

## COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 30<sup>TH</sup> SEPTEMBER, 2024

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

I, Gunjan Singh, Compliance Officer of National Highways Infra Investment Managers Private Limited (hereinafter referred to as 'Company') 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 the nature of UPSI along with the 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.

We also confirm that the Company was required to capture **6** (Six) number of events (covering 71 entries) during the quarter ended 30<sup>th</sup> September, 2024, and has captured **6** (Six) number of events (covering 71 entries) of the said required events.

7. 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 National Highways Infra Trust

**National Highways Infra Investment Managers Private Limited**

**Ms. Gunjan Singh**  
**Company Secretary and Compliance Officer**

**Date:** 19<sup>th</sup> October, 2024

**Place:** New Delhi