PUNIT COMMERCIALS LIMITED

Diamond Manufacturers, Importers & Exporters

Date: 09th October, 2020

To,
The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Dear Sir,

Scrip Code: 512099

Sub: Regulation 40 (9) of the SEBI (LODR) Regulations, 2015

Ref: Certificate from Practicing Company Secretary

With reference to above and pursuant to Regulation 40 (9) of SEBI (LODR) Regulations, 2015, please find enclosed herewith the copy of the Certificate received from M/s. P. P. Shah & Co., Practicing Company Secretaries in respect of transfer or transmission or transposition of securities for the half year ended 30th September, 2020.

You are requested to take the same on your record.

Kindly acknowledge the receipt.

Thanking you,

Yours faithfully,

For PUNIT COMMERCIALS LTD

MANAGING DIRECTOR

Encl: As Above ~

CERTIFICATE UNDER REGULATION 40 (9) OF SEBI (LODR) REGULATIONS, 2015

FOR THE HALF YEAR ENDED 30TH SEPTEMBER, 2020

1 have examined all Share Transfer Deeds, Memorandum of Transfers, Registers, files and other documents relating to *M/s. Punit Commercials Limited* having its Registered Office situated at AW 2022/2023, 'A' Tower, Bharat Diamond Bourse, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051 maintained by *M/s. Sharex Dynamic (India) Private Limited*, a Registrar & Share Transfer Agent (RTA) having its office at C 101, 247 Park, L B S Marg, Vikhroli West, Mumbai – 400 083 pertaining to transfer of equity shares (share transfer deeds of which were lodged prior to April 1, 2019 and returned due to deficiency and re-lodged during the half year ended September 30, 2020) of the Company for the period from *01st April*, 2020 to 30th September, 2020 for the purpose of issuing a Certificate as per Regulation 40 (9) of SEBI (LODR) Regulations, 2015 entered into by, *M/s. Punit Commercials Limited* with BSE Limited and based on the information provided by the Company, I hereby certify that the Company has delivered during *half year ended on 30th September*, 2020:

- A) Share/Debenture-Certificate(s) relating to the transfer of Shares/Debentures received during the period from \$\textit{\theta1}^{st}\$ April, 2020 to \$30^{th}\$ September, 2020 as entered in the Memorandum of Transfers have been issued within fifteen days of the date of lodgment for transfer, subdivision, consolidation, renewal, exchange or endorsement of calls/allotment monies from respective date of lodgment of each deed excepting those rejected on technical grounds.
- B) Any other information, if applicable:

Note: As per The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) (Fourth Amendment) Regulations, 2018, (hereinafter SEBI (LODR)) read with SEBI Notification No. SEBI/LAD-NRO /GN/ 2018/49 dated 30th November, 2018, first proviso has been inserted in Regulation 40 (1) of SEBI (LODR) as per which requests for effecting transfer of securities w.e.f. 1st April, 2019 shall not be processed unless the securities are held in

Company Secretaries

the dematerialized form with a depository. Accordingly, during the period from θI^{st} April, 2020 to 30^{th} September, 2020 no requests for share transfers were processed in physical form.



For P. P. SHAH & CO.

Pradip (Shah

(PRADIP C. SHAH)
Practicing Company Secretary
Partner
Membership No: 1483
Certificate of Practice: 436

UDIN: F001483B000886950

Please note that:

Place: Mumbai

Date: 8th October, 2020

1) This Certificate should be given by a *Practicing Company Secretary*.

2) The Certificates should be given for Half Year ended 30th September, 2020.