



Date: January 21, 2023

BSE Ltd. Corporate Relationship Department 1st Floor, New Trading Ring, Rotunda Building P.J. Towers, Dalal Street, Fort, Mumbai-400 001 Company's Scrip Code: 543669	The Manager, Listing Department, The National Stock Exchange of India Ltd., Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (E), Mumbai-400 051 Company's Scrip Code: RUSTOMJEE
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Dear Sirs,

Sub: Structural Digital Database (SDD) Compliance Certificate under SEBI (PIT) Regulations for the Quarter ended December 31, 2022

Pursuant to the provisions of Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), we are enclosing herewith the Structural Digital Database (SOD) Compliance Certificate in the specified format for the quarter ended 31st December, 2022.

You are requested to take the same on records.

Thanking you,

Yours faithfully,

For Keystone Realtors Limited

Bimal Nanda
Company Secretary and Compliance Officer
ACS 11578

KEYSTONE REALTORS LIMITED

Registered & Corp. Office : 702, NATRAJ, M. V. Road Junction, Western Express Highway,
Andheri (East), Mumbai - 400 069. Tel.: +91 - 22 - 6676 6888, Fax: +91 - 22 - 6676 6999.
Web : www.rustomjee.com, CIN : L45200MH1995PLC094208



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED DECEMBER 2022

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

I, Bimal K Nanda, Compliance Officer, have examined the following compliance requirement of Keystone Realtors 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 had been captured in the Database. If not details of events that had not been captured and the reason for the same?	Yes	
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 Regulations to upfront UPSI data. If not details of events that have not been captured and notifying sharing of UPSI and the reason for the same?	Yes	
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	
8.	Whether the database has been maintained internally?	Yes	

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9.	Whether time stamping is maintained?	Yes	
10.	Whether the database is non-tamperable?	Yes	
11.	Any other measures to ensure non-tamperability of the Database?	Yes	Access is only available with the designated officials. Hence, the Company ensures non-tamperability of the data

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

Further I also confirm that the Company was required to capture NIL number of events during the quarter ended December, 2022 and has captured NIL number of the said required events.

For Keystone Realtors Limited

Bimal Nanda
Company Secretary and Compliance Officer
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