COMPLIANCE CERTIFICATE FOR THE QUARTER AND YEAR ENDED MARCH 31, 2024

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

I, Mr. Shahnawaz A Shaikh, Compliance Officer for the *Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015)*, have examined the following compliance requirement of Octaware 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?	Yes	Yes, Company has its structured Digital Database.
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	The absolute control exists as the name and PAN of the persons who have access to structured Digital Database is captured in the system.
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?	Yes	The company has captured all the UPSI events.
4.	Whether the recipient 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	The recipient were upfront informed that the information is UPSI and the entry has been captured in the Database prior to forwarding the UPSI data.
5.	Whether nature of UPSI have been captured alongwith date and time?	Yes	The Company has captured the nature of UPSI along with the date and time.
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	The name of persons who have shared the information has been captured along with PAN.
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	The name of persons has been captured along with PAN.
8.	Whether the database has been maintained internally?	Yes	Yes, the database is maintained internally on our internal server.
9.	Whether audit trail is maintained?	Yes	The Company has maintained audit trail.
10.	Whether time stamping is maintained?	Yes	The Company has maintained time-stamping.
11.	Whether the database is non-tamperable?	Yes	Yes, database is non-tamperable.
12.	Any other measures to ensure non-tamperability of the Database?	Yes	Access is only available with the Compliance Officer.

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

For Octaware Technologies Limited

SHAHNAWAZ AIJAZUDDIN SHAIKH

Digitally signed by SHAHNAWAZ AIJAZUDDIN SHAIKH
Date: 2024.04.01 14:19:14 +05'30'

Mr. Shahnawaz A Shaikh
Compliance Officer
Date:01.04.2024
Place: Mumbai

COMPLIANCE CERTIFICATE FOR THE QUARTER AND YEAR ENDED MARCH 31, 2024
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015)

I Mr. Shahnawaz Shaikh, Compliance Officer for the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015), of Octaware Technologies Limited , 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
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.

(relevant points from 1 to 6 can be striked off in the case of non-compliance)

I also confirm that the Company was required to capture zero number of events during the quarter ended and has captured zero number of the said required events.

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: NIL

SHAHNAWAZ AIJAZUDDIN SHAIKH
Digitally signed by SHAHNAWAZ AIJAZUDDIN SHAIKH
Date: 2024.04.01 14:19:41 +05'30'

For Octaware Technologies Limited
Compliance Officer
Date: 01.04.2024
Place: Mumbai

Octaware Technologies Limited Mumbai