

TAINWALA

Date: 03rd March, 2025

To,
The Corporate Relations Department,
BSE Limited
1st Floor, New Trading Wing,
P. J. Tower, Dalal Street, Fort,
Mumbai - 400 001

To,
Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, Plot C/1, G Block,
Bandra Kurla Complex, Bandra (East),
Mumbai - 400 051

BSE Scrip Code: 507785

NSE SYMBOL: TAINWALCHM

Sub: Reporting of Violation related to SEBI (Prohibition of Insider Trading Regulations, 2015 and the Code of Conduct for Prevention of Insider Trading under the SEBI (Prohibition of Insider Trading) Regulations, 2015 of Tainwala Chemicals and Plastics (India) Limited.

In furtherance to our letter dated **24th February, 2025**; this is to inform you that in terms of the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 (SEBI Circular), the details of the violation of the Company's Code of Conduct for Prohibition of Insider Trading under the SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Immediate Relative of Designated Person in the format prescribed in the said Circular is enclosed as "Annexure A" to this letter.

Additionally, we are attaching the following documents for your reference:

- Show Cause Notice sent to Ms. Arushi Rajkumar Tainwala;
- Justification letter & Self-Declaration Letter received from Ms. Arushi Rajkumar Tainwala.

Kindly take a note of the same and acknowledge.

Thanking you,

Yours faithfully,
For Tainwala Chemicals and Plastics (India) Limited

Divya Saboo
Company Secretary and Compliance Officer
Membership No. A72994

Encl.: As stated above

TAINWALA CHEMICALS AND PLASTICS (INDIA) LIMITED

Registered Office: Tainwala House, Road No. 18, M.I.D.C., Andheri (East), Mumbai-93.

Works: Plot No.87, Govt. Indl. Estate, Khadoli Village, Silvassa - 396230

E-Mail: cs@tainwala.in; **Website:** www.tainwala.in

Contact: Tel: 022 6716 6100 To 199/ Mobile: 091 77100 13780

CIN: L24100MH1985PLC037387

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Annexure A

Report by Tainwala Chemicals and Plastics (India) Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Tainwala Chemicals and Plastics (India) Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Rajkumar Tainwala
	ii. PAN of the DP	A*****L
	iii. Designation of DP	Not Applicable
	iv. Functional Role of DP	Not Applicable
	v. Whether DP is Promoter or belongs to Promoter Group	Promoter
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Arushi Rajkumar Tainwala
	ii. PAN of the immediate relative of DP	A*****F
	C. Details of transaction(s)	
	i. Name of the scrip	BSE Scrip Code: 507785 NSE Symbol: TAINWALCHM
	ii. No of shares traded and value (Rs.) (Date- wise)	BUY 22-Jan-2025: 500 shares 23-Jan-2025: 500 shares Total Value: Rs. 2,73,121/-
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in current calendar quarter.

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	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	Ms. Arushi Rajkumar Tainwala had bought 1,000 Equity Shares of the Company when trading window was closed.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Audit Committee unanimously decided to issue a Warning Letter to Ms. Arushi Rajkumar Tainwala.
6	Reasons recorded in writing for taking action stated above	This was an inadvertent breach of the Code of Conduct. There was no wrongful intent, and neither was any price-sensitive information shared with the designated person and their immediate relative, nor did they have access to any UPSI.
7	Details of the previous instances of violations, if any, since last financial year	No previous violation
8	If any amount collected for Code of Conduct violation(s): Not Applicable	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable
	ii. Details of transfer/ payment In case of Online: Not Applicable In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	
DD Number		
DD date		
DD amount (in Rs.)		
9	Any other relevant information	None

Yours faithfully,
For Tainwala Chemicals and Plastics (India) Limited

Divya Saboo
Company Secretary and Compliance Officer
PAN: J***9H**
Email I'd: cs@tainwala.in

Date: 03rd March, 2025
Place: Mumbai

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Date: 24th February, 2025

To,

Ms. Arushi Rajkumar Tainwala

Add.: 71 K*****

Subject: Show Cause Notice for Trading in Shares during Trading Window Closure Period

Dear Madam,

It has come to our attention that you have purchased 1,000 shares of Tainwala Chemicals and Plastics (India) Limited on 22nd January, 2025, during the trading window closure period. As per the company's Code of Conduct for Prohibition of Insider Trading, read with SEBI (Prohibition of Insider Trading) Regulations, 2015, Designated Persons and their Immediate Relatives are prohibited from trading during the closure period.

