

# **J K Cement**

Estimate change	1
TP change	1
Rating change	

Bloomberg	JKCE IN
Equity Shares (m)	77
M.Cap.(INRb)/(USDb)	227 / 2.8
52-Week Range (INR)	3661 / 2005
1, 6, 12 Rel. Per (%)	12/11/-22
12M Avg Val (INR M)	416

## Financial Snapshot (INR b)

Y/E MARCH	FY23F	FY24E	FY25E
Sales	92.7		
EBITDA	15.4	19.1	22.1
Adj. PAT	6.4	7.2	8.9
EBITDA Margin (%)	16.6	18.7	19.7
Adj. EPS (INR)	83.2	93.7	115.7
EPS Gr. (%)	(5.4)	12.7	23.4
BV/Sh. (INR)	623	695	786
Ratios			
Net D:E	0.6	0.6	0.5
RoE (%)	14.1	14.2	15.6
RoCE (%)	9.7	10.3	11.3
Payout (%)	21.1	23.5	21.6
Valuations			
P/E (x)	35.3	31.4	25.4
P/BV (x)	4.7	4.2	3.7
EV/EBITDA(x)	15.2	13.3	11.3
EV/ton (USD)	165	146	112
Div. Yield (%)	0.6	0.7	0.9
FCF Yield (%)	(0.5)	1.2	3.6

## **Shareholding pattern (%)**

A	Com 22	Jun 22	Com 21
As On	Sep-22	Jun-22	3ep-21
Promoter	45.8	45.8	57.6
DII	21.9	21.1	20.1
FII	15.6	16.1	17.4
Others	16.6	17.0	4.9

FII Includes depository receipts

CMP: INR2,939 TP: INR3,370 (+15%) Buy

## White cement aids in better-than-peer performance

## Announces grinding capacity expansion of 5.5mtpa

- J K Cement (JKCE)'s 2QFY23 operating performance was largely in line, with standalone EBITDA at INR3b (est. INR2.9b) and EBITDA/t at INR814 (est. INR785). Adjusted PAT (adjusted for additional depreciation on CPP) was at INR1.4b v/s our estimate of INR1.2b.
- As expected, JKCE announced grinding capacity expansion of 5.5mtpa (with capex of INR11.6b i.e. capex/t of USD26). Clinker requirements of these plants will be met through existing capacities.
- We raise our FY23E/FY24E consolidated EBITDA/EPS by 3-4% given better profitability. We maintain our BUY rating on the stock, valuing white/grey cement at 14.5x/13.5x Sep'24E EV/EBITDA, respectively.

## Volumes up 9% YoY, OPM down 5.5pp YoY on higher costs

- JKCE's standalone revenue/EBITDA/Adj. PAT stood at INR21.4b/INR3.0b/INR1.4b (+17%/-16%/-27% YoY and 0%/+4%/+17% v/s our estimate), respectively. Total sales volume rose 9% YoY (10%/9% for grey/white cement). Grey cement realization was up 5% YoY (down 6.8% QoQ). White cement realization improved 9.5% YoY (up 2.5% QoQ).
- OPEX/t was up 14% YoY led by 27% increase in variable cost. Freight cost and other expenses were up 3-4% YoY. Higher OPEX led to 5.5pp YoY drop in OPM to 13.9%. EBITDA/t declined 24% YoY to INR814.
- In 1HFY23, JKCE's standalone revenue grew 24% YoY led by 10%/13% YoY growth in realization/sales volume. Cost pressures (OPEX/t up 17% YoY) led to 8% YoY decline in EBITDA and 5.6pp YoY drop in OPM. EBITDA/t declined 19% YoY to INR967. Adjusted profit was down 17% YoY to INR3.3b. CFO stood at INR4.6b v/s INR3.9b in 1HFY22.

