



JANKI & ASSOCIATES

Practising Company Secretary

Janki K. Brahmbhatt

B.Com., CS

M. 7383156050, 9408252186

E-mail: csjbrahmbhatt@gmail.com

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31st March, 2025

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

I, Janki Brahmbhatt, Practising Company Secretary (as decided by the ACCORD SYNERGY LIMITED having CIN: L45200GJ2014PLC079847) 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

Sr. No.	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	Yes	Not Applicable
2.	Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person?	Yes	
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?	Yes	
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?	Yes	
5.	Whether nature of UPSI have been captured along with date and time?	Yes	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	
8.	Whether the database has been maintained internally?	Yes	
9.	Whether audit trail is maintained?	Yes	
10.	Whether time stamping is maintained?	Yes	
11.	Whether the database is non-tamperable?	Yes	
12.	Any other measures to ensure non tamperability of the Database?	No	





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I also confirm that the Company was required to capture 4 (Four) number of events during the half year ended 31st March, 2025 and has captured 4 (four) number of the said required events.

I would like to report that the following noncompliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: Not Applicable

For Janki & Associates

Practicing Company Secretary

CS Janki Brahmbhatt

Proprietor

Membership No: 49469

CPN: 17960

PRC No. 2655/2022

UDIN: A049469G000675567

Date: June 28, 2025

Place: Vadodara