



# HSPN & ASSOCIATES, LLP

## COMPANY SECRETARIES

LLPIN: AAZ-8456 | Unique Code: L2021MHE011400  
(Formerly known as HS ASSOCIATES  
Unique Code: P2007MH004300)

**HEMANT S. SHETYE** (Designated Partner)  
B.COM., LLB(Gen.), FCS  
Insolvency Professional

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Web.: www.hspnassociates.in

### **COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30<sup>TH</sup> SEPTEMBER 2023**

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

I, Hemant Shetye (FCS: 2827 and COP: 1483), Practising Company Secretary appointed by **SHEETAL DIAMONDS LIMITED** is 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 as on date.
2. control exists as to who can access the SDD as on date.
3. all the UPSI disseminated in the previous quarter ended 30<sup>th</sup> September 2023 have been captured in the Database as on date.
4. the system has captured nature of UPSI along with date and time as on date.
5. the database has been maintained internally and an audit trail is maintained as on date.
6. the database is non-tamperable and has the capability to maintain the records for 8 years as on date.

I also confirm that the Company was required to capture 3(three) number of events during the quarter ended and has captured 3(three) number of the said required events as on date.

I would like to report that the following non-compliance(s) was observed in the previous quarter ended 30<sup>th</sup> September 2023 and the remedial action(s) taken along with timelines in this regard:

The Company has updated data for the quarter ended 30<sup>th</sup> September 2023, as on the date of this Certificate.

**FOR HSPN & ASSOCIATES LLP**

**Hemant Shetye**  
**Practising Company Secretary**  
**FCS: 2827**  
**COP: 1483**  
**UDIN: F002827E001741542**

**Date: 08/11/2023**  
**Place: Mumbai**

