

Motilal Oswal values your support in the EXTEL POLL 2024 for India Research, Sales, Corporate Access and Trading team. We request your ballot.



**Market snapshot**

Equities - India	Close	Chg. %	CYTD. %
Sensex	80,956	0.1	12.1
Nifty-50	24,467	0.0	12.6
Nifty-M 100	58,112	1.0	25.8
Equities-Global	Close	Chg. %	CYTD. %
S&P 500	6,086	0.6	27.6
Nasdaq	19,735	1.3	31.5
FTSE 100	8,336	-0.3	7.8
DAX	20,232	1.1	20.8
Hang Seng	7,085	0.2	22.8
Nikkei 225	39,276	0.1	17.4
Commodities	Close	Chg. %	CYTD. %
Brent (US\$/Bbl)	75	-0.2	-3.5
Gold (\$/OZ)	2,650	0.2	28.5
Cu (US\$/MT)	8,970	-0.4	6.0
Almn (US\$/MT)	2,619	1.3	11.7
Currency	Close	Chg. %	CYTD. %
USD/INR	84.7	0.0	1.8
USD/EUR	1.1	0.0	-4.8
USD/JPY	150.6	0.7	6.8
YIELD (%)	Close	1MChg	CYTD chg
10 Yrs G-Sec	6.7	-0.03	-0.5
10 Yrs AAA Corp	7.2	-0.03	-0.5
Flows (USD b)	4-Dec	MTD	CYTD
FII	0.2	1.76	-0.5
DII	-0.11	0.18	59.2
Volumes (INRb)	4-Dec	MTD*	YTD*
Cash	1,259	1190	1266
F&O	1,98,007	1,54,187	3,75,521

Note: Flows, MTD includes provisional numbers. \*Average

**Today's top research idea**

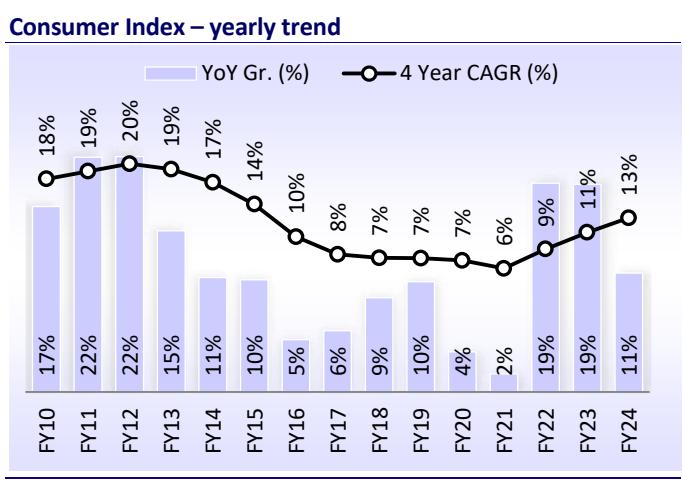
**Consumer: Growth diversity; overplaying valuation correction**

- ❖ In our last [consumer sector thematic](#) report published in Apr'24, we emphasized our overweight stance on staple companies owing to favorable risk-reward dynamics and anticipated volume recovery in FY25 and FY26. Over the past two quarters, we have observed steady improvement in volume growth, along with optimistic management commentary regarding further acceleration in growth in the upcoming quarters. After a strong run-up in stocks during Apr-Sep'24, we saw a sharp correction in stock prices as these companies failed to show further volume pickup in 2Q, along with adverse stock market activities. We continue to believe that the growth cycle will see an upward trend and valuations will also fall in place accordingly. **We reiterate our overweight stance on the staple segment and continue to prefer HUL, GCPL, and Dabur as our top picks.**
- ❖ We remain selective for our discretionary universe. Jewelry companies are expected to sustain strong growth momentum, led by SSSG and store addition. **Kalyan Jewelers and Titan are our top picks in the jewelry segment.** For Page Industries, we have recently upgraded our rating after the earnings pickup and normalizing trade inventory.
- ❖ We are monitoring QSRs, liquor, and paint companies for indications of improved growth. The recent fall in stock prices certainly captures a large part of negative sentiment for these companies too. We will choose these stocks selectively once we see the business cycle turning.

