

HIGHWAYS INFRASTRUCTURE TRUST

January 17, 2023

To, Listing Compliance Department, National Stock Exchange of India Limited Exchange Plaza, C-1, Block-G Bandra Kurla Complex, Bandra (E), Mumbai-400051 Symbol- HIGHWAYS	To, Corporate Relations Department, BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai — 400 001 Security Code- 974227 & 974228
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Sub: Compliance Certificate of Standard Operating Process for ensuring compliance with Structured Digital Database ('SDD') pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015) as amended from time to time (hereafter referred to as "PIT Regulations") for the quarter ended December 31, 2022.

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED DECEMBER 31, 2022

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

I, Kunjal Shah, Compliance Officer of Highway Concessions One Private Limited (acting in its capacity as Investment Manager of Highways Infrastructure Trust), am aware of the compliance requirement of Structured Digital Database ('SDD') pursuant to provisions of Regulation 3(5) and 3(6) of the 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;
2. control exists as to who can access the SDD;
3. all the UPSI disseminated in the previous quarter have been captured in the Database;
4. the system has captured nature of UPSI along with date and time;
5. the database has been maintained internally and an audit trail is maintained;
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 **NIL** number of event during the quarter ended December 31, 2022 and has captured **NIL** number of the said required events.

I would like to report that no non-compliance(s) was observed in the previous quarter.

For Highway Concessions One Private Limited

(acting in its capacity as Investment Manager of Highways Infrastructure Trust)

KUNJAL
BHAVIK SHAH

Digitally signed by
KUNJAL BHAVIK SHAH
Date: 2023.01.17
17:42:38 +05'30'

Kunjal Shah
Company Secretary and Compliance Officer

Place: Mumbai