

# Kshitij Investments Limited

Office: 509 Loha Bhavan, 93, P. D'mello Road, Carnac Bunder, Mumbai - 400 009

Tel: (022) 2348-0344, e-Fax: (+91) 88606-22447.

[ksh.inv.ltd@gmail.com](mailto:ksh.inv.ltd@gmail.com)

CIN-L67120MH1979PLC021315

Date: 09<sup>th</sup> August, 2022

To,  
Dear Sir/Madam,  
**Bombay Stock Exchange Limited,**  
Floor 25, P J Towers, Dalal Street,  
Mumbai - 400001  
BSE Scrip Code: 503626

**Sub: SSD Compliance Certificate for the Quarter ended June 30, 2022.**

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 SSD Compliance Certificate for the quarter ended June 30, 2022.

Kindly acknowledge the receipt.

Yours faithfully

For KSHITIJ INVESTMENTS LIMITED

**KSHITIJ INVESTMENTS LTD.**

*Naba Kumar Das.*

**Authorised Signatory/Director**

**NABA KUMAR DAS**

Director

DIN: 02604632

Place: Mumbai

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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, **NABA KUMAR DAS**, Director/ Compliance Officer, have examined the following compliance requirement of M/s **KSHITIJ INVESTMENTS 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?	<u>Yes</u>	The Company has its structured Digital Database.
2.	Whether control exists as to who can access the SDD for read/write alongwith the names and PAN of such person?	<u>Yes</u>	The absolute control exists as the name & PAN of the persons who have access to structured Digital Database is captured in the system.
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?	<u>Yes</u>	The Company has captured all the events of UPSI.
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?	<u>Yes</u>	The recipients were upfront informed that the information is UPSI and the entity has been captured in the Database prior to forwarding the UPSI data.
5.	Whether nature of UPSI have been captured alongwith date and time?	<u>Yes</u>	We have captured code name of the project rather capturing the nature of transaction. Sometimes, Compliance Officer may not be a party to the transaction, hence we capture code names.
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	<u>Yes</u>	The name of the person 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?	<u>Yes</u>	The name of the person is captured along with PAN.
8.	Whether the database has been maintained internally?	<u>Yes</u>	The Database is maintained internally on our internal server.
9.	Whether audit trail is maintained?	<u>Yes</u>	The Company has maintained the audit trail.
10.	Whether time stamping is maintained?	<u>Yes</u>	The Company has maintained the time stamping.
11.	Whether the database is non-tamperable?	<u>Yes</u>	The Database is non-tamperable as per the Observations and Confirmations received from the Board

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12.	Any other measures to ensure non-tamperability of the Database?	<u>Yes</u>	Access is only available with Compliance Officer, Company Secretary and designated officials of the Secretarial team. The Company has internal financial and operational controls which are subject to periodical management, secretarial and internal audit.
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**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 30<sup>th</sup> June, 2022 and has effectively captured 1 number of the said required events.

Yours faithfully

For KSHITIJ INVESTMENTS LIMITED

**KSHITIJ INVESTMENTS LTD.**

*NABA KUMAR DAS*

Authorised Signatory/Director

NABA KUMAR DAS

Director

DIN: 02604632

Place: Mumbai

Date: 09.08.2022