

Date: 09.08.2022

To,

BSE Limited P.J. Towers, Dalal Street Mumbai - 400001

Dear Sir/Madam,

Sub: Submission of SDD Compliance Certificate for the Quarter Ended June 30, 2022 under

Regulation 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Ref: Scrip code: 540570

Unit: Variman Global Enterprises Limited

With reference to the subject cited, please find the attached Structured digital base (SDD) compliance certificate for the quarter ended 30.06.2022 under Regulation 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

This is for the information and records of the Exchange, please.

Thanking you.

Yours sincerely,

For Variman Global Enterprises Limited

Hyderabad

D. Sirish

Managing Director DIN: 01999844

DIN. 01777011

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, Madhu Mala Solanki, Compliance Officer, have examined the following compliance requirement of Variman Global Enterprises 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. | Compliance Requirement | Yes/No | Observation/ Remark |
|-----|---|--------|---------------------|
| No | | | |
| 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: Nil

Further I also confirm that the Company was required to capture Six (6) number of events during the quarter/half year ended and has captured Six (6) number of the said required events.

- Purchase Order worth Rs. 88.14 Lakhs received from Centre for Development of Advanced Computing, Hyderabad on 04.04.2022.
- 2. Proceedings of Extra Ordinary General Meeting held on 12.04.2022.
- Allotment of 80,600 Equity shares and 2,35,000 convertible warrants, both at an issue price 165/- per share (including a premium of Rs. 155/- per share) on 03.05.2022.
- Splitting of the face value of the existing equity shares from Rs. 10/- per share to Re. 1 share, subject to the approval of the shareholders in next General Meeting on 03.05.2022.
- 5. Audited financial results for the quarter and year ended 31.03.2022 on 28.05.2022.
- 6. Change in directorate on 22.06.2022.

For Variman Global Enterprises Limited

Madhu Mala Solanki

Company Secretary & Compliance Officer

Date: 09.08.2022 Place: Hyderabad