## Highlights from the management commentary

- Combined volume growth should be at 10% YoY in FY23E. Price hikes of INR15-20/bag in South and INR10/bag in West markets had been taken in Oct'22. Though prices remained unchanged in the North region earlier, a price hike of INR10/bag has been announced recently.
- Fuel cost is estimated to remain higher in 3QFY23, given the high cost inventory and cost savings are likely to come in effect only from 4Q onwards.
- Capex in FY23/FY24 is pegged at INR19b/INR14b (v/s INR17b/INR11b guided earlier), respectively, due to grinding capacity expansion.

## Capacity expansion to aid growth; maintain BUY

- JKCE is set to increase grey cement capacity to 25mtpa by FY25E. We believe profitability should improve driven by cost efficiency measures and improvement in geo-mix. We estimate EBITDA CAGR of 13% over FY22-25.
- We value the Grey cement business at 13.5x Sep'24E EV/EBITDA. We estimate competitive intensity to ebb in white cement business and we value this at 14.5x Sep'24E (v/s 13.5x earlier). We maintain our BUY rating with a revised TP of INR3,370 (up from INR3,170 earlier).

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Standalone quarterly perform	rmance											(INR m)
Y/E March		FY	22			FY	23		FY22	FY23E	FY23	Var.
	1Q	2Q	3Q	4Q	1Q	2Q	3QE	4QE			2QE	(%)
Sales Dispatches (mt)	3.03	3.33	3.32	3.93	3.56	3.64	3.76	4.01	13.61	14.97	3.63	0
YoY Change (%)	71.4	18.5	4.8	1.0	17.7	9.4	13.2	1.9	16.9	10.0	9.0	
Realization (INR/t)	5,398	5,510	5,842	5,770	6,084	5,878	5,965	5,930	5,641	5,963	5,910	(1)
YoY Change (%)	(1.2)	(0.1)	5.1	9.5	12.7	6.7	2.1	2.8	3.8	5.7	7.3	
QoQ Change (%)	2.4	2.1	6.0	(1.2)	5.4	(3.4)	1.5	(0.6)			(2.8)	
Net Sales	16,337	18,355	19,404	22,690	21,664	21,418	22,424	23,768	76,786	89,275	21,454	(0)
YoY Change (%)	69.3	18.4	10.2	10.5	32.6	16.7	15.6	4.8	21.3	16.3	16.9	
Total Expenditure	12,341	14,805	15,696	18,863	17,663	18,451	18,866	19,049	61,705	74,029	18,605	(1)
EBITDA	3,996	3,550	3,708	3,827	4,001	2,967	3,559	4,719	15,081	15,246	2,849	4
Margin (%)	24.5	19.3	19.1	16.9	18.5	13.9	15.9	19.9	19.6	17.1	13.3	58
Depreciation	657	687	719	757	744	742	770	842	2,820	3,099	760	(2)
Interest	560	591	653	689	617	625	650	698	2,493	2,590	630	(1)
Other Income	273	480	264	412	222	228	248	437	1,428	1,136	280	(19)
PBT before EO expense	3,052	2,752	2,600	2,792	2,862	1,828	2,387	3,616	11,195	10,693	1,739	5
Extra-Ord. expense	0	260	0	1,300	155	155	0	0	1,560	310	0	
PBT	3,052	2,492	2,600	1,492	2,707	1,673	2,387	3,616	9,635	10,383	1,739	(4)
Tax	969	803	926	630	896	425	606	1,603	3,329	3,529	575	
Rate (%)	31.8	32.2	35.6	42.2	33.1	25.4	25.4	44.3	34.5	34.0	33.1	
Reported PAT	2,083	1,688	1,673	863	1,811	1,248	1,781	2,013	6,307	6,854	1,163	7
Adj. PAT	2,083	1,865	1,673	1,882	1,915	1,364	1,781	2,013	7,503	7,074	1,163	17
YoY Change (%)	168.1	(16.6)	(29.8)	(21.4)	(8.0)	(26.8)	6.4	6.9	(3.7)	(5.7)	(37.6)	

