV Asset Reconstruction Company Limited (subsequently substituted by UV Asset Management Company Limited) ("Resolution Plan"), and the application for its approval, being I.A. No. 873 of 2020, is pending before this Adjudicating Authority.
- 5) The Corporate Debtor is a public company whose equity shares are listed on the National Stock Exchange ("NSE") and the Bombay Stock Exchange ("BSE"). The records of its shareholders are maintained by Central Depository Services (India) Limited ("CDSL") and National Securities Depository Limited ("NSDL"), and the shareholder details are managed by Kfin Technologies Private Limited ("KTPL"), its Registrar and Transfer



Agent ("RTA"). Although the Corporate Debtor has paid all applicable statutory fees, custody fees, RTA fees and other regulatory costs up to FY 2025-2026, in view of its financial constraints during the prolonged CIRP, separate letters were issued to NSE, BSE, CDSL and NSDL seeking additional time/deferment for payment of the annual statutory fees for FY 2026-2027. Pursuant to the deliberations of the CoC in its meeting held on 27.05.2026, the Applicant, by letter dated 23.06.2026, approached the Securities and Exchange Board of India ("SEBI") seeking guidance and/or relaxation in respect of the recurring listing-related costs. By its letter dated 24.08.2026, SEBI informed that the payment, deferment, waiver or settlement of such charges is a matter between the Corporate Debtor and the concerned entities. Following deliberation in the CoC meeting held on 27.08.2026, the statutory fees for FY 2026-2027 were paid along with applicable interest/penalties. In the meantime, CDSL blocked the shareholders' data and KTPL did not provide the shareholder records, and the annual report for FY 2025-2026, though prepared, could not be circulated. By the time the fees were paid, and the shareholders' data was made available, the time for dispatch of the notice of the AGM under Section 101 of the Companies Act had elapsed.

- 6) In terms of Section 96(1) of the Companies Act, the Corporate Debtor was required to convene its AGM for FY 2025-2026 on or before 30.09.2026. Well before the said date, the Corporate Debtor initiated the process of seeking an extension of three months from ROC Mumbai under the third



proviso to Section 96(1), which requires the filing of Form GNL-1 on the MCA V3 portal in terms of Rule 12(2) of the Companies (Registration Offices and Fees) Rules, 2014. However, the MCA V3 portal did not permit the filing, since (a) the master data of the Corporate Debtor reflects its status as 'Under CIRP' and not 'Active'; and (b) the correct CIN of the Corporate Debtor is rejected as 'invalid'. The same impediment affects Forms DPT-3, MSME-1 and IEPF-5. According to MCA, the status can be changed only once the order approving the Resolution Plan is passed and Form INC-28 is uploaded.

- 7) The Corporate Debtor pursued every alternative available to it. Its authorised representatives met the Assistant ROC on 30.08.2026 and 01.09.2026. The Corporate Debtor submitted a physical application by letter dated 01.09.2026 (received by ROC Mumbai on 02.09.2026), followed by emails dated 02.09.2026 and 08.09.2026, seeking facilitation of the filing of Form GNL-1 and an extension up to 31.12.2026. On 10.09.2026, the Corporate Debtor filed Form GNL-2 on the MCA portal seeking extension. On 11.09.2026, ROC Mumbai sought clarification as to whether the Corporate Debtor had come out of CIRP, to which the Corporate Debtor responded on the same day, confirming that the CIRP continues and that no order is available for filing Form INC-28.
- 8) On 23.09.2026, ROC Mumbai informed the authorised representatives of the Corporate Debtor that although Form GNL-2 was reflected as "approved", no approval letter for extension of the AGM was available, and



that the extension could be granted only upon filing Form GNL-1, which is the very form the MCA portal does not permit the Corporate Debtor to file. The Corporate Debtor recorded the same by email dated 24.09.2026. However, no substantive response or approval has been received, and the statutory deadline of 30.09.2026 has lapsed for reasons wholly beyond the control of the Corporate Debtor.

