

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 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	Yes	
	in place		The Company has implemented the
2.	The Control exists as to who can access the SDD	Yes	database.
3.	All the Unpublished Price Sensitive Information	Yes	
	(UPSI) disseminated in the previous quarter		
	have been captured in the Database		
4.	The system has captured nature of UPSI	Yes	Note: There is no trading in the
	alongwith date and time;		Securities of the Company and Non-
5.	The database has been maintained internally	Yes	Convertible Debentures has been
	and an audit trail is maintained.		issued on privately placed basis.
6.	The database is non tamperable and has the	Yes	
	capability to maintain the records for 8 years.		

I also confirm that there were no such events 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

Yojna Ahuja Jain

Company Secretary (M No. A41461)

Address: 1901, 19th Floor, Tower-B, World Trade Tower,

Plot No. C-1, Sector-16, Noidaa-201301

Date: July 19, 2023

Place: Noida