



## OJHA & ASSOCIATES

Company Secretaries

473, Patel Nagar, P.O. Harjinder Nagar, Kanpur-208007

E-Mail: [cstanayojha@gmail.com](mailto:cstanayojha@gmail.com), Ph: +91-9198069316

### **COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022**

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

We have examined the following compliance requirement of **Vinayak Vanijya Limited (CIN: L52110DL1985PLC020109)** having its registered office at **Flat No.28, Stilt Floor, Devika Tower 6, Nehru Place, New Delhi-110019** 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)**:

<b>Sr. No</b>	<b>Compliance Requirement</b>	<b>Yes/No</b>	<b>Observation/ Remark</b>
1.	Whether the Company has a Structured Digital Database in place?	Yes	Nil
2.	Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person?	Yes	Nil
3.	Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?	Yes	Nil
4.	Whether the recipient 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	Nil
5.	Whether nature of UPSI have been captured along with date and time?	Yes	Nil
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	Nil
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	Nil
8.	Whether the database has been maintained internally?	Yes	Nil
9.	Whether audit trail is maintained?	Yes	Nil
10.	Whether time stamping is maintained?	Yes	Nil
11.	Whether the database is non-tamperable?	Yes	Nil
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Nil



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**Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.**

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

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

**For Ojha & Associates,  
Company Secretaries**

**Date: 21.10.2022**

**Place: Kanpur**

**Tanay Ojha  
Company Secretary  
Memb. No. A29658  
C.O.P. No. 10790**

**UDIN: A029658D001328681**