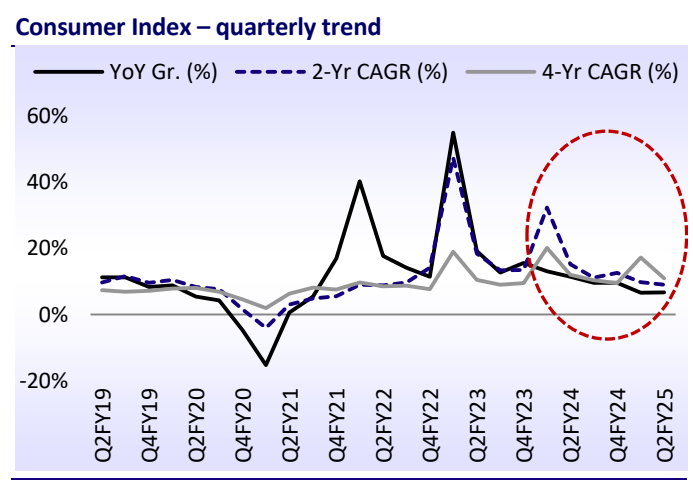
**Research covered**

Cos/Sector	Key Highlights
Consumer	Growth diversity; overplaying valuation correction
Telecom	Robust industry growth; Bharti's incremental RMS at ~49% in 2Q
EcoScope	Economic activity picked up in Oct'24, but still weak

**Chart of the Day: Consumer (Growth diversity; overplaying valuation correction)**



Source: Companies, MOFSL



Source: Companies, MOFSL

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Investors are advised to refer through important disclosures made at the last page of the Research Report.

Motilal Oswal research is available on [www.motilaloswal.com/Institutional-Equities](http://www.motilaloswal.com/Institutional-Equities), Bloomberg, Thomson Reuters, Factset and S&P Capital.



Kindly click on textbox for the detailed news link

1

### **Vodafone Group To Exit Indus Towers Stake To Repay Domestic Debt**

UK's Vodafone Group Plc will divest its entire 3% stake in Indus Towers Ltd. via open market deal. The British telecom operator will offload 7.9 crore shares that are held by its local affiliates Omega Telecom Holdings Pvt. and Usha Martin Telematics Ltd.

2

### **Adani Energy Preferred Bidder For Rs 25,000-Crore Project**

Adani Energy Solutions Ltd. has reportedly emerged as the preferred bidder for a high-value transmission project under Rajasthan Part-I Power Transmission.

3

### **Torrent Pharma Signs Agreement To Acquire Three Anti-Diabetics Brand**

Torrent Pharmaceuticals Ltd. has signed an agreement with Boehringer Ingelheim International to acquire three anti-diabetes brands: Cospiq (empagliflozin), Cospiq Met (empagliflozin + metformin), and Xilingio (empagliflozin + linagliptin). The acquisition will be completed by March 2025.

4

### **Suraj Estate arm acquires land in Mumbai for ₹101 crore to develop commercial building**

Through its wholly-owned subsidiary, Iconic Property Developers Private Limited, SEDL has purchased the 1,464 square metre (15,758 square feet) plot for ₹101 crore.

5

### **Muthoot Microfin cuts lending rates for third time this year**

The microfinance arm of Muthoot Pappachan Group, Muthoot Microfin Ltd has implemented its third interest rate reduction this year, lowering lending rates by 25 basis points (bps) for income-generating loans (IGLs) and by 125 bps for third-party product loans (TPPs).

6

### **Mazagon Dock says no decision yet on Scorpene submarines under Project 75**

The company confirmed that commercial negotiations for the project are ongoing but reiterated that it has not received any final communication regarding the matter.

7

### **Alembic Pharmaceuticals secures tentative USFDA nod for generic eye drops**

Alembic Pharmaceuticals Ltd has received tentative approval from the United States Food and Drug Administration (USFDA) for its Abbreviated New Drug Application (ANDA) for Olopatadine Hydrochloride Ophthalmic Solution USP, 0.7%, which is generic eye drops.



