

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

February 13, 2023

To The Listing Committee BSE Limited, PJ Towers, Dalal Street, Mumbai- 400 001.

<u>Kind Attn: Ms. Sonali Nikesh Kurhade, Deputy Manager – Listing Compliance</u>

Sub: Your queries received vide Email dated January 31, 2023 at 2:33pm ("Email") with respect to pending compliances/ formalities

Sir/ Madam,

We refer to the captioned Email whereby you have once again sought documents/ details in support of the pending compliances. In compliance with your captioned Email, please find below our para-wise response to the same along with supporting documents/ information:

1. Request you to apply for revocation through Listing Centre.

We confirm that application for revocation has been made through Listing Centre. Copy of the acknowledgment / proof of submission is annexed and marked as **Annexure "1"**.

2. Please provide non-applicability certificate as per Regulation 27(2) of LODR, Regulations, 2015 as on date on letterhead of the Company.

The non-applicability certificate as per Regulation 27(2) of LODR Regulations, 2015 is hereto enclosed and marked as **Annexure** "2".

3. Website of the Company should be updated as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We confirm that the website of the company has been updated as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

4. Please find attached herewith screenshot of the watch out investors. Request you to provide the status of charges shown at watch out investors.

				REMARKS (PRESENT STATUS)
TRADE WINGS LTD. (Agent of KOTAK MAHINDRA OLD MUTUAL LIFE INSURANCE LTD.)	IRDA	DID NOT APPLY FOR RENEWAL OF REGISTRATION	CAUTIONED INSURERS AND GENERAL PUBLIC NOT TO TRANSACT ANY LIFE INSURANCE BUSINESS WITH THE AGENT 08-JUN-2010	The company had discontinued the service of Life Insurance therefore the company had not applied for renewal of registration with Kotak Mahindra Old Mutual Life Insurance Ltd.
TRADE WINGS LTD. (Agent of BAJAJ ALLIANZ GENERAL INSURANCE CO.LTD.)	IRDA	DID NOT APPLY FOR RENEWAL OF REGISTRATION	CAUTIONED INSURERS AND GENERAL PUBLIC NOT TO TRANSACT ANY GENERAL INSURANCE BUSINESS WITH THE AGENT 08-JUN-2010	The company had discontinued the service of General Insurance therefore the company had not applied for renewal of registration with Bajaj Allianz General Insurance Co. Ltd.

5. Certificate from RTA/Depositaries (NSDL/CDSL) confirming matching of issued and listed capital of the company with the Exchange as well as with depositories in DN database. It was observed that in the certificate provided there is no mention of matching of issued and listed capital with DN database.

The Certificate from RTA is hereto enclosed and marked as **Annexure** "3".

We submit that our Company always endeavors to be fully compliant with the provisions of Listing Regulations and will continue to do so in future as well.

Thanking you,

Yours sincerely,

For and on behalf of

TRADE WINGS LIMITED

Zurica Kevin Pinto

Company Secretary and Compliance Officer

Membership Number: A27623

Encl.: As above.



You have successfully filed the application, which is subject to verification by the Exchange.

Your Case Number for this submission is 169253 dated Feb 12, 2023

Please mention above Case Number for any future communication for this application.

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February 7, 2023

To,

The Manager - Listing Compliance

Department of Corporate Services, Bombay Stock Exchange Ltd, Phiroze Jeejeebhoy Towers, Dalal Street Fort, Mumbai 400 001.

<u>Kind Attn: Ms. Sonali Nikesh Kurhade, Deputy Manager – Listing Compliance</u>

Dear Sir/Madam,

Sub: Non applicability certificate as per Regulation 27(2) of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements), 2015

Re: Your Email dated January 31, 2023

Dear Sir/ Madam,

As per Regulation 15 of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015, the compliance with the corporate governance provisions as specified in Regulation 17, 17A, 18, 19, 20, 21, 22, 23, 24, 24A, 25, 26, 27 and clauses (b) to (i) and (t) of sub-regulation (2) of Regulation 46 and para C, D and E of Schedule V shall not apply, in respect of –

- a. The listed entity having paid up equity share capital not exceeding rupees ten crore and net worth not exceeding rupees twenty-five crore, as on the last day of previous financial year; and/ or
- b. The listed entity which has listed its specified securities on the SME Exchange.

This is to inform you that we are covered under the above-mentioned exemption since our Company's paid-up equity share capital and net worth as on March 31, 2022 is Rs. 300,00,000 and Rs. (171,55,000) respectively. In view of the aforesaid, as our company, Trade Wings Limited, falls under the ambit of the aforesaid exemption, the requisite compliance with the Corporate Governance provision specified in the aforesaid Regulation shall not be applicable to the Company and consequently we are not required to file the Corporate Governance Report as per the provisions of Regulation 27 of SEBI LODR Regulations.

Request you to kindly take the above on record.

Thanking You,

For TRADE WINGS LIMITED

Zurica Keyin Pinto

Company Secretary and Compliance Officer

Membership Number: A27623





REF: BSS/TRA/2023 03/02/2023

TRADE WINGS LTD 30 K DUBHASH MARG KALAGHODA FORT MUMBAI 400023

Dear Sir/Madam,

This is to certify that, the shareholding as on 31/12/2022 are as under.

Category	Shareholding as on 30/09/2022	Shareholding as on 31/12/2022
Shares in Demat mode with NSDL	2297061	2296961
Shares in Demat mode with CDSL	26634	26734
Shares in Physical mode	676305	676305
TOTAL	3000000	3000000

We also confirm that issued and listed capital of the company is matching with the Exchange as well as with depositories in DN database.

Thanking You,

Yours faithfully,

For Bigshare Services Pvt. Ltd.

Authorised Signatory

CIN: U99999MH1994PTC076534

(An Association Company of Transfer Online Inc., USA)