



SEC 42 / 2022-23

9th August 2022

The General Manager, DCS – CRD
BSE Limited
Corporate Relationship Department
1st Floor, New Trading Ring
Rotunda Building, P J Towers
Dalal Street, Fort,
MUMBAI - 400 001
Scrip Code: **500114**

The General Manager, DCS – CRD
National Stock Exchange of India Ltd
Exchange Plaza,
Bandra-Kurla Complex,
Bandra (East),
MUMBAI - 400 051
Symbol: **TITAN**

Dear Sirs,

Sub: Structured Digital Database (SDD) compliance certificate for the quarter ended June 30, 2022

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 Structured Digital Database compliance certificate for the quarter ended June 30, 2022.

Kindly take the same on record and acknowledge receipt.

Yours truly,
For TITAN COMPANY LIMITED

Dinesh Shetty
General Counsel & Company Secretary

Encl. As stated





COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 2022

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

I, Ashok Sonthalia, Compliance Officer, have examined the following compliance requirement of Titan Company 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 UPSI data. If not details of events that have not been captured and the reason for the same?	Yes	
5.	Whether nature of UPSI have been captured along with 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	
9.	Whether audit trail is maintained?	Yes	
10.	Whether time stamping is maintained?	Yes	
11.	Whether the database is non-tamperable?	Yes	
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Data once updated in the system cannot be accessed for editing by anyone

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: None

Further I also confirm that the Company was required to capture 1 (one) number of event during the quarter ended Q1FY23 and has captured 1 (one) number of the said required events.

For Titan Company Limited

Compliance Officer

Date: 9th August 2022

Place:

Virginia, USA

