



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30TH SEPTEMBER, 2022

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

I, Ajay Kumar Agarwal, Proprietor of Agarwal A & Associates Practicing Company Secretary appointed by Manaksia Steels 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
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 also confirm that the Company was required to capture one number of event during the quarter ended and has captured one number of the said required events.

This report has to be read with Annexure-I which is annexed therewith and forms an integral part of this report.

Place: Kolkata
Date: 18/11/2022

For **Agarwal A & Associates**
Company Secretaries

CS Ajay Kumar Agarwal
Proprietor
(C.P.No.13493/M.No.F7604)

UDIN NO. F007604D001886118

Annexure-I

Our compliance certificate of even date is to be read along with this letter:

- i. Maintenance of Structural Digital Database (SDD) is the responsibility of the Company; the Company had been maintaining the SDD internally, otherwise than in software, with adequate internal control and checks and the right to access and edit the same reserves with the compliance officer. As on the date of this report, adequate software for maintain the SDD has been installed and operating.
- ii. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the record. The verification, wherever deemed appropriate, was done. We believe that the process and practices we followed provide a reasonable basis for our opinion.
- iii. During the course of issuance of this certificate, none of the information has been shared with us by the Company which can be in the nature of Unpublished Price Sensitive Information.

Place: Kolkata
Date: 18/11/2022

For **Agarwal A & Associates**
Company Secretaries

CS Ajay Kumar Agarwal
Proprietor
(C.P.No.13493/M.No.F7604)

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