

DBL BORGAON WATAMBARE HIGHWAYS PRIVATE LIMITED

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2022

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

I, Suranjan Barik, Compliance Officer of the company, have examined the following compliance requirement of DBL Boargaon Watambare Highways Private Limited (“**Company**”) and certify that the Company has maintained a 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):

Sr. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed
3.	Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-

Regd. Office: Plot No.5, Inside Govind Narayan Singh Gate, Chuna Bhatti Kolar Road, Bhopal – 462016 (M.P.),
Corporate Office: Unit No. 1901, 19th Floor, Tower B, World Trade Tower, Plot No. C-1, Sector-16, Noida-201301
Site Office: O&M Center of Pkg-2 - Village- Ankadhhal, Post Office- Chinke, Taluka- Sangole, District- Solapur (MH),
Pin Code: - 413308

Ph.:0755-4029999, Fax:0755-4029998 E-mail: compliance@bwhpl.co.in

(CIN No.: U45203MP2018PTC045516)

DBL BORGAON WATAMBARE HIGHWAYS PRIVATE LIMITED

			Convertible Debentures on privately placed
4.	Whether the recipient were upfront informed that the information which they will be receiving shortly is UPSI and the entry has been captured in the Database prior to forwarding the UPSI data. If not details of events that have not been captured and the reason for the same?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-

Regd. Office: Plot No.5, Inside Govind Narayan Singh Gate, Chuna Bhatti Kolar Road, Bhopal – 462016 (M.P.),
Corporate Office: Unit No. 1901, 19th Floor, Tower B, World Trade Tower, Plot No. C-1, Sector-16, Noida-201301
Site Office: O&M Center of Pkg-2 - Village- Ankadhral, Post Office- Chinke, Taluka- Sangole, District- Solapur (MH),
 Pin Code: - 413308
 Ph.:0755-4029999, Fax:0755-4029998 E-mail: compliance@bwhpl.co.in
(CIN No.: U45203MP2018PTC045516)

DBL BORGAON WATAMBARE HIGHWAYS PRIVATE LIMITED

			Convertible Debentures on privately placed
8.	Whether the database has been maintained internally?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed
9.	Whether audit trail is maintained?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed
10.	Whether time stamping is maintained?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed
11.	Whether the database is non-tamperable?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-

Regd. Office: Plot No.5, Inside Govind Narayan Singh Gate, Chuna Bhatti Kolar Road, Bhopal – 462016 (M.P.),
Corporate Office: Unit No. 1901, 19th Floor, Tower B, World Trade Tower, Plot No. C-1, Sector-16, Noida-201301
Site Office: O&M Center of Pkg-2 - Village- Ankadhal, Post Office- Chinke, Taluka- Sangole, District- Solapur (MH),
Pin Code: - 413308
Ph.:0755-4029999, Fax:0755-4029998 E-mail: compliance@bwhpl.co.in
(CIN No.: U45203MP2018PTC045516)

DBL BORGAON WATAMBARE HIGHWAYS PRIVATE LIMITED

			Convertible Debentures on privately placed
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company. Further, be noted that Company has issued Non-Convertible Debentures on privately placed

Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.

The number of days for which non-compliance was observed: **Not Applicable**

Further I also confirm that the Company was required to capture **Not Applicable** number of events during the quarter/half year ended and has captured **Not Applicable** number of the said required events.

For DBL Borgaon Watambare Highways Private Limited

Suranjan Barik

Compliance Officer of the company

Note: The attached certificate should cover events which have been disclosed by the listed entity to the stock exchange so that the secretarial auditor will not be exposed to UPSI.

Regd. Office: Plot No.5, Inside Govind Narayan Singh Gate, Chuna Bhatti Kolar Road, Bhopal – 462016 (M.P.),
Corporate Office: Unit No. 1901, 19th Floor, Tower B, World Trade Tower, Plot No. C-1, Sector-16, Noida-201301
Site Office: O&M Center of Pkg-2 - Village- Ankadhhal, Post Office- Chinke, Taluka- Sangole, District- Solapur (MH),
Pin Code: - 413308
Ph.:0755-4029999, Fax:0755-4029998 E-mail: compliance@bwhpl.co.in
(CIN No.: U45203MP2018PTC045516)