



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2022

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

I, **P S Amritha**, Compliance Officer of Vivriti Capital Private Limited (“the Company”), 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 _____ number of events during the quarter ended and has captured _____ number of the said required events - NA

I would like to report that the following noncompliance(s) was observed in the previous quarter and the remedial action(s) taken along with timelines in this regard:

1. The Company has taken necessary steps to onboard a software for capturing, monitoring, and managing the flow of unpublished price sensitive information as stipulated under the PIT regulations. The same is expected to go live in 3rd Quarter of FY 22-23.
2. Further, trainings with respect to SEBI (Prohibition of Insider Trading) Regulations, 2015, and Insider Compliance Management Tool were organized by the vendor and the Compliance Team of the Company for the employees & designated persons to familiarize them with the regulatory provisions and the procedures involved thereon.

For Vivriti Capital Private Limited

Name: P S Amritha
Designation: Company Secretary & Compliance Officer
Membership No: A49121

Date: 17-11-2022

Place: Chennai