



Trade-wings
LIMITED

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Sector 17, Vashi
Navi Mumbai - 400 705. INDIA
Phone : +91 (022) 68835801
Email : companysecy@twltravel.com
Website : www.tradewings.in

Date: 28th 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 December 31, 2022.

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 December 31, 2022.

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 DECEMBER 31, 2022

(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 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 05 number of events during the quarter ended and has captured five 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: 28th August, 2023

Place: Mumbai



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED DECEMBER 31, 2022

(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. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	<u>YES</u>	
2.	Whether control exists as to who can access the SDD for read/ write along with the names and PAN of such person?	<u>YES</u>	
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?	<u>YES</u>	
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?	<u>YES</u>	
5.	Whether nature of UPSI have been captured alongwith date and time?	<u>YES</u>	<u>Only date captured not the time</u>
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	<u>YES</u>	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	<u>YES</u>	
8.	Whether the database has been maintained internally?	<u>YES</u>	
9.	Whether audit trail is maintained?	<u>YES</u>	
10.	Whether time stamping is maintained?	<u>NO</u>	
11.	Whether the database is non-tamperable?	<u>YES</u>	
12.	Any other measures to ensure non-tamperability of the Database?	<u>YES</u>	<u>Located on a computer not connected to the internet and file is password protected.</u>

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 05 number of events during the quarter/half year ended and has captured five number of the said required events.

For Trade Wings Limited

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



Date: 28th July, 2023

Place: Mumbai