



**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: 30.11.2023**

Email: [bse.regulation30@bseindia.com](mailto:bse.regulation30@bseindia.com)

Shri Yash Gala  
Assistant Manager  
Listing Compliance  
BSE Ltd, Mumbai 400001.

Dear Sirs,

**Sub: Implementation of SDD**

**Ref: Scrip Code 509953**

With reference to your email communication dated November 23, 2023 on the above subject, we would like to inform you as under: -

The aforesaid communication with regard to non-compliance with maintaining Structured Digital Database (SDD) was placed before the Board of Directors at its meeting held on July 25, 2023. The same has been enclosed herewith for your ready reference.

Request you to kindly take note of the same.

Thanking you.

For and on behalf of

**TRADE WINGS LIMITED**

*Pinto*



**Zurica Kevin Pinto**

**Company Secretary and Compliance Officer**

**Membership Number: A27623**

**Place: Mumbai**

**Date: 30.11.2023**

CIN: L63040GA1949PLC000168

Registered Office: 1st Floor, Naik Building, Opp. Don Bosco High School, M.G. Road, Panjim, Goa-403001. India.

**From:** companysecy@twltravel.com  
**Sent:** 26 July 2023 PM 04:45  
**To:** 'Yash Gala'  
**Cc:** 'Regulation 30'; 'Team GHV'; 'Partner GHV'; Kirti Shah (kirti@twlforex.com);  
'Vishwanath Sir'  
**Subject:** RE: SDD Non-Compliant Company

Dear Sir/ Madam,

**Subject: Directors Comments on Standard Operating Process under SEBI (PIT) Regulations, 2015 for ensuring compliance with Structured Digital Database (“SDD”)**

**Reference: Trade Wings Limited (Scrip Code: 509953)**

With reference to the email dated 6.6.2023, we would like to humbly state as under:

1. The Board of Directors in its **meeting held on 25.07.2023**, discussed about the applicability of Regulation 3(5) and 3(6) of SEBI (PIT) Regulations, 2015, to the Company, which inter alia required SDD to be maintained by the Company and pursuant to this, Companies are required to submit the SDD compliance certificate as per the below schedule:

<b>Sr. No</b>	<b>Particulars</b>	<b>Due Date</b>
1.	For quarter ended 30.09. 2022	Latest by 18.11.2022
2.	For quarter ended 31.12. 2022	Latest by 21.01.2023

Further, as per circular Notice No: 20230329-20 dated 29.03.2023, it was observed that the listed entities are advised to take a note that the listed entities to whom the provisions of Regulation 24A of SEBI (LODR) Regulations, 2015 are **not applicable**, are required to continue to submit SDD Compliance certificate on quarterly basis, within 21 days from end of each quarter.

2. M/s. Trade Wings Limited (Company) having CIN: L63040GA1949PLC000168 had duly complied with the SDD Compliance Certificate for the Quarter ended June 2022 and had duly submitted the Quarterly compliance certificate by 12.09.2022.
3. Further, the Board of directors of the Company hereby confirms that the Company has internally complied with the regulations and also that a database maintained by the Company is password protected and is stored on a computer which is password protected. The system in which the data is stored is also not connected to the internet. However, due to inadvertence, the Company was unable to submit the quarterly SDD compliance certificate for quarter ended September 2022, December 2022 and March 2023.
4. Also, the Company has duly complied with the SDD Compliance Certificate for the quarter ended June 2023 and uploaded requisite compliance certificate on the BSE Portal.

5. The Company hereby confirms and ensures that the compliance with regard to submission of SDD compliance certificate on quarterly basis within the statutory timeline, as per SEBI (PIT) Regulations, 2015, will be adhered to in spirit.

We request you to take the above submission/comments on record and condone the delay which was caused due to inadvertence and with no malafide intentions. We assure of timely compliance of law in spirit.

Thanking you.

For Trade Wings Limited  
Zurica Kevin Pinto  
Company Secretary and Compliance Officer

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**From:** Yash Gala <yash.gala@bseindia.com>  
**Sent:** 06 July 2023 PM 07:00  
**To:** companysecy@twltravel.com  
**Cc:** Regulation 30 <bse.regulation30@bseindia.com>  
**Subject:** SDD Non-Compliant Company

509953  
TRADE WINGS LTD.

Dear Sir/Madam,

This is with reference to the non-submission made by the company relating to SDD Compliance Certificate for March 2023 quarter and/or Annual Secretarial Compliance Report (Reg. 24A) for Financial Year ended March 2023.

In view of the above, it has been observed that the company is non-compliant with provisions of Reg. 3(5) and/or Reg. 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015. Hence, as per Exchange Circular No. 20230125-33 dated January 25, 2023, ***Exchange has displayed the company is non-compliant with SDD and also mentioned the name of Compliance Officer under the "Get Quote" page of the Exchange Website of the Listed Entity.*** The said shall remain to be displayed on the Exchange Website ***till the Exchanges have satisfactorily verified that the company has completely complied.***

The Company is advised to place the said non-compliance ***before the Board within one month from the date of this communication or in ensuing Board meeting whichever is earlier*** and provide the comments of the Board to the Exchange ***within 1 working day post placing the same before the Board on [bse.regulation30@bseindia.com](mailto:bse.regulation30@bseindia.com).*** Failing which the same shall be reported to SEBI as not responded by the company.

Regards,  
**Yash Gala**  
Assistant Manager

Listing Compliance  
BSE Limited, MUMBAI  
Phone (Direct): 22728148

This mail is classified as 'BSE - PUBLIC' by yash.gala on July 06, 2023 at 19:00:06.

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To,  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai- 400001

Dear Sir/ Madam,

**Subject: Directors Comments on Standard Operating Process under SEBI (PIT) Regulations, 2015 for ensuring compliance with Structured Digital Database (“SDD”)**

**Reference: Email dated 06.06.2023 received from BSE Limited, Listing Compliance Department - Trade Wings Limited (Scrip Code: 509953)**

With reference to the above, we would like to humbly state as under:

1. The Board of Directors in its meeting held on 25.07.2023, discussed about the applicability of Regulation 3(5) and 3(6) of SEBI (PIT) Regulations, 2015, to the Company, which inter alia required SDD to be maintained by the Company and pursuant to this, Companies are required to submit the SDD compliance certificate as per the below schedule:

<b>Sr. No</b>	<b>Particulars</b>	<b>Due Date</b>
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2. M/s. Trade Wings Limited (Company) having CIN: L63040GA1949PLC000168 had duly complied with the SDD Compliance Certificate for the Quarter ended June 2022 and had duly submitted the Quarterly compliance certificate by 12.09.2022.
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protected. The system in which the data is stored is also not connected to the internet. However, due to inadvertence, the Company was unable to submit the quarterly SDD compliance certificate for quarter ended September 2022, December 2022 and March 2023.

4. Also, the Company has duly complied with the SDD Compliance Certificate for the quarter ended June 2023 and uploaded requisite compliance certificate on the BSE Portal.
5. The Company hereby confirms and ensures that the compliance with regard to submission of SDD compliance certificate on quarterly basis within the statutory timeline, as per SEBI (PIT) Regulations, 2015, will be adhered to in spirit.

We request you to take the above submission/comments on record and condone the delay which was caused due to inadvertence and with no malafide intentions. We assure of timely compliance of law in spirit.

Thanking you.

**For and on behalf of  
TRADE WINGS LIMITED**



**Zurica Kevin Pinto**  
**Company Secretary and Compliance Officer**  
**Membership Number: A27623**  
**Place: Mumbai**  
**Date : 26/07/2023**

