



VAS INFRASTRUCTURE LTD.

CIN NO : L65100MH1994PLC076538

Regd. Off. : Plot No. 757/758, Jwala Estate, Soniwadi, Near Kora Kendra, S. V. Road,
Borivali (W), Mumbai - 400 092. Tel. : 022-2899 3092 / 0841 Fax : +91-22-2899 7806
Email : cs@vasinfrastructureltd.com # Website : www.vasinfrastructureltd.com

Date: April 29, 2023

To
The Manager
Corporate Relations Department
BSE Limited
Phiroze Jeejeebhoy Towers, Dalal Street
Mumbai – 400001

Ref: Scrip Code: 531574

Sub: SDD Compliance Certificate for the Quarter ended December 31, 2022

Pursuant to Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, please find attached herewith the SDD Compliance Certificate for the Quarter ended December 31, 2022.

Kindly take the above information on record.

For VAS INFRASTRUCTURE LTD

(H.K.BIJLANI)



COMPANY SECRETARY CUM COMPLIANCE OFFICER

En : as above



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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED DECEMBER 31,2022

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

I, Hariram K.Bijlani –FCS , Compliance Officer, have examined the following compliance requirement of M/s Vas Infrastructure Limited (Company) 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):

S No	Compliance Requirement	Yes / No	Observations / Remarks
1	Whether the Company has a Structured Digital Database in place?	Yes	The Company has its Structured Digital Database
2	Whether control exists as to who can access the SDD for read / write along with the names and PAN of such person?	Yes	Absolute control exists as the Name and PAN of the Persons who have access to the Structured Digital Database is captured in the system
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	Yes	The Company has captured all the events of Unpublished Price Sensitive Information (UPSI)
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	The recipients were upfront informed that the information is UPSI and the entry has been captured in the Database, prior to forwarding of the UPSI Data.
5	Whether nature of UPSI have been captured along with date and time?	No	We have captured the data with the date and time
6	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	The name of persons who have shared the information has been captured along with the PAN



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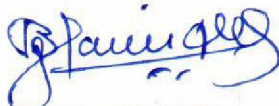
7	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	No	The name of persons with whom the information has been shared, has been captured along with the PAN
8	Whether the Database has been maintained internally?	Yes	Database is maintained internally
9	Whether Audit Trail is maintained?	Yes	The Company has maintained the Audit Trail
10	Whether time stamping is maintained?	No	The Company has maintained the Time Stamping
11	Whether the Database is non – tamperable?	Yes	The Database is non – tamperable. Adequate measures are taken to protect the same with limited access to the designated people only.
12	Any other measures to ensure non-tamperability of the Database?	Yes	Access is only available with the designated officials. Hence, the Company ensures nontamperability of the data.

Note: The information of the audit should cover the period when such information was inserted in the SDD up to the Date of Disclosure

The number of days for which non-compliance was observed: NIL

Further, I also confirm that the Company was required to capture 1 number of events during the Quarter ended December 31, 2022 and has captured 1 number of the said required events.

For VAS INFRASTRUCTURE LTD


(H.K. BIJLANI)

COMPANY SECRETARY



Date: April 29, 2023

Place: Mumbai