

McNally Sayaji Engineering Limited Regd. & Corporate Office

SAYAJI

Ecospace Business Park, Campus - 2B 11F/12, New Town, Rajarhat, Kolkata - 700 160, India E mse.corp@msel.co.in **W** www.mcnallysayaji.com

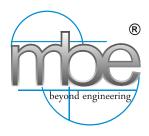
CIN No. L28999WB1943PLC133247

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED DECEMBER 31, 2022

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

I, Saikat Ghosh, Compliance Officer of the company, have examined the following compliance requirement of McNally Sayaji Engineering Limited 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	This is being further developed to make it in line with the requirement
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	This is being further developed to make it in line with the requirement
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	This is being further developed to make it in line with the requirement
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	This is being further developed to make it in line with the requirement
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	This is being further developed to make it in line with the requirement
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	This is being further developed to make it in line with the requirement
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	This is being further developed to make it in line with the requirement
8.	Whether the database has been maintained internally?	Yes	This is being further developed to make it in line with the requirement
9.	Whether audit trail is maintained?	Yes	This is being further developed to make it in line with the requirement
10.	Whether time stamping is maintained?	Yes	This is being further developed to make it in line with the requirement
11.	Whether the database is non-tamperable?	Yes	This is being developed
12.	Any other measures to ensure non-tamperability of the Database?	No	Being considered



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

Yours faithfully For McNally Sayaji Engineering Ltd.

Saikat Ghosh Company Secretary

Date: 05.01.2023 Place: Kolkata