Oil and Natural Gas Corporation Limited
Treasury Management Group
Deendayal Urja Bhawan
Regd. Office: Plot No 5A-5B, Nelson Mandela Marg, Vasant Kunj, New Delhi-110070
Telephone No. : +91-11-2675 3014 Fax No. : +91-11-2612 9076
CIN No. L74899DL1993GOI054155
Website: www.ongcindia.com

FORMAT OF THE QUARTERLY COMPLIANCE REPORT FOR THE QUARTER ENDED ON SEPTEMBER 30, 2025

Reference no: ONGC / DLI / NCD Compliance Q2 / 2025-26
Date: 11th November 2025

To,
IDBI Trusteeship Services Ltd,
Universal Insurance Building,
Ground Floor, Sir P.M. Road,
Fort, Mumbai – 400001.

Kind Attn: Compliance Team

Dear Sir,

Sub: Quarterly Compliance Report for the quarter ended on September 30, 2025

In compliance with the Securities and Exchange Board of India (SEBI) (Debenture Trustee) Regulations, 1993, the SEBI (Listing Obligations and Disclosure Requirements), Regulation, 2015, Companies Act, 2013 and SEBI Master Circular under no. SEBI/HO/DDHS-PoD-1/P/CIR/2025/117 dated August 13, 2025 and other applicable laws as amended from time to time and acts, rules, regulations, circulars, guidelines framed and issued thereunder, we furnish the required information for your needful.

1. **REGULATORY REQUIREMENT:**
[To be provided by Management/KMP/Compliance Officer]

a. **List of Debenture Holders: - (Benpos as on September 30, 2025).**

An updated list of debenture holders registered in the Register of Debenture Holders in the following format:

ISSUE-WISE PARTICULARS					
ISIN	Issue size	Name(s) of Debenture Holder	Address	Contact No.	Email Id
As per the BENPOS report - Attached for September 2025					

Oil and Natural Gas Corporation Ltd. New Delhi

b. **Any Modification in Existing Outstanding ISINs:**

ISSUE DETAILS				
Existing ISIN No.	Revised ISIN No.	Date of change in ISIN No.	Date of DP letter for change in ISIN	Furnish copy of letter from DP
No modification in Existing ISIN				

c. **Investor Grievances Details: -**

Details of complaints/grievances in the following format. In case no complaints have been received, a confirmation thereof.

ISSUE-WISE PARTICULARS					
Issue size	Nos. of Complaints/ Grievances pending for the previous quarter	Nos. of Complaints/ Grievances Received during current quarter	Resolved/ Unresolved	Nos. of Complaints/ Grievances pending for the current quarter	Reason (if pending beyond 21 days of receipt of grievance)
Rs. 1,000 Crore*	NIL	NIL	NIL	NA	NA

d. **Payment Of Interest / Principal:**

A Certificate cum Confirmation duly signed by a key managerial personnel viz., Managing Director/ Whole Time Director/CEO/ CS/CFO of the Company to the effect that: -

INTEREST/PRINCIPAL *(ISIN WISE list of due dates paid during the quarter)*					
ISIN	Issue Size	Due date of redemption and/or interest payment	Paid/unpaid (if paid write actual date of payment, if the status is not paid please state the reason)	Next due date for the payment of Interest / principal	Reasons for delay (if any)
INE213A08024	Rs. 1,000 Crore	11-August-2025	Paid	11-August-2026	

e. **Credit Rating: -**

Details of revisions in the credit rating (if any);

Name(s) of Rating Agency	Immediate Previous Credit Rating	Revised Credit Rating & date of revision
No change in Credit Rating assigned by ICRA and India Ratings and Research Private Limited		

Oil and Natural Gas Corporation Ltd. New Delhi

f. **Creation of DRR Details as per terms of Issue: -**

ISIN	Issue size	Maintenance of Debenture Redemption Reserve (Applicable/Not Applicable)	Transaction ref No.	DRR required to be Created [In Crs.]	DRR Created upto September 30, 2025 Rs. (In Cr.) (if any changes)	Funds invested for debentures maturing during the year
INE213A08024	Rs. 1,000 Crore	Not Applicable	INE213A08024	Rs. 1,000 Crore	Not Applicable	INE213A08024

