

ZEAL AQUA LIMITED
CIN No: L05004GJ2009PLC056270



Date: 18/10/2025

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

Scrip ID/ Code : ZEAL/539963

Subject : SDD Compliance Certificate for the Quarter ended September 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 for the quarter ended September 30, 2025.

Kindly take the same in your record

Thanking you,

Yours faithfully,
For Zeal Aqua Limited

Anita Digbijay Paul
Company Secretary & Compliance Officer
FCS: 9282

Place: Surat
Encl: As Above

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

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED

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

I, Anita Digbijay Paul, Compliance Officer of Zeal Aqua Limited, (as decided by 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 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.

I also confirm that the Company was required to capture **09** number of events during the quarter ended and has captured **09** number of the said required events.

I would like to report that the following noncompliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard:

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 As a result, the entries of all Unpublished Price Sensitive Information (UPSI) disseminated into the SDD software could not be made within the timelines prescribed under the SEBI (Prohibition of Insider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)~~previous quarter~~ and the remedial action(s) taken along with timelines in this regard is mentioned as per **Annexure – A** attached herewith:*

For Zeal Aqua Limited

Anita Digbijay Paul
Company Secretary & Compliance Officer
FCS: 9282
Place: Surat

Date: 18/10/2025

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 taken/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 Regulation 3(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."	Acknowledged