

# SWARNA SECURITIES LIMITED

(CIN: L52520AP1990PLC011031)

Ph: 2575928

Date: 10/08/2022

To  
**The Corporate Relations Department,  
BSE Limited, 1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building, P.J. Towers,  
Dalal Street, Fort, Mumbai - 400 001**

Dear Sir / Madam,

**Sub:** Compliance Certificate under Reg 3(5) & 3(6) of the regulations provided maintenance of SDD-1 - Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading Regulations, 2015)

**Ref:** Swarna Securities Ltd – 531003; Stock Symbol: SWRNASE

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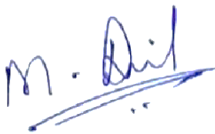
We hereby intimate that the names of persons with whom UPSI was shared and PAN/ any other identifier of the person (where PAN was not available). SDD was required to be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database of the Company under Reg 3(5) & 3(6) of the regulations provided maintenance of SDD-1 for the Quarter ended on 30<sup>th</sup> June, 2022 for the FY 2022-2023 along with Certificate issued by Compliance Officer of the Company.

Please take the same on record.

Thanking You,

Yours Faithfully,

For **Swarna Securities Limited**



**Moola Anil Kumar**  
**Company Secretary & Compliance Officer**  
**Membership No: A27989**

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## **COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2022**

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

I, Anil Kumar Moola, Compliance Officer of the company, have examined the following Compliance requirement of **Swarna Securities Limited** (Company) and certify that the Company has maintained a 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):

| Sr. No | Compliance Requirement   | Yes/No | Observation/ Remark  |
|--------|--|--------|--|
| 1.     | Whether the Company has a Structured Digital Database in place?  | No     | <b>Notice of the Board Meetings and Disclosures of Trading window Closure were sent to all the directors of the Company.</b> |
| 2.     | Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person?   | No     |  |
| 3.     | Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?   | No     |  |
| 4.     | Whether the recipient were upfront informed that the Information which they will be receiving shortly is UPSI and the entry has been captured in the Database prior to forwarding the UPSI data, if not details of events that have not been captured and the reason for the same? | No     |  |
| 5.     | Whether natures of UPSI have been captured along with date and time?   | No     |  |
| 6.     | Whether name of persons who have shared the Information has been captured along with PAN or any other identifier?  | No     |  |
| 7.     | Whether name of persons with whom information is shared has been captured along With PAN or any other identifier?  | No     |  |
| 8.     | Whether the database has been maintained internally?   | No     |  |
| 9.     | Whether audit trail is maintained?   | No     |  |
| 10.    | Whether time stamping is maintained?   | No     |  |
| 11.    | Whether the database is non-tamperable?  | No     |  |
| 12.    | Any other measures to ensure non-tamperability of the Database?  | No     |  |

**Note: The Company is in the process of purchasing designated software and implementing it. We assure you to comply with immediately.**

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Further, I also confirm that the Company was required to capture One number of events during the quarter/half year ended and has captured Nil number of the said required events.

For Swarna Securities Limited



**Moola Anil Kumar**

**Company Secretary & Compliance Officer**

**Membership No: A27989**

**Date: 10.08.2022**

**Place: Vijayawada**