



KALYANI COMMERCIALS LIMITED

Registered office: BG-223, Sanjay Gandhi Transport Nagar, GT Karnal Road, New Delhi-110042

CIN: L65923DL1985PLC021453

E-mail: kalyanicommercialslimited@gmail.com

Website- www.kalyanicommercialsLtd.com

Ph. 011- 43063223, 011-47060223

Ref: 2107/KCL/NSE/2023-24

21st July, 2023

**To,
The Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai- 400051
(NSE Symbol: KALYANI)**

Subject: Submission of Structured Digital Database Compliance Certificate for the quarter ended 30th June,2023

Dear Sir(s),

Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), Please find enclosed herewith the Structured Digital Database(SDD) Compliance Certificate for the quarter ended June 30, 2023.

Kindly take the above information on record.

**Thanking You
For Kalyani Commercials Limited**

**Suranjan Upadhyay
(Company Secretary & Compliance Officer)
Office Address: BG-223, Sanjay Gandhi Transport
Nagar, GT Karnal Road, New Delhi-110042**

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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 2023*(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)*

I, Suranjan Upadhyay, Compliance Officer, have examined the following compliance requirement of Kalyani Commercials Limited (“the Company”) and certify that the Company has maintained a Structured Digital Database (SDD) pursuant to the provisions of Regulations 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?	Yes	The Company has the Structured Digital Database.
2.	Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person?	Yes	The absolute control exists.
3.	Whether all the UPSI had been captured in the Database. If not details of events that had not been captured and the reason for the same?	Yes	Details have been recorded in database.
4.	Whether the recipients 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?	Yes	Recipients were informed about the UPSI and accordingly the entries were recorded in database.
5.	Whether nature of UPSI has been captured along with date and time?	Yes	Nature of UPSI have been recorded properly.
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	Name of persons who shared the information were recorded with the requisite details.
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	Name of persons with whom the information shared were recorded with the requisite details.
8.	Whether the database has been maintained internally?	Yes	It is maintained internally.
9.	Whether audit trail is maintained?	Yes	The requisite measures were taken.
10.	Whether time stamping is maintained?	Yes	Data was maintained timely
11.	Whether the database is non-tamperable?	Yes	The requisite measures for non-tampering of



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			the data was maintained.
12.	Any other measures to ensure non-tamperability of the Database?	Yes	The Company has internal financial and operational controls which are subject to periodical management check.

Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.

The number of days for which non-compliance was observed: NIL

Further I also confirm that the Company was required to capture 3 number of events during the quarter ended and has captured 3 number of the said required events.

For Kalyani Commercials Limited

Suranjan Upadhyay

(Company Secretary & Compliance Officer)

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