



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED DECEMBER 31, 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 (“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 42 number of events during the quarter ended and has captured 42 number of the said required events.

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

Note: The Company has onboarded a software for capturing, monitoring, and managing the flow of unpublished price sensitive information as stipulated under the PIT regulations during the quarter ended 31st December 2022. The Company also conducted trainings for creating awareness relating to PIT regulations and the usage of software.

For Vivriti Capital Private Limited

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

Date: 20th January 2023

Place: Chennai