



ROYAL ORCHID HOTELS LTD.,

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

I, Amit Jaiswal, Chief Financial Officer, have examined the following compliance requirement of Royal Orchid Hotels 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 along with 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? | Yes | |
| 5. | Whether nature of UPSI have been captured along with 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 | |

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: N.A.

Further I also confirm that the Company was required to capture one number of events during the quarter/half year ended and has captured one number of the said required events.

For Royal Orchid Hotels Limited


Amit Jaiswal
Chief Financial Officer



Date: 04.01.2023