

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31st Dec, 2022

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

I, P.Prabhakara Rao, Compliance Officer of Company, have examined the following compliance requirement of M/s. GTN Industries Limited and inform that the Company has to maintain 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) .

Sl. No	Compliance Requirement	Yes/No	Observation /Remarks
1	Whether the company has a structured Digital database in Place?	YES	
2	Whether Control exits as to who can access the SDD for read/write along with the name 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 there 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 capture and the reasons for the same?	YES	
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	
9	Whether audit trail in maintained?	YES	
10	Whether time stamping is maintained?	YES	
11	Whether the database is non - temperable ?	YES	
12	Any other measures to ensure non-tamper ability of the Database?	YES	

The number of days for which non-compliance was observed: Nil

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

For GTN Industries Limited

(P. Prabhakara Rao)
Compliance Officer
Date: 06-01-2023
Place: Hyderabad

