



Ahluwalia Contracts (India) Limited

ENGINEERING ♦ DESIGNING ♦ CONSTRUCTION

Date: October 28, 2022

To,

Compliance Department
BSE Limited.
25th Floor, P.J. Towers
Dalal Street, Mumbai -
400001

Compliance Department
National Stock Exchange of India Ltd.
5th Floor, Exchange Plaza,
Bandra Kurla Complex,
Bandra (East) Mumbai- 400051

Compliance Department
Calcutta Stock Exchange Ltd
7, Lyons Range, Dalhousie,
Murgighata, B B D Bagh,
Kolkata, West Bengal – 700001

Dear Sirs,

Sub.: SDD compliance certificate for the quarter ended September 30, 2022 of Ahluwalia Contracts (India) Limited.

NSE Stock Code: AHLUCONT – BSE: 532811

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 SDD compliance certificate for the quarter ended September 30, 2022.

Kindly take the same on record.

Thanking you,

Yours faithfully,

For Ahluwalia Contracts (India) Limited

Vipin Kumar Tiwari
Company Secretary

Enclosed: a/a





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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 2022

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

I, Vipin Kumar Tiwari, Compliance Officer, have examined the following compliance requirement of Ahluwalia Contracts (India) Limited (Company) and certify that the Company has 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?	Yes	The Company has its internal Structured Digital Database.
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	The control exists as the name & PAN of the persons who have access to the Structured digital database is captured in the system.
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?	Yes	The company has captured all the events of UPSI in the database.
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?	Yes	The recipients were upfront informed that the information is UPSI and the entry has been captured in the Database prior to forwarding the UPSI data.
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	The nature of UPSI is captured with date & time.
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	The name of the persons who have shared the information has been captured along with their PAN.
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	The name of the persons with whom information is shared is captured along with their PAN.
8.	Whether the database has been maintained internally?	Yes	The Database is maintained internally.
9.	Whether audit trail is maintained?	Yes	The company has started maintaining the audit trail.
10.	Whether time stamping is maintained?	Yes	The Company started maintaining the time stamping.
11.	Whether the database is non-tamperable?	Yes	The Database is non-tamperable.



Registered & Corporate Office : A-217, Okhla Industrial Area, Phase-I, New Delhi-110020

Phone: 011-49410500, 502, 517, & 599. Fax: 011-49410553 E-mail: mail@acilnet.com Website: www.acilnet.com

(Corporate Identification Number : L45101DL1979PLC009654)



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12.	Any other measures to ensure non-tamperability of the Database?	Yes	Access to the database is only available with Compliance Officer, Company Secretary and the designated officials of the Secretarial team.
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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: NIL

Further I also confirm that the Company was required to capture 2 number of events during the quarter ended and has captured 2 number of the said required events.

For Ahluwalia Contracts (India) Limited

(Vipin Kumar Tiwari)
Compliance Officer

