



October 14, 2023

BSE Limited  
Listing Department,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai 400 001

National Stock Exchange of India Limited  
Listing Department,  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No. C/1, G Block,  
Bandra Kurla Complex,  
Bandra (East), Mumbai-400 051

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Dear Sirs,

**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30<sup>TH</sup> SEPTEMBER 2023**  
*(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)*

This is with reference to Regulation 3(5) and 3(6) of SEBI (PIT) Regulations, 2015 which requires Structural Digital Database (SDD) to be maintained by the Company.

In compliance with the aforementioned Regulation, we are submitting herewith the quarterly compliance certificate for the quarter ended 30<sup>th</sup> September 2023, duly certified by the Practicing Company Secretary.

You are requested to take the attached compliance certificate on record.

Thanking you,

Yours faithfully,

**For FOSECO INDIA LIMITED**

**MAHENDRA**

**KUMAR**

**DUTIA**

**Mahendra Kumar Dutia**

**Compliance Officer & Company Secretary**

Digitally signed by  
MAHENDRA KUMAR  
DUTIA

Date: 2023.10.14  
21:59:06 +05'30'

Enclosing: as above

**RAJESH KARUNAKARAN**  
**COMPANY SECRETARY**  
**C.P. NO. 6581, F.C.S NO. 7441**

204 Pragati Towers, Opposite Shivajinagar S.T. Stand, Shivajinagar, Pune – 411 005  
[M-9890320874; www.csrk.in; e-mail: karunakaran2004@yahoo.com](mailto:karunakaran2004@yahoo.com)

**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30<sup>TH</sup> SEPTEMBER 2023 (PURSUANT TO SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015.**

I, Rajesh Karunakaran, Practicing Company Secretary, appointed by Foseco India Limited (the Company), am aware of the compliance requirement of the 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) and based on the information/explanation provided by the Company for the quarter ended as above including information of the Company disseminated on the stock exchanges website, and based on such checking of facts, information or developments relating to the Company, as were available on perusal of records and financial statements and subject to my note below, I certify that:-

Sr. No.	Particulars	Remarks/Comments
1.	the Company has a Structured Digital Database in place	Yes
2.	control exists as to who can access the SDD	Yes
3.	all the UPSI disseminated in the previous quarter have been captured in the Database	No. The Company had faced cyber security incident and hence IT systems at various places was shut down. Therefore, the entries relating to flow of UPSI could not be fully captured. As the restoration process of the IT systems is still underway, the Company informs that it will be able to record all UPSI entries effectively, once the systems are back to normal.
4.	the system has captured nature of UPSI along with date and time	Yes, subject to note at Serial No. 3. Though dummy entries were tested which showed that date and time are captured correctly.



5.	the database has been maintained internally and an audit trail is maintained	Yes, subject to note at Serial No. 3. Though dummy entries were tested which showed that the audit trail is maintained.
6.	the database is non-tamperable and has the capability to maintain the records for 8 years.	Yes

I also confirm and report that the Company was required to capture 1 event during the quarter ended as above and has captured the said required event. Subject to what has been reported above, there were no non-compliance(s) observed in the reporting quarter.

I also confirm that during the process of audit, no UPSI was shared with me in the capacity of certifying professional.

**Note which forms an integral part of my certificate:**

It has been observed that the SDD Server is present in the Company's Borken Datacenter at Vesuvius GmbH Gelsenkirchenerstraße 10, D-46325, Borken and the Backup of SDD Database is stored in the Company's Nederland datacenter at BVPantheon 307521 PR, Enschede, The Netherlands. The recent Cyber security incident faced by the Company has prevented the Company to bring the SDD to the Indian server. The Company's IT Team is working to transfer it to the Indian server.

**For Rajesh Karunakaran & Co.  
Company Secretaries**



**Rajesh Karunakaran  
Company Secretary in Practice  
FCSNo. 7441  
CP.No. 6581**

**The Peer Review Certificate no. 1260/2021 dated 28<sup>th</sup> June, 2021 .**

**UDIN- F007441E001290734**

**Pune:13<sup>th</sup> October 2023**

