

# SHELTER INFRA PROJECTS LIMITED

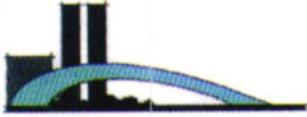
(formerly CCAP Limited)

REGD. AND HEAD OFFICE

ETERNITY, DN - 1, SECTOR -V, SALT LAKE CITY, KOLKATA - 700 091

PH.: 2357 - 6255 / 4003 2290

E-MAIL : info@ccapltd.in, WEBSITE : www.ccapltd.in, CIN - L45203WB1972PLC028349



## **COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2022**

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

I, Mrs Aparupa Das, Compliance Officer of the company, have examined the following compliance requirement of Shelter Infra Projects Limited (Company) and certify that the Company has maintained a Structured Digital Database (SDD) internally, 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 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 absolute control exists as the name & PAN of the persons who have access to structured Digital Database is captured in the system.              |
| 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?   | Yes    | The company has captured all the events of UPSI.  |
| 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? | 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 along with date and time?  | Yes    | Has the nature of UPSI have been captured along with date and 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 persons who have shared the information has been captured along with 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 persons with whom the information has been shared is captured along with PAN  |
| 8.     | Whether the database has been maintained internally?   | Yes    | The Database is maintained internally on our internal server.   |
| 9.     | Whether audit trail is maintained?   | Yes    | The company has maintained the audit trail.   |
| 10.    | Whether time stamping is maintained?   | Yes    | We have maintained the time stamping.   |
| 11.    | Whether the database is non-tamperable?  | Yes    | The database is Non temperable.   |
| 12.    | Any other measures to ensure non-tamperability of the Database?  | Yes    | Access is only available with Compliance Officer.   |

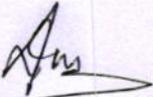
**Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.**

The number of days for which non-compliance was observed: NIL

Further I also confirm that the Company was required to capture **1** number of events during the quarter ended and has captured **1** number of the said required events.

Remark: The Digital Database is been maintained in encrypted excel sheet.

For Shelter Infra Projects Limited



Mrs Aparupa Das,  
Compliance Officer of the company  
Date: 10.08.2022  
Place: Kolkata



**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.