

Janki K. Brahmbhatt

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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30th September, 2024

(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

- 1. the Company has a Structured Digital Database in place
- 2. control exists as to who can access the SDD
- 3. all the UPSI disseminated in the previous quarter have been captured in the Database
- 4. the system has captured nature of UPSI along with date and time
- 5. the database has been maintained internally and an audit trail is maintained
- 6. the database is non-tamper able and has the capability to maintain the records for 8 years.

I also confirm that the Company was required to capture nil number of events during the quarter ended and has captured nil 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

Brehmbhatt

CS JankiBrahmbhatt

Proprietor

Membership No: 49469

CPN: 17960

PRC No. 2655/2022

UDIN: A049469F001674059 Vadodara; October 21, 2024