



Date: 30.10.2023

To,  
Bombay Stock Exchange  
Corporate Relationship Department  
1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building,  
P.J. Towers, Dalal Street Fort,  
Mumbai-400 001

**Scrip Code: 531900**  
**Scrip id: CCLINTER**

**Sub: SSD compliance certificate for the quarter ended September 30, 2023**

Dear Sir(s);

Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), Please find enclosed herewith the SDD compliance certificate for the quarter ended September 30, 2023.

Kindly take the above information on record.

Thanking You,

Yours faithfully,  
**For CCL International Limited**

**Akash Gupta**  
**Managing Director**  
**DIN: 01940481**

**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2023**  
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Pradeep Kumar, Company Secretary of the M/s CCL International Limited (CIN: L26940DL1991PLC044520) am aware of 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 (PIT Regulations):

Sr. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	Yes	We are maintaining the data internally in the company with proper control measures and we are in the process of purchasing and installing the software.
2.	Whether control exists as to who can access the SDD for read/write alongwith the names and PAN of such person?	Yes	Yes, we are maintaining the PAN record for all the person Who can access the UPSI information or Database.
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	Yes, We have captured all the events occurred which contains UPSI during the Period from 01st July, 2023 to 30th September, 2023. (publishing the audited financial results for year ended 30.06.2023)
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	Yes, the recipients were informed and entry is done before forwarding the UPSI data.
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	Yes, we capture the nature of UPSI with Date & Time internally managed by the company.
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	Yes, we capture the information of the person who has shared the information.
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	Yes, we capture the information of the person to whom the information is shared.
8.	Whether the database has been maintained internally?	Yes	Yes, we have maintained the data internally.

For CCL International Limited  
  
Company Secretary

9.	Whether audit trail is maintained?	Yes	Yes, we have proper internal control system to check the correctness of the information captured under SEBI (PIT) Regulations, 2015. However, We are in the process of purchasing and installing the software to bring more transparency and integrity and which also have the feature to maintain audit trail.
10.	Whether time stamping is maintained?	Yes	Yes, we captured the information with time & date as and when the information is entered internally.
11.	Whether the database is non-tamperable?	Yes	We would like to bring in your kind attention that the data is not tempered because the database is in the custody of Compliance Officer only.
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Access is only available with the Compliance Officer / Company Secretary / Senior Management of the Company.

For CCL International Limited

For CCL International Limited



Company Secretary  
Pradeep Kumar  
Company Secretary  
A-50972

Akash Gupta  
Director  
DIN: 01940481