



ARUNA HOTELS LIMITED

CIN: L15421TN1960PLC004255

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2022

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

I, K Lakshmi Compliance Officer of the company, have examined the following compliance requirement of Aruna Hotels 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	
2.	Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person?	Yes	
3.	Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?		We have purchased a software with all the required features and installed the same on 08.08.2022. We assure to comply with the requirements henceforth
4.	Whether the recipient 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	We have purchased a software with all the required features and installed the same on 08.08.2022. We assure to comply with the requirements henceforth
5.	Whether nature of UPSI have been captured along-with date and time?	No	We have purchased a software with all the required features and installed the same on 08.08.2022. We assure to comply with the requirements henceforth
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	No	We have purchased a software with all the required features and installed the same on 08.08.2022. We assure to comply with the requirements henceforth.
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	No	We have purchased a software with all the required features and installed the same on 08.08.2022. We assure to comply with the requirements henceforth
8.	Whether the database has been maintained internally?	Yes	
9.	Whether audit trail is maintained?	No	We have purchased a software

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Ph.: 044- 2530 3404; e-mail: directorsaruna@gmail.com;



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10.	Whether time stamping is maintained?	No	We have purchased a software with all the required features and installed the same on 08.08.2022. We assure to comply with the requirements henceforth
11.	Whether the database is non-tamperable?	No	We have purchased a software with all the required features and installed the same on 08.08.2022. We assure to comply with the requirements henceforth
12.	Any other measures to ensure non-tamperability of the Database?	No	In the software purchased, the Data base is posted in Demilitarized zone (DMZ) without exposing to external network and this is implemented with WORM systems method (Write Once and Read many). Encryption is adopted wherever sensitive data storage is enforced.

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:

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

For **Aruna Hotels Limited**



K Lakshmi
Compliance Officer of the company

Date: 09.08.2022
Place: Chennai

Note: The attached certificate should cover events which have been disclosed by the listed entity to the stock exchange so that the secretarial auditor will not be exposed to UPSI.

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