GMR Highways

GMR Pochanpalli Expressways Limited

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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2023

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

- I, **Paramjeet Singh**, Compliance Officer of **GMR Pochanpalli Expressways 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 number of events during the quarter ended September 30, 2023 and has captured 1 number of the said required events.

For GMR Pochanpalli Expressways Limited

Paramjeet Singh Compliance Officer

Karnataka