

INTERNAL SOP FOR CAPTURING INFORMATION IN THE STRUCTURAL DIGITAL DATABASE ("SDD")	
About the Database	
1	The SDD maintained by the Company is an inbuilt software.
2	The storage of SDD is on the cloud storage which is not accessible to any third party.
Format and manner of maintaining of SDD	
1	To have control on the sharing of UPSI by creating events on the Database for which such UPSI is being shared. The Compliance Officer has the centralized access as Administrator of the SDD System.
2	Lead Originator (Internal) informs the Compliance Officer about the nature of UPSI, event for such UPSI is being shared to the Recipient (Internal/ External).
3	In case the UPSI has been erroneously shared by the Originator without prior intimation to the Compliance Officer, the Compliance Officer upon receiving such information shall seek confirmation of the CFO of the Company and shall promptly create an event on the SDD post which the further sharing of information will be done.
4	On creation of the event, an automated email is received by the Originators and Recipients notifying them about delivery/receipt of the UPSI and the Recipient is informed to keep such information confidential which is provided by the Originator for legitimate purposes.
5	Post such email, the Originator disseminates the UPSI to the intended Recipients.
6	Entries in SDD once made is reflected in the Audit Logs for any deletion/modification made if any.
Manner of determining UPSI	
1	The Chief Financial Officer and Compliance Officer have identified an inclusive list of information that can be classified as UPSI based on past events occurred in the Company and any foreseeable events that are highly probable to appear in the near future.
2	Such UPSI is reviewed and revised on need basis.

Accessibility and Controls	
1	The Access rights of the SDD are given to the Compliance Officer.
2	The backup of SDD is saved on the cloud storage of the Company.
3	The Company has implemented monthly complete virtual machine backup for the SDD.
Sharing of SDD	
1	With whom SDD shall be shared - Holding Company, Practicing Company Secretary of the Company, Statutory Auditors, Management, Investor Relation Team, Costing Team, Accounts and Finance Team, Strategy Team, others for any Legitimate purpose on time basis.
2	Purpose of Sharing - Legitimate purpose on time and need basis.
Audit Trails	
1	The Audit Log can be downloaded date wise. It contains the Purpose of UPSI, Name of the Creator, Date and time on which Event was created, names of the Originator and Recipient.
Consequence of deviation from the norms stated in the SOP	
1	Any deviation is reported to the Compliance Officer which is discussed and approved by the CFO and later promptly create an event on the SDD post which the further sharing of information will be done.
2	Review of SDD controls - The SDD Certificate is taken from the Practicing Company Secretary which is submitted to Stock Exchanges on quarterly basis.
Manner of sensitization on the obligations	
1	The Company Secretary communicates on quarterly basis the obligations relating to sharing of the UPSI and maintenance of SDD.