Source: Company, MOFSL estimates

Y/E March		FY2	2			FY2	3		FY22	FY23E	FY23	Var.
	1Q	2Q	3Q	4Q	1Q	2Q	3QE	4QE			2QE	(%)
Gray Cement (mt)	2.8	2.9	2.9	3.5	3.2	3.2	3.3	3.6	12.1	13.3	3.2	0
Growth (%)	73.5	20.0	4.8	1.1	15.0	9.5	15.0	2.4	17.7	10.0	9.5	
As a percentage of total volume	91.1	88.3	86.9	90.0	89.1	88.4	88.3	90.4	89.1	89.1	88.7	
White Cement (mt)	0.3	0.4	0.43	0.4	0.4	0.4	0.4	0.4	1.5	1.6	0.4	3
Growth (%)	52.5	8.2	5.3	0.1	45.0	8.5	1.0	(2.5)	10.8	10.0	5.0	
As a percentage of total volume	8.9	11.7	13.1	10.0	10.9	11.6	11.7	9.6	10.9	10.9	11.3	
Per tonne analysis (INR)												
Net realization	5,398	5,510	5,842	5,770	6,084	5,878	5,965	5,930	5,641	5,963	5,910	(1)
RM Cost	794	960	849	1,076	966	1,028	1,008	925	934	980	1,016	1
Employee Expenses	409	390	388	309	402	385	386	378	370	387	397	(3)
Power, Oil, and Fuel	988	1,032	1,310	1,254	1,364	1,509	1,449	1,298	1,155	1,403	1,514	(0)
Freight and handling	1,105	1,147	1,154	1,175	1,220	1,194	1,165	1,110	1,148	1,171	1,208	(1)
Other Expenses	781	916	1,024	983	1,009	946	1,011	1,042	927	1,003	992	(5)
Total Exp.	4,078	4,445	4,725	4,797	4,960	5,063	5,018	4,753	4,533	4,944	5,126	(1)
EBITDA	1,320	1,066	1,116	973	1,124	814	947	1,177	1,108	1,018	785	4

Source: Company, MOFSL estimates

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# Highlights from the management commentary

## Demand and pricing trend

■ Volume growth guidance for the company has been maintained at 10% YoY in FY23 (including white cement volume). Volume grew ~13% YoY in 1HFY23.

- Cement prices in North India were under more pressure in 2QFY23 as compared to other regions. JKCE has relatively higher volume share from North India, which led to higher decline in grey cement realization as compared to other players.
- In Oct'22, price hike of INR15-20/bag in South and INR10/bag in West markets had been taken while prices remained unchanged in the North region. Recently, (in 2<sup>nd</sup> week of Nov'22) price hike of INR10/bag has been announced in the North region.

## **Operational highlights**

- Gray Cement capacity utilization stood at 84% v/s 77%/87% in 2QFY22/1QFY23.
  Premium product sales stood at 9% of trade volumes (up 3pp YoY and 1pp QoQ).
- JKCE used 50% petcoke and the balance was a mix of imported coal and alternative fuel. It has achieved thermal substitution rate (TSR) of 11.2% in 1HFY23 v/s 9% in FY22.
- The average cost of fuel stood at INR12,000/t v/s INR10,000/t in 1QFY23. In kcal terms; average fuel cost stood at INR2.74kg v/s INR2.3/kg in 1QFY23. Fuel cost is estimated to remain higher in 3QFY23 given the high cost inventory and savings are expected from 4Q onwards.
- Trade sales were at 69% of total volumes. Blended Cement sales stood at 65% of volumes (up 3pp YoY and 1pp QoQ). Rail: road mix stood at 19:81%. Lead distance stood at 477Km v/s 473km in 1QFY23.

