CIN: L65993WB1983PLC036332 168-B, JAMUNALAL BAJAJ STREET, KOLKATA-700007 E mail: <u>swatiprojectsltd@gmail.com</u> Phone: +91 9830077000/9988796071 Website: <u>www.swatiprojects.com</u>

18th November, 2022

To The Listing Department The Calcutta Stock Exchange Limited 7 Lyons Range Kolkata- 700001

Sub: COMPLIANCE CERTIFICATE FOR THE QUARTER & HALF YEAR ENDED 30, SEPTEMBER 2022

Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Kindly take the same in yours records and acknowledge the receipt of the same.

Thanking You,

Yours faithfully,

For Swati Projects Limited

Roy Todd

Company Secretary Name: Ravi Todi



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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022

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

I, Ravi Todi, Compliance Officer of the company, have examined the following compliance requirement of Swati Projects 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	-
2.	Whether control exists as to who can access the SDD 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	-
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?		-



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5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	-
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	· · · · · · · · · · · · · · · · · · ·
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	
8.	Whether the database has been maintained internally?	Yes	-
9.	Whether audit trail is maintained?	Yes	-
10.	Whether time stamping is maintained?	Yes	
11.	Whether the database is non-tamperable?	Yes	Maintained with Password Security
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Kept only copy and cannot be copied



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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: NA

Further I also confirm that the Company was required to capture 1 number of events during the quarter& half year ended and has captured 1 number of the said required events.

For Swati Projects Limited

Rovi Todi

Ravi Todi Compliance Officer of the company Date:18/11/2022 Place:Kolkata

