

# DBL BORGAON WATAMBARE HIGHWAYS PRIVATE LIMITED

## COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2022

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

I, Suranjan Barik, Compliance Officer of the company, have examined the following compliance requirement of DBL Boargaon Watambare Highways Private Limited (“**Company**”) and certify that the Company has maintained a 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):

Sr. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed
3.	Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-

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**Corporate Office:** Unit No. 1901, 19<sup>th</sup> Floor, Tower B, World Trade Tower, Plot No. C-1, Sector-16, Noida-201301  
**Site Office:** O&M Center of Pkg-2 - Village- Ankadhhal, Post Office- Chinke, Taluka- Sangole, District- Solapur (MH),  
Pin Code: - 413308  
Ph.:0755-4029999, Fax:0755-4029998 E-mail: [compliance@bwhpl.co.in](mailto:compliance@bwhpl.co.in)  
**(CIN No.: U45203MP2018PTC045516)**

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4.	Whether the recipient were upfront informed that the information which they will be receiving shortly is UPSI and the entry has been captured in the Database prior to forwarding the UPSI data. If not details of events that have not been captured and the reason for the same?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed
5.	Whether nature of UPSI have been captured alongwith date and time?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-

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8.	Whether the database has been maintained internally?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed
9.	Whether audit trail is maintained?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed
10.	Whether time stamping is maintained?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed
11.	Whether the database is non-tamperable?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-

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12.	Any other measures to ensure non-tamperability of the Database?	<b>Yes</b>	Provisions of PIT Regulation 2015 may not be applicable on the Company as there is no trading in the Securities of the Company.  Further, be noted that Company has issued Non-Convertible Debentures on privately placed

**Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.**

The number of days for which non-compliance was observed: **Not Applicable**

Further I also confirm that the Company was required to capture **Not Applicable** number of events during the quarter/half year ended and has captured **Not Applicable** number of the said required events.

For DBL Borgaon Watambare Highways Private Limited

Suranjan Barik

Compliance Officer of the company

**Note:** The attached certificate should cover events which have been disclosed by the listed entity to the stock exchange so that the secretarial auditor will not be exposed to UPSI.

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