

(Formerly known as SP Refractories Private Limited) (A Group of Mr. Prabodh S Kale) **CIN:** L51909MH2007PLC167114 **Registered Office:** M-10, M-11/1 & M-11/2, MIDC, Hingna, Nagpur-440016 **Office No.:** 07104-235388/235399 **Mob No:** 9422103525 **Email:** sprefractory@gmail.com/info@sprefractories.com

Date: 12th October, 2023

To The Manager Corporate Relationship Department, NSE Limited, Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai – 400 051

Symbol: SRPL

Sub: Submission of Stuructured Digital Database compliance certificate for the quarter ended September 30, 2023.

Sir / Madam,

Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations). Please find enclosed herewith the Stuructured Digital Database compliance certificate for the quarter ended September 30, 2023.

Request you to take the above information on your records.

Thanking you,

Yours faithfully,

For SP Refractories Limited

Mr. Pawan Kumar Company Secretary cum Compliance Officer Mem No: A59861



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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED

30th SEPTEMBER, 2023

(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Pawan Kumar, Compliance Officer of SP Refractories 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 I certify that:

- 1. the Company has a Structured Digital Database in place
- 2. control exists as to who can access the SDD
- 3. all the UPSI disseminated in the previous quarter have been captured in the Database
- 4. the system has captured nature of UPSI along with date and time
- 5. the database has been maintained internally and an audit trail is maintained
- 6. the database is non-tamperable and has the capability to maintain the records for 8 years.

I also confirm that the Company was required to capture 0 (zero) number of events during the quarter ended and has captured 0 (zero) number of the said required events.

I would like to report that the following noncompliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: Nil

For SP Refractories Limited

Mr. Pawan Kumar Company Secretary cum Compliance Officer Mem No: A59861

Date: 12th October, 2023