MTNL

MAHANAGAR TELEPHONE NIGAM LIMITED
(A GOVERNMENT OF INDIA ENTERPRISE)
CIN L32101DL1986GOI023501
Registered and Corporate Office: Mahanagar Doorsanchar Sadan 5th Floor, 9 CGO Complex, Lodhi Road, New Delhi - 110 003. Tel: 011-24319020, Fax: 011-24324243, Website: www.mtnl.net.in /www.bol.net.in Email Id: mtnlcsco@gmail.com

MTNL/SECTT/SE/2024
January 11, 2024

To
The Listing Department,
National Stock Exchange (NSE)

Ref: NSE Symbol: MTNL

Sub: COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED December 31, 2023 - PURSUANT TO SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

Dear Sir,

Kindly find attached Compliance Certificate issued by Mritunjay Chandra Shekhar, Prop. Mritunjay Shekhar & Associates, Practising Company Secretary for the Quarter ended December 31, 2023 pursuant to Regulation 3(5) and 3(6) of Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, dtd 10.01.2024.

Kindly take the same on record.

Thanking you

Yours' Faithfully,

11.01.2024

RATAN MANI SUMIT
Digitally signed by RATAN MANI SUMIT
Date: 2024.01.11 13:16:54 +05'30'

(RATAN MANI SUMIT)
COMPANY SECRETARY

Encl: A/A

CS
MRITUNJAY SHEKHAR & ASSOCIATES
Company Secretaries
Email – shekharmritunjay3@gmail.com
MNo.9540043975/8076567045

311B , Vikas Surya Galaxy, Plot No. 09,
Sector-4, Dwarka, New Delhi 110078
Website: https://www.msaonline.info/
FRN-S2018DE619000
P R -2919/2023

COMPLIANCE CERTIFICATE

FOR THE QUARTER ENDED 31ST DECEMBER, 2023

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

I, Mritunjay Chandra Shekhar, Prop. Mritunjay Shekhar & Associates, Practising Company Secretary appointed by Mahanagar Telephone Nigam Limited, (the Company) 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 Structured Digital Database in place:- From 06.12.2023 onwards.

2. Control exists as to who can access the SDD:-From 06.12.2023 onwards

3. ~~All the UPSI disseminated in the previous quarter have been captured in the Database.~~

4. The system has captured nature of UPSI along with date and time:- From 06.12.2023 onwards

5. The database has been maintained internally and an audit trail is maintained:- From 06.12.2023 onwards

6. The database is non-tamperable and has the capability to maintain the records for 8 years:- From 06.12.2023 onwards

(Relevant points from 1 to 6 can be striked off in the case of non-compliance)

Remarks for Points (1 to 6): Mahanagar Telephone Nigam Limited (MTNL) is maintaining Structured Digital Database (SDD) with effect from 06.12.2023 i.e. "Go Live" date for installation of SDD software "MyInsider UPSI", during the Quarter ended 31.12.2023.

Mahanagar Telephone Nigam Limited (MTNL) was maintaining SDD information in Excel sheet from the period 01.10.2023 to 05.12.2023. On and after 06.12.2023, it is SDD Complaint Company and has a Structured Digital Database in place

MRITUNJAY SHEKHAR & ASSOCIATES
Company Secretaries
Email – shekharmritunjay3@gmail.com
MNo.9540043975/8076567045

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Sector-4, Dwarka, New Delhi 110078
Website: https://www.msaonline.info/
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I also confirm that the Company was required to capture ONE number of event during the quarter ended 31st December 2023 and has captured NIL number of event in the SDD Software MyInsider UPSI as it was installed on 06.12.2023.

As informed by MTNL, the Company has captured ONE number of event which occurred before 06.12.2023 in Excel Sheet during the quarter ended 31st December 2023.

I would also like to report that the following noncompliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard:

The Company was not having SDD Compliance Software during the Previous Quarter ended 30.09.2023 and the Company has taken the remedial action by installing SDD software "MyInsider UPSI" on 06.12.2023.

I hereby certify the above on the basis of documents, registers, records of emails, access to the SDD and other information provided by the Company including information disseminated on the stock exchanges, and based on such checking of facts, information or developments relating to the Company as were available on perusal of records. I did not seek access to any UPSI, and that no such UPSI was shared with me.

For Mritunjay Shekhar & Associates,
Company Secretaries

MRITUNJAY CHANDRA SHEKHAR
Digitally signed by MRITUNJAY CHANDRA SHEKHAR
Date: 2024.01.10 13:26:38 +05'30'

Name: Mritunjay Chandra Shekhar
Membership No. 12594
COP: 20871
UDIN: F012594E003171640
Peer Review No.: 2919/2023

Date: 10/01/2024
Place: New Delhi