

Date:- 18.11.2025

To
The Manager
The Listing Compliance Department,
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (E), Mumbai – 400051

Subject: Submission of certificate of SDD Compliance Certificate under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Pushpa Jewellers Limited (SYMBOL/ISIN: PUSHPA/INE154801018)

Dear Sir/ Ma'am,

Please find enclosed the SDD Compliance Certificate, for the quarter ended 30th September, 2025. The report has been received from Rahul Srivastava & Co., Practicing Company Secretary. This report is submitted in compliance with Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Request you to kindly update the same on your record and oblige us.

Thanking You,
FOR PUSHPA JEWELLERS LIMITED

SMITA
MONDAL
Digitally signed by
SMITA MONDAL
Date: 2025.11.18
14:13:50 +05'30'

SMITA MONDAL
Company Secretary & Compliance Officer
Membership No. A44279
PLACE : KOLKATA



STRUCTURED DIGITAL DATABASE (SDD) COMPLIANCE CERTIFICATE

(Pursuant to Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

For the Quarter Ended: 30th September 2025

To,

The Board of Directors

PUSHPA JEWELLERS LIMITED (CIN : L27310WB2009PLC135593)

22, EAST TOPSIA ROAD, 4TH FLOOR, FL-4A, TIRUMALA, Gobinda Khatick Road, A. C

Lane, Kolkata - 700046, West Bengal

Sir(s),

I have examined the compliance requirements relating to the maintenance of the **Structured Digital Database ("SDD")** by PUSHPA JEWELLERS LIMITED (CIN : L27310WB2009PLC135593) for the quarter ended 30th September 2025, in accordance with the provisions of **Regulation 3(5) and 3(6)** of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").

Based on the information, explanations and representations made available to me by the Company, I hereby certify the following:

1. SDD Availability & System Controls

The Company has implemented and maintained a Structured Digital Database ("SDD") which, as represented, is aligned with the technical and operational requirements prescribed under the PIT Regulations. Adequate internal access controls and user-rights protocols, as informed, are in place.

2. UPSI Recording & Timestamping

I am informed that the SDD system is designed to record all instances of Unpublished Price Sensitive Information ("UPSI"), wherever generated or shared, including the nature of UPSI, date and time, and the names of persons sharing and receiving such information.

My review has been limited to examining entries and logs made accessible to me on a sample basis. I have **relied entirely on data, explanations, and representations provided by the Compliance Officer and designated personnel.**

I have **not** carried out a technical audit, system-level validation, or independent verification of the origin, completeness, correctness, or timeliness of UPSI entries.

Accordingly, the **responsibility for identifying UPSI events, determining their nature, and ensuring their complete and timely recording in the SDD rests solely with the management** of the Company.

Nothing has come to my attention, based on the information provided, that would cause me to believe that the SDD has not been maintained in accordance with the stated framework.

3. System Integrity & Data Retention

As informed, the SDD is non-tamperable, secure, and capable of preserving records for a minimum period of eight (8) years, in accordance with Regulation 3(5).

4. Internal Maintenance & Audit Trail

The SDD is maintained internally and retains audit trails, and I have relied on the representations of the Compliance Officer regarding the continuous preservation and non-disabling of such audit trails.

5. Event-Based Confirmation (Quarterly Review)

For the quarter ended 30th Sepetember2025, and based on the representation of the Company, **All UPSI events were required to be captured**, and accordingly, **All events have been recorded** in the Structured Digital Database.

6. Scope Limitation & Reliance on Management

This certificate is based solely on the information, documents, access rights, and explanations provided to me. I have not performed any investigative, forensic, or IT systems audit. Management remains fully responsible for compliance with the SEBI PIT Regulations.

Conclusion

Subject to the above and based on the representations received, nothing has come to my notice that causes me to believe that the Company has not complied with Regulation 3(5) and 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, for the quarter under review.

For Rahul Srivastava & Co.
Practising Company Secretary
A Peer Reviewed Firm
Peer Review Certificate No.: 3408/2023
RAHUL
SRIVASTAVA
Rahul Srivastava
Membership no.: F11828
CP no.: 23592
UDIN: F011828G001922253

Digitally signed by
RAHUL SRIVASTAVA
Date: 2025.11.18
14:03:36 +05'30'

Place: Kolkata
Date: 18-11-2025