



Borgaon Watambare
Highways Private Limited

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2023

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

I, Yojna Ahuja Jain, Company Secretary and Compliance Officer of Borgaon Watambare Highways Private Limited (formerly known as DBL Borgaon Watambare Highways Private 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:

| Sr. No. | Compliance Requirement | Yes/No | Observation/ Remark |
|----------------|--|---------------|---|
| 1. | The Company has a Structured Digital Database in place | Yes | |
| 2. | The Control exists as to who can access the SDD | Yes | |
| 3. | All the Unpublished Price Sensitive Information (UPSI) disseminated in the previous quarter have been captured in the Database | Yes | The Company has implemented the database. However, due to technical glitches the Company was not able to disseminate the information through SDD software. The data, however, is available with time stamp in the electronic form. The technical issues have now been rectified. |
| 4. | The system has captured nature of UPSI alongwith date and time; | Yes | The Company has implemented the database. However, due to technical glitches the Company was not able to disseminate the information through SDD software. The data, however, is available with time stamp in the electronic form. The technical issues have now been rectified. |
| 5. | The database has been maintained internally and an audit trail is maintained. | Yes | |
| 6. | The database is non tamperable and has the capability to maintain the records for 8 years. | Yes | |

Note: There is no trading in the Securities of the Company and Non-Convertible Debentures have been issued on private placement basis. Further, it may be noted that the debt securities listed on the stock exchange are available only to institutional investors.

Borgaon Watambare Highways Private Limited Formerly Known as DBL Borgaon Watambare Highways Private Limited

Regd. Office: Cabin -1, S-11, IInd Floor, Gurukripa Plaza Zone – II, M.P. Nagar, Bhopal – 462011 (M.P), **CIN:** U45203MP2018PTC045516

Site Office: O&M Center of Pkg-2 - Village- Ankadhaj, Post Office- Chinke, Taluka- Sangole, District- Solapur (MH), Pin Code: - 413308

Corporate Office: 1901, 19th Floor, Tower - B, World Trade Tower, Plot # C - 1, Sector - 16, NOIDA - 201301, U.P., India.

Phone: +91-0120-486 8323, **Fax:** +91-0120-486 8330, **Email:** compliance@bwhpl.co.in



I also confirm that there was 1 (one) event during the quarter.

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: **Nil**

Yours faithfully,

For **Borgaon Watambare Highways Private Limited**
(Formerly known as DBL Borgaon Watambare Highways Private Limited)

Yojna Ahuja Jain

Company Secretary (M No. A41461)

Address: 308, Prakash Mohalla, East of Kailash
New Delhi 110065

Date: October 20, 2023

Place: Noida

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