

दि ओरिएण्टल इश्योरेन्स कम्पनी लिमिटेड

(भारत सरकार का उपक्रम)

पंजीकृत एवं प्रधान कार्यालय: "ओरिएण्टल हाउस", पो.बॉ.नं. 7037

ए-25/27, आसफ अली रोड, नई दिल्ली-110002

सिन: यू66010डीएल1947जीओआई007158



THE ORIENTAL INSURANCE COMPANY LIMITED

(A Government of India Undertaking)

Regd. & Head Office: "Oriental House" P.B. NO. 70

A-25/27, Asaf Ali Road, New Delhi-110002

CIN - U66010DL1947GOI007158

rashmibajpai@orientalinsurance.co.in

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30TH SEPTEMBER 2022

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

I, **Rashmi Bajpai**, Compliance Officer of **The Oriental Insurance Company Limited**, 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.
- (Relevant points from 1 to 6 can be strikedoff in the case of non-compliance)

I also confirm that the Company was required to capture 1 number of events during the quarter ended and has captured 1 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: **Please refer to our letter annexed hereto.**

For **The Oriental Insurance Company Limited**

(Rashmi Bajpai)

General Manager & Company Secretary

Compliance Officer or Practising Company Secretary

Date: 15/11/2022

Place: New Delhi

दि ओरिएण्टल इन्शुरेन्स कम्पनी लिमिटेड

(भारत सरकार का उपक्रम)

पंजीकृत एवं प्रधान कार्यालय: "ओरिएण्टल हाउस", पो.बॉ.नं. 7037

ए-25/27, आसफ अली रोड, नई दिल्ली-110002

सिन: यू66010डीएल1947जीओआई007158



THE ORIENTAL INSURANCE COMPANY LIMITED

(A Government of India Undertaking)

Regd. & Head Office: "Oriental House" P.B. NO. 70

A-25/27, Asaf Ali Road, New Delhi-110002

CIN - U66010DL1947GOI007158

rashmibajpai@orientalinsurance.co.in

Deptt : Board Sectt

15/11/2022

Manager

Listing Compliance Department

National Stock Exchange of India Ltd. (NSE)

5th Floor, Exchange Plaza

Bandra Kurla Complex

Bandra (East)

Mumbai-400051

Re : Standard Operating Process under SEBI (PIT) Regulations, 2015 for ensuring compliance with Structured Digital Database (SDD) vide NSE Circular Ref NSE/CML/2022/51

Ref: ISIN INE06GZ08015- Security OICL 29 (OICL) 8.80% 2029 (Series I) Type-PT

Dear Sir/Madam,

Please take reference of NSE Circular Dated 28th October 2022. In this connection we would like to submit that-

- 1) The Oriental Insurance Company Limited is a fully owned government Company which made private placement of NCDs and listed its aforementioned debt securities viz. 10 years, fixed coupon, Unsecured subordinated, redeemable Fully Paid-up non convertible debentures of Rs. 10 lacs each, amounting to Rs 750 Crore, issued pursuant to Insurance Regulatory Development Authority of India (Other Forms of Capital) Regulations, 2015. The Coupon in respect of these is fixed and payable annually every year in March.
- 2) Further, with reference to your circular dated 28th October 2022, the Company has identified and created a database of the Designated persons who on the basis of their roles and functions have regular / frequent access to information relating to a company or its securities, directly or indirectly, that is not generally available to others.
- 3) However, as the Company has issued fixed coupon bearing non convertible debentures of Rs. 10 lacs each, the unpublished financial and operational information available with the designated persons and other employees of the Company is not impactful enough to materially affect the price of the listed debentures of the Company. Furthermore, as these NCDs are held by institutional investors, the debentures are traded sparingly.

- 4) In the light of the facts given above, there are limited entries required in the SDD system of the Company, which is presently managed, monitored and accessed solely by the Compliance officer of the Company as a standalone system.
- 5) However, in view of the given directions of the SEBI and the instructions of the NSE, the Company in order to comply with the said circular, is seeking to implement a locally stirred software in Excel for the maintenance of the SDD of the Company having adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.
- 6) Also, as informed earlier, the Company is a wholly owned central government Company and the identification and implementation of a suitable server based SDD management software, which is harmonious with the currently implemented operational software of the Company, besides meeting the IRDAI standards, and is having suitable and sufficient security features to prevent leakage of sensitive customer data of the Company, is to be carried out as per the prescribed procedures of the government and the Company, in a transparent manner. This software implementation exercise is both expensive and time consuming as the Company has to follow the complete process of identification of the requirements, seek approval of the Board, float RFP for the procurement and then ensure final procurement in accordance with the procurement policy of the Company, CVC guidelines etc. Thus, the implementation of the software on the servers of the Company will take time.
- 7) We request you that the attached certificate should be read in light of the above facts pertaining to the Company.

Thanking you.

Yours faithfully,
For The Oriental Insurance Company Limited



Rashmi Bajpai
General Manager &
Company Secretary