

DATE: 16th November, 2022
REF. : PIL/DVN/L107/2022-23

Security Code No.: 522205	Company Code- PRAJIND
BSE LIMITED PHIROZE JEEJEEBHOY TOWERS, 25TH FLOOR, DALAL STREET, MUMBAI - 400 001 Fax: 022- 22723121/3719/2037/2039/2041/2061	NATIONAL STOCK EXCHANGE OF INDIA LTD. EXCHANGE PLAZA, 5TH FLOOR, PLOT NO. C/1, G BLOCK, BANDRA-KURLA COMPLEX, BANDRA (EAST), MUMBAI - 400 051 Fax: 022 - 66418124/25/26, 2659 8237 / 38

Dear Sir / Madam,

Pursuant to Regulation 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, please find attached Compliance Certificate for the quarter ended 30th September 2022.

You are requested to please take the same on your record.

Thanking you,

Yours faithfully,

For PRAJ INDUSTRIES LIMITED



DATTATRAYA NIMBOLKAR
CHIEF INTERNAL AUDITOR
& COMPANY SECRETARY
(M. No. 4660)



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30TH SEPTEMBER, 2022
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

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

The number of days for which non-compliance was observed: Not applicable

Further I also confirm that the Company was required to capture One (1) event during the quarter ended 30th September, 2022 and has captured the same.

For Praj Industries Ltd.


Dattatraya Nimbolkar
Company Secretary and Compliance Officer
(M. No. 4660)
Date: 16/11/2022
Place: Pune

