

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	Yes	
	in place		
2.	The Control exists as to who can access the SDD	Yes	
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	All the Unpublished Price Sensitive Information	Yes	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	
	alongwith date and time;		
5.	The database has been maintained internally and	Yes	
	an audit trail is maintained.		
6.	The database is non tamperable and has the	Yes	
	capability to maintain the records for 8 years.		

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

> 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, Madhya Pradesh, India Site Office: O&M Center of Pkg-2 - Village- Ankadhal, Post Office- Chinke, Taluka- Sangole, District- Solapur 413308, Maharashtra, India Corporate Office: Unit No. 1901, 19th Floor, Tower - B, World Trade Tower, Plot No. C - 1, Sector - 16, NOIDA - 201301, U.P., India Phone: +91-0120-486 8323, CIN: U45203MP2018PTC045516

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