Note: Debenture are listed and issued on Private Placement , hence no requirement of creation of debenture Redemption Reserve

g **Creation of Recovery Expense Fund (REF) as per SEBI regulations: -**

ISIN	Issue size	Maintenance of REF, REF required to be created [in Rs.]	Transaction Ref No.	REF created upto September 30, 2025	REF maintained In the form of	Any addition in the REF during the last quarter September 30, 2025
INE213A08024	Rs. 1,000 Crore	Rs. 15 Lakh	Rs. 15 Lakh	Bank Guarantee to BSE	NIL	NIL

h **Transfer of unclaimed amount to Escrow Account in terms of Reg 61 A (2)**

ISIN	Amount lying Unclaimed	Category (Interest/Dividend/Redemption Amount	Date when amount became due for transfer to escrow Account	Amount transferred to Escrow account
INE213A08024	NIL	Not Applicable	Not Applicable	NIL

Oil and Natural Gas Corporation Ltd. New Delhi

DOCUMENTS TO BE SUBMITTED AND THEIR REGULATORY TIMELINES: - *(mandatory submissions as applicable)*

2.

			Attached (Yes/No)
a.	i. Security cover certificate* issued by the Statutory Auditor as per Chapter V of the SEBI Master Circular for DT dated August 13, 2025 and as per the format provided in **Annex-VA** (read with Clause 1.2 & Clause 1.9 of Chapter V: Security Cover Certificate of the SEBI Master Circular dated 13.08.2025) ^ ii. Certificate of confirmation of compliance with all covenants from the statutory auditor of the company pursuant to Reg. 56(1)(d) of SEBI (LODR) Regulation, 2015 and SEBI Master Circular dated 13.08.2025 (**Applicable to Secured as well as Unsecured NCDs**) ***iii.*** ISIN wise details *(Only ISINs pertaining to IDBI Trusteeship Services Limited)* ***(attached as Annexure- I)*** **(Applicable to Secured as well as Unsecured NCDs to be sent in excel file only)**	Within 60 days from end of each quarter	i. Security cover Certificate is not applicable as all the NCDs are unsecured. The NIL Certificate filed with BSE is enclosed. ii. Covenant Compliance Certificate for period ended 30.09.2025 from Statutory Auditor is attached. iii. ISIN wise details are attached
b.	A statement of value of pledged securities* as per the format of Annexure II, if any / applicable ***(Applicable Quarterly)***	Within 60 days from end of each quarter	Not Applicable
c.	A statement of value of Debt Service Reserve Account or any other form of security* as per the format of Annexure III if any / applicable ***(Applicable Quarterly)***	Within 60 days from end of each quarter	Not Applicable
d.	Net worth certificate of personal guarantors [if any](Applicable Half-Yearly)	Within 60 days from end of each quarter	Not Applicable
e.	A copy of Annual report as required under Regulation 53 (2) of SEBI LODR Regulations	Cotermino us with the	Integrated Annual Report 2024-25 is filed with Stock exchange. Disclosure

* To be submitted by the DT to SEBI and Stock Exchanges within 75 days from end of each quarter except last quarter when submission is to be made within 90 days as per the SEBI Master Circular, bearing reference number SEBI/HO/DDHS-PoD-1/P/CIR/2025/117 dated August 13, 2025.

^ " Clause no 1.2 *The Issuer shall provide the values in the format under the market values column including the reference date based on which the market value has been arrived at and the certificate shall be submitted to the Debenture Trustee. In case of loans/ receivables or any other asset offered as security and the market value is not ascertainable in the specific quarter, then the Issuer may provide the carrying value/ book value as per the format for security cover is enclosed at Annex-VA of this Master Circular. However, the Issuer shall provide the justification for not providing the market value along with the certificate in that quarter."*

"Clause no 1.9 Further, in order to adequately capture details regarding other debt securities, viz. unsecured debentures, subordinated debt, other debt issuances which fall in the lower priority order in the waterfall mechanism for liquidation/ resolution proceeds, an additional column named "Debt not backed by any assets offered as security" shall be incorporated in the security cover certificate and the same shall be covered under such column."

