+91 80 6659 8700
+91 80 6696 3333
info@subex.com
www.subex.com

November 02, 2020

To
BSE Limited
The National Stock Exchange of India Limited

Dear Sir/Madam,

Sub: Subex Limited "The Company"- Intimation pursuant to Regulation 31A of the SEBI (LODR) Regulations, 2015

This is to inform you that the Company has received request letters cum undertakings from the Promoter/Promoter Group of the Company on November 02, 2020 for reclassifying them from the category of 'Promoter/Promoter Group' to 'Public' under Regulation 31A of the SEBI (LODR) Regulations, 2015.

Sl. No.	Names of the Promoter/Promoter Group	No. of shares held	Reclassification requested to
1.	Mr. Subash Menon-Promoter	NIL	Public
2.	Mr. Sudeesh Yezhuvath- Promoter Group		
3.	Kivar Holdings Private Limited- Promoter Group		

We request you to take the same on record.

Thanking you.

Yours truly,
For Subex Limited

G V Krishnakanth
Company Secretary & Compliance Officer

SUBASH MENON

86/1, Nandidurga Road,
Benson Town,
Bangalore - 560 046, India
Tel : +91 80 2333 6922
E-mail : subash.menon@kivar.com

Date: November 02, 2020

The Board of Directors
Subex Limited
RMZ Eco world
Outer Ring Road, Devarabisanahalli,
BANGALORE – 560 103

Subject: Application Letter for reclassification under Regulation 31A of Securities and Exchange Board of India (Listing Obligations and disclosure Requirements) Regulations 2015, "SEBI (LODR) Regulations, 2015", from Promoter category to Public Category of Subex Limited ("Company").

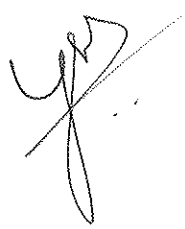
With reference to the abovementioned subject, I, Subash Menon have been disclosed as a member of the "Promoter & Promoter Group" category of the Company. I am not connected directly or indirectly with any activity of the Company nor do I have any direct or indirect control, over the affairs of the Company. Further, I am not holding any shares in the Company as on date. Hence, I request you to reclassify my status from "Promoter & Promoter Group" category to "Public" category of the Company.

In connection with the application for reclassification, I hereby undertake as follows:

1. I, along with persons acting in concert or persons related to me, together do not hold more than ten percent of the total voting rights in the Company.
2. I do not exercise control over the affairs of the Company, directly or indirectly.
3. I do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements.
4. I am not represented on the board of directors (including not having a nominee director) of the Company.
5. I do not act as key managerial person of the Company.
6. I am not a'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
7. I am not a fugitive economic offender.

2. There is no pending regulatory action against me.

3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015**at all times from the date of re-classification, failing which, I shall be automatically reclassified as promoter/person belonging to the promoter group of the Company.



4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015** for a period of not less than three years from the date of reclassification, failing which, I shall be automatically reclassified as promoter/person belonging to promoter group of the Company.

Thanking you,

Yours faithfully,

SUBASH MENON

701, Prestige Clarkeville
No.9, Clarke Road
Richards Town
Sudeesh Yezhuvath Bangalore – 560 084

Date: 2 November 2020

The Board of Directors
Subex Limited
RMZ Eco world
Outer Ring Road, Devarabisanahalli,
Bangalore – 560 103

Subject: Application Letter for reclassification under Regulation 31A of Securities and Exchange Board of India (Listing Obligations and disclosure Requirements) Regulations 2015, "SEBI (LODR) Regulations, 2015", from Promoter category to Public Category of Subex Limited ("Company").

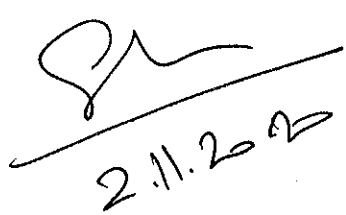
With reference to the abovementioned subject, I, Sudeesh Yezhuvath have been disclosed as a member of the "Promoter & Promoter Group" category of the Company. I am not connected directly or indirectly with any activity of the Company nor do I have any direct or indirect control, over the affairs of the Company. Further, I am not holding any shares in the Company as on date. Hence, I request you to reclassify my status from "Promoter & Promoter Group" category to "Public" category of the Company.