# Consumer

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### Valuation summary

Consumer	CMP (INR)	TP (INR)	Rating
ITC	472	575	Buy
HUVR	2,481	3,100	Buy
APNT	2,469	2,650	Neutral
NESTLE	2,261	2,400	Neutral
VBL	622	730	Buy
PIDI	3,146	3,200	Neutral
GCPL	1,230	1,550	Buy
BRIT	4,910	5,500	Neutral
UNSP	1,543	1,550	Neutral
TATACONS	954	1,320	Buy
DABUR	523	700	Buy
MRCO	641	750	Buy
CLGT	2,896	3,250	Neutral
PG	15,915	16,500	Neutral
PAGE	46,123	54,000	Buy
UBBL	1,953	1,950	Neutral
HMN	640	850	Buy
JYL	412	500	Neutral
INDIGOPN	1,431	1,750	Buy

### Retail

TTAN	3,334	3,850	Buy
KALYANKJ	727	800	Buy
JUBI	657	625	Neutral
DEVYANI	165	215	Buy
WESTLIFE	790	800	Neutral
SAPPHIRE	338	415	Buy
SENCO	1,144	1,400	Buy
RBA	88	135	Buy
BARBEQUE	520	600	Neutral

## Growth diversity; overplaying valuation correction

- Our widespread consumer coverage universe, with combined revenue of INR4,000b and market cap of INR32,000b, registered aggregate revenue growth of 8%/9% in 2QFY25/FY24. The coverage includes six segments, most of which posted revenue growth in 2QFY25/FY24 (i.e., staples +7%/+6%, paints -2%/+4%, liquor +4%/+5%, innerwear +11%/-3%, QSR +7%/+12%, and jewelry +22%/+28% YoY). Staple companies missed the expectation of further pickup in volume growth in 2QFY25; however, their performance was steady and better than that of many discretionary categories. With rural performance improving, there was expectation for a sequential improvement for staple companies in 2QFY25. However, extended monsoon, disruption in supply chain, adjustment in GT inventory, and slow urban demand limit the desired pickup. We continue to believe that revenue growth acceleration for staple companies was driven by steady volume, aided by price hikes. Gross margin was affected by commodity price inflation, which we believe will be gradually offset by pricing actions.
- Discretionary categories have been a drag on overall volume growth and margins. The paint segment witnessed a slowdown in growth due to industry-wide challenges, and pressure on margins from high input costs and negative operating leverage. The alcoholic beverages segment revenue was impacted by seasonality and adverse weather conditions (heavy rains), which dampened consumer demand. Similarly, the quick service restaurant (QSR) category continued to face growth challenges, particularly in the dine-in format, with sluggish margins adding to headwinds. On the other hand, the jewelry segment outperformed, with strong revenue growth driven by a recovery in demand after the customs duty reduction. However, profitability was a mixed bag due to a change in the product mix and gold inflation (margin impact).
- Though management commentary for 2HFY25 remains optimistic, backed by pricing, it appears more achievable for staple and jewelry companies at present. Among our coverage companies, Page Industries, UBBL and Varun Beverages were the outliers in 2QFY25, with revenue/EBITDA growth of 11%/21%, 12%/23% and 24%/30%, respectively.

### Performance summary of all categories and key areas to monitor:

- Staples:** Following a modest upswing in 1QFY25, volumes were marginally impacted in 2QFY25 by several factors, including subdued macroeconomic conditions, inventory corrections by select companies to improve systemic health, adverse weather conditions such as floods and heavy rains (disrupted categories like beverages), and persistently high inflation. While rural markets continued to recover, urban demand remained challenging for FMCG players during the quarter. Additionally, the rapid growth of e-commerce and quick commerce channels exerted pressure on the general trade (GT) channel's growth for the industry. Gross margins for most companies remained under stress due to rising inflation, though a few companies managed post EBITDA margin expansion by controlling their A&P spends. Despite these efforts, EBITDA growth was slow across companies. Looking ahead, companies are expected to implement price hikes in 2HFY25 to offset the rising raw material costs. We anticipate a gradual improvement in volumes in the coming quarters, supported by a healthy monsoon season, consistent rural pickup and better portfolio play for emerging channels. In terms of revenue, Colgate (+10%) and Marico (+8%) were outliers, but EBITDA performance was better for Pidilite (+13%) and Emami (7%).

