

McNally Bharat Engineering Company Limited

CIN: L45202WB1961PLC025181

Corporate Office: Ecospace Campus 2B 11F/12

New Town Rajarhat North 24 Parganas Kolkata-700160

Telephone +91 3344591111

Email: mbe.corp@mbecl.co.in Website: www.mcnallybharat.com

Registered Office: 4 Mangoe Lane Kolkata-700001

Compliance Certificate for the Quarter ended 30th September 2022

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

I, Indrani Ray, Compliance Officer, have examined the following compliance requirement of McNally Bharat Engineering Company Limited 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)**:

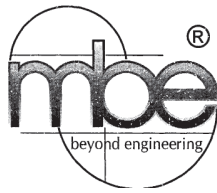
Sr. No	Compliance Requirement	Yes /No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	Yes	This is being further developed to make it in line with the requirement
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	This is being further developed to make it in line with the requirement
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	This is being further developed to make it in line with the requirement
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	This is being further developed to make it in line with the requirement
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	This is being further developed to make it in line with the requirement
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	This is being further developed to make it in line with the requirement
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	This is being further developed to make it in line with the requirement
8.	Whether the database has been maintained internally?	Yes	This is being further developed to make it in line with the requirement
9.	Whether audit trail is maintained?	Yes	This is being further developed to make it in line with the requirement
10.	Whether time stamping is maintained?	Yes	This is being developed
11.	Whether the database is non-tamperable?	Yes	This is being further developed to make it in line with the requirement
12.	Any other measures to ensure non-tamperability of the Database?	No	Being considered

Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.

[McNally Bharat Engineering Company Limited is under Corporate Insolvency Resolution Process as per provisions of the Insolvency and Bankruptcy Code, 2016. Its affairs, business, and assets are being managed by the Resolution Professional, Mr. Ravi Sethia, appointed by the Kolkata Bench of the Hon'ble National Company Law Tribunal vide Order dated 26 August 2022 (Order published on 2 September 2022) under the provisions of the Code.]

An ISO 9001:2015, ISO 14001:2015 & ISO 45001:2018 Certified Company

Member  Williamson Magor Group



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

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

For McNally Bharat Engineering Company Limited

INDRANI
RAY

Indrani Ray
Company Secretary
(Compliance Officer)

Kolkata

19th October 2022

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