



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30th SEPTEMBER, 2024

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

I, Heenal Hitesh Rathod, Company Secretary & Compliance Officer of Associated Coaters 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 the 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 not required to capture any events during the quarter ended 30th September 2024 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:~~

Thanking you.

Yours faithfully,

For Associated Coaters Limited

Heenal Hitesh Rathod

Company Secretary and Compliance Officer

Date: 18.10.2024

Place: Kolkata

