

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022

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

I, Neha Agarwal Company Secretary & Compliance Officer of the company, have examined the following compliance requirement of Digamber Capfin Limited (Company) and certify that only Non-Convertible Debentures are listed on the BSE stock exchange and company has partially 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):

| Sr. No | Compliance Requirement | Yes/No | Observation/ Remark |
|--------|---|--------|---------------------|
| 1. | Whether the Company has a Structured Digital Database in place ? | Yes | |
| 2. | Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person ? | Yes | |
| 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 | |
| 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 | |
| 5. | Whether nature of UPSI have been captured alongwith date and time ? | Yes | |
| 6. | Whether name of persons who have shared the information has been captured along with PAN or any other identifier ? | Yes | |
| 7. | Whether name of persons with whom information is shared has been captured along with PAN or any other identifier ? | Yes | |
| 8. | Whether the database has been maintained internally ? | Yes | |
| 9. | Whether audit trail is maintained ? | No | The software is in |



| | | | |
|-----|--|----|---|
| | | | implementation stage |
| 10. | Whether time stamping is maintained ? | No | The software is in implementation stage |
| 11. | Whether the database is non-tamperable ? | No | The software is in implementation stage |
| 12. | Any other measures to ensure non-tamperability of the Database ? | No | The software is in implementation stage |

Thanking You.

**For and on Behalf of
Digamber Capfin Limited**

**Neha Agarwal
Company Secretary & Compliance Officer
M. No.: A35576
Place: Jaipur
Date: 06.10.2022**

CC To:

**Catalyst Trusteeship Limited
(Erstwhile GDA Trusteeship Limited)
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