

Regd. & Admn. Office :

Bengaluru Road Varur

HUBBALLI - 581 207 Karnataka State

Phone : 63661 19394

Fax : 0836 2237614

e-mail : varurho@vrllogistics.com

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 2022*(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)*

I, Aniruddha Phadnavis, Company Secretary & Compliance Officer, have examined the following compliance requirement of VRL Logistics Limited 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):

Sr. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	Yes	Yes, KFIN FINTRAK (UPSI module) helps in storing the data as per Structured Digital Database (SDD) format.
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	Yes. FINTRAK UPSI module maintains data in structured manner along with the names and PAN details. The module is deployed at our internal location/server. Hence, the database security is monitored and handled by us.
3.	Whether all the UPSI had been captured in the Database. If not details of events that had not been captured and the reason for the same?	Yes	NA
4.	Whether the recipients 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	System is designed in such a manner that the information will be sent to recipient after inserting the same in module. The recipients first receive the alerts and later requires login into the module to check the kind and details of UPSI data shared.

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Phone : 0836 2237511 Fax : 0836 2256612 e-mail : headoffice@vrllogistics.com

Customer Care : HUBBALLI ☎ 0836 - 2307800 e-mail : customercare@vrllogistics.com**Website : www.vrllogistics.com** CIN : L60210KA1983PLC005247 **GSTIN (KAR): 29AABCV3609C1ZJ**

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5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	The nature of UPSI gets captured along with date and time, as entered in the module
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	Yes, module helps in capturing the name of persons who have shared the information along with PAN.
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	Yes, the name of persons with whom information is shared gets captured in the module along with PAN, if shared through module
8.	Whether the database has been maintained internally?	Yes	Database resides on our internal server at our location.
9.	Whether audit trail is maintained?	Yes	Yes, module helps in maintaining the audit trail.
10.	Whether time stamping is maintained?	Yes	Yes, module maintains time stamping of the transactions done through module.
11.	Whether the database is non-tamperable?	Yes	Yes, data security and non-tamperable logs get saved in the system
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Data gets stored in encrypted form.



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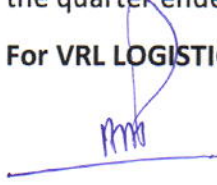
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The number of days for which non-compliance was observed: N.A.

Further I also confirm that the Company was required to capture 2 number of events during the quarter ended and has captured the said required events.

For VRL LOGISTICS LIMITED



ANIRUDDHA PHADNAVIS

Company Secretary & Compliance Officer

Date: 20.10.2022

Place: Hubballi