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July 29, 2022

The Secretary  
**BSE Limited**  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai- 400 001  
Fax: 022-2272 2037/2039/2041/3121  
**BSE Scrip Code: 532348**

The Secretary  
**National Stock Exchange of India Limited**  
Exchange Plaza, 5th Floor, Plot no. C/1  
G Block, Bandra-Kurla Complex  
Bandra (E), Mumbai - 400 051  
Fax: 022-2659 8237/38; 2659 8347/48  
**NSE Symbol: SUBEXLTD**

Dear Sir/Madam,

**Sub: Intimation of Receipt of Request Letters for Re-classification from 'Promoter/Promoter Group' category to 'Public' category pursuant to Regulation 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

We would like to inform you that, the Company has vide email dated July 29, 2022 received request letters dated 28th July, 2022 from Mr. Subash Menon, Mr. Sudeesh Yezhuvath, Promoters of the Company and Kivar Holdings Pvt. Ltd, member of the Promoter Group of the Company, to reclassify themselves from the existing "Promoters/Promoter Group category" to "Public category" of the Company, pursuant to Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The aforesaid request for re-classification shall be subject to the Board of Directors of the Company analyzing the same, approval of shareholders of the Company, if applicable and the Stock Exchanges and other applicable conditions under the provisions of Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This is for your information and record.

Thanking you

Yours truly,  
For Subex Limited

**G V Krishnakanth**  
Company Secretary & Compliance Officer

Encl.: Request Letters received from Promoters/Promoter Group

**Subex Limited**

CIN - L85110KA1994PLC016663

Registered Address : Pritech Park - SEZ, Block-09, 4th Floor B Wing

Survey No. 51 to 64/4, Outer Ring Road, Bellandur Village, Varthur Hobli, Bengaluru - 560 103. India

July 28, 2022

The Board of Directors  
Pritech Park, Block No. 9  
4th Floor, B Wing  
Sy. No 51 to 64/4, Outer Ring Road  
Devarabisanahalli  
**BANGALORE – 560 103**

**Subject: Application Letter for reclassification under Regulation 31A of Securities and Exchange Board of India (Listing Obligations and disclosure Requirements) Regulations 2015, “SEBI (LODR) Regulations, 2015”, from Promoter Category to Public Category of Subex Limited (“Company”).**

With reference to the abovementioned subject, I, Subash Menon have been disclosed as a member of the “Promoter & Promoter Group” category of the Company. I am not connected directly or indirectly with any activity of the Company nor do I have any direct or indirect control, over the affairs of the Company. Further, I am not holding any shares in the Company as on date. Hence, I request you to reclassify my status from “Promoter & Promoter Group” category to “Public” category of the Company.

In connection with the application for reclassification, I hereby undertake as follows:

1. I, along with persons acting in concert or persons related to me, together do not hold more than ten percent of the total voting rights in the Company.
  2. I do not exercise control over the affairs of the Company, directly or indirectly.
  3. I do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements.
  4. I am not represented on the board of directors (including not having a nominee director) of the Company.
  5. I do not act as key managerial person of the Company.
  6. I am not a ‘wilful defaulter(s)’ as per the Reserve Bank of India Guidelines.
  7. I am not a fugitive economic offender.
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015** at all times from the date of reclassification, failing which, I shall be automatically reclassified as promoter/person belonging to the promoter group of the Company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015** for a period of not less than three years from the date of reclassification, failing which, I shall be automatically reclassified as promoter/person belonging to promoter group of the Company.

Thanking you

Yours faithfully,

  
**Subash Menon**

July 28, 2022

The Board of Directors  
Pritech Park, Block No. 9  
4th Floor, B Wing  
Sy. No 51 to 64/4, Outer Ring Road  
Devarabisanahalli  
**BANGALORE – 560 103**

**Subject: Application Letter for reclassification under Regulation 31A of Securities and Exchange Board of India (Listing Obligations and disclosure Requirements) Regulations 2015, “SEBI (LODR) Regulations, 2015”, from Promoter Category to Public Category of Subex Limited (“Company”).**

With reference to the abovementioned subject, I, Sudeesh Yezhuvath have been disclosed as a member of the “Promoter & Promoter Group” category of the Company. I am not connected directly or indirectly with any activity of the Company nor do I have any direct or indirect control, over the affairs of the Company. Further, I am not holding any shares in the Company as on date. Hence, I request you to reclassify my status from “Promoter & Promoter Group” category to “Public” category of the Company.

In connection with the application for reclassification, I hereby undertake as follows:

1. I, along with persons acting in concert or persons related to me, together do not hold more than ten percent of the total voting rights in the Company.
  2. I do not exercise control over the affairs of the Company, directly or indirectly.
  3. I do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements.
  4. I am not represented on the board of directors (including not having a nominee director) of the Company.
  5. I do not act as key managerial person of the Company.
  6. I am not a ‘wilful defaulter(s)’ as per the Reserve Bank of India Guidelines.
  7. I am not a fugitive economic offender.
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015**, at all times from the date of reclassification, failing which, I shall automatically be reclassified as promoter/person belonging to the promoter group of the Company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015**, for a period of not less than three years from the date of reclassification, failing which, I shall automatically be reclassified as promoter/person belonging to promoter group of the Company.

Thanking you

Yours faithfully,

  
Sudeesh Yezhuvath

July 28, 2022

The Board of Directors  
Pritech Park, Block No. 9  
4th Floor, B Wing  
Sy. No 51 to 64/4, Outer Ring Road  
Devarabisanahalli  
**BANGALORE – 560 103**

**Subject: Application Letter for reclassification under Regulation 31A of Securities and Exchange Board of India (Listing Obligations and disclosure Requirements) Regulations 2015, “SEBI (LODR) Regulations, 2015” from Promoter Group Category to Public Category of Subex Limited (“Company”).**

With reference to the abovementioned subject, we, Kivar Holding Private Limited (“Kivar” or “we”) having our registered office at 18 C, 1<sup>st</sup> B Main, Sector 6, IAS Officer’s Colony, HSR Layout, Bangalore – 560 102, have been disclosed as a member of the “Promoter & Promoter Group” category of the Company. We are not connected directly or indirectly with any activity of the Company nor do we have any direct or indirect control, over the affairs of the Company. Further, we are not holding any shares in the Company as on date. Hence, we request you to reclassify our status from “Promoter & Promoter Group” category to “Public” category of the Company.

In connection with application for reclassification, we hereby undertake as follows:

1. We, along with persons acting in concert or persons related to us, together do not hold more than ten percent of the total voting rights in the Company.
  2. We do not exercise control over the affairs of the Company, directly or indirectly.
  3. We do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  4. We are not represented on the board of directors (including not having a nominee director) of the Company.
  5. We have not nominated any person / do not have any representatives acting as key managerial person of the Company.
  6. We are not ‘wilful defaulter(s)’ as per the Reserve Bank of India Guidelines
  7. We are not fugitive economic offenders.
2. There is no pending regulatory action against us.
3. We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015**, at all times from the date of re-classification, failing which, we shall be automatically reclassified as promoter/person belonging to the promoter group of the Company.



*Mammyev*  
*PBLm*

4. We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015** for a period of not less than three years from the date of reclassification, failing which, We shall be automatically reclassified as promoter/person belonging to promoter group of the Company.

Thanking you,

for Kivar Holdings Private Limited



Name: Manoj C V  
Designation : Director

Encl: Board Resolution authorizing the Directors / representatives for making the application for re-classification.