

July 21, 2025

To,
National Stock Exchange Limited,
Listing Department,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E) Mumbai 4000 51
NSE Symbol - EFFWA,

Sub: SDD Compliance Certificate for the Quarter ended June 30, 2025.

Dear Sir/Madam,

Pursuant to provisions of Regulation 3(5), 3(6) and other applicable provisions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, please find enclosed the Structured Digital Database (SDD) Compliance Certificate for the Quarter ended June 30, 2025.

This is for your information and record.

For EFFWA INFRA & RESEARCH LIMITED

Varsha
Subhash
Kamal

Digitally signed by
Varsha Subhash Kamal
Date: 2025.07.21
18:03:47 +05'30'

VARSHA S. KAMAL
MANAGING DIRECTOR
DIN: 00270314

Encl: as above



**STRUCTURED DIGITAL DATABASE (SDD) COMPLIANCE CERTIFICATE FOR THE
QUARTER ENDED JUNE 30, 2025**

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

I, Yogesh Dinanath Dabholkar, Practicing Company Secretary appointed by Effwa Infra & Research Limited (the company) 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 or financial year 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-tamperable and has the capability to maintain the records for 8 years.

Based on the information provided to me, I confirm that the Company was required to capture 04 (Four) number of events during the quarter ended June 30, 2025 and has only captured 01 (One) number of the said required event with delay after the said UPSI was publicly available.

I would like to report that the following non compliance (s) was observed in the previous quarter (March 31, 2025) and the remedial action(s) taken along with timelines in this regard:

There were 3 (three) event (s) which was required to be captured in SDD database during the quarter ended March 31, 2025 however the company has not taken any remedial action for the same till date.

NSE has advised the company to create all back dated entries in SDD software and for future entries the same should be created on real time basis. The Company has started recording backdated entries but the same has not been completed till date.

For **YOGESH D. DABHOLKAR & CO.,**
Practicing Company Secretary

Yogesh D. Dabholkar
Proprietor
Membership No. 6336
COP: 6752.
UDIN: F006336G000829061
Date: 21/07/2025.
Place: Dombivli



Disclaimer

- 1) This certificate is exclusively issued upon the request made by the Company and is issued solely based on the information and documents provided. It is grounded entirely on factual data, interpretation, and implication of Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), and is subject to my professional opinion.
- 2) The obligation lies with the Management/Company to enforce the stipulations outlined in Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations). This includes the maintenance of records and the establishment of appropriate systems to guarantee adherence to said provisions. Furthermore, it is incumbent upon the Management/Company to ensure that such systems are sufficient and function efficiently in accordance with the Regulations and any subsequent amendments issued periodically.

