The Silent Performer
XL ENERGY LTD

Date: 14-04-2026

To,
The General Manager,
**BSE Limited**
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001
**Scrip Code 532788**

To,
**National Stock Exchange of India Limited**
Listing Department,
Exchange Plaza, Plot no. C/1,
G Block, Bandra-Kurla Complex,
Bandra (E), Mumbai- 400051
**SYMBOL: XLENERGY**

**Subject: Structured Digital Database (SDD) Compliance Certificate for the quarter ended 31st March, 2026.**

Dear Sir/Madam,

In terms of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations"), please find attached herewith the Structured Digital Database (SDD) Compliance Certificate issued by **R. Bhandari & Co**, Practising Company Secretaries (PCS), for the Quarter ended 31st March, 2026.

We would like to inform you that the Company is presently undergoing implementation of an NCLT-approved Resolution Plan under the Insolvency and Bankruptcy Code, 2016, and was earlier delisted and subsequently placed under suspension. During the transition phase, compliances are being undertaken in line with regulatory applicability and operational feasibility, subject to regulatory approvals and the outcome of the pending appeal filed by NSE before the Hon'ble NCLAT.

The SDD compliance status has been reviewed and certified based on the records maintained by the Company during the relevant period.

Kindly take this submission in your records.

Thanking You.

Yours faithfully,

**FOR XL ENERGY LIMITED**

Naresh Jain

Digitally signed by Naresh Jain
DN: c=IN, o=Personal, title=9728, pseudonym=c7fe8a759b604c8daa7374c21f351cfa, 2.5.4.20=934b30e1603c0a0c4a04ed25151ab523dd4a1b7c423713ac2f70bca753e51abc, postalCode=400025, st=Maharashtra, serialNumber=4555f9feb50923beed6b68d7f98e31e5167ff73ec7668c88d2dd08a39b6651c9, cn=Naresh Jain
Date: 2026.04.14 12:38:04 +05'30'

**Naresh Jain**
Director
**(DIN: 00291963)**

# 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 striked 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;

R. Bhandari & Co. ★ CP No. 15381 ★ Company Secretary

- 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

R. Bhandari & Co. CP No. 15381 Company Secretary

**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.*