



(M.) 9825560260

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CS JITENDRA R. BHAGAT

BHAGAT ASSOCIATES.

B. Com., D.B.I.M., F.C.S.

Company Secretary

, 2/1417-18, "URABH HOUSE", HANUMAN SHERI, SAGRAMPURA, RING ROAD, SURAT -395002

TO,
BOARD OF DIRECTORS,
GHUSHINE FINTRRADE OCEAN LIMITED,
SHOP NO-GF/27, AAGAM CROSS RD AC MARKET.
OPP-STAR, GALAXY, NR SHRUNAGAR RESI.
VESU-ABHAVARD, SURAT-395007.

COMPLIANCE CERTIFICATE FOR SDD

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

I, JITENDRA R. BHAGAT Proprietor of BHAGAT ASSOCIATES, Practising Company Secretary appointed by BOARD OF DIRECTORS OF GHUSHINE FINTRRADE OCEAN LIMITED (CIN: L65910GJ1995PLC025823) 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-tamper able and has the capability to maintain the records for 8 years.

~~(relevant points from 1 to 6 can be strike off in the case of noncompliance)~~

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

Company was reported to be non-compliant with maintaining SDD on BSE dashboard but following steps were taken towards implementation of SDD:

1. Company has purchased & installed SDD software
2. Company has appointed Ambica Pal Sharma member of ICSI as COMPANY SECRETARY & COMPLAINEE OFFICER.
3. Company has appointed Jenish Sadadiwala as CEO.

4. Company has recorded past UPSI shared till 30th JUNE, 2025 in the SDD software along with date & time.

This certificate is issued at the specific request of the company for filing with BSE & should not be used for any other purpose.

Place: Surat

Date: 25.07.2025

For BHAGAT ASSOCIATES
Company Secretary

JITENDRA
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JITENDRA
RAMANLAL
BHAGAT
Date: 2025.07.25
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JITENDRA R. BHAGAT
(Proprietor)

C. P. No.: 1311

FCS: 3032

UDIN:F003032G000863804

UID No. S1995GJ014500

PR 2665/2022

To, The Manager BOMBAY STOCK EXCHANGE LTD 1 ST Floor ,P J Towers , Dalal Street Mumbai- 400001. Equity Script Code: 539864 ISIN NO.: INE009U01011	DATE: 25.07.2025

Dear Sir/s,

Sub: SDD compliance PCS certificate for the FY 2024-25 TILL First quarter ended on 30th JUNE, 2025.

In pursuance to Standard Operating Process under SEBI (PIT) Regulations, 2015 Circular Ref. No: NSE/CML/31 dated October 18, 2024 for ensuring compliance with Structured Digital Database ("SDD"), we hereby state that company is listed on SME BSE Platform and the provisions of Regulation 24A of SEBI(LODR) Regulations, 2015 are not applicable. Hence as per the requirement to confirm compliance status of SDD, we are submitting herewith the SDD Compliance Certificate in the prescribed format (as per Annexure I) certified by Practicing Company Secretary confirming that the company is compliant with Structured Digital Database (SDD) provisions.
 Kindly take the above information on record.

Thanking you,

Yours Truly,

Place: SURAT

Date: 25.07.2025

FOR BOARD OF DIRECTORS OF
 GHUSHINE FINTRRADE OCEAN LIMITED

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MANAGING DIRECTOR CUM COMPLIANCE OFFICER

DIN: 00006643