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SPECTRA INDUSTRIES LIMITED

Plot No. 9, Spectra Compound, 4th Floor, Ramchandra Lane Extn., Kachpada II, Malad (West), Mumbai - 400 064. CIN: L74999MH1992PLC067849

Date: April 27, 2022

To, The General Manager **BSE LIMITED** P. J. Towers, Dalal Street, Mumbai 400 021

Scrip Code: 513687

Sub.: Certificate under Clause 40(9) of the SEBI (Listing Obligations and Disclosures requirements) Regulations 2015.

Sir,

Pursuant to the Clause 40 (9) of the SEBI (Listing Obligations and Disclosure requirements) Regulations 2015, enclosed please find the Certificate from the practicing company secretary for the half year ended 31.03.2022.

Thanking you.

Yours faithfully, For Spectra Industries Limited

Jatdev Gupta Executive Director & CFO DIN : 00066999



Factory : C-1, MIDC, Murbad, Dist Thane. Maharashtra-421 401. Tel.: 02524-224298



Office: 111, 11th floor, Sai-Dwar CHS Ltd., SAB TV Lane, Opp. Laxmi Industrial Estate, Off Link Road, Above Shabari Restaurant, Andheri (West), Mumbai-400 053. Tel.: 26301232 / 26301233 Email: cs@parikhassociates.com Website: www.parikhassociates.com Firm Unique Code: P1987MH010000

CERTIFICATE UNDER REGULATION 40(9) OF SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 FOR THE YEAR ENDED 31ST MARCH, 2022.

The Securities and Exchange Board of India (SEBI) vide gazette notification dated 8th June, 2018 and vide its press release dated 3rd December, 2018, amended Regulation 40 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and has mandated that the transfer of securities would be carried out only in dematerialized form w.e.f. 01st April, 2019. SEBI vide its press release dated 27th March, 2019 clarified that the transfer deeds lodged prior to deadline and returned due to deficiency in the document may be re-lodged for transfer even after the deadline of 01st April, 2019. Further, SEBI vide its circular dated 07th September, 2020 has fixed 31st March, 2021 as the cut-off date for re-lodgment of such transfer deeds and the shares that are re-lodged for transfer shall be issued only in demat mode. SEBI has specified operational guidelines for transfer and dematerialization of re-lodged physical shares vide its circular dated 02nd December, 2020.

SEBI vide gazette notification dated 24th January, 2022 read with SEBI circular no. SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2022/8 dated 25th January, 2022 has mandated that companies shall effect issuance of certificates or receipts or advices, as applicable in dematerialized form only, while processing the service requests relating to Issue of duplicate securities certificate, Claim from Unclaimed Suspense Account, Renewal / Exchange of securities certificate, Endorsement, Sub-division / Splitting of securities certificate, Consolidation of securities certificates/folios, Transmission and Transposition.

Accordingly, on the basis of examination of the relevant documents relating to SPECTRA INDUSTRIES LIMITED ('the Company') maintained and provided electronically by Link Intime India Private Limited, Registrar and Share Transfer Agents (RTA), pertaining to the financial year ended 31st March, 2022 for the purpose of issuing a Certificate as per Regulation 40(9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, We hereby certify that:

A) 1.a. The Company has not received any requests relating to transfers of securities during the financial year ended 31st March, 2022.

1. b. The Company has delivered during year ended on 31st March, 2022, share certificates/ letters of confirmation as per SEBI's operational guidelines, for execution of deletion of name received during the financial year ended 31st March, 2022, within the prescribed time from the respective date of lodgement. As informed to us there were no requests relating to transmission of securities, transposition of securities, sub-division (split), renewal, consolidation, exchange or endorsement of calls/allotment monies received during the said period.

B) Any other information, if applicable:

For Parikh Parekh & Associates Company Secretaries

Place: Mumbai Date: April 26, 2022 MOHAMMAD FAKRUDDIN PILLIKANDUU

Signature: Mohammad Pillikandlu Partner

FCS No: 10619 CP No: 14603 UDIN: F010619D000213503 PR No.: 723/2020