

# SWARNA SECURITIES LIMITED

(CIN: L52520AP1990PLC011031)

Ph: 2575928

Date: 21/11/2022

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 Structured Digital Database (SDD) 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 for the Quarter ended on 30<sup>th</sup> September, 2022 for the FY 2022-2023 along with Certificate issued by Practicing Company Secretary (PCS).

Please take the same on record.

Thanking You,

Yours Faithfully,

For **Swarna Securities Limited**



**Murali Krishna Muthavarapu  
Managing Director  
DIN: 01889812**



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

I, **Kode Hemachand**, Practising Company Secretary appointed by **Swarna Securities Limited (CIN: L52520AP1990PLC011031)** 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 events during the quarter ended and has captured **One** number of the said required events.

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

KODE  
HEMACHAND

Digitally signed by  
KODE HEMACHAND  
Date: 2022.11.18  
11:35:29 +05'30'

**Kode Hemachand**  
Company Secretary in Practice  
M.No.35463, CP.No. 13416  
ICSI UDIN: **A035463D001853862**

Place: Vijayawada  
Date: 18.11.2022