

Date: 20.10.2022

To,

The General Manager
BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai- 400 001
BSE Scrip Code: 531449

The Manager
National Stock Exchange of India Limited
Listing Department Exchange Plaza
5th Floor, Plot No. C-1, Block-G
Bandra-Kurla Complex, Bandra(E)
Mumbai-400 051
NSE Scrip Code: GRMOVER

Sub: Sdd Compliance Certificate for The Quarter Ended September 30,2022

Dear Sir/ Madam,

Pursuant to Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, please find attached herewith SDD Compliance Certificate for the Quarter ended September 30, 2022 certified by the Compliance Officer and the Practising Company Secretary.

The above information will be available on the website of company at www.grmrice.com.

You are requested to kindly take the above information on your records and acknowledge the same.

Yours truly,

For GRM Overseas Limited


Manish Kumar
General Counsel and Company Secretary
M.No. F7990



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ORGANIC

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Registered Office
128, First Floor,
Shiva Market Pitampura,
Delhi 110034, India. • +91-11-4733 0330

Corporate Office
8 K.M. Stone, Gohana-Rohtak Road
Village Naultha, Panipat 132145
Haryana, India • +91-972964 7000/8000

Factory
• Gohana Road (Panipat), Haryana
• Naultha (Panipat), Haryana
• Gandhidham, Gujarat

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 2022

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

I, Manish Kumar, Compliance Officer, have examined the following compliance requirement of M/s **GRM Overseas 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):

S No	Compliance Requirement	Yes / No	Observations / Remarks
1	Whether the Company has a Structured Digital Database in place?	Yes	The Company has its Structured Digital Database
2	Whether control exists as to who can access the SDD for read / write along with the names and PAN of such person?	Yes	Absolute control exists as the Name and PAN of the Persons who have access to the Structured Digital Database is captured in the system
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?	Yes	The Company has captured all the events of Unpublished Price Sensitive Information (UPSI)
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?	Yes	The recipients were upfront informed that the information is UPSI and the entry has been captured in the Database, prior to forwarding of the UPSI Data.
5	Whether nature of UPSI have been captured along with date and time?	Yes	We have captured the data with the date and time
6	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	The name of persons who have shared the information has been captured along with the PAN
7	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	The name of persons with whom the information has been shared, has been captured along with the PAN

**Registered Office**

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8	Whether the Database has been maintained internally?	Yes	Database is maintained internally
9	Whether Audit Trail is maintained?	Yes	The Company has maintained the Audit Trail
10	Whether time stamping is maintained?	Yes	The Company has maintained the Time Stamping
11	Whether the Database is non – tamperable?	Yes	The Database is non – tamperable. Adequate measures are taken to protect the same with limited access to the designated people only.
12	Any other measures to ensure non-tamperability of the Database?	Yes	Access is only available with the designated officials. Hence, the Company ensures non-tamperability of the data.

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

Further, I also confirm that the Company was required to capture 02 (two) number of events during the Quarter ended September 30, 2022 and has captured 02 (two) number of the said required events.

Yours truly,

For GRM Overseas Limited



Manish Kumar
General Counsel and Company Secretary
M.No. F7990



Devesh Arora & Associates

Company Secretaries

48/16 Back Side, 2nd Floor,
Ashok Nagar, New Delhi - 110018

Email Id: daa.office1@gmail.com

Tel: +91-8860212992

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022

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

I, Devesh Arora, Practising Company Secretary, do hereby certify that the GRM Overseas Limited 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?	Yes	The Company has a Structured Digital Database.
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	Access is permitted to the Designated employees only. The list is updated by the Compliance Officer of the Bank from time to time to enter UPSI as per SEBI guidelines. The Name and PAN are captured in each sharing / receipt entry of UPSI by designated person.
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	The Company has captured all the events of UPSI.
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	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
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	The Company have captured the data with date and time.
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	The name of persons who have shared the information has been captured along with PAN.

7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	The name of persons with whom information is shared has been captured along with PAN.
8.	Whether the database has been maintained internally?	Yes	The Company has maintained the database internally.
9.	Whether audit trail is maintained?	Yes	The Company has maintained the audit trail.
10.	Whether time stamping is maintained?	Yes	The Company has maintained the time stamping.
11.	Whether the database is non-tamperable?	Yes	The entry once made are non-modifiable and database is non-tamperable.
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Access is only available with the designated officials.

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

Further I also confirm that the Company was required to capture 2 number of events during the quarter ended 30th September, 2022 and has captured 2 number of the said required events.

Note: The above certificate is based on the certificate provided by the compliance officer of the Company.

For Devesh Arora & Associates
Company Secretaries

Devesh Arora Digitally signed
by Devesh Arora
Date: 2022.10.20
18:26:05 +05'30'

Devesh Arora
Mem No: A49034
C.P No: 17860
UDIN: A049034D001320799

Date: 20.10.2022
Place: New Delhi