



Upsurge Investment & Finance Ltd.

COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED SEPTEMBER 2022

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

I, Diksha Joshi, Compliance Officer of Upsurge Investment & Finance Limited, am 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.

I also confirm that the Company was required to capture 2 number of events during the quarter ended and has captured 2 number of the said required events.

For Upsurge Investment & Finance Limited

Diksha Joshi
Company Secretary & Compliance Officer
Membership No- A66150
Date: 18.11.2022
Place: Mumbai