



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED MARCH 31, 2024

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

I, Poonam Bhatnagar, 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	All the Unpublished Price Sensitive Information (UPSI) disseminated in the previous quarter have been captured in the Database	Yes	
4.	The system has captured nature of UPSI alongwith date and time;	Yes	
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.

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)

Poonam Bhatnagar
Company Secretary (M No. A15812)

Date: April 20, 2024
Place: Noida