



Creating value. Sharing value.

October 30, 2019

BSE Ltd., Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai 400 001 Scrip Code: 532504

National Stock Exchange of India Ltd.,

Exchange Plaza, Bandra Kurla Complex, Bandra (E), Mumbai 400 051

Scrip Code: NAVINFLUOR EQ

Dear Sir/Madam,

<u>Sub.: Submission of certificate under Regulation 40(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015</u>

We enclose herewith the certificate under Regulation 40(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 issued by M/s. Makarand M. Joshi & Co., Company Secretaries, certifying the compliance for the half year ended September 30, 2019.

Kindly take the same on your records.

Thanking you,

Yours faithfully,
For Navin Fluorine International Limited,

Niraj B. Mankad President Legal and Company Secretary

Encl.: a/a

MAKARAND M. JOSHI & CO.

Company Secretaries Ecstasy, 803/804, 9th Floor, City of Joy, J.S.D Road, Mulund (West), Mumbai- 400080, (T) 022-21678100

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

FOR THE HALF YEAR ENDED 30TH SEPTEMBER, 2019

We have examined Memorandum of Transfers, Registers, files and other documents relating to Navin Fluorine International Limited (the "Company") having its Registered Office at 2nd Floor, Suntech Centre, 37-40 Subhash Road, Vile Parle (East), Mumbai-400057, maintained by Karvy Fintech Private Limited, Registrars and Transfer Agents (RTA), for the purpose of issuing certificate under Regulation 40(9) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, and based on information provided and explanation given to us by the Company and RTA, we hereby certify that for the half year ended on September 2019:

- A) Share Certificates relating to the valid Share Transfer forms relodged during the period from 1st April, 2019 to 30th September, 2019 as entered in the Memorandum of Transfers have been issued within one month from the respective date of lodgment of each form except those rejected on technical grounds.
- B) All requests in respect of transmission, split and duplicate share certificate were issued within one month from the date of lodgment except for cases that were kept on hold due to technical grounds or incomplete applications, and cases that are hereinafter mentioned. Share Certificates in respect of requests for 4 (four) transmissions, and 2 (two) duplicate share certificates have not been issued within the stipulated time limit specified under the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015. As explained to us by the RTA, the delays were due to voluminous transactions. Further there was no, sub-division, transposition, consolidation, renewal, exchange or endorsement of calls/allotment monies.

Place: Mumbai Date: 30-10-2019

For Makarand M. Joshi & Co. **Practicing Company Secretaries**

MUMBA

Makarand Idshi Partnet

CP No: 3662

UDIN-F005533A000185966