



**khaitan** (India) Limited  
CIN No. L10000WB1936PLC008775

Phone : (033) 4050 5000  
Fax : (033) 2288 3961

Ref: KIL: SEC: 47:2022-23  
Date: 30-10-2022

To,  
The Manager  
Listing Department,  
National Stock Exchange of India Limited  
5<sup>th</sup> Floor, C/1, G Block,  
Bandra Kurla Complex, Bandra (E),  
Mumbai - 400051, Maharashtra India  
NSE Symbol: KHAITANLTD

To,  
The Secretary,  
Listing Department  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai - 400001  
Maharashtra India  
BSE Symbol: 590068

Dear Sir,

In terms of Regulation 3 (5) of Securities and Exchange Board of India (Prohibition of Insider Trading Requirements) Regulations, 2015, we are enclosing herewith **Structured digital database (SDD)** compliance Certificate for the Quarter ended 30-09-2022.

The above is for your information and records

Yours faithfully

For Khaitan (India) Limited

  
Pradip Halder  
Company Secretary & Compliance Officer





**COMPLIANCE CERTIFICATE FOR THE SEPTEMBER QUARTER ENDED 30-09-2022**

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

I, Pradip Halder, Compliance Officer, have examined the following compliance requirement of Khaitan (India) Ltd. (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):

Sr. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	YES	
2.	Whether control exists as to who can access the SDD for read/write along with the names and PAN of such person?	YES	PRADIP HADER PAN: AIRPH7882C
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	THERE IS NO UPSI AS ON DATE REQUIRED CAPTURING IN THE DATABASE
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	THERE IS NO UPSI AS ON DATE REQUIRED CAPTURING IN THE DATABASE. HOWEVER SYSTEM IS IN PLACE.
5.	Whether nature of UPSI have been captured along with date and time?	YES	THERE IS NO UPSI AS ON DATE REQUIRED CAPTURING IN THE DATABASE
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	YES	THERE IS NO UPSI AS ON DATE REQUIRED CAPTURING IN THE DATABASE
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	YES	THERE IS NO UPSI AS ON DATE REQUIRED CAPTURING IN THE DATABASE
8.	Whether the database has been maintained internally?	YES	
9.	Whether audit trail is maintained?	YES	NO AUDIT DONE TILL DATE
10.	Whether time stamping is maintained?	YES	THERE IS NO UPSI AS ON DATE REQUIRED CAPTURING IN THE DATABASE
11.	Whether the database is non-tamperable?	YES	
12.	Any other measures to ensure non-tamperability of the Database?	YES	PASSWORD PROTECTED

**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: Not Applicable

Further I also confirm that the Company was required to capture ZERO number of events during the quarter/half year ended and has captured ZERO number of the said required events.

Yours faithfully

**For Khaitan (India) Limited**

  
**Pradip Halder**  
Company Secretary & Compliance Officer

Date: 30-10-2022

Place: Kolkata