## **Capacity expansion and Capex update**

- Cement grinding and packing system has been commissioned at the Panna plant and dispatch has started in Nov'22. Clinkerization unit is expected to be commissioned soon. At Hamirpur (grinding unit), work is at an advance stage and the plant will be commissioned shortly. Initially, monthly volume is expected to be 50-60k ton and ramp-up will happen in six to nine months.
- Grinding capacity expansion of 5.5mtpa has been announced. Capacities will be increased at existing units at Mangrol, Muddapur, Jharli and Aligarh by 0.5mtpa each (total 2mtpa) through debottlenecking/upgradation. The expansion is likely to get completed by Mar'23.
- It will set up a Greenfield grinding unit (GU) in Ujjain, Madhya Pradesh with a capacity of 1.5mtpa and the plant is expected to be commissioned by Mar'24. The company will source clinker for this GU from exiting integrated plants in North (Mangrol and Nimbahera).
- It is also setting up a Greenfield GU of 2mtpa in Prayagraj, Uttar Pradesh. This plant is expected to be commissioned in 1HFY25. It will also increase clinker capacity at Panna by 0.66mtpa to source incremental clinker requirement.
- Capex in FY23/FY24 is pegged at INR19b/INR14b (v/s INR17b/INR11b guided earlier).

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JKCE's green power share stood at 43% in 1HFY23 v/s 32% in FY22. It targets to increase green power share to 75% by FY30 by adding WHRS and Solar power plants. WHRS capacity of 22MW is expected to get commissioned by Mar'24.

## **Debt and other highlights**

- Standalone gross debt was at INR26.9b v/s INR28.5b in Mar'22; whereas; net debt stood at INR17.1b v/s INR16.1b in Mar'22. Net debt to EBITDA stood at 1.15x v/s 1.05x in Mar'22. Consolidated gross debt was at INR39.5b v/s INR34.3b in Mar'22; whereas; net debt stood at INR29.4b v/s INR21.5b in Mar'22. Net debt is expected to peak out at INR35b by Jun'23.
- NCLT approval is awaited for merger of JayKay Cement (Central India) with JKCE and the merger is likely to get completed by FY23-end.

**Exhibit 1: Revisions to our estimates** 

(INR m)	Revised estimate		Old es	stimate	Change (%)		
	FY23E	FY24E	FY23E	FY24E	FY23E	FY24E	
Net Sales	92,683	1,02,060	92,133	1,01,476	0.6	0.6	
EBITDA	15,417	19,113	14,867	18,529	3.7	3.2	
Net Profit	6,485	7,242	6,271	6,977	3.4	3.8	
EPS (INR)	83.9	93.7	81.2	90.3	3.4	3.8	

Source: MOFSL Estimates

# **Key exhibits**

Exhibit 2: Total sales volume up 9% YoY and 2% QoQ

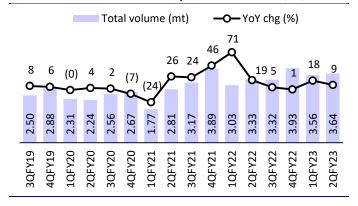


Exhibit 3: Gray Cement realization up 5% YoY, down 7% QoQ

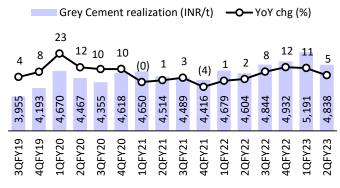


Exhibit 4: OPEX/t up 14% YoY and 2% QoQ...

