

CIN No. : L51102MP1984PLC002664

## **Satya Shyam Trading Limited**

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Ref. No. SST/ : .....

Dated : .....

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

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

I, **Vinod Daga**, Compliance Officer for SEBI(Prohibition of Insider Trading)Regulations, 2015 have examined the following compliance requirement of **Satya Shyam Trading 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) :

<b>Sr. No</b>	<b>Compliance Requirement</b>	<b>Yes/No</b>	<b>Observation/ Remark</b>
1.	Whether the Company has a Structured Digital Database in place?	Yes	The Company has internally maintained Structured Digital Database in MS Excel format.
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	The absolute control exists_as to who can access the database for read/ write alongwith the names and PAN of such person
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?	Yes	The Company has captured all the events of UPSI
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?	Yes	The recipients were upfront informed that the information is UPSI and the entry has been captured in the Database prior to forwarding the UPSI data

5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	The nature of UPSI have been captured
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	The name of persons who have shared the information has been captured along with PAN.
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	The name of persons with whom information is shared has been captured along with PAN
8.	Whether the database has been maintained internally?	Yes	The database is maintained internally
9.	Whether audit trail is maintained?	Yes	We have maintained the audit trail.
10.	Whether time stamping is maintained?	Yes	We have maintained the time stamping.
11.	Whether the database is non-tamperable?	Yes	The database is non-tamperable as it has limited access.
12.	Any other measures to ensure non-tamperability of the Database?	Yes	The access is only available with the Compliance Officer

**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 1 number of events during the quarter ended and has captured 1 number of the said required events.

**For Satya Shyam Trading Limited**

For Satya Shyam Trading Ltd.



**CFO**

**Vinod Daga**

**Compliance Officer for SEBI(Prohibition of Insider Trading)Regulations, 2015**

**Date: 09.08.2022**

**Place: Indore**