

Date : 8th January, 2025
Ref. : BSE/NSE/CSE/67/2024-2025.

To,
Dept. of Corporate Services,
Bombay Stock Exchange Ltd,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001.
Company Code: 514300
Company ISIN: INE156C01018

To,
The Listing Department,
National Stock Exchange of India Ltd,
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai- 400051.
Company Code: PIONEEREMB
Company ISIN: INE156C01018

To,
The Listing Department,
Calcutta Stock Exchange Ltd,
7, Lyons Range, 4th Floor,
Kolkata – 700 001.
Company Code: 26033
Company ISIN: INE156C01018

Dear Sir/Madam,

Sub. : Compliance certificate for the quarter ended 31st December, 2024

Pursuant to the provision Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, we are enclosing herewith a Quarterly Compliance Certificate on certify that the Company has maintained a Structured Digital Database (SDD) for the Quarter Ended 31st December, 2024. Please take note of the same

Kindly acknowledge receipt of the same.

Thanking You,
Yours faithfully,
For Pioneer Embroideries Limited

(AMI THAKKAR)
Company Secretary & Compliance Officer
Membership No.: FCS 9196
Encl: As Above

PIONEER EMBROIDERIES LIMITED

Regd. Office: Unit No. 101B, 1st Floor, Abhishek Premises, Plot No. C5-6, Dalia Industrial Estate, Off New Link Road, Andheri (West), Mumbai -400058. Website: www.pelhakoba.com, E-mail: mumbai@pelhakoba.com

Corporate Office: Unit No 21 to 25, 2nd Floor, Orient House, 3A Udyog Nagar, Off S.V. Road, Goregaon (West), Mumbai – 400 062. Maharashtra (India), Tel: +91-22-4223 2323 Fax: +91-22- 4223 2313.

CIN: L17291MH1991PLC063752

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST DECEMBER, 2024

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

I, Ami Thakkar, Compliance Officer, have examined the following compliance requirement of Pioneer Embroideries Limited (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?	<u>Yes</u>	
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	<u>Yes</u>	
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?	<u>Yes</u>	
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?	<u>Yes</u>	
5.	Whether nature of UPSI have been captured alongwith date and time?	<u>Yes</u>	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	<u>Yes</u>	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	<u>Yes</u>	
8.	Whether the database has been maintained internally?	<u>Yes</u>	
9.	Whether audit trail is maintained?	<u>Yes</u>	
10.	Whether time stamping is maintained?	<u>Yes</u>	
11.	Whether the database is non-tamperable?	<u>Yes</u>	
12.	Any other measures to ensure non-tamperability of the Database?	<u>Yes</u>	

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: NIL

Further, I, also confirm that the Company was required to capture 27 number of events during the quarter ended 31st December, 2024 and has captured 27 number of the said required events.

For Pioneer Embroideries Limited

Ami Thakkar
Company Secretary and Compliance Officer
Date: 8th January, 2024
Place: Mumbai

PIONEER EMBROIDERIES LIMITED

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