ZEAL AQUA LIMITED
CIN No: L05004GJ2009PLC056270

Date: 21/07/2025

To
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400 001.

Scrip ID/ Code : **ZEAL/539963**

Subject : **SDD Compliance Certificate for the Quarter ended June 30, 2025.**

Ref No. : **Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.**

Dear Sir/Madam,

Pursuant to Regulation 3(5) and 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015, Please find enclosed herewith the SDD Compliance Certificate issued by Practising Company Secretary for the quarter ended June 30, 2025.

Kindly take the same in your record

Thanking you,

Yours faithfully,
For Zeal Aqua Limited

ANITA DIGBIJAY PAUL
Digitally signed by ANITA DIGBIJAY PAUL
Date: 2025.07.21 20:18:38 +05'30'

Anita Digbijay Paul
Company Secretary & Compliance Officer
M.No.: F9282

Place: Surat
Encl: As Above

Regd. Office: Block No. 347, Vill. Orma, Ta: Olpad, Surat, Gujarat 394540 India
Tel.: +91 -2621-220047**Email:** zealaqua@gmail.com, **Website:** www.zealaqua.com

SAAURABH JHAVERI

(B.Com, LL.B, F.C.S)
Company Secretary, Trade Mark Attorney, Insolvency Professional
6th Floor, 620, Jolly Plaza, Opp. Athwagate Circle, Athwagate
Surat – 395001
Email: - sjhaveri333@gmail.com
Phone- 7016266365/ +919824440137

COMPLIANCE CERTIFICATE
FOR THE QUARTER ENDED 30th JUNE, 2025
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015)

To,
The Board of Directors,
ZEAL AQUA LIMITED
BLOCK NO. 347 VILL. ORMA, TA: OLPAD, SURAT- 394540, GUJARAT, INDIA

Company No.	:	056270
CIN	:	L05004GJ2009PLC056270
ISIN No.	:	INE819S01025

Authorised Share Capital of the Company:
Rs.13,00,00,000/- (Rupees Thirteen Crore Only)

I, SAAURABH JHAVERI, Practising Company Secretary appointed by **ZEAL AQUA LIMITED (CIN-L05004GJ2009PLC056270)** (hereinafter referred to as "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. all the UPSI disseminated in the previous quarter i.e. 30.06.2025 have been captured in the Database*
4. the system has captured nature of UPSI along with date and time
5. the database has been maintained internally and an audit trail is maintained
6. the database is non-tamperable and has the capability to maintain the records for 8 years

(Relevant points from 1 to 6 can be striked off in the case of non-compliance)

*** The Structured Digital Database (SDD) system was under maintenance during the previous quarter ended on June 30, 2025. As a result, the entries of all Unpublished Price Sensitive Information (UPSI) disseminated into the SDD software could not be made within the timelines prescribed under the SEBI (Prohibition of Insider Trading) Regulations, 2015.**

I also confirm that the Company was required to capture **12 (Twelve)** events during the quarter end 30.06.2025 and has captured **12 (Twelve)** numbers of the said required events as under:

I would like to report that the noncompliance(s) was observed in the SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED 31.03.2025 (Previous Report) and the remedial action(s) taken along with timelines in this regard is mentioned as per **Annexure – A** attached herewith:

Date: 19th July, 2025
Place: Surat

SAURABH JHAVERI
SURAT
FCS 6670
CP 3711
COMPANY SECRETARY

S Jhaveri

SAAURABH JHAVERI
PRACTISING COMPANY SECRETARY
M. No. – F6670
C.P. No. – 3711
Peer Review No. 2671/2022
ICSI UDIN - F006670G000816083

Disclaimer: This certificate is exclusively issued upon the request made by the Company and is issued solely based on the information, representation and documents provided. It is grounded entirely on factual data, interpretation, and implication of Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), and is subject to our professional opinion.

The obligation lies with the Management/Company to enforce the stipulations outlined in Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations). This includes the maintenance of records and the establishment of appropriate systems to guarantee adherence to said provisions. Furthermore, it is incumbent upon the Management/Company to ensure that such systems are sufficient and function efficiently in accordance with the Regulations and any subsequent amendments issued periodically.

Annexure - A

Listed entity has taken following actions to comply with the observations made in the previous report

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in previous report	Observation made in the secretarial compliance report for the year ended 31.03.2025	Compliance requirement (Regulations/ Circulars/ Guidelines including specific clause)	Details of Violation / deviations and Actions teken/Penalty impose, if any, on the listed entity	Remedial Action, if any, taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Did not maintain a Structured Digital Database (SDD) with adequate internal controls, timestamping, and audit trails as required under **Reg. 3(5)]** **AND** Non-Preservation of structured digital database (SDD) software as required under **Reg. 3(6)**	The Company has not provided the complete data maintained under structured digital database (SDD) software, hence we are unable to comments whether Company has complied the provisions of Regulation 3(5) and 3(6)SEBI (Prohibition of Insider Trading) Regulations, 2015 OR not.	Regulation 3(5) and 3(6) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.	Non-Compliance of Regulation3(5) and 3(6) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The Listed entity has not maintained SDD Data Base with adequate internal controls, timestamping, and audit trails during the Reporting period as per requirements of **Reg. 3(5)** **AND** Non-Preservation of structured digital database (SDD) software as required under **Reg. 3(6)** **The Company has not provided the report from the SDD software.**	During the reporting period, the SDD system was under maintenance and we were unable to enter periodically data on time into the SDD software. Hence, we unable to provide the complete data maintained under structured digital database (SDD) software. Furthermore, **the company assures that all entries in the Structured Digital Database (SDD) will be made within the timelines prescribed under Regulations 3(5) and 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 from now onwards.**	Acknowledged

Date: 19th July, 2025

Place: Surat

SAAURABH JHAVERI SURAT FCS 6670 CP 3711 COMPANY SECRETARY

S Jhaveri

SAAURABH JHAVERI
PRACTISING COMPANY SECRETARY
M. No. – F6670
C.P. No. – 3711
Peer Review No. 2671/2022
ICSI UDIN - F006670G000816083