



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:

Sr. No	Particulars	Due Date
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 and on behalf of
TRADE WINGS LIMITED**



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