In connection with the application for reclassification, I hereby undertake as follows:

1. I, along with persons acting in concert or persons related to me, together do not hold more than ten percent of the total voting rights in the Company.
2. I do not exercise control over the affairs of the Company, directly or indirectly.
3. I do not have any special rights with respect to the Company through formal or informal arrangements including through any shareholder agreements.
4. I am not represented on the board of directors (including not having a nominee director) of the Company.
5. I do not act as key managerial person of the Company.
6. I am not a 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
7. I am not a fugitive economic offender.

2. There is no pending regulatory action against me.

3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015,** at all times from the date of re-classification, failing which, I shall automatically be reclassified as promoter/person belonging to the promoter group of the Company.

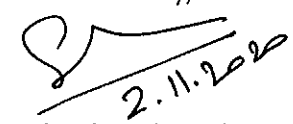


701, Prestige Clarkeville
No.9, Clarke Road
Richards Town
Bangalore – 560 084

Sudeesh Yezhuvath

4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015,** for a period of not less than three years from the date of reclassification, failing which, I shall automatically be reclassified as promoter/person belonging to promoter group of the Company.

Thanking you
Yours faithfully,



Sudeesh Yezhuvath
701, Prestige Clarkville Apts.
9, Clark Road, Richards Town
Bangalore - 560 084

Kivar Holdings Pvt. Ltd.
CIN: U65993KA1996PTC019826
Regd. Office: 18C, 1st B Main
Sector 6, IAS Officer's Colony
HSR Layout
Bangalore - 560 102, India

Date: November 02, 2020

The Board of Directors
Subex Limited
RMZ Eco world
Outer Ring Road
Devarabisanahalli
BANGALORE – 560 103

Subject: Application Letter for reclassification under Regulation 31A of Securities and Exchange Board of India (Listing Obligations and disclosure Requirements) Regulations 2015, "SEBI (LODR) Regulations, 2015" from Promoter category to Public Category of Subex Limited ("Company").

With reference to the abovementioned subject, we, Kivar Holding Private Limited ("Kivar" or "we") having our registered office at 18C, 1st B Main, Sector 6, IAS Officer's Colony, HSR Layout, Bangalore - 560 102, have been disclosed as a member of the "Promoter & Promoter Group" category of the Company. We are not connected directly or indirectly with any activity of the Company nor do we have any direct or indirect control, over the affairs of the Company. Further, we are not holding any shares in the Company as on date. Hence, we request you to reclassify our status from "Promoter & Promoter Group" category to "Public" category of the Company.

In connection with application for reclassification, We hereby undertake as follows:

1. We, along with persons acting in concert or persons related to us, together do not hold more than ten percent of the total voting rights in the Company.
2. We do not exercise control over the affairs of the Company, directly or indirectly.
3. We do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
4. We are not represented on the board of directors (including not having a nominee director) of the Company.
5. We have not nominated any person / do not have any representatives acting as key managerial person of the Company.
6. We are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
7. We are not fugitive economic offenders.

2. There is no pending regulatory action against us.

3. We shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015,** at all times from the date of re-classification, failing which, we shall be automatically reclassified as promoter/person belonging to the promoter group of the Company.

KIVAR HOLDINGS PVT. LTD. BANGALORE

Kivar Holdings Pvt. Ltd.
CIN: U65993KA1996PTC019826
Regd. Office: 18C, 1st B Main
Sector 6, IAS Officer's Colony
HSR Layout
Bangalore - 560 102, India

4. We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of the **SEBI (LODR) Regulations, 2015** for a period of not less than three years from the date of reclassification, failing which, We shall be automatically reclassified as promoter/person belonging to promoter group of the Company.

Thanking you,

for **KIVAR HOLDINGS PRIVATE LIMITED**

Name: Manoj C V
Designation : Director

KIVAR HOLDINGS PVT. LTD. BANGALORE

Encl: Board Resolution authorizing the Director to submit the application for re-classification.