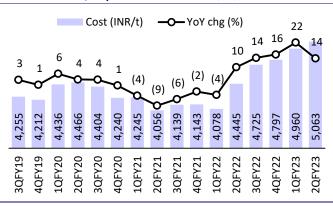
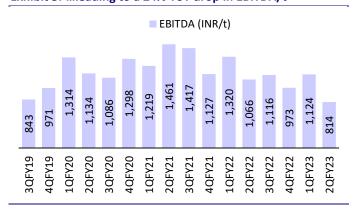


Exhibit 5: ...leading to a 24% YoY drop in EBITDA/t

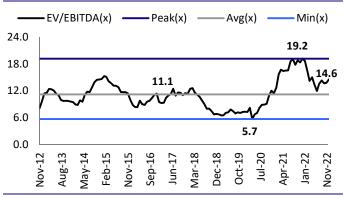


**Exhibit 6: Key operating metrics (blended)** 

INR/t	2QFY23	2QFY22	YoY (%)	1QFY23	QoQ(%)
Blended realization	5,878	5,510	7	6,084	(3)
Gray Cement realization	4,838	4,604	5	5,191	(7)
White Cement realization	12,540	11,455	9	12,230	3
Raw Material Cost	1,028	960	7	966	6
Staff Cost	385	390	(1)	402	(4)
Power and fuel	1,509	1,032	46	1,364	11
Freight and selling Exp.	1,194	1,147	4	1,220	(2)
Other Exp.	946	916	3	1,009	(6)
Total Exp.	5,063	4,445	14	4,960	2
EBITDA	814	1,066	(24)	1,124	(28)

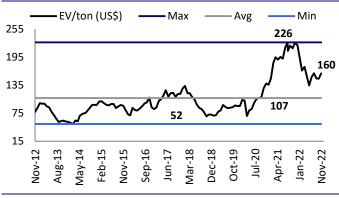
Source: Company, MOFSL

Exhibit 7: One-year forward EV/EBITDA ratio trend



Source: Company, MOFSL

Exhibit 8: One-year forward EV/t trend



Source: Company, MOFSL

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# **Consolidated financials and valuations**

Income Statement								(INR m)
Y/E March	FY18	FY19	FY20	FY21	FY22	FY23E	FY24E	FY25E
Net Sales	48,535	52,587	58,016	66,061	79,908	92,683	1,02,060	1,12,268
Change (%)	20.7	8.3	10.3	13.9	21.0	16.0	10.1	10.0
EBITDA	7,875	8,345	12,134	15,387	14,824	15,417	19,113	22,110
Margin (%)	16.2	15.9	20.9	23.3	18.6	16.6	18.7	19.7
Depreciation	2,313	2,413	2,880	3,062	3,425	3,443	4,481	4,755
EBIT	5,561	5,932	9,255	12,325	11,399	11,973	14,632	17,355
Int. and Finance Charges	2,841	2,611	2,764	2,528	2,697	3,041	4,256	4,375
Other Income – Rec.	1,269	804	853	1,130	1,429	1,136	1,266	1,400
PBT bef. EO Exp.	3,989	4,124	7,344	10,927	10,131	10,069	11,642	14,380
EO Expense/(Income)	157	0	0	0	0	310	0	0
PBT after EO Exp.	3,832	4,124	7,344	10,927	10,131	9,758	11,642	14,380
Current Tax	941	1,037	1,593	3,296	2,429	2,673	4,400	5,440
Deferred Tax	35	451	917	600	908	855	0	0
Tax Rate (%)	25.5	36.1	34.2	35.7	32.9	36.2	37.8	37.8
Reported PAT	2,856	2,636	4,834	7,031	6,794	6,230	7,242	8,940
