

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: 01.07.2024

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

Dear Sir/ Madam,

<u>Subject: Structured Digital Database Compliance Certificate for quarter ended on June 30, 2024</u>

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 June 30, 2024.

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

A-2 Kaveri CHS, Plot No.63 Sector 17, Vashi Navi Mumbai - 400 705. INDIA

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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE, 2024

(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 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: Nil

Would like to confirm that there were no non-compliance(s) observed in the previous Quarter ended on June 30th, 2024.

For

Trade Wings Limited,

Ms. Zurica Kevin Pinto

Company Secretary and Compliance Officer

Membership Number: A27623

Date: 01th July, 2024 Place: Mumbai



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COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2024

(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/
No			Remark
	Whether the Company has a Structured Digital Database in place?	Yes	
	Whether control exists as to who can access the SDD for read/write	Yes	
	along with the names and PAN of such person?		
	Whether all the UPSI have been captured in the Database.	Yes	
	If not details of events that have not been captured and the reason for		
	the same?		
	Whether the recipient were upfront informed that the information	Yes	
	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?		
	Whether nature of UPSI have been captured alongwith date and	Yes	
	time?		
	Whether name of persons who have shared the information has been	Yes	
	captured along with PAN or any other identifier?		
	Whether name of persons with whom information is shared has been	Yes	
	captured along with PAN or any other identifier?		
	Whether the database has been maintained internally?	Yes	
	Whether audit trail is maintained?	Yes	
	Whether time stamping is maintained?	Yes	
	Whether the database is non-tamperable?	Yes	
	Any other measures to ensure non-tamperability of the Database?	Yes	

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: Nil

For Trade Wings Limited

Ms. Zurica Kevin Pinto

Company Secretary and Compliance Officer

Membership Number: A27623

Date:

Place: Mumbai