



August 9, 2022

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Fort, Mumbai 400001

National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C/1,
G Block, Bandra Kurla Complex,
Bandra (East), Mumbai 400051

Dear Sir,

Sub: Quarterly Compliance of Structural Digital Database under Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Re: Stock Code: 500337 (BSE) / PRIMESECU (NSE)

Pursuant to above referred regulations, please find attached the Compliance Certificate for the Quarter ended June 30, 2022.

This is for your information and records.

Thanking you,

Yours faithfully,
For **Prime Securities Limited**




Ajay Shah
Company Secretary
(ACS-14359)



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2022
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, **Ajay Shah, Compliance Officer**, have examined the following compliance requirement of **Prime Securities Limited** (“the Company”) 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 along with the names and PAN of such person?	Yes	-
3	Whether all the UPSI had been captured in the Database. If not details of events that had not been captured and the reason for the same?	Yes	-
4	Whether the recipients 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 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 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	-

The number of days for which non-compliance was observed: **Not Applicable**

Further I also confirm that the Company was required to capture 1 (One) event during the quarter ended and has captured 1 (One) number of the said required events.

For, **Prime Securities Limited**

Ajay Shah
Compliance Officer

Mumbai, August 9, 2022