

Ref: -GVHL/REG_3(5) N 3(6)/2/SEBI/CS/SE/0922/2022-2023

Date: - 16th November, 2022

To,

BSE Limited, Listing Department, Phiroze Jeejeebhoy Towers 1 st Floor, Rotunda Building, Dalal Street, Mumbai - 400 001 Scrip code No.: - 532773	The National Stock Exchange of India Limited, Listing Department, Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051 Symbol: - GLOBALVECT
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Dear Sirs,

Sub: SDD compliance certificate for the quarter ended September 30, 2022

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)., Please find enclosed herewith the SDD compliance certificate for the quarter ended September 30, 2022.

Kindly take the above information on record.

Thanking you,

Yours faithfully,

FOR GLOBAL VECTRA HELICORP LIMITED



**RAAKESH SONI
COMPANY SECRETARY**

ENCL: - AS ABOVE

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

I, Raakesh Soni, Compliance Officer, have examined the following compliance requirement of Global Vectra Helicorp 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):

Sr. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	Yes	The Company has its in place 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	The absolute control exists as the name & PAN of the person who have access to structured Digital Database is captured in the system.
3.	Whether all the UPSI had been captured in the Database including previous quarter. 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 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 the UPSI data.
5.	Whether nature of UPSI have been captured along with date and time?	Yes	We have captured code name of the project rather capturing the nature of transaction. Sometimes, Compliance Officer may not be a party to the transaction, hence we captured code names.
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 information has been captured along with PAN
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	The name of persons is captured along with PAN
8.	Whether the database has been maintained internally and audit trail is maintained ?	Yes	The Database is maintained internally on our internal server and the Company has maintained the audit trail.
9.	Whether time stamping is maintained?	Yes	We have maintained the time stamping.
10.	Whether the database is non-tamperable and has the capability to maintain the records for 8 years ?	Yes	The database is non-tamperable and the company has capability to maintain the records for 8 years.
11.	Any other measures to ensure non-tamperability of the Database?	Yes	Access is only available with Compliance Officer, Company Secretary and designated officials of the Secretarial team. The Company has internal financial and operational controls which are subject to periodical management, secretarial and internal audit.

Note: The information of the audit should cover the period when such information was inserted in the SDD upto 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 and has captured 1 number of the said required events.

For Global Vectra Helicorp Limited



Raakesh Soni
Compliance Officer

Date: 16.11.2022
Place: - Mumbai

