

# K.Z. LEASING & FINANCE LTD.

REGD. OFFICE : DESHNA CHAMBERS, H/H. KADVA PATIDAR VADI, USMANPURA,  
ASHRAM ROAD, AHMEDABAD-380014.(GUJARAT) PHONE : 079-27543200  
CIN L 65910 GJ 1986 PLC 008864

## COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED June 30, 2023

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

I, PARTH S. SHAH, Compliance Officer of the company, have examined the following compliance requirement of K.Z.LEASING & FINANCE 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	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 alongwith date and time?	Yes	We have captured code name of the project rather capturing the nature of transaction. Sometimes, Compliance Officer may not be a party to the transaction , hence we captured code names.
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 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 tamperable.
12.	Any other measures to ensure non-tamperability of the Database?	NO	

**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 1 number of events during the quarter/half year ended and has captured 1 number of the said required events.

FOR K Z LEASING AND FINANCE LIMITED

Parth

**Parth S. Shah**  
Company Secretary & Compliance Officer  
ACS : A60990  
Date: 03/06/2023  
Place: AHMEDABAD.

**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.