

Pankaj Srivastava
Chartered Accountant & Insolvency Professional
IBBI Reg No. IBBI/IPA-001/IP-P00245/2017-2018/10474

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

I, Pankaj Srivastava, Resolution Professional, have examined the following compliance requirement of Empee Sugars and Chemicals Limited (Company) and certify that the Company has not 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?	No	The company is undergoing the Corporate Insolvency Resolution Process ("CIRP") vide the order of Hon'ble NCLT, Amaravati Bench, Hyderabad dated 24.02.2022. The RP is in the process of inviting the Resolution Plans for further consideration by the members of the committee of creditors.
2.	Whether control exists as to who can access the SDD for read/write along with the names and PAN of such person?	No	
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?	No	
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?	No	
5.	Whether nature of UPSI have been captured along with date and time?	No	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	No	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	No	
8.	Whether the database has been maintained internally?	No	
9.	Whether audit trail is maintained?	No	
10.	Whether time stamping is maintained?	No	
11.	Whether the database is non-tamperable?	No	
12.	Any other measures to ensure non-tamperability of the Database?	No	

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: To be assessed

Further, I also confirm that the Company was required to capture "to be assessed" number of events during the quarter/half year ended and has captured "to be assessed" number of the said required events.

For Empee Sugars and Chemicals Limited (In CIRP)


Pankaj Srivastava
Insolvency Professional
IBBI/IPA-001/IP-P00245/2017-18/10474

Pankaj Srivastava
Resolution Professional
Date: 09th August 2022
Place: Bangalore

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