

Mumbai Office: 407 Business Park, Chincholi Junction, S V Road, Malad (W), Mumbai, 400 064.
Factory: Survey No. 46, Plot No. 5, Pen Khopoli Road, Village Arav, P.O. Ransai, Pen, Dist. Raigad, 402 107.
Tel No. +91 22 6792 9912

Date: 17th April, 2024

To,

The Department of Corporate Services, BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001.

Scrip ID: INFRAIND Scrip Code: 530777

Sub: SDD Compliance Certificate for the Quarter ended March 31, 2024.

Pursuant to provisions of Regulation 3(5), 3(6) and other applicable provisions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, and related Circulars of Stock Exchange, please find enclosed the Structured Digital Database (SDD) Compliance Certificate certified by the Compliance Officer for the Quarter ended March 31, 2024.

Kindly take the same in your records.

Thanking you

Yours faithfully, For Infra Industries Limited

Shilpa N. Satra Company Secretary and Compliance Officer Membership No: A45953

Encl.: As above



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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED MARCH 31, 2024

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

I, Shilpa N. Satra, Company Secretary & Compliance Officer (Membership No: A45953 of **Infra Industries Limited** ('the Company'), am aware of the compliance requirement of 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) and I certify that:

- 1. the Company has a Structured Digital Database in place.
- 2. control exists as to who can access the SDD.
- 3. all the UPSI disseminated in the previous quarter have been captured in the Database.
- **4.** the system has captured nature of UPSI along with date and time.
- 5. the database has been maintained internally and an audit trail is maintained.
- **6.** the database is non-tamperable and has the capability to maintain the records for 8 years.

I also confirm that the Company was required to capture 3 (**Three**) number of events during the quarter ended March 31, 2024 and has captured 3 (**Three**) number of the said required events.

I would like to report that the following noncompliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: The Company has installed software for maintaining and recording events in the nature of UPSI w.e.f. 28th November, 2023 and before that the Company was recording and maintaining events in a separate SDD Register made for that purpose. However, after installing the software the Company has recorded previous events in the software installed.

During the Quarter ending March 31, 2024 SDD Database accessed by authorised Representative of our Consultant whose details were captured subsequently in the SDD Database.

Yours faithfully, For Infra Industries Limited

Shilpa N. Satra Company Secretary and Compliance Officer Membership No: A45953 17.04.24, Mumbai