

Date: 18th November, 2022

To,
Listing Department
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

Dear Sir,

Subject : **STRUCTURED DIGITAL DATABASE (SDD) COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022**

With reference to the subject matter, please find enclosed the Structured Digital Database (SDD) Compliance Certificate for the Quarter ended September 30, 2022.

We request you to take the same on record and acknowledge the receipt of the same.

Thanking You,

Yours faithfully,
For Nirmal Bang Securities Private Limited

Namrata Pai
Company Secretary & Compliance Officer

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

I, Namrata Pai, Company Secretary and Compliance Officer of Nirmal Bang Securities Private Limited 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

- ~~1. the Company has a Structured Digital Database in place~~
- ~~2. control exists as to who can access the SDD~~
- ~~3. all the UPSI disseminated in the previous quarter have been captured in the Database~~
- ~~4. the system has captured nature of UPSI along with date and time~~
- ~~5. the database has been maintained internally and an audit trail is maintained~~
- ~~6. the database is non-tamperable and has the capability to maintain the records for 8 years.~~

I would like to report and draw your attention to the following facts / ~~non-compliance(s)~~ and the reasons in the previous quarter and the remedial action(s) taken along with timelines in this regard:

- 1) The Company was not listed for almost 2.5 months out of the previous quarter, hence the Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) were not applicable.
- 2) The Company has listed its Debt Securities on 8th September, 2022 and the Company started working on selection of the suitable software for maintaining the SDD.
- 3) In such a short span of time it was difficult for the Company to have the software in place as on 30th September, 2022.
- 4) Further there were no UPSI that was required to be captured for the period 8th September, 2022 till 30th September, 2022.

For Nirmal Bang Securities Private Limited

Namrata Pai
Company Secretary & Compliance Officer
Date: 18th November, 2022
Place: Mumbai

Registered Office : B-2, 302, Marathon Innova, Ganpatrao Kadam Marg, Opp. Peninsula Corporate Park, Lower Parel (W), Mumbai - 400013
Tel.: 6273 8000 / 6273 8001 Fax: 6273 8010

CIN NO.: U99999MH1997PTC110659

Member : BSE, NSE, MSEI, MCX, NCDEX, ICEX SEBI Registration No. INZ000202536
Exchange Registered Broker in BSE Currency Segment ,
Exchange Registered Broker in BSE & NSE Commodity Segment