

India Radiators Limited

CIN: L27209TN1949PLC000963

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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 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?	No	We assure to comply with the requirements henceforth.
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?	No	We assure to comply with the requirements henceforth.
5.	Whether nature of UPSI have been captured along with date and time?	No	We assure to comply with the requirements henceforth.

6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	No	We assure to comply with the requirements henceforth.
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	No	We assure to comply with the requirements henceforth.
8.	Whether the database has been maintained internally?	Yes	-
9.	Whether audit trail is maintained?	Yes	It is part of the software and shall be maintained henceforth.
10.	Whether time stamping is maintained?	Yes	It is part of the software and shall be maintained henceforth.
11.	Whether the database is non-tamperable?	Yes	It is part of the software and shall be maintained henceforth.
12.	Any other measures to ensure non-tamperability of the Database?	No	In the software purchased, the Database 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: *

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

*Note- The company has intimated the stock exchange regarding trading window closure. However 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) will be complied henceforth.

For India Radiators Limited


V Padmapriya

Compliance Officer of the company

Date: 09-08-2022

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.