

STRUCTURED DIGITAL DATABASE (SDD) COMPLIANCE CERTIFICATE
(Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Harshika D. Bhadracha, Practising Company Secretary (PCS) appointed by **Trade Wings Limited (CIN: L63040GA1949PLC000168, Scrip Code: 509953)**, 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, subject to herein under mentioned in this certificate, 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.

(relevant points from 1 to 6 can be striked-off in the case of noncompliance)

I also confirm that the Company was required to capture 03 number of events (detailed below) during the quarter ended (i.e. December 2023) and has captured 03 number of the said required events-

- i. Creation of UPSI by accountant, approval by CFO and sharing with Internal Auditor as well as Company Secretary for upcoming meetings.
- ii. Sharing of UPSI for approval and discussion with Audit Committee.
- iii. Sharing of UPSI for approval of Board members in the Board Meeting.

I would like to report that the following non compliances were observed in the previous quarter (i.e. December 2023) and remedial actions taken along with timelines in this regard:

Non-Compliance Observed:

- The Company meticulously preserves thorough records of Unpublished Price Sensitive Information (UPSI) transactions internally. However, the establishment of the Audit Trail facility is currently deficient.
- The database maintained by the Company is susceptible to modifications, and alterations made to the details do not reflect a corresponding change in the timestamp.
- The Structured Digital Database is not maintained in accordance with the prescribed or recommended format. Additionally, the list detailing designated individuals with whom UPSI is shared or who has access to it is incomplete.
- Presently, the Company utilizes a freely accessible version of Structured Digital Database Software.

Remedial Actions Taken by the Company along with timelines:

The Company guarantees the non-tamperability of the Structured Digital Database (SDD) through proactive measures aimed at safeguarding the database's integrity and security. These measures encompass prevention of unauthorized access, modifications, and alterations, in addition to the implementation of robust audit trail mechanisms and regular security assessments.

In adherence to ethical standards and legal obligations, the Company is actively investigating alternatives to migrate to a licensed version of the software commencing from the upcoming quarter, specifically from quarter ended 31st March 2024 onwards.

**For GHV & Co.
Practising Company Secretaries**

**Harshika D. Bhadracha
Partner Membership Number: F10418
COP No. 12622
Date: 07th March, 2024
Place: Mumbai
UDIN: F010418E003554838**

Disclaimer

This certificate is exclusively issued upon the request made by the Company and is issued solely based on the information, representation and documents provided. It is grounded entirely on factual data, interpretation, and implication of Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), and is subject to our professional opinion.

The obligation lies with the Management/Company to enforce the stipulations outlined in Regulation 3(5) and 3(6) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations). This includes the maintenance of records and the establishment of appropriate systems to guarantee adherence to said provisions. Furthermore, it is incumbent upon the Management/Company to ensure that such systems are sufficient and function efficiently in accordance with the Regulations and any subsequent amendments issued periodically.

215, 2nd Floor, Shreeji Chamber, Tata Road No. 2, Opera House, Mumbai -400004

022- 4011 5434 | 9322241040 | 9987173114 | 9987495434

Partner@ghvandco.com
