



**THE FOUNDATION
FOR SECURE
MARKETS**

#49738

Date: December 10, 2021

Subject: Vedanta Limited - Anticipated ADR Termination/Anticipated Cash Settlement/Broker-to-Broker Settlement
Option Symbol: VEDL
Date: ???
* * * Update * * *

Update: Vedanta Limited (VEDL) announced on December 6, 2021, that the deadline for surrendering ADRs to Citibank, N.A. ("the Depositary") in exchange for the underlying equity has been extended to January 10, 2022. For further information, investors are advised to consult the VEDL Press Release, and the Depositary's Revised Termination Notice, both dated December 6, 2021.

VEDL exercise and assignment activity was subject to delayed settlement from November 9, 2021 to November 30, 2021. Effective December 1, 2021, OCC determined that, effective with exercises of November 9, 2021 and thereafter, all VEDL exercise and assignment activity will settle on a broker-to-broker basis.

All delayed settlement obligations from November 9, 2021 through December 1, 2021 were no longer delayed and will be settled on a broker to broker basis. The deliverable for VEDL options remains the underlying VEDL ADSs.

Vedanta Limited (VEDL) announced its intention to terminate the Depositary Agreement for Vedanta Limited American Depositary Receipts ("ADRs") as of November 8, 2021, thereby terminating the VEDL ADR program. As a result of the termination of the Deposit Agreement, holders of the VEDL ADRs may exchange their ADRs for the corresponding Shares in India. **VEDL ADR holders may surrender their ADRs to the Depositary until January 10, 2022 (formerly December 8, 2021).**

Starting on or about **January 11, 2022**, the Depositary may attempt to sell the then-remaining shares held on deposit. Following any such sale(s), the Depositary will promptly remit the net proceeds to the holders of ADSs then outstanding through the payment mechanism of DTC. The ADSs will be deemed cancelled and terminated from the date of the cancellation of the ADS resulting from the sale of the Shares.

Cash proceeds from the sale of underlying shares may be subject to surrender fees and Indian withholding taxes of up to 43.68%.

Vedanta Limited ADRs were delisted from the New York Stock Exchange (NYSE) at the close of business November 8, 2021.

Contract Adjustment

The option symbol VEDL will not change

Date: ???

New Deliverable

Per Contract: 100 x the cash proceeds received per VEDL ADR, less applicable fees and withholdings, if any

No Exercise Restrictions

OCC has determined not to impose any exercise restrictions with respect to VEDL options. Therefore OCC will continue to accept and process exercise instructions in accordance with its Rules and as further described below. Because OCC has been informed NSCC will not accept exercise/assignment transactions involving the VEDL for settlement, such settlement will be effected as follows.

Broker to Broker Settlement

Pursuant to OCC By-Law Article VI, Section 19, OCC has determined that, effective with exercises of November 9, 2021 and thereafter, all VEDL exercise and assignment activity shall settle on a broker to broker basis. The deliverable for VEDL options will remain the underlying VEDL Shares.

If it is not possible for the delivering Clearing Member to effect delivery of the VEDL shares on the designated settlement date, then the settlement obligations of both delivering and receiving Members shall be delayed until such time as OCC designates a new exercise settlement date, settlement method and/or settlement value. This determination allows delivering Members the opportunity to effect settlement if they have VEDL shares and are able to effect delivery, but delays the settlement obligation when this is not possible. Both the delivering and receiving Clearing Members are required to immediately notify OCC if they are unable to effect settlement.

In determining that delivery of the VEDL shares is in fact not possible in respect of a given exercise or assignment, OCC shall require an appropriate officer(s) of the delivering Clearing Member to represent in writing that delivery is not possible. (Upon exercise or assignment of VEDL options, OCC will contact each delivering Clearing Member to provide the specific requirements and procedures for such representation.)

Pursuant to customary OCC broker to broker settlement procedures, inability to effect delivery may subsequently occasion cash settlement as determined by OCC.

Broker-to-Broker Delivery Advice/Settlement Procedures

Clearing Members should note that VEDL exercise and assignment activity will be reported on the Broker-to-Broker Delivery Advice, which is a separate report from the regular Delivery Advice. Members will need to refer to this report each day to be informed of VEDL exercise/assignment activity. The Broker-to-Broker Delivery Advice will also identify the opposite side Clearing Member with whom settlement is to be made. Members are responsible for contacting the opposing side on all VEDL activity and for making arrangements for settlement. Both delivering and receiving Members are also reminded of their obligation to inform OCC when settlement is made. OCC will continue to margin VEDL exercise/assignment activity until settlement is accomplished.

Disclaimer

This Information Memo provides an unofficial summary of the terms of corporate events affecting listed options or futures prepared for the convenience of market participants. OCC accepts no responsibility for the accuracy or completeness of the summary, particularly for information which may be relevant to investment decisions. Option or futures investors should independently ascertain and evaluate all information concerning this corporate event(s).

The determination to adjust options and the nature of any adjustment is made by OCC pursuant to OCC By-Laws, Article VI, Sections 11 and 11A. The determination to adjust futures and the nature of any adjustment is made by OCC pursuant to OCC By-Laws, Article XII, Sections 3, 4, or 4A, as applicable. For

both options and futures, each adjustment decision is made on a case by case basis. Adjustment decisions are based on information available at the time and are subject to change as additional information becomes available or if there are material changes to the terms of the corporate event(s) occasioning the adjustment.

ALL CLEARING MEMBERS ARE REQUESTED TO IMMEDIATELY ADVISE ALL BRANCH OFFICES AND CORRESPONDENTS ON THE ABOVE.

For questions regarding this memo, call Investor Services at 1-888-678-4667 or email investorservices@theocc.com. Clearing Members may contact Member Services at 1-800-544-6091 or, within Canada, at 1-800-424-7320, or email memberservices@theocc.com.