

# XPRO INDIA LIMITED



Birla Building (2nd Floor),  
9/1, R. N. Mukherjee Road,  
Kolkata - 700 001, India  
Tel: +91-33-40823700/22200600  
e-mail: xprocal@xproindia.com

November 11, 2022

National Stock Exchange of India Ltd.  
"Exchange Plaza",  
Bandra-Kurla Complex, Bandra (E),  
  
Mumbai 400 051

**Stock Symbol XPROINDIA(EQ)**

The Dy. General Manager  
BSE Limited  
Corporate Relationship Department  
1<sup>st</sup> Floor, New Trading Ring  
Rotunda Building, P J Towers  
Dalal Street, Fort  
Mumbai 400 001

**Stock Code No. 590013**

Dear Sir,

Sub: **Structured Digital Database (SDD) Compliance Certificate for the Quarter ended September 30, 2022**

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**, for your kind information & records.

Please acknowledge receipt.

Thanking You,

Yours Faithfully,  
For Xpro India Ltd.

**Amit Dhanuka**  
**Company Secretary**

Encl: a/a.

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## COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022

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

I, Amit Dhanuka, Compliance Officer, of Xpro India 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 – **System implementation is in Process**
5. the database has been maintained internally and an audit trail is maintained – **System implementation is in Process**
6. the database is non-tamperable and has the capability to maintain the records for 8 years.  
(Relevant points from 1 to 6 can be striked off in the case of non-compliance)

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.

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: Not Applicable

Note: The requirement of Time Stamping and Audit Trail has not been developed / implemented in the existing system, for which the Company is in discussion with vendors to maintain internally the system with adequate facility of Time Stamping and Audit Trail. We expect to finalise the same by end December 2022.

For Xpro India Limited

**Amit Dhanuka**  
**Compliance Officer**

Date: November 11, 2022

Place: Kolkata