- **Paints:** The paint sector reported flat value growth in 2QFY25, reflecting subdued demand dynamics amid multiple headwinds. Demand was impacted by weak consumer sentiment, extended monsoons, and floods that disrupted offtake during Aug-Sep'24. Additionally, price cuts in prior quarters, an unfavorable product mix, and competitive intensity further weighed on revenue performance. Urban markets have seen a bit of slowdown pressure, contrasting with relatively better recovery trends in rural and tier-3/tier-4 regions. Margins came under pressure due to raw material inflation, the adverse product mix, and increased discounting. Modest price hikes of 1-2% implemented during 2QFY25 are expected to yield benefits in 2HFY25. A near-term demand outlook remains challenging as urban markets continue to underperform, and the festive season was subdued due to extended monsoons and an early Diwali, coupled with rising competitive pressures. Asian Paints performance was the weakest among its peers, with revenue/EBITDA down 5%/28% YoY.
- **Liquor:** The alcoholic beverages segment faced several challenges in 2QFY25, with seasonal factors and heavy rainfall dampening overall demand. Volume growth remained subdued, particularly in the mass segment, which continued to experience pressure. United Spirits' (UNSP) P&A segment saw a deceleration in growth, owing to the front-loading of sales in 1QFY25, a high base effect due to festive-related loading in the prior year, and softer consumer demand during the quarter. In contrast, peer companies, Radico Khaitan, UBBL and Sula Vineyards, reported better volume growth. ENA prices continued to face inflationary pressures, while glass prices remained stable, providing partial relief from cost volatility. However, barley costs exhibited an inflationary trend and are expected to remain volatile, keeping margin pressures elevated in the near term. Looking ahead, higher volume growth supported by a focus on premiumization and better realizations should drive revenue growth and improve operating margins. Additionally, stability in excise duties and the rollout of excise policy reforms in Karnataka and Andhra Pradesh are likely to support demand for premium brands, offering a positive outlook for the segment. UBBL outperformed that category with 5%/27% growth in revenue/EBITDA, while UNSP was a laggard with revenue/EBITDA performance of -1%/+8%.
- **QSR:** The segment continues to face significant demand challenges, marked by weak unit economics and heightened market competition. The subdued underlying growth during 2QFY25 weighed heavily on financial performance, with restaurant margins and EBITDA margins contracting across all major brands. Profit before tax also declined universally, reflecting the broader pressure on profitability. We remain cautious about the recovery prospects for the QSR sector in the near term. Despite favorable ADS and SSSG bases, meaningful underlying improvement in 2HFY25 appears unlikely. Restaurant operating margins remain under strain, and we expect this pressure to persist in the coming quarters, given the challenges in the current demand environment and competitive dynamics. Jubilant outperformed its peers in 1HFY25.
- **Jewelry:** Jewelry companies have delivered robust sales growth, driven by demand recovery after the customs duty reduction. Titan (jewelry standalone), Kalyan, and Senco delivered revenue growth of 26%, 37%, and 31%, and SSSG of 15%, 23%, and 20% respectively. Studded jewelry sales declined across

companies, except for Kalyan, due to softer diamond demand, which impacted margins. For Kalyan, a higher revenue contribution from franchise stores led to a contraction in reported margins. The reduction in customs duty resulted in an inventory loss of INR2.9b for Titan, INR690m for Kalyan, and ~INR300m for Senco, which hurt the reported profitability of companies. Festive demand in Oct'24 was robust and we remain positive on the jewelry sector, anticipating an accelerated shift in consumer preference from unorganized/local channels to organized, driven by trust and transparency.

- Innerwear:** Consumer sentiment remained muted during the quarter, though rural consumption recovery continued to support demand trends. The onset of the festive season toward the end of the quarter provided encouraging signs, while e-commerce channels maintained strong growth momentum. Urban markets underperformed compared to tier-3 and tier-4 towns, where demand recovery was more pronounced. Margin expansion was driven by stable raw material costs, particularly cotton, along with improved cost efficiencies. Page Industries focused on optimizing inventory levels across its distribution network, reducing channel inventory in 1HFY25, with further improvements planned for 2HFY25. Secondary sales were higher than primary sales by ~4% as the company strategically calibrated inventory to align with market demand. Looking ahead, the festive season and normalizing trade inventory should further drive improvement in primary sales in 2HFY25. Input prices have eased, which should help PAGE sustain margin expansion. PAGE remained an outlier among its innerwear peers, with 11%/21% YoY growth in revenue/EBITDA.



