



Zenlabs Ethica Ltd.

CIN NO. : L74900CH1993PLC033112, GSTIN NO. : 03AAFCS6226G1ZL

Regd. Office : Plot No. 194-195, 3rd Floor, Industrial Area, Phase-II, Chandigarh -160 002

Tel. : 0172-465 1105, Fax : 0172-265 6855

E-mail: queries@zenlabsethica.com, Website : www.zenlabsethica.com

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2022

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

I, **Tanvi Chhabra**, Compliance Officer of the company, have examined the following compliance requirement of Zenlabs Ethica Limited 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	The Company has a Structured Digital Database
2.	Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person?	Yes	The control exists as the names and PAN of the person 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 such events
4.	Whether the recipients 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	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 have been captured along with PAN

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8.	Whether the database has been maintained internally?	Yes	The database has been maintained internallyP
9.	Whether audit trail is maintained?	No	The Company is in the process of procuring the necessary services to establish and maintain a software for Structural Digital Data base with the facility to maintain audit trail. In the meantime, the Company is maintaining all UPSI information in Excel. The information is periodically updated into the data files maintained by the Compliance Officer and is accessible to authorised officials on need basis.
10.	Whether time stamping is maintained?	No	The Company is in process of procuring the necessary services to establish and maintain a software for Structural Digital Data base for recording the information with time stamping.
11.	Whether the database is non-tamperable?	No	The Company is in process of procuring a non tamperable software for Structural Digital Data base. As of now, the database is maintained at the level of compliance officer with limited access to officials to edit the same.
12.	Any other measures to ensure non-tamperability of the Database?	No	The Company is in the process of procuring a non tamperable software for Structural Digital Data base. As of now, the database is maintained at the level of compliance officer with limited access to officials to edit the same.

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 4(four) number of events during the quarter ended and has captured 4 (four) number of the said required events.

For ZENLABS ETHICA LIMITED


(TANVI CHHABRA)
Compliance Officer of the company



Date: 09-08-2022

Place: Chandigarh

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