

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

I, **Deepika Jagdale, Company Secretary & Compliance Officer of S&T Corporation Limited**, am aware of the compliance requirement of 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, subject to our comments against respective clauses herein, I certify that:

#	Particulars	Comments/Remarks
1.	The Company has a Structured Digital Database in place	The data base of Designated Persons and details of UPSI shared was maintained in MS Excel. The Company had acquired an SDD software on November 1, 2022 and the same was put to use w.e.f. November 15, 2022.
2.	Control exists as to who can access the SDD	Considering size and activity of Company and nature of UPSI generally shared, only Designated Persons are authorised to share UPSI and details of such sharing was maintained in MS Excel.
3.	All the UPSI disseminated in the previous quarter have been captured in the Database	Yes
4.	The system has captured nature of UPSI along with date and time	Yes
5.	The database has been maintained internally and an audit trail is maintained	The MS-Excel data base of Designated Persons and details of UPSI shared was maintained in MS-Excel and physical copy of the same, duly signed, were retained in records.
6.	The database is non-tamperable and has the capability to maintain the records for 8 years.	The SDD, which has been implemented w.e.f. November 15, 2022, is non-tamperable and has capability to maintain the records for 8 years. However, the MS-Excel file, by its very nature, is not temper proof.

I also confirm that the Company was required to capture one (1) event during the quarter and has captured the said event.

Contd...2/-

I would like to report as under:

As mentioned in the comments against respective clauses hereinabove, considering size and business activity of the Company; nature of UPSI and frequency of sharing the same; and prohibitive cost of SDD software, the database of designated persons and details of sharing UPSI to Insider(s) was maintained in MS Excel in past. However, the Company has now procured a SDD Software and same has been put to use on and from November 15, 2022.

For S&T Corporation Limited

Deepika Jagdale
Company Secretary & Compliance Officer
ACS -65539

Date: November 18, 2022

Place: Mumbai