



JAIN P & ASSOCIATES

Company Secretaries

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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED MARCH, 2023

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

I, **Preeti Mittal**, Practicing Company Secretary appointed by **Vinayak Vanijya Limited (CIN: L52110DL1985PLC020109)**, 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 **THREE** number of events during the quarter ended and has captured **THREE** 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

**Jain P & Associates,
Company Secretaries**

**Preeti Mittal
Company Secretary
Memb. No.: A41759
C.O.P. No.: 17079**

**Place: Delhi
Date: 14-04-2023**

UDIN: A041759E000099168