## VINAYAK VANIJYA LIMITED

Registered Office: Flat No. 28, Stilt Floor, Devika Tower, 6, Nehru Place, New Delhi-110019 CIN: L52110DL1985PLC020109, Website: <a href="www.vinayakvanijya.com">www.vinayakvanijya.com</a>
Phone: 011 - 4367 5500, Email Id: <a href="www.vinayakvanijya.com">www.vinayakvanijya.com</a>

Date: 10.10.2024

## COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2024

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

- I, <u>Sunayana Anand</u>, Compliance Officer of 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 data base has been maintained internally and an audit trail is maintained
- 6. The database is non-tamperable and has the capability to maintain the recordsfor8years.

I also confirm that the Company was required to capture <u>FOUR</u> number of events during the quarter ended and has captured <u>FOUR</u> number of the said required events.

I would like to report that the following non-compliance(s) was observed in the previous quarter and there medial action(s) taken along with time lines in this regard: NIL

For Vinayak Vanijya Limited

Sunayana Anand Company Secretary & Compliance officer Memb No.: A46238

Place: New Delhi