

REF: BIL/ST.EX/REG 40(9)/2019-20/1

23rd October, 2019

The Secretary The Calcutta Stock Exchange Limited, 7, Lyons Range, Kolkata - 700001.

Asst. Vice President National Stock Exchange of India Limited Exchange Plaza, 5th Floor, Plot No. C/1, G Block Bandra Kurla Complex, Bandra (East) Mumbai - 400051 Code: BINANIIND

General Manager - DCS Bombay Stock Exchange Limited Corporate Relationship Department 1st Floor, New Trading Ring, Rotunda Building, P. J. Towers, Dalal Street, Fort. Mumbai - 400001 Code: 500059

Dear Sir.

Sub: Certificate under Regulation 40(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

We enclose herewith Certificate in terms of Regulation 40(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the period 1st April, 2019 to 30th September, 2019.

Kindly take the same on record.

Thanking you,

Yours faithfully, For Binani Industries Limited

Visalakshi Sridhar

Managing Director, CFO & Company Secretary

Sudalul Ache

Encl.: As above

Binani Industries Limited

CIN: L24117WB1962PLC025584

Corporate Office: Mercantile Chambers, Ground Floor, 12, J. N. Heredia Marg, Ballard, Estate, Mumbai - 400 001, India. Tel: +91 22 3026 3000 / 01 / 02 | Fax: +91 22 2263 4960 | Email: mumbai@binani.net | www.binaniindustries.com Registered Office: 37/2, Chinar Park, New Town, Rajarhat Main Road, P.O. Hatiara, Kolkata - 700 157 India Tel: 08100326795 / 08100126796 | Fax: +91 33 4008 8802

P. K. B. NAMBIAR B.Com. (Hon.) LL.B.,F.C.S., Company Secretary 204, Blue Bell, Vasant Valley Phase 1 CHS Ltd., Film City Road, Mumbai - 400 097

Tel: 28400070 Mobile: 98200 92754

E-mail: nambiarpbalan@gmail.com

CERTIFICATE UNDER REGULATION 40(9) OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 FOR THE HALLF YEAR ENDED 30TH SEPTEMBER, 2019

The Securities and Exchange Board of India ('SEBI') pursuant to the Gazette Notifications No SEBI/LAD-NRO/GN/2018/24 dated June 8, 2018 and No. SEBI/LAD-NRO/GN/2018/49 dated December 3, 2018, has mandated that effective from April 1, 2019, request for transfer of securities shall not be processed by a listed entity, unless such securities are held in dematerialized form with a Depository. Further SEBI vide its press release dated 27th March, 2019 clarified that the transfer deed(s) 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.

Accordingly, I have examined the relevant Books and records of M/s. Binani Industries Limited (the Company) maintained by Link Intime India Private. Ltd., Mumbai, Registrars & Share Transfer Agents, produced before me for the purpose of issuing this Certificate as per Regulation 40(9) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the half year ended 30th September, 2019. Based on my such examination as well as information and explanation furnished to me, which to the best of my knowledge and belief were necessary for the purpose of my certification, I hereby certify that:

- a) the Company has delivered during the half year ended on 30th September, 2019 share certificate(s) relating to the transfer deeds lodged prior to 01st April, 2019 and re-lodged thereafter, during the period from 01st April, 2019 to 30th September, 2019, within thirty days as entered in the memorandum of transfers from the respective date of lodgement of each deed except those rejected on technical grounds.
- b) the Company has delivered during half year ended on 30th September, 2019 share certificate(s) in respect of requests relating to renewal, subdivision (split) and consolidation received during the period from 01st April, 2019 to 30th September, 2019, within thirty days from the respective date of lodgment except few instances of nominal delay and those rejected on technical grounds. As per the records made available to me there were no requests for exchange or endorsement of calls/allotment monies during the said period.

Place: Mumbai

Dated: 23rd October, 2019

P.K.B.NAMBIAR Company Secretary C.P No.1090

UDIN:F001296A000147728