**Valuation and View: Maintain preference for staples and jewelry companies**

- In our last [consumer sector thematic](#) report published in Apr'24, we emphasized our overweight stance on staple companies owing to favorable risk-reward dynamics and anticipated volume recovery in FY25 and FY26. Over the past two quarters, we have observed steady improvement in volume growth, along with optimistic management commentary regarding further acceleration in growth in the upcoming quarters. After a strong run-up in stocks during Apr-Sep'24, we saw a sharp correction in stock prices as these companies failed to show further volume pickup in 2Q, along with adverse stock market activities. We continue to believe that the growth cycle will see an upward trend and valuations will also fall in place accordingly. **We reiterate our overweight stance on the staple segment and continue to prefer HUL, GCPL, and Dabur as our top picks.**
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## Robust industry growth; Bharti's incremental RMS at ~49% in 2Q

### Robust industry revenue growth driven by tariff hikes

India's telecom industry revenue (AGR including NLD) increased 8% QoQ to INR674b (+13% YoY) in 2QFY25, mainly driven by the flow-through of tariff hikes. The implied industry ARPU was up 9% QoQ to INR194/month, while industry subscriber base declined ~17m (~1.5%) QoQ. India's telecom spends as a % of nominal GDP inched up to ~0.9% in 2Q (vs. 0.8% in 1Q), but still remained significantly below ~1.4% of GDP prior to the RJio launch. Bharti remained the biggest beneficiary of the tariff hike, with ~49% QoQ incremental RMS (vs. ~39% overall RMS) in 2QFY25. We expect industry revenue growth to remain robust in the near term as full benefits of the tariff hike is realized over the next two quarters as subscriber churn subsides.

### Bharti remains the biggest beneficiary of the tariff hike with ~49% incremental RMS

Bharti continued to grow ahead of its peers in 2QFY25, with AGR (including NLD) rising ~11% QoQ to INR260b (+19% YoY), as implied ARPU inched up to INR224 (+11% QoQ). Bharti's QoQ incremental RMS in 2QFY25 was robust at ~49% (vs. ~39% overall RMS). RJio's AGR (inc. NLD) grew ~7% QoQ to INR280b (+14% YoY) as implied ARPU improved ~7% QoQ to INR199. Vi continued to lag peers as the 7% QoQ implied ARPU uptick was offset by a decline in subscribers, resulting in ~5% QoQ revenue growth to INR97b. Driven by subscriber share gains and ~6% QoQ implied ARPU uptick, revenue for others (primarily BSNL) inched up ~8% QoQ (+7% YoY) to INR38b in 2Q.

### A and B circles drive industry growth, while Metros and C circles lag

The decline in the overall subscriber base was largely similar across circle categories at ~1.3-1.6% QoQ. However, tariff hike flow-through has been the highest in Circles A and B with 9-10% ARPU uptick, while Metros and C Circles lagged with ~7% QoQ ARPU growth. As a result, Circles A and B led with ~10%/8% revenue uptick in 2QFY25, while Metros and C Circles recorded lower ~7% QoQ revenue growth. Bharti was the biggest gainer across A, B and C category circles, while Vi led with ~14% QoQ revenue growth in Metros.

### Industry revenue doubled since Sep'19 on three rounds of tariff hikes

Since Sep'19 (quarter preceding the first tariff hike), the telecom industry's ARPU has almost doubled from INR98 in Sep'19 to INR193 in Sep'24, driven by tariff hikes. However, as a result of sharp tariff hikes (~15% industry ARPU CAGR over the last five years), the industry's subscriber base at 1.15t in Sep'24 is even lower than Sep'19 levels (1.17t). Further, adjusting for the growth in M2M/IoT SIMs, the decline in industry subscriber base would have been even higher. Driven by three rounds of smartphone tariff hikes (Dec'19, Dec'21, and Jul'24), India's quarterly telecom revenue has almost doubled (up 96%) since Sep'19, implying ~14% five-year industry revenue CAGR.