- 9) The Applicant submits that, under Sections 17(1) and 17(2)(e) of the Code, the RP is responsible for complying with the requirements of any law for the time being in force on behalf of the Corporate Debtor, and under Sections 20(1) and 25(1) of the Code, is required to preserve the value of the Corporate Debtor and manage its operations as a going concern. It is submitted that compliance with the Companies Act, including holding the AGM, forms part of these obligations.
- 10) It is submitted that the failure to convene the AGM exposes the Corporate Debtor and the Applicant to penal consequences under Section 99 of the Companies Act, being a fine which may extend to one lakh rupees and, for a continuing default, a further fine which may extend to five thousand rupees for every day during which the default continues, and also triggers consequential defaults under Sections 92 and 137 of the Companies Act. Any such penalty would deplete the limited resources of the Corporate Debtor, a listed company with public shareholding in respect of which a Resolution Plan is pending approval, to the detriment of its creditors and stakeholders.



11) It is also submitted that the delay is attributable to the technical/system-related impediment on the MCA V3 portal arising from the Corporate Debtor's CIRP status, which is beyond the reasonable control of the Corporate Debtor, and not to any lack of diligence on its part. The present request is the first request for extension of time to convene the AGM made by the Corporate Debtor during the CIRP. It is pertinent to mention that all previous AGMs were held within the statutory timelines. The Applicant does not seek to substitute the statutory decision-making function of ROC Mumbai, but seeks limited directions to ROC Mumbai to enable and permit the filing of Form GNL-1, together with Forms DPT-3, MSME-1 and IEPF-5, on the MCA V3 portal notwithstanding the "Under CIRP" categorisation of the Corporate Debtor; or in the alternative, to ROC Mumbai to consider and decide the physical application dated 01.09.2026 for extension of the AGM in accordance with law, without rejecting the same solely on account of the technical difficulties arising from the Corporate Debtor's "Under CIRP" status; together with an ad-interim direction that no coercive or penal action under Section 99 of the Companies Act, or related provisions concerning non-filing of financial statements or annual returns, be taken against the Corporate Debtor or the RP for the delay attributable to the portal impediment during the pendency of these proceedings. The balance of convenience lies wholly in favour of the Applicant, and the directions sought merely facilitate compliance, preserve the statutory role of ROC Mumbai and would cause no prejudice to ROC Mumbai or any other person.



- 12)** It is noted that, due to a system limitation, the applicant is unable to file Form GNL-1 to seek an extension for convening and holding AGM for the Financial year ending on 31.03.2026. Accordingly, the applicant had filed physical application on 01.09.2026 seeking such extension, however, the said application has not been processed by the Respondent RoC on account of processing of work be carried out electronically. It is further noted that the MCA system does not allow filing of such form after change of the status of the corporate debtor upon admission in CIRP and such filing is permissible only if the relevant company is under active status. Further, the company even if under the CIRP is obligated to follow the provision of Companies Act as well as SEBI Regulation and complete required corporate action. In view of this practical difficulty, we consider it appropriate to direct the Respondent ROC to process the application in physical format so as to allow the corporate debtor to have timelines extended for convening and holding of the General Meeting for the year ended on 31.03.2026. In case the processing of the physical form is not permissible, the said form is to be uploaded through the back end and processed.
- 13)** Further, the aforesaid direction shall also be applicable to filing of other forms, which are otherwise not being uploaded on account of change in status.
- 14)** Needless to say, no coercive or penal action under Section 99 of the Companies Act, or related provisions concerning non-filing of financial statements or annual returns, be taken against the Corporate Debtor or the



RP for the delay attributable to the portal impediment during the pendency of these proceedings.

- 15)** Further, the MCA is requested to look into the practical difficulty faced by the Resolution Professional managing the CIRP process of companies for holding AGM's (Annual General Meeting) beyond the prescribed date and seeking extension on the RoC, as the portal does not permit filing of any such application if the company is already in CIRP.
- 16)** A copy of this order be sent to the DG Corporate Affairs, for necessary information.
- 17)** In terms of above, **IA(I.B.C)/4489(MB)2026** is **allowed** and **disposed of**.

Sd/-
PRABHAT KUMAR
MEMBER (TECHNICAL)
/Nitesh Puri Goswami/
(Stenographer)

Sd/-
SUSHIL MAHADEORAO KOCHEY
MEMBER (JUDICIAL)