



**Trade-wings**  
LIMITED

A-2 Kaveri CHS, Plot No.63  
Sector 17, Vashi  
Navi Mumbai - 400 705. INDIA  
Phone : +91 (022) 68835801  
Email : companysecy@twltravel.com  
Website : www.tradewings.in

Date: 28<sup>th</sup> August 2023.

To,

BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai- 400001

Dear Sir/ Madam,

**Subject: Structured Digital Database Compliance Certificate for quarter ended on June 30, 2023.**

**Ref: Regulation 3 (5) & 3 (6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015**

In terms of Regulation 3(5) & 3 (6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, please find enclosed herewith the Structured Digital Database Compliance Certificate for the quarter ended on March 31, 2023.

Kindly take the above on record and oblige.

Thanking you,  
**For and on behalf of**  
**TRADE WINGS LIMITED**

**Zurica Kevin Pinto**  
**Company Secretary and Compliance Officer**  
**Membership Number: A27623**



**Place: Mumbai**  
Encl: As above



**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED MARCH 31, 2023**

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

I, Zurica K Pinto, Compliance Officer of the company, have examined the following compliance requirement of Trade Wings Limited 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
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 have been captured in the Database. If not details of events that have not been captured and the reason for the same?	YES	
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	
5.	Whether nature of UPSI have been captured alongwith date and time?	YES	Only date captured not the time
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?	NO	
11.	Whether the database is non-tamperable?	YES	
12.	Any other measures to ensure non-tamperability of the Database?	YES	Located on a computer not connected to the internet and file is password protected.

**Note: The information of the audit should cover the period when such information was inserted in the SDD up to the date of disclosure.**

The number of days for which non-compliance was observed:

Further I also confirm that the Company was required to capture 02 number of events during the quarter/half year ended and has captured 02 number of the said required events.

For Trade Wings Limited

Ms. Zurica Kevin Pinto  
Company Secretary and Compliance Officer  
Membership Number: A27623  
Date: 28<sup>th</sup> August, 2023  
Place: Mumbai





**COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED MARCH 31, 2023**

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

I, Zurica K Pinto, Compliance Officer of Trade Wings Limited. I 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
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 02 number of events during the quarter ended and has captured 02 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: Would like to confirm that there were no non-compliance(s) observed in the previous Quarter

For Trade Wings Limited,

Ms. Zurica Kevin Pinto  
Company Secretary and Compliance Officer  
Membership Number: A27623



Date: 28<sup>th</sup> August, 2023

Place: Mumbai