Oil and Natural Gas Corporation Ltd. New Delhi

		submission to Stock Exchange after AGM	with Stock Exchange is attached.
f.	Quarterly statement indicating the utilisation of the issue proceeds and a statement disclosing material deviation(s) (if any) in the use of issue proceeds of non-convertible securities from the objects of the issue, till such proceeds have been fully utilised or the purpose for which the proceeds were raised has been achieved.¥ (as per the format of Annexure IV A & B)	Along with submission of Financial Results	The Company had issued four series of NCDs aggregating to Rs. 4,140 Crore during FY 2020-21 (outstanding amount as on 30.09.2025 is Rs. 1,000 Crore) for which funds were fully utilized for the intended purpose during the same year. The disclosure made with Stock Exchange along with the submission of Financial Results is attached .
g.	Certified True Copy of quarterly standalone financial results containing line items as required under Regulation 52 (4) of SEBI LODR Regulations. ¥	Within 45 days from the end of the quarter	Financial Results for the Quarter and Half Year ended 30th September, 2025 is attached.
h.	Copy of the un-audited [with limited review report] or audited financial results submitted to stock exchange¥	Within 45 days from the end of the quarter	Financial Results for the Quarter and Half Year ended 30th September 2025 is attached.
i.	Periodical reports from lead bank regarding progress of the Project, if applicable	If Applicable, shall be submitted along with this report	Not Applicable as all NCDs are unsecured
j.	Copy of the Insurance Policies duly endorsed in favour of the Debenture Trustee as *'Loss Payee'*	If Applicable, shall be submitted along with this report	Not Applicable as all NCDs are unsecured
k.	Details of initiation of forensic audit (by whatever name called) in respect of the Company and copies of the disclosures made by the Company to the Stock Exchange in this regard.	If Applicable, shall be submitted along with this report	Not Applicable as all NCDs are unsecured

Oil and Natural Gas Corporation Ltd. * New Delhi *

¥ Regulation 52(7) and Regulation 52 (7A) of SEBI LODR Regulations – To be submitted within 45 days from the end of the quarter and on the same day the information is submitted to stock exchanges.

¥ Regulation 52(1) of SEBI LODR Regulations – To be submitted within 45 days from the end of the quarter and on the same day the information is submitted to stock exchanges.

3. MANAGEMENT CONFIRMATIONS:

<table>
<tr><td>I.</td><td>Management Confirmation for Security and insurance for Secured NCDs</td><td>Confirmation (Yes/No)</td></tr>
<tr><td>a)</td><td>Security Documents executed by the Company remain valid (including but not limited to the purpose of and as provided in Limitation Act 1963), subsisting and binding upon the Company</td><td>Not Applicable as all NCDs are unsecured.</td></tr>
<tr><td>b)</td><td colspan="2">Details of security provided to IDBI Trusteeship
<table>
<tr><th>Type</th><th>Confirmation (Yes/No)</th><th>Self-owned/ Holding/ Subsidiary/ Third Party etc.</th><th>ISIN for which the security is provided</th><th>Type of charge (Pari passu/ exclusive/residual etc.)</th></tr>
<tr><td>Receivables/Book debts/Hypothecation</td><td colspan="4" rowspan="10">Not Applicable</td></tr>
<tr><td>Immovable Property</td></tr>
<tr><td>Pledge of Securities</td></tr>
<tr><td>Personal Guarantee</td></tr>
<tr><td>Corporate Guarantee</td></tr>
<tr><td>Government Guarantee</td></tr>
<tr><td>Other movable assets</td></tr>
<tr><td>Intangible Assets</td></tr>
<tr><td>DSRA/ ISRA or any other account</td></tr>
<tr><td>Any other form of security (please provide description)</td></tr>
</table>
*Confirmation that the sufficient Security Cover is being maintained all the time for all active and outstanding ISINs.</td></tr>
<tr><td>c)</td><td>Addition/Revision/ Release of security during the quarter:

(If there is no such change, kindly mention NIL)</td><td>Not applicable</td></tr>
<tr><td>d)</td><td>Whether the ISIN is mapped on BSE/NSE portal for filing DT disclosures