PAT adj. for EO items	2,973	2,636	4,834	7,031	6,794	6,428	7,242	8,940
Change (%)	62.0	-11.3	83.4	45.5	-3.4	-5.4	12.7	23.4
Margin (%)	6.1	5.0	8.3	10.6	8.5	6.9	7.1	8.0
Less: Minority Interest	-39.9	-67.1	-90.0	-66.2	-77.0	0.0	0.0	0.0
Net Profit	3,013	2,703	4,924	7,317	6,729	6,428	7,242	8,940
Balance Sheet Y/E March	FY18	FY19	FY20	FY21	FY22	FY23E	FY24E	(INR m) FY25E
Equity Share Capital	699	773	773	773	773	773	773	773
Total Reserves	19,049	26,249	29,504	36,595	42,476	47,392	52,935	59,943
Net Worth	19,749	27,022	30,277	37,367	43,249	48,165	53,708	60,716
Deferred Liabilities	2,670	3,123	4,173	5,930	7,383	8,238	8,238	8,238
Minority Interest	0	-72	-203	-257	-343	-343	-343	-343
Total Loans	27,306	26,779	32,840	34,017	38,549	42,549	47,049	45,049
Capital Employed	49,724	56,852	67,086	77,057	88,838	98,609	1,08,652	1,13,660
Gross Block	59,334	62,681	75,780	82,126	91,614	96,335	1,26,935	1,34,935
Less: Accum. Deprn.	14,900	17,313	20,235	22,752	26,177	29,620	34,101	38,856
Net Fixed Assets	44,433	45,367	55,545	59,374	65,437	66,715	92,834	96,079
Capital WIP	1,043	5,618	5,295	5,093	10,321	24,600	8,000	10,000
Total Investments	1,189	4,383	458	1,422	2,157	2,157	2,157	2,157
Curr. Assets, Loans, and Adv.	17,877	18,810	24,122	32,831	36,115	31,839	33,678	34,474
Inventory	5,898	6,365	6,904	7,566	12,087	9,757	10,112	10,142
Account Receivables	2,358	2,606	2,677	3,615	4,268	4,204	4,331	4,737
Cash and Bank Balance	5,595	5,115	9,649	16,416	10,793	9,212	10,368	10,329
Loans and Advances	4,026	4,722	4,892	5,233	8,967	8,667	8,867	9,267
Curr. Liability and Prov.	14,818	17,325	18,334	21,663	25,192	26,701	28,017	29,049
Account Payables	14,316	16,809	16,725	20,276	23,803	25,249	26,525	27,516
Provisions	502	516	1,609	1,388	1,389	1,452	1,493	1,534
Net Current Assets	3,059	1,484	5,788	11,167	10,923	5,137	5,661	5,425
Appl. of Funds	49,724	56,852	67,086	77,057	88,838	98,609	1,08,652	1,13,660
Courses Company MOECL estimates	~ <b>/</b>	,	- ,	,	/	,	, ,	, -,

