

**WALCHANDNAGAR INDUSTRIES LIMITED**

Walchandnagar: 413 114, Dist Pune, Maharashtra, India

Tel: 02118- 357100 / 252 235 Fax: 02118- 252 358

Website: www.walchand.com Email: wil@walchand.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, G. S. Agrawal, Compliance Officer of the company, have examined the following compliance requirement of Walchandnagar Industries 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>	
2.	Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person?	<u>Yes</u>	
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?	<u>Yes</u>	
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?	<u>Yes</u>	
5.	Whether nature of UPSI have been captured along with date and time?	<u>Yes</u>	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	<u>Yes</u>	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	<u>Yes</u>	
8.	Whether the database has been maintained internally?	<u>Yes</u>	
9.	Whether audit trail is maintained?	<u>Yes</u>	
10.	Whether time stamping is maintained?	<u>Yes</u>	
11.	Whether the database is non-tamperable?	<u>Yes</u>	
12.	Any other measures to ensure non-tamperability of the Database?	<u>Yes</u>	Access is only available with Company Secretary and other designated officials of the Secretarial team.

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: 0

Further I also confirm that the Company was required to capture 02 number of events during the quarter ended and has captured 02 number of the said required events.

For Walchandnagar Industries Limited

G. S. Agrawal
Compliance Officer of the company

Date: November 14, 2022

Place: Mumbai