

BSEL INFRASTRUCTURE REALTY LIMITED

CIN : L99999MH1995PLC094498

Regd. Office : 737, 7th Floor, The Bombay Oilseeds & Oils Exchange Premises Co-op, Soc. Ltd.,
The Commodity Exchange, Plot No. 2,3 & 4, Sector-19-A, Vashi, Navi Mumbai-400 705.
Tel. : +91-22-6512 3124, Tele fax : +91 22 2784 4401, website : www. bsel.com



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022

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

I, **Monika Nathani**, Compliance Officer of the company, have examined the following compliance requirement of **BSEL Infrastructure Realty 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?	Yes	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?	Yes	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 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	We have captured nature of UPSI.
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 is captured along with PAN.
8.	Whether the database has been maintained internally?	Yes	The Database is maintained internally on our internal server.
9.	Whether audit trail is maintained?	Yes	The company has 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.
12.	Any other measures to ensure non-tamperability of the Database?	Yes	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 30th September, 2022 and has captured 1 number of the said required events.

For BSEL Infrastructure Realty Limited



Monika Nathani
Company Secretary and Compliance Officer

Date: 4th November, 2022
Place: Mumbai