

October 17, 2024

To,

<b>National Stock Exchange of India Limited</b> Listing Compliance Department, Exchange Plaza, C-1, Block-G Bandra Kurla Complex, Bandra (E), Mumbai-400051  <b>Symbol - HIGHWAYS</b>	<b>BSE Limited</b> Corporate Relationship Department Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai- 400001 <b>Scrip Code - 974227, 974228, 975333 ("Non-Convertible Debentures") &amp; 727926 ("Commercial Paper")</b>
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**Subject: Compliance Certificate of Standard Operating Process for ensuring compliance with Structured Digital Database ('SDD') pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time (hereafter referred to as "PIT Regulations, 2015") for the quarter ended September 30, 2024.**

Dear Sir(s),

This has reference to circular no. 20221028-16 dated October 28, 2022, read along with Circular No. 20230329-20 and Circular No. 20230329-21, dated March 29, 2023, issued by BSE Limited (BSE) and Circular No. NSE/CML/2022/51 dated October 28, 2022, read along with Circular No. NSE/CML/25 dated March 29, 2023, issued by the National Stock Exchange of India Limited (NSE) regarding Submission of Structured Digital Database (SDD) Compliance Certificate on quarterly basis pursuant to the Regulation 3(5) & 3(6) of SEBI PIT Regulations, 2015.

Accordingly, please find enclosed herewith the Compliance certificate for the quarter ended September 30, 2024, pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015.

You are requested to kindly take the same on record.

The said intimation is also available on the website of the Trust i.e. [www.highwaystrust.com](http://www.highwaystrust.com).

Thanking you,

**For Highway Concessions One Private Limited**

*(acting in its capacity as Investment Manager of Highways Infrastructure Trust)*

**Meghana Singh**  
**Authorised Signatory**

**Place: Mumbai**  
**Encl: as above**

**CC:-**

<b>Axis Trustee Services Limited</b> (“Trustee of the HIT”)	<b>Catalyst Trusteeship Limited</b> (“Debenture Trustee”)	<b>ICICI Bank Ltd.</b> (“Issuing & Paying Agent”)
Axis House, Bombay Dyeing Mills Compound, Pandurang Budhkar Marg, Worli, Mumbai – 400025, Maharashtra, India	901, 9th Floor, Tower B, Peninsula Business Park, Senapati Bapat Marg, Lower Parel, Mumbai – 400013, Maharashtra, India	ICICI Bank Towers, Bandra Kurla Complex, Bandra, (East), Mumbai – 400051, Maharashtra, India

RAMESH CHANDRA BAGDI & ASSOCIATES

COMPANY SECRETARIES

31, SHRADDHANAND MARG, CHHAWANI, INDORE(MP)-452001

Email : [rcbagdipcs@yahoo.in](mailto:rcbagdipcs@yahoo.in)

Mobile – 9827244043

**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 30, 2024**

**(Pursuant to Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations))**

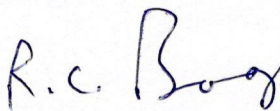
I, Ramesh Chandra Bagdi, proprietor of M/s. Ramesh Chandra Bagdi & Associates, Practising Company Secretary appointed by **Highways Infrastructure Trust( SEBI REGISTERED -“HIT or Trust”)** (acting through its Investment Manager Highway Concessions One Private Limited), am aware of the compliance requirement 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. HIT 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 HIT was required to capture 1 number of event(s) during the quarter ended September 30, 2024 and has captured 1 number of the said required event(s).

I would like to report that there were no non-compliance(s) observed in the previous quarter.

For Ramesh Chandra Bagdi & Associates,  
Company Secretaries,



Ramesh Chandra Bagdi

Proprietor

M. No.: FCS 8276

CP No.: 2871

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Date: October 15, 2024

Place: Indore