**Bharti and RJio account for ~97% of incremental revenue since Sep'19**

Among telcos, Bharti has been the biggest beneficiary of tariff hikes with a 2.2x increase in implied ARPU over Sep'19-Sep'24, implying a ~17% five-year CAGR, followed by ~13%/12% CAGR for RJio/Vi. We believe the significant improvement in the data subs proportion has also been a key driver for Bharti's industry-leading ARPU.

Over Sep'19-Sep'24, Bharti's revenue has increased ~2.6x, implying ~21% five-year revenue CAGR, with incremental revenue market share significantly higher at ~48% (vs. ~39% RMS in 2Q). Similarly, RJio's incremental RMS over the last five years also stood at healthy ~49% (vs. ~42% RMS in 2Q), driving ~2.4x increase in revenue since Sep'19 (~19% five-year CAGR). Comparatively, Vi accounted for modest ~2% incremental RMS over Sep'19-Sep'24 as its revenue inched up by modest INR6b (~7%) since Sep'19, with subscriber churn offsetting the tariff hike benefits.

**Valuation and view**

- The pass-through of Jul'24 tariff hikes has been encouraging and the full benefits are likely to reflect by Mar'25 as the impact of subscriber churn subsides over the next few months.
- Given the consolidated market structure in the Indian telecom industry, higher data consumption, lower ARPU, and inadequate returns generated by telcos, we expect tariff hikes to be more frequent. We build in ~15% tariff hike in Dec'25.
- With Vi's large capex plans, we believe the pace of market share gains may slow down. However, RJio and Bharti are still likely to continue gaining market share at Vi's expense, in our view. We continue to prefer Bharti and RIL in the telecom space.



### EAI – Monthly Dashboard: Economic activity picked up in Oct'24, but still weak

Expect real GDP at 5.7-6.0% in 3QFY25

- Preliminary estimates indicate that India's EAI-GVA growth accelerated to a four-month high of 6.0% YoY in Oct'24 vs. 4.8%/9.9% in Sep'24/Oct'23. The acceleration was primarily led by 30-month high growth in the agriculture sector and growth recovery in the services sector. Additionally, the industrial sector grew at a three-month high rate in Oct'24.
- EAI-GDP growth picked up to a 15-month high of 10.2% YoY in Oct'24 vs. 1.9%/3.0% YoY in Sep'24/Oct'23. Total consumption growth accelerated sharply to a 15-month high in Oct'24, while investment growth remained muted. Excluding fiscal spending, EAI-GDP grew 7.9% YoY in Oct'24, the highest in 13 months.
- Selected high frequency indicators (HFIs) portray a mixed picture for economic activity in Nov'24. CV sales were subdued in Nov'24 and air cargo traffic contracted for the fourth consecutive month. At the same time, toll collections remained robust, PV sales grew at an eight-month high rate, PMIs remained resilient, and water reservoir levels expanded for the fifth straight month.
- After growing at ~8% or more in each of four quarters in FY24, real GDP growth decelerated to 6.7% in 1QFY25 and to a seven-quarter low of 5.4% in 2QFY25 (missing all estimates). For Oct'24, our estimates suggest that EAI-GVA growth improved to 6% YoY but remained subdued. At the same time, HFIs portray a mixed picture for Nov'24. Accordingly, we believe that real GDP growth could be 5.7-6.0% in 3QFY25, much lower than the RBI forecast of 7.4%.

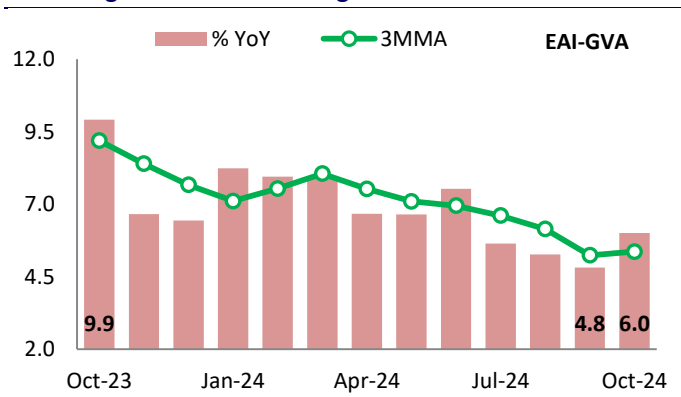
Preliminary estimates indicate that India's EAI-GVA grew 6.0% YoY in Oct'24, the highest in four months

