

## SANJAY DUBEY

2/1902, Victor Regency Heights, NR Brahmam, Azad Nagar Circle, Kolshet, Thane, Maharashtra 400607

Date: 12/06/2025

To

**The Board of Directors**

**Clear Secured Services Limited**

14B/4, Ground Floor, Plot -14A/14B, New Sion CHS,  
Swami Vallanbhdas Marg, Road No 24,  
Sindhi Colony, Sion, Mumbai - 400022

**Horizon Management Private Limited**

19 R N Mukherjee Road,  
Main Building, 2<sup>nd</sup> Floor,  
Kolkata- 700 001,  
West Bengal, India

(Horizon Management Private Limited referred to as the "Book Running Lead Manager")

Dear Sir,

**Sub: Proposed initial public offering of equity shares of face value Rs. 10 each ("Equity Shares") by Clear Secured Services Limited ("Company") (referred to as the "Issue").**

I, Sanjay Dubey, hereby give my consent to my name being included as a Promoter of the Company in the Draft Red Herring Prospectus, the Red Herring Prospectus and the Prospectus ("Offer Documents") that the Company intends to file with the SME Platform of National Stock Exchange of India Limited where the Equity Shares are proposed to be listed ("Stock Exchange") and with the Registrar of Companies, Mumbai, Maharashtra ("RoC") or any other authority as may be applicable.

I hereby confirm and certify that:

1. I have no interest in the Company except to the reimbursement of expenses and to the extent of any Equity Shares of the Company held by me or my relatives and associates or held by the companies, firms and trusts in which I am interested as director, member, partner, and/or trustee, and to the extent of benefits arising out of such shareholding;
2. Following is my shareholding in the Company:  
*No. of equity shares: 43,90,528*  
*% of shareholding: 25%*
3. I am not interested in the appointment of underwriters, registrar and bankers to the proposed initial public offering of Equity Shares of the Company or any such intermediary registered with Securities and Exchange Board of India;
4. I am not interested in any loan or advance given by the Company to any Person(s)/ Company (ies) nor am I a beneficiary of any loan or advance;
5. Neither I nor any firm/company with whom I am associated as a promoter/partner/director has entered into any contract, agreement or arrangement with the Company;
6. I have not entered into any service contracts with the Company providing for benefits upon termination of my employment;
7. I am not interested in any property acquired by the Company within the last three years or proposed to be acquired by the Company *Nil*

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8. The Company has not purchased any property in which I had or have a direct or indirect interest or in respect of any payment thereof, except the following: *Nil*
9. I have not been paid any amount of compensation by the Company pursuant to any bonus or profit-sharing plan;
10. Except as disclosed below no amount or benefit has been paid or given to me within the two years preceding the date of filing draft offer document or intended to be paid or given to me;
- a. Equity Shares / ~~convertible securities / stock options~~ held by me in the Company and the shareholding (more than 20 percent) of the companies, firms and trusts in which I am interested as director, member, partner and/or trustee, and to the extent of benefits arising out of such shareholding, details of which are disclosed below:

Name of Company	Shareholding (in %)
Clear Secured Services Limited	25
Cleartech Cement Pvt Ltd	33.33
Vimal Dubey Foundation	20

- b. remuneration payable to me / normal fees payable to me for attending meetings of the board of directors or any committee thereof, if any and normal reimbursement of any traveling and other incidental expenses: *Nil*
- c. loans and advances given by the Company to me and to the companies, firms and trusts in which I am interested as director, member, partner and/or trustee, details of which are disclosed below: *Nil*
- d. as sundry debtors of the Company, to me and to the companies, firms and trusts in which I am interested as director, member, partner and/or trustee, details of which are disclosed below;
- Nil*
- e. being lender of any secured or unsecured loans to the Company.
- Nil*

11. I have not entered into any buy-back and/or standby arrangements for purchase of Equity Shares of with any person;
12. I or any of my relatives, have not entered into any financial arrangement to finance the purchase by any other person of securities of the Company other than in the normal course of business of the financing entity during the period of six months immediately preceding the date of filing Draft Red Herring Prospectus with the Stock Exchange, except:-

Name of entity	Transferor	Transferee	Date	Number of Securities	Price per Security
NIL					

