



08<sup>th</sup> January 2024

To,  
Listing Department  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai-400001  
**Scrip Code: 973535**

**Sub: Structured Digital Database (“SDD”) Compliance Certificate for the quarter ended 31<sup>st</sup> December 2023.**

Dear Sir,

Pursuant to Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended, please find enclosed herewith the SDD Compliance Certificate (Annexure-A) for the quarter ended 31<sup>st</sup> December 2023.

Please take the above information on record.

Thanking you,  
Yours sincerely,

**For GR Phagwara Expressway Limited**

**Heena Talesara**  
**Company Secretary & Compliance Officer**  
**ICSI Membership No. ACS42655**

Encl: As above.



**Annexure-A**

**Compliance Certificate for the Quarter ended 31<sup>st</sup> December 2023**

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

I, Heena Talesara, Compliance Officer of GR Phagwara Expressway 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:

1. the Company has a Structured Digital Database in place.
2. control exists as to who can access the SDD.
3. all the UPSI disseminated in the previous quarter have been captured in the Database.
4. the system has captured nature of UPSI along with date and time.
5. the database has been maintained internally and an audit trail is maintained.
6. the database is non-tamperable and has the capability to maintain the records for 8 years.

I also confirm that the Company was required to capture 1 (one) number of events during the quarter ended and has captured 1 (one) number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard: Nil.

**For GR Phagwara Expressway Limited**

**Heena Talesara**  
**Company Secretary & Compliance Officer**  
**ICSI Membership No. ACS42655**

Date: 08.01.2024  
Place: Udaipur