



24<sup>th</sup> October, 2019

To,  
The Manager  
Department of Corporate Services (DCS)  
The BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai- 400 001.

**Scrip Code: 509546**

Dear Sir/Madam,

**Sub: Compliance Certificate as per Regulation 40(10) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

With reference to the above, please find enclosed the Compliance Certificate under Regulation 40(10) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 issued by VKMG & Associates LLP, Company Secretaries, Mumbai, for the half year ended 30<sup>th</sup> September, 2019.

Kindly take the same on your record.

Thanking you.

Yours truly,  
For **Graviss Hospitality Limited**

*K. Bharucha*

**Kainaaz Bharucha**  
Company Secretary

Encl.: As above

To,  
The Board of Directors,  
**Graviss Hospitality Limited**  
Dairy Tops, Plot No. J-177, MIDC,  
Bhosari, Pune - 411026

**CERTIFICATE UNDER CLAUSE 40(9) OF THE SEBI (LISTING OBLIGATIONS AND  
DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

**FOR THE HALF YEAR ENDED 30<sup>th</sup> September, 2019**

We have examined the relevant books and records of **Graviss Hospitality Limited** at their R & T Agent **Link Intime India Private Limited**, pertaining to transfer of equity shares of the Company for the period from **1<sup>st</sup> April, 2019 to 30<sup>th</sup> September, 2019** for the purpose of issuing a Certificate as per regulation 40(9) of the SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015 entered into by the Company with National Stock Exchange of India Limited and BSE Limited and based on the information provided by the Company and RTA, I hereby certify that the Company has delivered in respect of the half year ended **30<sup>th</sup> September, 2019**:

- a) The Company has delivered Share Certificates relating to the transfers of Shares, received during the period from **1<sup>st</sup> April, 2019 to 30<sup>th</sup> September, 2019**, as entered in the Memorandum of Transfers within fifteen days of the date of lodgment for transfers, however in one case request has been objected within 39 days, wherein after enquiry the RTA has given the reason of delay that due to the recent Circulars by SEBI, regarding discontinuation of transfer of securities in physical mode and registration of KYC details of physical shareholders, RTA has sent multiple reminders to physical shareholders to update their KYC details and in anticipations of these reminders, the overall volume of shareholders requests has increased in manifolds as compared to the normal overall volumes This in turn has led to delay in attending the documents and processing the certificates.
- b) The Company has neither issued any debenture nor carried out any activity such as sub-division, consolidation, renewal, exchange or endorsement of calls/ allotment monies, during the period under consideration, hence information in this regards could not commented.

For VKMG & Associates LLP  
Company Secretaries  
FRN: L2019MH005300



Manish Gupta  
Partner  
ACS-43802, CP-16067



Place : Mumbai  
Date : 24-10-2019  
UDIN: A043802A000157333