13. I am not associated as promoter / director / partner / proprietor of any firm that is/ was associated with securities related business and registered with SEBI, ~~except as mentioned below~~, and there has been no action initiated by SEBI against me or any of the entities,
14. The entities of which, I am/was a promoter/director/person in control (as defined in the SEBI (Issue of Capital and Disclosure Requirement) Regulations, 2018 as amended, are not debarred from accessing the capital market under any order or directions made by the SEBI;
15. I have not been prohibited by SEBI from accessing the capital market and no penalty has been imposed by SEBI or any other regulatory authority in India or abroad against me or any other company/firm with whom I am associated as a promoter/partner/director;



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16. Neither my name nor the name of the entity(ies) where I am associated, as Director/Promoter/Proprietor/Partner has appeared in the past and is presently not appearing in the RBI Defaulters List ([www.cibil.com](http://www.cibil.com); [www.watchoutinvestors.com](http://www.watchoutinvestors.com)). I shall immediately intimate the Company and the Book Running Lead Manager / legal advisor in case of any changes/developments/amendments with regard to above, till the date when the Equity Shares from the proposed Issue of the Company, start trading on the Stock Exchange where the Equity Shares of the Company are proposed to be listed;
17. I have not been declared as a fugitive economic offender under the Fugitive Economic Offenders Act, 2018. I shall immediately intimate the Company and the Book Running Lead Manager / legal advisor in case of any changes/developments/amendments with regard to above, till the date when the Equity Shares from the proposed Issue of the Company, start trading on the Stock Exchange where the Equity Shares of the Company are proposed to be listed;
18. I am in compliance with the Companies (Significant Beneficial Ownership) Rules, 2018, as amended and the details of the companies in which I hold significant beneficial ownership along with the details of my shareholding are as follows: *Nil*
19. There are no pending litigations in which I am involved or defaults to the financial institutions/banks, non-payment of statutory dues and dues towards instrument holder like debenture holder, fixed deposits, and arrears on cumulative preference share by me or the companies/ firms/any other entity promoted by me.
20. There are no cases of pending litigations, defaults etc. And no lenders have taken action in respect of companies/ firms/ ventures with which I was associated in the past; in which my name continues to be associated with any particular litigation.
21. I have neither been, nor currently am, on the board of directors of any company that was, or has been directed by any Registrar of Companies to be struck off from the rolls of such Registrar of Companies under Section 248 of the Companies Act. Further, I have not been identified as a director who has been disqualified to act as a director in terms of Section 164(2)(a) of the Companies Act ("**Disqualified Director**") and neither am I a proclaimed offender under Section 82 of the Code of Criminal Procedure, 1973, as amended ("**Proclaimed Offender**"), and my name does not feature in the lists of Disqualified Directors or the lists of Proclaimed Offenders released by various Registrars of Companies and the Ministry of Corporate Affairs ("**MCA**") and currently disclosed on the website of the MCA;
22. I confirm that I have not been declared as a fraudulent borrower by the lending banks or financial institutions or consortium, in terms of the Reserve Bank of India (Frauds classification and reporting by commercial banks and select FIs) Directions, 2016, as amended, issued by the RBI by way of its circular dated July 1, 2016; and
23. Except as disclosed below, there are no recovery proceedings initiated by the SEBI, order for disgorgement or monetary penalty issued by SEBI, non-compliance of any direction issued by the SEBI, or proceedings which have been remanded by the Securities Appellate Tribunal or court, probable cause for investigation, enquiry, adjudication, prosecution or other regulatory action that has been found against me by any authority, as referred to under the SEBI (Issuing Observations on Draft Offer Documents Pending Regulatory Actions) Order 2020 and no show cause notice has been issued to us, which is pending determination by any such authority, involving me: Nil
24. There is no litigation against me involving violation of statutory regulation or criminal offences and no penalty has been imposed against me by Securities and Exchange Board of India ("**SEBI**") or any regulatory authority in India/abroad. I have not violated the provisions of the Companies Act, 2013 and Companies Act, 1956 and have not been suspended by SEBI nor has any disciplinary action been taken by SEBI.
25. There are no pending proceedings initiated for economic offences against me and in my capacity as a director, promoter of the companies/ firms promoted by me and there are no past cases in this regard in which the penalties were imposed by any authority.

