



McNally Bharat Engineering Company Limited

CIN: L45202WB1961PLC025181

Corporate Office : Ecospace Campus 2B 11F/12

New Town Rajarhat North 24 Parganas Kolkata 700 160

T +91 3344591111 E mbe.corp@mbecl.co.in W www.mcnallybharat.com

Registered Office : 4 Mangoe Lane Kolkata-700 001

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST DECEMBER, 2022 (Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Indrani Ray, Compliance Officer, have examined the following compliance requirement of McNally Bharat Engineering Company 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 | This is being further developed to make it in line with the requirement |
| 2. | Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person? | Yes | -do- |
| 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 | -do- |
| 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 | -do- |
| 5. | Whether nature of UPSI have been captured alongwith date and time? | Yes | -do- |
| 6. | Whether name of persons who have shared the information has been captured along with PAN or any other identifier? | Yes | -do- |
| 7. | Whether name of persons with whom information is shared has been captured along with PAN or any other identifier? | Yes | -do- |
| 8. | Whether the database has been maintained internally? | Yes | -do- |
| 9. | Whether audit trail is maintained? | Yes | -do- |
| 10. | Whether time stamping is maintained? | Yes | -do- |
| 11. | Whether the database is non-tamperable? | Yes | -do- |
| 12. | Any other measures to ensure non-tamperability of the Database? | No | Being considered |

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

I further confirm that the Company was required to capture the reportable 'events' pursuant to provisions of Regulation 3 of the SEBI PIT Regulations, 2015 during the quarter ended 31st December 2022 and no such event was reported to have occurred.

For McNally Bharat Engineering Company Limited

INDRANI RAY

Indrani Ray

Compliance Officer

(McNally Bharat Engineering Company Limited is under Corporate Insolvency Resolution Process as per the provisions of the Insolvency and Bankruptcy Code, 2016. Its affairs, business, and assets are being managed by the Resolution Professional, Mr. Ravi Sethia, appointed by the Kolkata Bench of Hon'ble National Company Law Tribunal vide order dated 26 August 2022 (order published on 2 September 2022) under the provisions of the Code.)

Date & Time of Download : 18/01/2023 13:03:36

BSE ACKNOWLEDGEMENT

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| Acknowledgement Number | 18012023732633 |
| Date and Time of Submission | 18/01/2023 12:58:20 |
| Scripcode and Company Name | 532629 - MCNALLY BHARAT ENGINEERING COMPANY LTD. |
| Subject / Compliance Regulation | Structured Digital Database (SDD) compliance certificate |

Disclaimer : - Contents of filings has not been verified at the time of submission.



National Stock Exchange Of India Limited

Date of

18-Jan-2023

NSE Acknowledgement

| | |
|-------------------------------|--|
| Symbol:- | MBECL |
| Name of the Company: - | Mcnally Bharat Engineering Company Limited |
| Submission Type:- | Announcements |
| Short Description:- | Disclosure under SEBI (PIT) Reg 2015 |
| Date of Submission:- | 18-Jan-2023 01:19:06 PM |
| NEAPS App. No:- | 2023/Jan/5683/5699 |

Disclaimer : We hereby acknowledge receipt of your submission through NEAPS. Please note that the content and information provided is pending to be verified by NSEIL.