

SL/BSE/NSE/20-21

October 24, 2020

<p>The Manager , Listing Department, <b>National Stock Exchange of India Ltd.,</b> 'Exchange Plaza' C-1 , Block G, Bandra-Kurla Complex, Bandra (E), Mumbai-400 051. <b>Security ID: SUBROS</b></p>	<p>Dy. General Manager, Department of Corporate Services, <b>BSE LIMITED,</b> First Floor, P.J. Towers, Dalal Street, Fort, Mumbai – 400001. <b>Security ID: 517168</b></p>
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Dear Sir/Madam,

**Sub: Half Yearly Compliance Certificate**

**Ref: Regulation 40(9) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

We are enclosing herewith a Compliance Certificate in accordance with Regulation 40(9) and 40(10) of the SEBI(Listing Obligations & Disclosure Requirements) Regulation, 2015 for the half year ended 30<sup>th</sup> September, 2020 issued by Practicing Company Secretary.

Kindly take the same on your record.

Thanking you,

Yours faithfully,  
**SUBROS LIMITED**



Rakesh Arora  
Company Secretary



**CERTIFICATE UNDER REGULATION 40(9) OF SEBI (LISTING OBLIGATIONS AND  
DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

**FOR THE HALF YEAR ENDED SEPTEMBER 30, 2020**

We have examined all Share Transfer Deeds, Memorandum of Transfers, Registers, files and other documents relating to **SUBROS LIMITED** maintained by their share transfer agent **MCS SHARE TRANSFER AGENT LIMITED** having its Corporate office at **F-65, 1<sup>st</sup> Floor, Okhla Industrial Area Phase – I, New Delhi 110 020** pertaining to transfer of equity shares of the company for the period from **1<sup>st</sup> April, 2020 to 30<sup>th</sup> September 2020** for the purpose of issuing a Certificate as per Regulation 40(9) of the SEBI(LODR) Regulations, 2015 and based on the information provided by the Company/Registrar and Share Transfer Agent, We hereby certify that during half year ended on 30<sup>th</sup> September 2020.

- A) The Company has not received any request for transfer of shares in physical form during the half year ended on 30<sup>th</sup> September, 2020 and as such, no occasion has arisen for delivering the share certificates relating to the Transfer Deeds lodged in the said period or re-lodged thereafter; and
- B) The Company has delivered, during half year ended on 30<sup>th</sup> September, 2020, share certificates in respect of requests relating to issuance of duplicate share certificate, transmission of securities, deletion of name, renewal, exchange, split and consolidation, if any, received during the period from 1st April 2020 to 30<sup>th</sup> September, 2020, within thirty days, from the respective date of lodgment.

For **R S M & Co.**  
Company Secretaries  
FRN P1997DL17000



*[Handwritten Signature]*

**RAVI SHARMA**  
C.P. No. 3666  
UDIN F004468B000953691

Place: New Delhi  
Date: 14.10.2020