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26. There are no adverse findings against me or entities connected with me, as regards compliance with securities law.
27. Except as disclosed below, I am not related to any other Promoter, Director or Key Managerial Personnel or Senior Management of the Company:

Name	Relationship
Mr. Vimal Dhar Laltaprasad Dubey	Brother
Mr. Rakesh Dhar Dubey	Brother
Mrs. Kusum Vimal Dubey	Brother's Spouse

28. In addition to the Company, I am interested as a Director/ Officer in the following companies:

Name Of Company	Position
Cleartech Cement Private Limited	Director
Vimal Dubey Foundation	Director

29. I was not associated with any public or rights issue;
30. I have not disassociated myself from any Company or venture in the last three years;
31. There is no company, partnership firm, HUF, sole proprietorship or other business entities or ventures in which I am interested and which is in the same line of business as the Company and there is no potential conflict of interest with the Company save and except the following: Nil
32. I will not receive any portion of the proceeds from the proposed initial public offer of the Company;
33. Apart from the following individuals and companies there are no other entities/individuals comprising Promoter Group:

(a) *Individuals forming part of promoter group:*

Name of the member	Relationship
Late Laltaprasad Dubey	Father
Late Barfi Devi Laltaprasad Dubey	Mother
Suman Dubey	Spouse
Rakesh Dhar Dubey	Brother (s)
Vimal Dhar Dubey	Brother (s)
Mithilesh Mishra	Sister (s)
Asha Devi	Sister (s)
Sarvesh Sanjay Dubey	Son (s)
Rithik Dubey	Son (s)
Ritika Dubey	Daughter
Dataram	Spouse Father
Late Bediya Devi	Spouse Mother
Poonam Mishra	Spouse Sister
Sonam Pandey	Spouse Sister
Priyanka	Spouse Sister

(b) *Companies, partnerships and HUFs forming part of the Promoter Group:*

Name of the entity / company	% of shareholding
Barfi Steel LLP	10
Cleartech Cement Pvt Ltd	33.33
Vimal Dubey Foundation	20



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34. None of the Equity Shares held by us have been pledged to any person, including banks and financial institutions;

35. The share capital build-up of Equity Shares held by me in the Company is as under:

Date of Allotment / acquisition	Nature of transaction	Number of Equity Shares	Face value per Equity Share (in ₹)	Issue / transfer price per Equity Share (in ₹)	Nature of consideration (cash / other than cash)	Cumulative number of Equity Shares	% of pre issue capital	% of post issue capital	Source of funds
October 14, 2008	Subscriber to MOA	3,000	10	10	Cash	3,000	0.02	-	Owned Fund
19/10/2011	Allotment	59,500	10	10	Cash	62,500	0.34	-	Owned Fund
22/04/2025	Swap of Shares	6,102	10	8,292	Other than Cash	68,602	0.03	-	Nil
30/05/2025	Bonus Issue	43,21,926	10	NA	Other than Cash	43,90,528	24.61	-	Nil

36. The average cost of acquisition per Equity Share of the Company by me is as under -

Sr. No.	Name of Promoter	Number of Equity Shares held	Average cost of acquisition
1.	Sanjay Dubey	43,90,528	11.67

37. I further confirm that all the Equity Shares held by me are and will be in a dematerialised form prior to filing the Draft Red Herring Prospectus with Stock Exchange.

I confirm that I will immediately inform the Book Running Lead Manager appointed in respect of the Issue, of any changes to the above information until the date when the Equity Shares offered in this Issue receive final listing and trading approval from the Stock Exchange and commence trading on the Stock Exchange. In the absence of any such communication from us, the above information should be taken as updated information until the commencement of listing and trading on the Stock Exchange.

I hereby authorize you to deliver this certificate to the SEBI, Stock Exchange, RoC and other statutory, regulatory or governmental authority, as may be required. This certificate may be relied on by the Book Running Lead Manager and the legal advisor in relation to the Issue in conducting and documenting their investigation of the affairs of the Company in connection with the Issue and for the purpose of any defence the Book Running Lead Manager may wish to advance in any claim or proceeding in connection with the Issue.

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I also consent to the extracts of this certificate being used for disclosure in the Offer Documents to be issued by the Company in relation to the Issue and other Issue related materials. This certificate may be produced in any actual or potential proceeding or actual or potential dispute relating to or connected with the Issue or otherwise in connection with the Issue.

**Yours faithfully,**



*Sanjay Dubey*

**Promoter**

Cc to:

**Legal counsel to the Issue**

**MV KINI Law Firm**

Kini House, Near Citibank,

D.N. Road, Fort, Mumbai - 400001,

Maharashtra, India