



**THE INSTITUTE OF
Company Secretaries of India**
भारतीय कम्पनी सचिव संस्थान
IN PURSUIT OF PROFESSIONAL EXCELLENCE
Statutory body under an Act of Parliament
(Under the jurisdiction of Ministry of Corporate Affairs)

April 08, 2025

**COMPLIANCES WITH RESPECT TO STRUCTURED DIGITAL DATABASE (SDD) BY LISTED
ENTITY UNDER SEBI (PROHIBITION OF INSIDER TRADING REGULATIONS), 2015**

Dear Professional Colleague(s),

Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“SEBI PIT Regulations”) read with FAQs issued by the SEBI and circulars dated October 18, 2024, issued by National Stock Exchange of India Limited (NSE) and BSE Limited (formerly known as Bombay Stock Exchange) *inter alia* require SDD to be maintained by all the listed/ proposed to be listed entity(ies) and the intermediaries, fiduciaries associated with it and to adhere to the Standard Operating process for ensuring compliance with the SDD requirements.

In line with the above, the listed entities are required to comply with the below mentioned requirements w.r.t. SDD:

S. No.	Applicability	Compliance Requirement
1.	In case of SDD compliant entity(ies) to whom Regulation 24A of SEBI(LODR) Regulations, 2015 is applicable	Confirm SDD compliance status in the Annual Secretarial Compliance Report within sixty days from the end of financial year
2.	In case of SDD compliant entity(ies) to whom Regulation 24A of SEBI(LODR) Regulations, 2015 is not applicable	Confirm SDD compliance status by submitting Compliance Certificate certified by Practicing Company Secretary (PCS) within 60 days from the end of the Financial Year.
3.	In case of SDD non-compliant entity(ies)*	Submit quarterly compliance certificate certified by PCS till the time company complies with SDD requirements
4.	In case of proposed to be /newly listed companies	Provide PCS certificate to Stock Exchange at the time of filing of offer document.

* In this case, the NSE and BSE will take action within 30 days from the due date of submission of report/certificate.

Further, in case of **suspended non-compliant Companies**, the revocation will take place only when the confirmation of compliance status will be provided by the Company.

Therefore, the Company Secretaries appointed as Compliance Officer in a listed/ proposed to be listed entity(ies) shall strictly confirm with the aforesaid requirements and submit the certificate as applicable, to the Stock Exchange(s) in order to avoid any violation under the Regulations.

This is for your information please.

Regards,

Team, ICSI