



Tunwal
E-Motors Limited

TUNWAL E-MOTORS LIMITED
(Formerly Known as Tunwal E-Motors Private Limited)

GST NO. : (Rajasthan) 08AAHCT0838P1ZR
GST NO. : (Maharashtra) 27AAHCT0838P1ZR
CIN No. : L34300PN2018PLC180950

REGISTERED ADDRESS:- OFFICE NO 501, 5th FLOOR, RAMA ICON COMMERCIAL
BUILDING, PLOT NO. 31/11, SADASHIV PETH, PUNE, MAHARASHTRA 411030

Date: 4th February 2025

To,
Listing Department
National Stock Exchange of India
Exchange Plaza, Bandra-Kurla Complex,
Bandra (E), Mumbai -400051

Symbol: TUNWAL

ISIN: INE0OXV01027

Series: SM

Subject: SDD Implementation and Compliance Certificate under Regulation 3 (5) and 3 (6) of SEBI (Prohibition of Insider Trading) Regulations, 2015, for the quarter ended 31st December 2024.

Respected Sir/ Madam,

Pursuant to Regulation 3 (5) and 3 (6) of SEBI (Prohibition of Insider Trading) Regulations, 2015, please find attached herewith the Structured Digital Database (SDD) Compliance Certificate as issued by the PCS for the quarter ended 31st December 2024.

Kindly take the above information on record.

Thanking you.

Yours faithfully,

For Tunwal E-Motors Limited

Niharika Choudhary
Company Secretary & Compliance Officer
A75342
Place: Pune



Factory Address:- Ground Floor, Plot No. E123 & 124 Rajasthan State Industrial Dev Invst Corporation Ltd. IID Palsana, Sikar Rajasthan 332402

Contact No.:- 020 2433 6001 E-mail:- info@tunwal.com / web site:- www.tunwal.com



COMPLIANCE CERTIFICATE AS ON 04TH FEBRUARY 2025 (Pursuant to
Securities and Exchange Board of India (Prohibition of Insider Trading)
Regulations, 2015)

I, **CS Pawan Randad**, Practising Company Secretary appointed by Tunwal E-Motors 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: **YES**
2. control exists as to who can access the SDD: **YES**
3. all the UPSI disseminated in the previous quarter have been captured in the Database: **YES**
4. the system has captured nature of UPSI along with date and time: **YES**
5. the database has been maintained internally and an audit trail is maintained: **YES**
6. the database is non-tamperable and has the capability to maintain the records for 8 years: **YES**

I also confirm that the Company was required to capture 2 number of events during the quarter or financial year ended and has captured 2 number of the said required events.

I would like to report that the following noncompliance(s) was observed in the previous quarter ended 31st December 2024 and the remedial action(s) taken along with timelines in this regard:

S.No.	Description of Non-Compliance	Remedial action taken along with timelines
1.	The entry for the first UPSI was not made on a real-time basis. Although the trading window was closed from October 1, 2024, to November 16, 2024, due to the occurrence of UPSI related to the financial statements, the entry was only made on December 19, 2024.	The company conducted an internal investigation to determine the cause of the delay in entering the UPSI. It was found that the previous compliance team had failed to perform certain tasks on time. As a result, the company appointed a new compliance officer, effective from January 1, 2025. On January 3, 2025, during an inspection by the NSE's SDD department, the management became aware of the non-

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Jondhale Chowk, Kumthekar Road Pune - 411 030





		<p>compliance regarding the real-time entry of UPSI.</p> <p>By January 5, 2025, the company submitted the requested documents from the inspection and sought advisory on future compliance. The advisor recommended that UPSI be entered on a real-time basis moving forward.</p> <p>On January 6, 2025, the company conducted refresher training for relevant employees and stakeholders on timely UPSI disclosures and compliance processes. Additionally, the company reviewed and strengthened its internal controls to prevent future delays, including implementing additional approval layers and automated triggers to alert the compliance team.</p> <p>The company emphasizes that the failure to enter the UPSI on a real-time basis was unintentional, and it assures that such an issue will not occur in the future.</p>
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For Pawan B Randad & Co
Company Secretaries



CS Pawan Balmukund Randad
M. No. F10036
C. P. No. : 12565
Peer Review No: 3780/2024
UDIN :- F010036F003869848

Date: 04/02/2025
Place:Pune

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