



April 21, 2023

BSE Limited
Listing Department
1st Floor, New Trade Ring, Rotunda Building,
Phiroze Jeejeebhoy Towers, Dalal Street
Mumbai - 400 001

Dear Sir / Madam,

Scrip Codes: 958825,973308,973926,974073,974106

Subject: SDD Compliance Certificate for the quarter ended 31st March 2023

Pursuant to the provision of Regulation 3(5) and 3(6) of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015. Please find attached herewith SDD compliance certificate for the quarter that ended on 31st March 2023.

We request you kindly take the same on record.

Thanking You,
For Dvara Kshetriya Gramin Financial Services Private Limited

Deepika Bhatt
Company Secretary & Compliance Officer
M. No.: F11027

Dvara Kshetriya Gramin Financial Services Private Limited
(Formerly Pudhuaaru Financial Services Private Limited)

CIN.: U65991TN1993PTC024547

Regd. Office: 10th Floor, Phase I, IIT-Madras Research Park,
Kanagam Village, Taramani, Chennai 600113, India.

T: +91 44 66687000 | **E:** contactus@dvarakgfs.com | **W:** dvarakgfs.com



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED MARCH 31, 2023

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

I, Deepika Bhatt, Compliance Officer of Dvara Kshetriya Gramin Financial Services 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. the Company has a Structured Digital Database in place - *The same is maintained in form of an Excel.*
2. control exists as to who can access the SDD- *The excel is accessible only by the Compliance officer.*
3. all the UPSI disseminated in the previous quarter have been captured in the Database- *Captured in Excel only.*
4. the system has captured the nature of UPSI along with date and time - *Captured but not along with date and time as it is maintained via an excel.*
5. the database has been maintained internally and an audit trail is maintained- *No Audit trail is maintained as the data was maintained in Excel.*
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 four events during the quarter ended March 31, 2023 and has captured four of the said required events in Excel.

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

The Company has been maintaining the SDD database via an excel and is in the process of onboarding software from vendors for capturing, monitoring, and managing the flow of unpublished price-sensitive information as stipulated under the PIT regulations. The Company is also in process of conducting training for creating awareness relating to PIT regulations and the usage of the software.

For Dvara Kshetriya Gramin Financial Services Private Limited

Deepika Bhatt
Company Secretary & Compliance Officer
M. No.: F11027

Date: April 21, 2023

Place: New Delhi

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