

VTL/CS/22-23/

9 AUG 2022

BSE Ltd.
Corporate Relationship Department
1st Floor, New Trading Ring,
Rotunda Building
P.J. Towers, Dalal Street,
Fort,
MUMBAI-400 001

The Manager,
Listing Department,
The National Stock Exchange of India Ltd.,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E),
MUMBAI-400 051

Company's Scrip Code: 517015

Company's Scrip Code: VINDHYATEL

Dear Sirs,

**Sub: Structural Digital Database (SDD) Compliance
Certificate under SEBI (PIT) Regulations for the
Quarter ended 30th June, 2022**

Pursuant to the provisions of Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), we are enclosing herewith the Structural Digital Database (SDD) Compliance Certificate in the specified format for the quarter ended 30th June, 2022.

You are requested to take the same on records.

Thanking you,

Yours faithfully,
For Vindhya Telelinks Limited



(Dinesh Kapoor)
Company Secretary & Compliance Officer



Encl: As above

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 2022

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

I, Dinesh Kapoor, Compliance Officer, have examined the following compliance requirement of Vindhya Telelinks 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	
2.	Whether control exists as to who can access the SDD for read/write alongwith the names and PAN of such person?	Yes	
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	
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?	No	There is no such requirement under Regulation 3(5) of PIT Regulations to upfront notifying sharing of UPSI and to make entry in SDD before sharing of UPSI.
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	
8.	Whether the database has been maintained internally?	Yes	
9.	Whether audit trail is maintained?	Yes	
10.	Whether time stamping is maintained?	Yes	
11.	Whether the database is non-tamperable?	Yes	
12.	Any other measures to ensure non-tamperability of the Database?	No	None

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 two (2) number of events during the quarter ended June, 2022 and has captured two (2) number of the said required events.

For Vindhya Telelinks Limited


(Dinesh Kapoor)
Compliance Officer



Date: 09.08.2022
Place: New Delhi