Details of the Transaction:

- Name of the Individual: Ms. Arushi Rajkumar Tainwala
- Relationship with the Promoter: Daughter of Mr. Rajkumar Dungarmal Tainwala
- Number of Shares Traded: 1,000
- Date of Transaction: 22nd January, 2025
- Nature of Trade: Purchase
- Pre-Clearance Obtained: No

This transaction appears to be in violation of Regulation 4(1) of SEBI PIT Regulations, 2015, which restricts trading by insiders during the closure period.

You are required to:

1. Provide a written explanation within 3 working days from the receipt of this notice, justifying the transaction.
2. Clarify whether you were in possession of any Unpublished Price Sensitive Information (UPSI) at the time of trading.
3. Submit any supporting documents or clarifications to assist in the investigation.

Failure to provide a satisfactory response may lead to further actions, including penalties as per the company's policy and reporting the matter to SEBI.

Kindly treat this matter with utmost urgency.

For Tainwala Chemicals and Plastics (India) Limited

Divya Saboo
Digitally signed
by Divya Saboo
Date: 2025.02.24
12:22:23 +05'30'

Divya Saboo

Company Secretary and Compliance Officer

Contact No.: *****

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ARUSHI RAJKUMAR TAINWALA

Address: 71 *****

Email I'd: *****

Date: 25th February, 2025

To,
Ms. Divya Saboo,
The Compliance Officer,
Tainwala Chemicals and Plastics (India) Limited
Tainwala House, Road No. 18, M.I.D.C.,
Andheri (East), Mumbai MH-400 093.

Subject: Justification for Inadvertent Purchase of Shares during Trading Window Closure.

Dear Madam,

I am writing to clarify my **unintentional purchase of 1,000 shares** of Tainwala Chemicals and Plastics (India) Limited on January 22, 2025, which occurred during the trading window closure period.

I would like to state that this trade was executed **unintentionally**. I had **no access to any Unpublished Price Sensitive Information (UPSI)** related to the company during closure of Trading Window.

The purchase was made due to lack of awareness of the closure period. **Upon receiving the letter from the company's Compliance Officer, I am submitting this justification letter and am prepared to take any corrective action as advised.**

I sincerely regret this inadvertent error and request you to consider this as an **unintentional trade without any malafide intent**. I am ready to comply with any remedial measures suggested by the company to resolve the matter.

I appreciate your guidance in rectifying the said non-compliance and assure you that due caution would be exercised by me in the future.

Thank you for your understanding.



Yours sincerely,
Arushi Rajkumar Tainwala
Immediate Relative of Promoter

SELF - DECLARATION AFFIDAVIT

(Under SEBI (PIT) Regulations, 2015)

Date: 25th February, 2025

To,
Ms. Divya Saboo,
The Compliance Officer,
Tainwala Chemicals and Plastics (India) Limited
Tainwala House, Road No. 18, M.I.D.C.,
Andheri (East), Mumbai MH-400 093.

Subject: Declaration Regarding Non-Possession of UPSI for Trade Executed on January 22, 2025

Dear Sir/Madam,

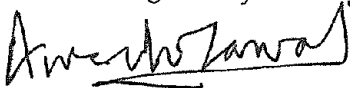
I, Arushi Rajkumar Tainwala, daughter of Mr. Rajkumar Dungarmal Tainwala, residing at 71

*****), hereby declare that my purchase of 1,000 shares of
Tainwala Chemicals and Plastics (India) Limited on January 22, 2025, was done inadvertently
due to lack of knowledge regarding the trading restrictions during closure of trading window.

I further declare that:

1. I was not in possession of any Unpublished Price Sensitive Information (UPSI) related to Tainwala Chemicals and Plastics (India) Limited at the time of executing the transaction.
2. I have not received any inside information through emails, meetings, documents, discussions, or any other means from any Designated Person or insider of the company.
3. My transaction was purely coincidental and unintentional, with no intent to take advantage of any non-public company information.
4. I have always complied with the SEBI (PIT) Regulations, 2015, and the company's Insider Trading Code.

I provide this declaration truthfully and voluntarily, and I understand that any false statement may attract regulatory and legal consequences.



Arushi Rajkumar Tainwala
Immediate Relative of Promoter

Date: 25th February, 2025

Place: Mumbai