*https://listing.bseindia.com/rta/Login_RTA.aspx

*https://neaps.nseindia.com/NEWLISTINGCORP/

**User Manuals are already provided. Issuers are requested to refer to the same and map all the live ISINs on the portal.</td><td>Yes mapped on BSE</td></tr>
<tr><td>e)</td><td>The assets of the Company and of the guarantors, if any, which are available by way of security/cash flows/profits are sufficient to discharge the claims of the debenture holders as and when they become due and that such assets are free from any other encumbrances except those which are specifically agreed to by the debenture holders and adequate security cover is maintained.</td><td>Not applicable
Oil and Natural Gas Corporation Ltd. New Delhi</td></tr>
<tr><td>f)</td><td>Delay or Failure to create security (if any), with detailed reasons for delay or default in security creation and the time lines within which the</td><td>Not applicable</td></tr>
</table>

<table>
<tr><td></td><td>same shall be created</td><td></td></tr>
<tr><td>g)</td><td>All the Insurance policies of the Secured Assets of the captioned debentures obtained are valid, enforceable and cover the risks as required under the Information Memorandum/ Debenture Trust Deed, and are endorsed in favour of Debenture Trustee as 'Loss Payee'. The premium in respect of the following insurance policies have been paid.
<table>
<tr><th>Issue Size</th><th>Policy No.</th><th>Coverage (Rs.)</th><th>Period & expiry date</th><th>Status of Endorsement</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
</table></td><td>Not applicable</td></tr>
<tr><td>II.</td><td><u>Management Confirmation for statutory items:</u></td><td></td></tr>
<tr><td>a)</td><td>The Company has complied with and is in compliance with the provisions of the Companies Act 2013, the extant SEBI Regulations and the terms and conditions of the captioned debentures and there is no event of default which has occurred or continuing or subsisting as on date. If no, please specify details.</td><td>Yes, confirmed compliance with provisions of Companies Act 2013, the extant SEBI Regulations and the terms and conditions of the captioned Debentures and there is no event of default which has occurred or continuing or subsisting as on date.</td></tr>
<tr><td>b)</td><td>Whether there is any breach of covenant / terms of the debenture issues in terms of the Information Memorandum and DTD.

If yes, please specify date of such breach occurred, the details of breach of covenant and remedial action taken by the Company along with requisite documents.

Any additional covenants of the issue (including side letters, accelerated payment clause, etc.) and status thereof

Note: As per SEBI Master Circular, bearing reference number SEBI/HO/DDHS-PoD-1/P/CIR/2025/117 dated August 13, 2025, Debenture Trustee is required to intimate the covenant breach to Debenture Holders, Stock Exchange, CRA, and SEBI, and website disclosure etc.</td><td>No breach of covenant / terms of the debenture issues in terms of the Information Memorandum and DTD.</td></tr>
<tr><td>c)</td><td>There is no major change in composition of its Board of Directors, which may amount to change in control as defined in SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Changes if any to be disclosed along with copies of intimation made to the stock exchanges)</td><td>Yes, confirmed no such major change in composition of the Board of Directors.</td></tr>
<tr><td>d)</td><td>Any amalgamation, demerger, merger or corporate restructuring or reconstruction scheme proposed by the Company</td><td>No</td></tr>
<tr><td>e)</td><td>Change, if any, in the nature and conduct of the business by the Company</td><td>No</td></tr>
<tr><td>f)</td><td>Outstanding litigations, orders, directions, notices, of court/tribunal affecting, or likely to materially affect the interests of the Debenture Holders or the assets, mortgaged and charged under security creation documents, if any</td><td>No</td></tr>
</table>

