

## COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED DECEMBER 31, 2022 Highways Private Limited

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

I, Yojna Ahuja Jain, 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	The Company is in the process of implementing the database
			Note: There is no trading in the Securities of the Company and Non-Convertible Debentures have been issued on privately placed basis
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	All the Unpublished Price Sensitive Information (UPSI) disseminated in the previous quarter have been captured in the Database	-	The Company is in the process of implementing the database
4.	The system has captured nature of UPSI alongwith date and time;	-	The Company is in the process of implementing the database
5.	The database has been maintained internally and an audit trail is maintained.	-	The Company is in the process of implementing the database
6.	The database is non-tamperable and has the capability to maintain the records for 8 years.	-	The Company is in the process of implementing the database

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** 

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

Yojna Ahuja Jain

**Company Secretary & Compliance Officer** 

**Date: January 20, 2023** 

Place: Noida