



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 2022

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

I, Heena Talesara, Company Secretary & Compliance Officer, have examined the following compliance requirement of GR Phagwara Expressway 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?	Yes	-
2.	Whether control exists as to who can access the SDD for read/write alongwith the names and PAN of such person?	Yes	-
3.	Whether all the UPSI had been captured in the Database. If not details of events that had not been captured and the reason for the same?	Yes	-
4.	Whether the recipients 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?	Yes	-
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	-
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	-
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	-
8.	Whether the database has been maintained internally?	Yes	-
9.	Whether audit trail is maintained?	Yes	-
10.	Whether time stamping is maintained?	Yes	-
11.	Whether the database is non-tamperable?	Yes	-
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Access is only available with the compliance officer/company secretary

The number of days for which non-compliance was observed: NIL

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

For GR Phagwara Expressway Limited

Heena Talesara
Company Secretary & Compliance Officer

Date: 09.08.2022

Place: Udaipur

