



V KUMAR AND ASSOCIATES

Company Secretaries

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Ref. No.

Date ..21/01/2026

COMPLIANCE CERTIFICATE OF SDD AS ON 31st DECEMBER, 2025

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

I, **Vivek Kumar, Practising Company Secretary** appointed by "**Niraj Ispat Industries 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 Structured Digital Database in place.
2. Control exists as to who can access the SDD.
3. All the UPSI disseminated in the previous quarter or year have been captured in the Database.
4. The system has captured 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 years.

I also confirm that the Company was required to capture zero number of events as on 31st December, 2025 and has captured zero number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous quarter or financial year ended and the remedial action(s) taken along with timelines in this regard: NA

For V Kumar & Associates

Company Secretaries



Membership No. FCS 8976

Certificate of Practice No. 10438

UDIN: F008976G003412145

Date: 21.01.2026

Place: Delhi