Oil and Natural Gas Corporation Ltd. * New Delhi *

g)	Proposals, if any placed before the board of directors for seeking alteration in the form or nature or rights or privileges of the Debentures or in the due dates on which interest or redemption are payable, if any	No
h)	Disclosures, if any made to the stock exchange in terms of Regulation 30 or Regulation 51(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which may have a bearing on the Debentures or on the payment of interest or redemption of the Debentures	All disclosures made under SEBI (LODR) Regulations 2015 are available in Stock Exchange (BSE).
i)	There are no events or information or happenings which may have a bearing on the performance/operation of the Company, or there is no price sensitive information or any action as per SEBI (LODR) Regulations, 2015 that may affect the payment of interest or redemption of the Debentures	Confirmed, there are no such events or information or happenings.
j)	Confirmation that the unclaimed/ unpaid amounts of monies due on debentures and redemption of debentures are transferred to Investor Education and Protection Fund (IEPF)	There is no unclaimed/ unpaid amounts of monies due on debenture holders.
III.	**Management Confirmation /Undertaking for other items:**	
a)	*i. Generation of Annexure A and Annexure B for all the existing outstanding ISINs by the issuer company on DLT platform (Applicable only for secured NCDs)* *ii. Recording of interest payment and principal repayment status [cash flow event] (on retrospective basis from the year 2017) and recording of interest payment and principal repayment on T+1 basis whenever the payment is due as per the SEBI Master Circular for Debenture Trustees No. SEBI/HO/DDHS-PoD-1/P/CIR/2025/117 dated August 13, 2025 (Applicable for both secured and unsecured NCDs)* *iii. Recording of covenants as per the outstanding ISIN on the DLT platform as per the SEBI Master Circular for Debenture Trustees No. SEBI/HO/DDHS-PoD-1/P/CIR/2025/117 dated August 13, 2025 (Applicable for both secured and unsecured NCDs)* ****User Manual is uploaded on the DLT Platform. Issuers are requested to refer to the same.**	i. Not applicable as NCDs are unsecured. ii. All interest and principal payments up to 30.09.2025 has been uploaded on the NSDL, DLT platform. iii. Confirmed that covenant as per the outstanding Trust Deed are uploaded on DLT platform of NSDL.
b)	Details of any default committed by the Issuer with respect to borrowings obtained from banks / financial institutions pertaining to: - payment obligations and/or covenant compliance	No Default
c)	Details of Reference to Insolvency or a petition (if any) filed by any creditor or details of Corporate Debt Restructuring (if any)	No
d)	Details of lenders/creditors joining or entering into Inter Creditor Agreement as per RBI guidelines, including all such information/ documents required to be submitted by the Company to the RBI on an annual basis in respect of such Financial Year, as applicable	No
e)	Details of fraud/defaults by promoter or key managerial personnel or by Issuer Company or arrest of key managerial personnel or promoter	No

Oil and Natural Gas Corporation Ltd * New Delhi *

f)	Details of one-time settlement with any bank (if any)	No
g)	Confirmation that a functional website containing, amongst others as per Regulation 46 & 62 (as applicable) of SEBI (LODR) Regulations is maintained by the Company.	Yes
h)	Confirmation that the information/documents has been submitted to the debenture holders as per Regulation 58 of SEBI LODR Regulations.	Yes
i)	Confirmation that the capital adequacy norms are maintained as per RBI Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016	Not Applicable
j)	Confirmation that there has been no change in the bank details of the Company for preauthorizing Debenture Trustee(s) to seek debt redemption payment related information from the Bank†	No Change in Bank Account details submitted
k)	Confirmation that a provision, mandating the issuer to appoint the person nominated by the debenture trustee(s) has been duly mentioned in the **Trust deed as well as authorized by the Articles of Association** of the Company	Yes, provision of the appointment of Debenture Director is present in all the Trust deeds and in Articles of Association of the Company. Further accepted copy of the side letter was also provided on 27.09.2023.
l)	Confirmation that the provision of the regulation No. 62K‡ of SEBI (LODR) 2015, has been complied with for all material RPT and subsequent material modification. Regulation no. 62(k) of SEBI (LODR) states that- All material related party transactions and subsequent material modifications as defined by the audit committee under sub-regulation (3) shall require prior No-Objection Certificate from the Debenture Trustee and the Debenture Trustee shall in turn obtain No-Objection from the debenture holders who are not related with the Issuer and hold at least more than fifty per cent. of the debentures in value, on the basis of voting including e-voting.	Not Applicable

For Oil and Natural Gas Corporation Limited

Signature:

Aniruddha Banerjee
Head Treasury & Budget
ONGC, Deendayal Urja Bhawan,
Vasant Kunj, New Delhi-110070

Name of the signatory: Anirudhha Banerjee

Designation: CGM(F&A) - Head Treasury

Date: 11th November 2025

Place: New Delhi

† Clause 3.2 of SEBI circular SEBI/HO/DDHS/CIR/P/103/2020 dated 23.06.2020.

‡ Regulation 62 (k) of the SECURITIES AND EXCHANGE BOARD OF INDIA NOTIFICATION dated 27th March, 2025 on SEBI (LODR) (AMENDMENT) Regulations, 2025

Anirudha Banerjee
Head Treasury & Budget
CMOU, Deendayal Upa dhyaya
Vasant Kunj, New Delhi-110070