

KEL/SEC/SKC/10/2019

October 24, 2019

**BSE LTD**

Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai 400 001.

**Company Code No. 533451**

**Sub : Compliance of Clause 40(10) of SEBI (LODR) Regulations, 2015.**

Dear Sir,

Enclosed find herewith a certificate from Company Secretary in practice in compliance with Regulation 40(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the period 1<sup>st</sup> April 2019 to 30<sup>th</sup> September 2019.

Kindly take the same on record and acknowledge the receipt.

Thanking you,

For **KARMA ENERGY LIMITED**

T V Subramanian  
CFO & Company Secretary



**KARMA ENERGY LTD.**

Regd. Off: Empire House, 214, Dr. D. N. Road, Ent. A.K. Nayak Marg, Fort, Mumbai - 400 001  
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www.karmaenergy.co • CIN: L31101MH2007PLC168823

To,  
**Bombay Stock Exchange Limited**  
Phiroze Jeejabhoy Towers,  
Dalal Street,  
Mumbai - 400 001

Dear Sir / Madam,

**CERTIFICATE UNDER REGULATION 40(9) OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS), REGULATIONS, 2015 FOR THE HALF YEAR ENDED SEPTEMBER 30, 2019:**

We have examined all Share Transfer Deeds, Memorandum of Transfers, Registers, files and other documents relating to **KARMA ENERGY LIMITED** maintained by **BIGSHARE SERVICES PRIVATE LIMITED** pertaining to transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/allotment monies of equity shares of the Company for the period from **April 01, 2019 to September 30, 2019** for the purpose of issuing a Certificate as per Regulation 40(9) of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 and based on the information provided by the Company, we hereby certify that the following comments are applicable for the half-year ended on **September 30, 2019:**

- A. Share Certificates relating to the Share Transfer Deeds received during the period from **April 01, 2019 to September 30, 2019** as entered in the Memorandum of Transfers have not been issued within 30 days from respective date of lodgment of each deed except those rejected on technical grounds.
- B. Share Certificate in respect of a request for exchange of a duplicate certificate has not been issued within 30 days of lodgment.

The reason for the same as received from M/s. Bigshare Services Pvt. Ltd. is reproduced as follows: "As per SEBI Notification No. SEBI/LAD-NRO/GN/2018/24 dated June 8, 2018 no transfer of shares would be processed w.e.f December 5, 2018 (which got extended till April 1, 2019) unless the shares are held in dematerialized form. In order to comply with the amended SEBI Regulations, there was spurt in the volumes of Transfer Requests received till March 31, 2019, resulting in delay of Transfer Requests




*i.e. beyond 15 days from the date of lodgement of transfer. Further, please note this had cascading effect on other requests such as Duplicate & Transmission."*

- C. Has not received any request for sub-division, consolidation, renewal and exchange endorsement of calls/allotment monies.

For Martinho Ferrao & Associates  
Company Secretaries



  
Martinho Ferrao  
Proprietor  
F.C.S. No. 6221  
C.P. No. 5676

UDIN: F006221A000146878

Date: 22<sup>nd</sup> October, 2019

Place: Mumbai