



Grand Foundry Ltd.

CIN NO.: L99999MH1974PLC017655

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 2022

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

I, Parul Gupta, Compliance Officer, have examined the following compliance requirement of Grand Foundry Limited (Company) and certify that the Company has not 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?	No	<p>The Company has not maintained the Structured Digital Database since its applicability. Considering the small size of the Company, huge losses, it was decided to maintain data manually in the Company.</p> <p>The Company has now appointed and avail Structured Digital Database facility from Purva Sharegistry (India) Private Limited and from this quarter onwards Company will comply with relevant procedures/requirements/provisions of SEBI (PIT) Regulations 2015.</p>
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	No	
3.	Whether all the UPSI had been captured in the Database. If not details of events that had not been captured and the reason for the same?	No	
4.	Whether the recipients 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?	No	
5.	Whether nature of UPSI have been captured alongwith date and time?	No	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	No	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	No	
8.	Whether the database has been maintained internally?	No	
9.	Whether audit trail is maintained?	No	
10.	Whether time stamping is maintained?	No	
11.	Whether the database is non-tamperable?	No	

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12.	Any other measures to ensure non-tamperability of the Database?	No	
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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: As per the remarks stated above.

Further I also confirm that the Company was required to capture one number of events during the quarter ended June 30, 2022 and has not been captured in SDD, but the said event is captured in Company manual database.

For Grand Foundry Limited

Parul Gupta
Compliance Officer

Date: August 09, 2022
Place: Mumbai

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