

India Radiators Limited

CIN: L27209TN1949PLC000963

Regd. Off. 88, Mount Road, Guindy, Chennai 600 032

Admin.Off: 88, Mount Road, Guindy, Chennai 600 032

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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, V Padmapriya, Compliance Officer of the company, have examined the following compliance requirement of India Radiators 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	-
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	-
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	UPSI captured for Trading Window Closure.
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	UPSI captured for Trading Window Closure.
5.	Whether nature of UPSI have been captured along with 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	-

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9.	Whether audit trail is maintained?	Yes	-
10.	Whether time stamping is maintained?	Yes	-
11.	Whether the database is non-tamperable?	Yes	-
12.	Any other measures to ensure non-tamperability of the Database?	Yes	In the software purchased, the Data base is posted in Demilitarized Zone (DMZ) without exposing to external network and this is implemented with WORM systems method (Write Once and Read Many). Encryption is adopted wherever sensitive data storage is enforced.

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 one number of events during the quarter year ended and has captured one number of the said required events.*

*Note- The company has intimated the stock exchange regarding trading window closure.

For India Radiators Limited

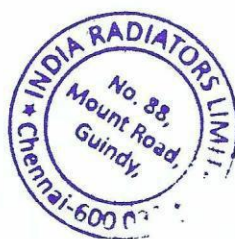
Padmapriya

V Padmapriya

Compliance Officer of the company

Date: 18-10-2022

Place: Chennai



Note: The attached certificate should cover events which have been disclosed by the listed entity to the stock exchange so that the secretarial auditor will not be exposed to UPSI.