

Date: October 20, 2022

To,
Manager (CRD),
Bombay Stock Exchange Ltd. (BSE),
P.J. Tower, Dalal Street,
Mumbai- 400001

Name of the Scrip: Esaar (India) Limited

Scrip Code - 531 502

Subject: Certificate under Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) for the Quarter ended September 30, 2022

Dear Sir / Madam,

In Compliance with Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), we are enclosing herewith a copy of the Compliance Certificate for maintaining a Structured Digital Database by the Company, for the quarter ended September 30, 2022.

This is for your information and records.

Thanking you,

For and on behalf of **Esaar (India) Limited**

**JAI
VAIDYA**

Digitally signed by JAI VAIDYA
DN: c=IN, o=Personal,
postalCode=400607, st=Maharashtra,
serialNumber=7862EE7E6C30A17A81
20D6375304887BC1692DA638A13898
F5E13F2456708560, cn=JAI VAIDYA
Date: 2022.10.20 16:15:46 +05'30'

Jai Vaidya
Company Secretary & Compliance Officer

Enclosure: a/a

HD AND ASSOCIATES COMPANY SECRETARIES

Address: Shop No. 7 BadamWadi, MarwadiChawl,
Grant Road (East), Mumbai - 400 004.
Email : Hardik@hdandassociates.com ; Mob.: +91-9699610825

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30TH SEPTEMBER, 2022

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

I, Hardik Darji, Practicing Company Secretary, have examined the following compliance requirement of Esaar (India) 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	
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	
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	



HD AND ASSOCIATES

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	
12.	Any other measures to ensure non-tamperability of the Database?	Yes	

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 **3** number of events during the quarter/half year ended and has captured **3** number of the said required events.

FOR HD AND ASSOCIATES
COMPANY SECRETARIES



PRACTICING COMPANY SECRETARY

PROPRIETOR

ACS NO. 47700 C.P.NO.: 21073

FRN: S2018MH634200

PLACE: MUMBAI

DATE: 20TH OCTOBER, 2022

UDIN: A047700D001312788

PEER REVIEW NO: 2208/2022

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.