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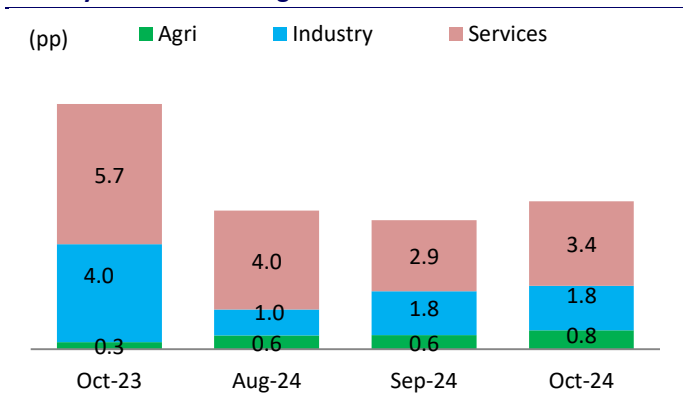
- **EAI-GVA growth at four-month high in Oct'24:** Preliminary estimates indicate that India's EAI-GVA growth accelerated to a four-month high of 6.0% YoY in Oct'24 vs. 4.8%/9.9% in Sep'24/Oct'23. The acceleration was primarily led by 30-month high growth in the agriculture sector and growth recovery in the services sector. Additionally, the industrial sector grew at the 3-month highest rate in Oct'24. (Exhibits 1 and 2)
- **EAI-GDP growth picked up to 15-month high in Oct'24:** EAI-GDP growth picked up to a 15-month high of 10.2% YoY in Oct'24 vs. 1.9%/3.0% YoY in Sep'24/Oct'23. Total consumption growth accelerated sharply to a 15-month high in Oct'24, while investment growth remained muted. Excluding fiscal spending, EAI-GDP grew 7.9% YoY in Oct'24, the highest in 13 months. (Exhibits 3 and 4)

EAI-GVA growth at 4-month high in Oct'24...



Please refer to our earlier [report](#) for details

...led by acceleration in agriculture and services



Contribution of various components to EAI-GVA  
Source: Various national sources, CEIC, MOFSL



**Swiggy: No strangers to competition & welcome all new entrants; Sriharsha Majety (MD & CEO) & Rahul Bothra (CFO)**

- Have a series of new use-cases for food delivery business
- Focusing more on affordability
- Targeting profitability by 3QFY26 on a consolidated basis
- See nearly 100bps of operating leverage on food delivery business

[→ Read More](#)**VECV: Full year growth for the company will be better than the industry; Vinod Aggarwal, MD & CEO**

- November is usually a lean month for commercial vehicles
- Our growth in November is in-line with industry
- Despite muted growth in sales, we are seeing healthy tonnage growth
- 6-7% industry growth in H2FY25 looks difficult as first 2 months have been muted

[→ Read More](#)**Brigade Enterprises: Sales are expected to be between ₹6,300-6,500 crore in FY25; Pavitra Shankar, MD**

- Around 90% of bookings during 2Q emanated from Bengaluru
- H2 should be better than H1
- Fresh launches are contingent on approvals in different states
- Done with 40% of bookings in H1 vs what they are targeting

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[→ Read More](#)**Lumax Auto: See 25-30% CAGR growth over next few years; Anmol Jain, MD**

- FY26 revenue guidance for Green fuel energy at Rs 350cr with margin +18-20%
- Company focus is to outgrow industry
- Overall FY25 guidance for revenue at +18-20% with margins around 12-13%+
- As part of inorganic opportunities, will continue diversifying into new segments

[→ Read More](#)**Monte Carlo Fashions: Margin will see an improvement for the full year in FY25; Sandeep Jain, Executive Director**

- Winter has started on a good note
- Last quarter was good and expect positive growth
- FY25 can end with some revenue growth and margin improvement
- Home Textile will see double digit growth

[→ Read More](#)

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## 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 within following 30 days take appropriate measures to make the recommendation consistent with the investment rating legend.

**Disclosures:**

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