



SDD COMPLIANCE CERTIFICATE
FOR THE QUARTER ENDED 30TH SEPTEMBER, 2024

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

I, Prakash Kumar Shaw, Practicing Company Secretary, appointed by **MCNALLY BHARAT ENGINEERING COMPANY LIMITED**, 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 Structural Digital Database in place.
2. Control exists as to who can access the SDD.
3. All the UPSI disseminated during the period under review have been captured in the database.
4. The system has captured the 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 (eight) years.

I also confirm that the Company has captured 16 number of events during the quarter.

I would like to report that the following noncompliance(s) was observed in the previous quarter or financial year ended and the remedial action(s) taken along with timelines in this regard – Nil

Thanking you,

Yours truly

For **PRAKASH SHAW & Co.**

**PRAKASH
KUMAR
SHAW**

Digitally signed by
PRAKASH KUMAR
SHAW
Date: 2024.10.21
13:06:17 +05'30'

PRAKASH KUMAR SHAW
Practicing Company Secretary

Membership No. 32895

COP – 16239

UDIN No. A032895F001663073

Date: 21.10.2024

Place: Kolkata

Database of Information Shared

Sr No	Name	PAN	Category	Date	Time	End Date	Datashared	Purpose	Sent By
1	PRAKASH SHAW	BRQPS4928D	Secretarial Auditor	04-07-2024	11:00:00	05-07-2024	TOP TEN REMUNERATION	AUDIT	Indrani Ray
2	Chanchal Karar	BJMPK3963N	Employee	25-07-2024	12:00:00	25-07-2024	reconciliation of share Capital audit report	filing	Syed Emrarul Kabir
3	V. SINGHI & ASSOCIATES	AABFV8971C	Statutory Auditor	27-09-2024	15:07:00	27-09-2024	Notice regarding Closure of the Company's Trading Window with effect from 01-October-2024, for your information and compliance.	CLOSURE OF TRADING WINDOW W.E.F. 01-OCT-2024	Chanchal Karar
4	SYED KABIR	BJCPK9330B	Employee	27-09-2024	14:37:00	27-09-2024	CLOSURE OF TRADING WINDOW W.E.F. 01-OCT-2024	CLOSURE OF TRADING WINDOW	Chanchal Karar
5	PRAKASH SHAW	BRQPS4928D	Secretarial Auditor	27-09-2024	16:00:00	27-09-2024	CLOSURE OF TRADING WINDOW W.E.F. 01-OCT-2024	CLOSURE OF TRADING WINDOW	Chanchal Karar
6	Ashis Kr Bhattacharya	ACZPB2480L	Cost Auditor	21-06-2024	16:29:00	21-06-2024	Financial statement	COST AUDIT	Chanchal Karar
7	Ashis Kr Bhattacharya	ACZPB2480L	Cost Auditor	24-07-2024	14:45:00	24-07-2024	Annexures to Cost Audit report	Cost Audit	Anjan Saha
8	V. SINGHI & ASSOCIATES	AABFV8971C	Statutory Auditor	07-10-2024	14:15:00		Summary_Trial_Project_&_Corporate_Q1_FY_2024-25_070824	STat Audit	Rakesh Karmakar
9	V. SINGHI & ASSOCIATES	AABFV8971C	Statutory Auditor	20-08-2024	17:49:00		MBECL Contingent Liability - Direct Taxes	STat Audit	Rakesh Karmakar
10	V. SINGHI & ASSOCIATES	AABFV8971C	Statutory Auditor	20-08-2024	17:21:00		Note-33 310324	Stat Audit	Rakesh Karmakar
11	V. SINGHI & ASSOCIATES	AABFV8971C	Statutory Auditor	12-08-2024	21:53:00		RPT Confirmation format	Stat Audit	Rakesh Karmakar
12	V. SINGHI & ASSOCIATES	AABFV8971C	Statutory Auditor	09-08-2024	12:50:00		Provision details Q1 FY 2024-25	Stat Audit	Rakesh Karmakar
13	Mbecl Audit	311017E	Statutory Auditor	26-07-2024	04:59:00		Ledger Dump Series Four	Audit	Rakesh Karmakar
14	Mbecl Audit	311017E	Statutory Auditor	26-07-2024	04:58:00		Ledger Dump Series Three	Audit	Rakesh Karmakar
15	Mbecl Audit	311017E	Statutory Auditor	26-07-2024	04:57:00		Ledger Dump Series Two	Audit	Rakesh Karmakar
16	Mbecl Audit	311017E	Statutory Auditor	26-07-2024	04:56:00		Ledger Dump Series One	Audit	Rakesh Karmakar
17	Mbecl Audit	311017E	Statutory Auditor	23-07-2024	01:25:00		Trial Balance	Audit	Rakesh Karmakar