



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: September 5, 2022

To,

BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai- 400001

Dear Sir/ Madam,

Subject: Structured Digital Database Compliance Certificate for quarter ended on June 30, 2022.

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, 2022.

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

CIN: L63040GA1949PLC000168

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



COMPLIANCE CERTIFICATE FOR THE QUARTER ENDED JUNE 30, 2022

(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 (Company) 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. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	Yes	The database is maintained in Ms Excel.
2.	Whether control exists as to who can access the SDD for read/ write alongwith the names and PAN of such person?	Yes	Only the Managing Director has access to the file
3.	Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?	Yes	-
4.	Whether the recipient were upfront informed that the information 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?	Yes	-
5.	Whether nature of UPSI have been captured along with date and time?	Yes	-
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	Yes	-
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	Yes	-
8.	Whether the database has been maintained internally?	Yes	-
9.	Whether audit trail is maintained?	Yes	-
10.	Whether time stamping is maintained?	Yes	-
11.	Whether the database is non-tamperable?	Yes	Appropriate measure with password security has been taken by the company
12.	Any other measures to ensure non-tamperability of the Database?	Yes	The file is located on a private computer and not on the company server to prevent access to the same and ensure non-tamperability.

Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.

The number of days for which non-compliance was observed: 0

Further I also confirm that the Company was required to capture 3 number of events during the quarter/half year ended and has captured 3 number of the said required events.

For and on behalf of

TRADE WINGS LIMITED

Zurica Kevin Pinto
Company Secretary and Compliance Officer
Membership Number: A27623

Date: 1st September, 2022
Place: Mumbai

Note: The attached certificate should cover events which have been disclosed by the listed entity to the stock exchange so that the secretarial auditor will not be exposed to UPSI.