

**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022**  
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Mrs. Devika Priyadarsini, Company Secretary and Compliance Officer of the company, have examined the following compliance requirement of Embassy Property Developments Private Limited (Company) and certify that the Company has maintained a 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):

Sr. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	<b><u>Yes</u></b>	Currently data is maintained in excel form which is password protected.
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	<b><u>Yes</u></b>	
3.	Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?	<b><u>Yes</u></b>	
4.	Whether the recipient were upfront informed that the information which they will be receiving shortly is UPSI and the entry has been captured in the Database prior to forwarding the UPSI data. If not details of events that have not been captured and the reason for the same?	<b><u>Yes</u></b>	
5.	Whether nature of UPSI have been captured alongwith date and time?	<b><u>Yes</u></b>	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	<b><u>Yes</u></b>	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	<b><u>Yes</u></b>	
8.	Whether the database has been maintained internally?	<b><u>Yes</u></b>	
9.	Whether audit trail is maintained?	<b><u>Yes</u></b>	
10.	Whether time stamping is maintained?	<b><u>Yes</u></b>	
11.	Whether the database is non-tamperable?	<b><u>Yes</u></b>	
12.	Any other measures to ensure non-tamperability of the Database?		Currently data is maintained in excel

**Embassy Property Developments Pvt. Ltd.**

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			form which is password protected. It is proposed to procure a suitable software which will contain features of system enabled audit trail, time stamping and non temperability in due course of time for this purpose
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**Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.**

The number of days for which non-compliance was observed: NIL

Further I also confirm that the Company was required to capture 7(Seven) number of events during the quarter/half year ended and has captured the said required events.

**For Embassy Property Developments Private Limited**

**DEVIKA PRIYADARSINI  
COMPANY SECRETARY  
ACS: 49485**

**Date: 17.10.2022  
Place: Bangalore**

**Note:** The attached certificate should cover events which have been disclosed by the listed entity to the stock exchange so that the secretarial auditor will not be exposed to UPSI.