Appl. of Funds Source: Company, MOFSL estimates

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# **Consolidated financials and valuations**

Ratios								
Y/E March	FY18	FY19	FY20	FY21	FY22	FY23E	FY24E	FY25E
Basic (INR)*								
Consol. EPS	42.5	34.1	62.6	91.0	87.9	83.2	93.7	115.7
Cash EPS	75.6	65.3	99.8	130.6	132.3	127.7	151.7	177.2
BV/Share	282.4	349.7	391.8	483.6	559.7	623.3	695.1	785.8
DPS	9.0	10.0	17.5	15.0	15.0	17.0	22.0	25.0
Payout (%)	29.5	35.3	33.7	16.5	17.1	21.1	23.5	21.6
Valuation (x)*								
P/E		86.1	47.0	32.3	33.4	35.3	31.4	25.4
Cash P/E		45.0	29.4	22.5	22.2	23.0	19.4	16.6
P/BV		8.4	7.5	6.1	5.2	4.7	4.2	3.7
EV/Sales		4.5	4.2	3.6	3.0	2.5	2.5	2.2
EV/EBITDA		28.7	20.2	15.5	16.4	15.2	13.3	11.3
EV/t (USD)		235	188	172	172	165	146	11.3
Dividend Yield (%)		0.3	0.6	0.5	0.5	0.6	0.7	0.9
Return Ratios (%)		0.3	0.0	0.5	0.5	0.0	0.7	0.3
RoIC	9.6	9.1	13.0	15.0	12.8	11.9	12.1	12.0
RoE	16.4	11.6	17.2	21.6	16.7	14.1	14.2	15.6
RoCE	10.4				11.2	9.7		
	10.7	8.5	11.4	12.9	11.2	9.7	10.3	11.3
Working Capital Ratios	1.0	0.9	0.0	0.0	0.0	0.0	0.0	1.0
Asset Turnover (x)	1.0 44.4	44.2	0.9	0.9	0.9	0.9	0.9	1.0
Inventory (Days)			43.4	41.8	55.2	38.4	36.2	33.0
Debtor (Days)	17	18	17	20	19	17	15	15
Creditor (Days)	108	117	105	112	109	99	95	89
Working Capital Turnover (Days)	-19	-25	-24	-29	1	-16	-17	-16
Leverage Ratio (x)	1.2	4.4	4.2	4 5	4.4	4.2	4.2	4.2
Current Ratio	1.2	1.1	1.3	1.5	1.4	1.2	1.2 0.9	1.2
Debt/Equity ratio	1.4	1.0	1.1	0.9	0.9	0.9	0.9	0.7
Cash Flow Statement								(INR m)
Y/E March	FY18	FY19	FY20	FY21	FY22	FY23E	FY24E	FY25E
OP/(Loss) before Tax	3,832	4,124	7,344	10,927	10,131	10,069	11,642	14,380
Depreciation	2,313	2,413	2,880	3,062	3,425	3,443	4,481	4,755
Interest and Finance Charges	2,348	2,209	1,975	1,666	2,697	3,041	4,256	4,375
Direct Taxes Paid	-996	-977	-1,530	-1,959	-2,429	-2,673	-4,400	-5,440
(Inc.)/Dec. in WC	1,193	-778	2,819	1,715	-5,379	4,204	633	197
CF from Operations	8,691	6,991	13,488	15,411	8,445	18,084	16,612	18,267
Others	140.7	5	179.2	490	-967	-310	0	0
CF from Operations incl. EO	8831.2	6996.1	13,668	15,901	7,478	17,774	16,612	18,267
(Inc.)/Dec. in FA	-1,443	-6,191	-12,428	-7,678	-14,716	-19,000	-14,000	-10,000
Free Cash Flow	7,388	805	1,240	8,223	-7,238	-1,226	2,612	8,267
(Pur.)/Sale of Investments	-369	-3,193	-2,622	-11,747	-734	0	0	0
Others	1,642	182	6,998	11,665	2,234	0	0	0
CF from Investments	-170	-9,202	-8,052	-7,760	-13,216	-19,000	-14,000	-10,000
Issue of Shares	0	5,043	0	0	0	0	0	0
Inc./(Dec.) in Debt	-4,010	328	3,133	1,120	4,532	4,000	4,500	-2,000
Interest Paid	-2,789	-2,798	-2,507	-2,427	-2,697	-3,041	-4,256	-4,375
Dividend Paid	-673	-843	-1,630	0	-1,159	-1,314	-1,700	-1,932
Others	54	-3	-1,030	-68	-1,139	-1,314	-1,700	-1,932
CF from Fin. Activity	- <b>7,419</b>	1,727	-1,081	-1,375	114	-355	-1,456	-8,306
Inc./Dec. in Cash	1,242	-479	4,534		-5,624			-8,306
				<b>6,767</b>		-1,581	1,156	
Opening Balance	4,353	5,595 <b>5</b> 116	5,116	9,650	16,416	10,793	9,212	10,368
Closing Balance	5,595	5,116	9,650	16,416	10,793	9,212	10,368	10,329

# NOTES

Explanation of Investment Rating	
Investment Rating	Expected return (over 12-month)
BUY	>=15%
SELL	<-10%
NEUTRAL	< - 10 % to 15%
UNDER REVIEW	Rating may undergo a change
NOT RATED	We have forward looking estimates for the stock but we refrain from assigning recommendation

\*In case the recommendation given by the Research Analyst is inconsistent with the investment rating legend for a continuous period of 30 days, the Research Analyst shall be within following 30 days take appropriate measures to make the recommendation consistent with the investment rating legend.

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