

P.C. JAIN & CO
Company Secretaries

2382, Sector-16, Phone: 0129-4043338 +91 9811087881 Faridabad-121002 (NCR)

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URL: <u>www.cspcjain.com</u>

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED MARCH 31, 2023

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

I, Poonam Chand Jain, Practising Company Secretary (CP No. 3349), Managing Partner of P. C Jain & Co, Company Secretaries (FRN: P2016HR051300) appointed by SPS International Limited (BSE Stock Code- 530177) 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 01 (one) number of events during the quarter ended 31st March, 2023 and has captured 01 (one) number of the said required events.

For P.C. Jain & Co.

P.C Jain Practising Company Secretary FCS No. 4103 CP No. 3349

Date: 20.04.2023 Place: Faridabad

UDIN: F004103E000150172