

10.04.2019

To,

The Manager
The Bombay Stock Exchange Limited
25th Floor, P.J. Towers
Dalal Street
Mumbai-400001

Sub: Certificate under Regulation 40(9) of SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015 Stock Code: 517360

Dear Sir,

Please find enclosed herewith a copy of Certificate from Practicing Company Secretary as per Regulation 40(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended on 31st March, 2019.

This is for your information and record

Thanking You

For SBEC Systems (India) Limited

Priyanka Negi

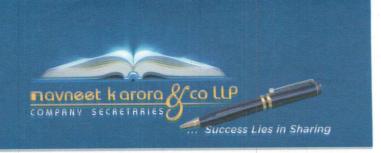
Company Secretary & Compliance Officer

Encl: As Above

CIN No.: L74210DL1987PLC029979

Regd. Office: 1400, Modi Tower, 98 Nehru Place, New Delhi - 110019, Tel.: 42504665, 42504555, Fax: 26293822

E-mail: sbecsystems@rediffmail.com





Regd. Office: E-8/1, LGF, Near Geeta Bhawan Mandir, Malviya Nagar, New Delhi-110017 +91-11-26686432, 26684877, 49901507 +91 9810328141, 8076401996

info@novneetarcracs.com arcranavneet@rediffmail.com www.novneetarcracs.com LLPIN-AAJ-0972

CERTIFICATE UNDER REGULATION 40(9) OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIRMENTS) REGULATIONS, 2015 FOR THE HALF YEAR ENDED 31st MARCH 2019

We have examined all Share Transfer Deeds, Memorandum of Transfers, Registers, files and other documents relating to *SBEC Systems (India) Limited* maintained by *M/s. Beetal Financial & Computer Services (P) Limited* pertaining to transfer of equity shares of the Company for the period from *IstOctober*, *2018* to 31st March, *2019* for the purpose of issuing a Certificate as per Regulation 40(9) of the SEBI (LODR) Regulations 2015 read with uniform Listing Agreement entered into by, *SBEC Systems (India) Limited* with BSE and basedon the information provided by the Company,we hereby certify that the Company has delivered during half year ended on 31st March, *2019*:

- Share Certificate(s) relating to the transfer, transmission, consolidation of shares received during the period from *I*st *October*, *2018* to *31*st *March*, *2019* as entered in the Memorandum of Transfers have been issued within stipulated time except those rejected on technical grounds.
- Share Certificates in respects of requests for issue of duplicate certificates have been issued within one month of lodgment.
- No cases were registered for T ransfer of Debentures, Sub-Division, Renewal, Exchange or endorsement of call / allotment monies of Share Certificates during the period under review.

For Navneet K Arora & Co LLP

Company Secretaries

(LLPIN: AAJ-0972) New Delhi

CS Navneet Arora

M

Managing Partner

C.P. NO 3005, FCS: 3214

Date: 10th April, 2019 Place: New Delhi