CITADEL REALTY AND DEVELOPERS LIMITED

Corporate Office: 702, Marathon Max, Mulund-Goregaon Link Road, Mulund (West), Mumbai - 400 080. Tel.: +91-22-6724 8484 / 88

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CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022

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

- I, Kiran Bangera, Compliance Officer of Citadel Realty & Developers 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:
- 1. the Company has a Structured Digital Database in place;
- 2. control exists as to who can access the SDD;
- 3. the system implemented by the Company is capable of capturing nature of UPSI along with date and time;
- 4. the database installed is non-tamperable and has the capability to maintain the records for 8 years.

Remedial Actions to be completed by December 20, 2022:

Necessary actions will be taken for capturing all the UPSI in the Database disseminated; and for maintaining the database and an audit trail;

For Citadel Realty & Developers Limited

Kiran Bangera

Compliance Officer

Date: November 18, 2022

Place: Mumbai