

SPERO PROPERTIES AND SERVICES PRIVATE LIMITED

Date: 18th January, 2023

To,
The Manager - Listing Department
BSE Limited
1st Floor, Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400001

ISIN	INE0IFW08011
Scrip Code	973377
Scrip ID	ZCSPSPL10

Dear Sir/ Madam,

Subject: Structured Digital Database ('SDD') Compliance Certificate for Spero Properties and Services Private Limited ("the Company") pursuant to the provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Pursuant to the provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and BSE Circular No. 20221028-16 dated 28th October, 2022, please find enclosed a copy of the SDD compliance certificate for the Company for the quarter ended 31st December, 2022.

This is for your information and records.

Thanking You,

For Spero Properties and Services Private Limited

Akshay Rajkumar Sharma
Company Secretary and Compliance Officer

Place: Mumbai

SPERO PROPERTIES AND SERVICES PRIVATE LIMITED

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST DECEMBER, 2022 FOR SPERO PROPERTIES AND SERVICES PRIVATE LIMITED

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

I, Akshay Rajkumar Sharma, Compliance Officer of Spero Properties and Services Private Limited (“the Company”), am aware of the 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) and I certify that:

Sr. No	Particulars	Status of Compliance
1.	the Company has a Structured Digital Database in place*	Yes
2.	control exists as to who can access the SDD*	Yes
3.	all the UPSI disseminated in the previous quarter have been captured in the Database*	Yes
4.	the system has captured nature of UPSI along with date and time*	Yes
5.	the database has been maintained internally and an audit trail is maintained*	Yes
6.	the database is non-tamperable and has the capability to maintain the records for 8 years.*	Yes

Note: After the deployment of SDD Tool, the Company is in compliance with above provisions.

For Spero Properties and Services Private Limited

Akshay Rajkumar Sharma
Company Secretary and Compliance Officer

Place: Mumbai