

**COMPLIANCE CERTIFICATE
FOR THE QUARTER ENDED DECEMBER 31,2022**

(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	During the quarter the data base of Designated Persons and details of UPSI shared was maintained in MS Excel till November 14, 2022. During the quarter, 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 data base of Designated Persons and details of UPSI shared was maintained in MS-Excel upto November 14, 2022 and afterwards on SDD software which was put to use w.e.f. November 15, 2022
6.	The database is non-tamperable and has the capability to maintain the records for 8 years.	The SDD Software, which has been implemented w.e.f. November 15, 2022, is non-tamperable and has capability to maintain the records for 8 years.

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

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 till November 14, 2022. However, the Company had procured a Software for maintaining SDD 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: January 20, 2023
Place: Mumbai