



R. Bhandari & Co.

Company Secretaries ★ Insolvency Professional ★ Trademark Attorney

STRUCTURED DIGITAL DATABASE (SDD) COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED - MARCH, 2026

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

We, **R. Bhandari & Co.**, Practising Company Secretaries (PCS) appointed by XL Energy 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~~ - *(SDD has not yet implemented, as the Company was under suspension / transition pursuant to an NCLT-approved Resolution Plan. An appeal has been filed by NSE before Hon'ble NCLAT, and the outcome is presently awaited.)*
3. ~~all the UPSI disseminated in the previous quarter or year have been captured in the Database~~ - *(Not Applicable as the Company was under suspension / transition pursuant to an NCLT-approved Resolution Plan)*
4. ~~the system has captured nature of UPSI along with date and time~~ - *(Not applicable, due to non-implementation of SDD)*
5. ~~the database has been maintained internally and an audit trail is maintained~~ - *(Not applicable, as the system has not yet been operationalised.)*
6. ~~the database is non-tamperable and has the capability to maintain the records for 8 years.~~ - *(Not applicable since SDD has not been implemented)*

(Relevant points from 1 to 6 can be strucked off in the case of non-compliance)

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

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

Non-compliances:

Non-implementation of Structured Digital Database, due to:

- The Company being earlier delisted and presently suspended from trading;
- Change in management pursuant to IBC-CIRP proceedings;



Office No. 402, 4th floor, A- Wing,
Pushp Vinod No. 2, S.V. Road, Borivali W,
Mumbai-400092.

Office No.
84509 43725 / 70214 00658

✉ csrbhandari@gmail.com

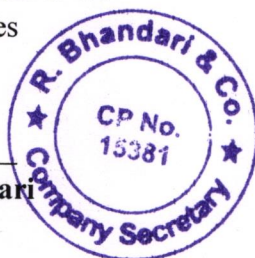
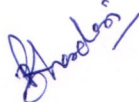
- Absence of active trading and non-applicability of routine UPSI events during the period.
- Ongoing implementation of resolution plan, subject to regulatory approvals and the outcome of the pending appeal filed by NSE before Hon'ble NCLAT.

Remedial Action & Timeline:

The Company has undertaken to implement and operationalise a fully compliant SDD in accordance with Regulation 3(5) and 3(6) of the PIT Regulations upon completion of restructuring and normalization of operations, subject to regulatory approvals and outcome of appeal filed by NSE.

This certificate is issued for the purpose of submission to the Stock Exchanges and is based on information made available to me.

For M/s. R. Bhandari & Co
Company Secretaries



Raghunath Bhandari

Proprietor

FCS No.: 8048

COP: 15381

Date: 13-04-2026

Place: Mumbai

UDIN: F008048H000085466

Disclaimer

This certificate is exclusively issued upon the request made by the Company and is issued solely based on the information, representation and documents provided. It is grounded entirely on factual data, interpretation, and implication of Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), and is subject to our professional opinion. The obligation lies with the Management/Company to enforce the stipulations outlined in Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations). This includes the maintenance of records and the establishment of appropriate systems to guarantee adherence to said provisions. Furthermore, it is incumbent upon the Management/Company to ensure that such systems are sufficient and function efficiently in accordance with the Regulations and any subsequent amendments issued periodically.