



Date: 26th May, 2026

To,
The Manager
Listing Department
National Stock Exchange of India Limited

Symbol: SUBAHOTELS
Series: EQ

Sub: Submission of SDD Compliance Certificate for the Financial Year ended 31st March, 2026

Dear Sir/Madam,

Pursuant to provisions of Regulation 3(5), 3(6) and other applicable provisions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, read with NSE Circular NSE/CML/31, dated 18th October, 2024 issued by the Exchange, the listed entities to whom the provisions of Regulation 24A of SEBI (LODR) Regulations, 2015 are not applicable, are required to confirm compliance status of SDD by submitting SDD Compliance Certificate in the prescribed format, certified by a Practicing Company Secretary within 60 days from the end of the Financial Year.

Further, we hereby enclose the Compliance Certificate with respect to Structural Digital Database maintained by the Company as per the aforesaid Regulations for the Financial Year ended 31st March, 2026.

Kindly take the same on your records.

Thanking You,
For Suba Hotels Limited

Sonam Aggarwal
Company Secretary
Email: compliance@subahotels.com
Tel: 022-24825101



Registered Office : Judges Bungalow Road, Near Akash Tower, Bodakdev, Opp. Premchand Nagar, Ahmedabad - 380 015.
T: +91 79 66 04 9777 / W: www.subahotels.com **CIN No. :** U99999GJ1997PLC120713

Correspondence Office : B2-1004, Marathon Nextgen Innova, Off Ganpat Rao Kadam Marg, Lower Parel, Mumbai - 400 013, Maharashtra, India.
T: +91 22 66820707 / W: www.subahotels.com



HRU & ASSOCIATES

Company Secretaries

Hemanshu R. Upadhyay B. Com., A.C.S.

Mobile(s): 7304995743/8104259060

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OFFICE: F-15, Sai Krupa Mall, Opp
Dahisar Railway Station west,
Mumbai -400068.

COMPLIANCE CERTIFICATE FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026

(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Hemanshu Upadhyay, Practicing Company Secretary appointed by Suba Hotels Limited am aware of the compliance requirement of Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) and I certify that:

1. the Company has a Structured Digital Database in place
2. control exists as to who can access the SDD
3. all the UPSI disseminated in the financial year have been captured in the Database
4. the system has captured nature of UPSI along with date and time
5. the database has been maintained internally and an audit trail is maintained
6. the database is non-tamperable and has the capability to maintain the records for 8 years.

I also confirm that the Company was required to capture 2 (Two) number of events during the Financial Year ended 31st March, 2026 and has captured 2 (Two) number of the said required events.

**For HRU & Associates
Practicing Company Secretaries**

HEMANSHU
ROHIT
UPADHYAY
Digitally signed by
HEMANSHU ROHIT
UPADHYAY
Date: 2026.05.26
17:09:06 +05'30'

Hemanshu Upadhyay

Proprietor

Membership No.: A46800

COP No.: 20259

Peer Review No.: 3883/2023

UDIN: A046800H000490914

Date: 26th May, 2026

Place: Mumbai