

24-01-2023

To,
The Manager
Listing Department
BSE Limited, PhirozeJeejeebhoy Towers
Dalal Street, Mumbai – 400001

Scrip code: 542923

SUB: SDD COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED 31ST DECEMBER, 2022

Pursuant to 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 31ST December, 2022.

Thanking you,

For Tranway Technologies Limited

A handwritten signature in blue ink, appearing to read "Anitha R", written over a horizontal line.

Anitha R

Company Secretary and Compliance Officer

Enclosed: CC

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED December 31st, 2022

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

I, Anitha. R, Company Secretary and Compliance Officer of the company, have examined the following compliance requirement of Tranway Technologies 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?	<u>Yes</u>	
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	<u>Yes</u>	
3.	Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?	<u>Yes</u>	
4.	Whether the recipient was 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?	<u>Yes</u>	
5.	Whether nature of UPSI have been captured alongwith date and time?	<u>Yes</u>	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	<u>Yes</u>	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	<u>Yes</u>	
8.	Whether the database has been maintained internally?	<u>Yes</u>	

9.	Whether audit trail is maintained?	<u>Yes</u>	
10.	Whether time stamping is maintained?	<u>Yes</u>	
11.	Whether the database is non-tamperable?	<u>Yes</u>	
12.	Any other measures to ensure non-tamperability of the Database?		Currently data is maintained in excel form. Software has been procured by company and it is in a Implementation and Training Stage.

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 one number of events during the quarter ended and has captured one number of the said required events.

For Tranway Technologies Limited



Anitha. R
Company Secretary and Compliance Officer

Date: 24th January 2023

Place: Bangalore