

# MODI RUBBER LIMITED

4-7C, DDA SHOPPING CENTER, NEW FRIENDS COLONY, NEW DELHI-110 025, TEL: 011-47107398  
Website: www.modirubberlimited.com, CIN- L25199UP1971PLC003392 Email:skbajpai@modigroup.net

OUR REF:

DEPTT: Secretarial & Legal

DATED: 29.09.2021

<b>Bombay Stock Exchange Ltd.</b> Phiroze Jeejeebhoy Tower 1 <sup>st</sup> Floor, Dalal Street <b>Mumbai 400 001</b> Ph. 022-22722066, 22722375 Fax 022-22723354, 22723577, 22721278, 22723719	<b>National Stock exchange of India Ltd</b> Exchange Plaza Bandra Kurla Complex Bandra (E) Mumbai 400 051 Ph. 022-6598100-14 Fax 022-6598237-38 Email <a href="mailto:cm1ist@nse.co.in">cm1ist@nse.co.in</a>
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Dear Sir,

**Sub: Intimation under Regulation 30 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 -**

Pursuant to Regulation 30 of (SEBI Listing Regulations, 2015) read with SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019, we wish to inform that M/s. SURESH SURANA & ASSOCIATES LLP, Chartered Accountants Firm's Registration No. 121750 W / W-100010, Statutory Auditors of the Company have tendered their resignation vide their letters dated 29<sup>th</sup> September 2021 informing their inability to continue as the Statutory Auditors of the following subsidiary Companies:

- a); Spin Investment (India) Limited (Material wholly owned subsidiary)
- b) Superior Investment (India) Limited (wholly owned subsidiary)

The copy of the resignation letters dated 29<sup>th</sup> September, 2021 with Annexure as received from M/s. SURESH SURANA & ASSOCIATES LLP are attached herewith. Details with respect to resignation as required under Regulation 30 Read with Schedule III of the Listing Regulations, SEBI Circular CIR/CFD/CMD/4/2015 dated September 09, 2015 and CIR/CFD/CMD1/114/2019 dated October 18, 2019 are annexed herewith. You are requested to take the same on your record.

Kindly take above on your record and acknowledge the same.

Thanking you,  
Yours faithfully,  
For MODI RUBBER LIMITED

  
(S.K. Bajpai)  
Head - Legal & Co. Secretary, Membership No.10110  
Place: New Delhi



# Suresh Surana & Associates LLP

Chartered Accountants

Suresh Surana & Associates LLP

2nd Floor, Tower -B

B-37 Sector-1

Noida (NCR) - 201301, (U.P), India

T +91 (120) 626 5555

newdelhi@ss-associates.com www.ss-associates.com

LLP Identity No. AAB-7509

To

Date: 29 September 2021

The Board of Directors,  
**Spin Investment (India) Limited**  
4-7-C, DDA Shopping Centre,  
New Friends Colony, New Delhi-110025

Dear Sir,

**Sub: Resignation as Statutory Auditor with immediate effect**

As you were aware, we were appointed as the Statutory Auditors of **Spin Investment (India) Limited** ('the Company'). Refer to our ongoing discussions in connection with our continuation as statutory auditor of the Company and due to our preoccupation in other assignments, we are not in a position to continue to act as a statutory auditor of the Company, hence we hereby resign as the statutory auditor of the Company with immediate effect.

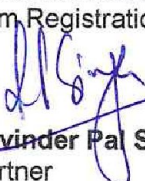
We enclose herewith Annexure-A as envisaged in SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

As per the requirement of the Companies Act, 2013, we shall be forwarding the copy of the ADT-3, as filled with ROC, in due course.

Please accept our resignation with immediate effect.

Yours faithfully,

For **Suresh Surana & Associates LLP**  
Chartered Accountants  
Firm Registration No. 1217503A/W-100010

  
**Ravinder Pal Singh**  
Partner  
Membership No. 090988



Head Office:

13th Floor, Bakhtawar, 229, Nanman Point  
Mumbai - 400 021, India, T +91 (22) 6121 4444  
emails@ss-associates.com

Offices at: Mumbai, Chennai, Kolkata, Bengaluru, Surat, Hyderabad, Ahmedabad, Pune, Gandhidham & Jaipur

**Annexure A**

**Format of information to be obtained from  
the statutory auditor upon resignation**

1. Name of the listed entity/ material subsidiary: **Spin Investment (India) Limited**
2. Details of the statutory auditor:
  - a. Name: **Suresh Surana & Associates, LLP**
  - b. Address: **2<sup>nd</sup> Floor, Tower-B, B-37, Sector-1, Noida 201301**
  - c. Phone number: **0120-626 5555**
  - d. Email: **newdelhi@ss-associates.com**
3. Details of association with the listed entity/ material subsidiary: **Material Subsidiary**
  - a. Date on which the statutory auditor was appointed: **05 February 2018**
  - b. Date on which the term of the statutory auditor was scheduled to expire: **Up to date of AGM for FY ending 31 March 2022**
  - c. Prior to resignation, the latest audit report/limited review report submitted by the auditor and date of its submission: **Limited Review Report for Quarter Ended 30 June 2021 submitted by the auditors on 13 August 2021.**
4. Detailed reasons for resignation: **Pre-occupation with other unlisted companies**
5. In case of any concerns, efforts made by the auditor prior to resignation (including approaching the Audit Committee/Board of Directors along with the date of communication made to the Audit Committee/Board of Directors): **NIL**
6. In case the information requested by the auditor was not provided, then following shall be disclosed: **Not Applicable**
  - a. *Whether the inability to obtain sufficient appropriate audit evidence was due to a management-imposed limitation or circumstances beyond the control of the management.*
  - b. *Whether the lack of information would have significant impact on the financial statements/results.*
  - c. *Whether the auditor has performed alternative procedures to obtain appropriate evidence for the purposes of audit/limited review as laid down in SA 705 (Revised)*



*d. Whether the lack of information was prevalent in the previous reported financial statements/results. If yes, on what basis the previous audit/limited review reports were issued.*

7. Any other facts relevant to the resignation: **NIL**

**Declaration**

*1. We hereby confirm that the information given in this letter and its attachments is correct and complete.*

*2. We hereby confirm that there is no other material reason other than those provided above for my resignation/ resignation of my firm.*



Signature of the authorized signatory

Date: 29 September 2021

Place: Noida (UP)



# Suresh Surana & Associates LLP

Chartered Accountants

Suresh Surana & Associates LLP

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B-37 Sector-1

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LLP Identity No. AAB-7509

To

Date: 29 September 2021

The Board of Directors,  
**Superior Investment (India) Limited**  
4-7-C, DDA Shopping Centre,  
New Friends Colony, New Delhi-110025

Dear Sir,

**Sub: Resignation as Statutory Auditor with immediate effect**

As you were aware, we were appointed as the Statutory Auditors of **Superior Investment (India) Limited** ('the Company'). Refer to our ongoing discussions in connection with our continuation as statutory auditor of the Company and due to our preoccupation in other assignments, we are not in a position to continue to act as a statutory auditor of the Company, hence we hereby resign as the statutory auditor of the Company with immediate effect.

As per the requirement of the Companies Act, 2013, we shall be forwarding the copy of the ADT-3, as filled with ROC, in due course.

Please accept our resignation with immediate effect.

Yours faithfully,

For **Suresh Surana & Associates LLP**  
Chartered Accountants  
Firm Registration No. 121750 W / W-100010



**Ravinder Pal Singh**  
Partner  
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