

Bothra Metals & Alloys Ltd.

A House of Metals

CIN: L27100MH2001PLC133926

+91-(022) 49785309 | info@bothrametals.com | www.bothrametals.com

Registered Address: Office No. 15, 3rd Floor, 5 Bothra House, Assembly Lane, Dadi Seth Agyari Lane, Kalbadevi, Mumbai - 400002, Maharashtra, Bharat

To
The Manager
Corporate Relationship Department,
Bombay Stock Exchange Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400001.

Date: 13th October, 2023

Scrip Code-535279, Scrip ID- BMAL

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

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

Request you to take the above information on your records.

Thanking you,

Yours faithfully,

For Bothra Metals and Alloys Limited

Sonu Singhal
Company Secretary Cum Compliance Officer
Membership No: F33059

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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, Sonu Singhal, Compliance Officer of SP Refractories Limited, I 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 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 (NIL) number of event during the quarter ended and has captured 1 (one) 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

Thanking you,

Yours faithfully,

For Bothra Metals and Alloys Limited

Sonu Singhal
Company Secretary Cum Compliance Officer
Membership No: F33059