TAiNWALA

Date: 19th May, 2015

To,
The National Stock Exchange of India Limited
Plot No C/1, G Block,
Bandra Kurla Complex,
Bandra (East), Mumbai – 400 051

Dear Sir / Madam

NSE Symbol: TAINWALCHM

Sub: Code of Conduct and Code of Practices and Procedures for Fair Disclosure under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Ref. SEBI Circular, CIR/ISD/01/2015 dated 11th May, 2015.

The Board of Directors have approved adopted revised Code of Conduct to regulate, monitor and report Insider Trading and Code of Fair Disclosure as per the terms of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 vide circular resolution passed by the Board of Directors dated 14th May, 2015.

Further, as per aforesaid mentioned SEBI Circular dated 11th May, 2015, please find enclosed herewith the aforesaid Codes pursuant to Regulation 8 and Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015 for your kind perusal.

Further, the effective date of these Codes ie 15th May, 2015.

Kindly take the same on records and acknowledge the receipt of the same.

Thanking you,
Yours faithfully,
For Tainwala Chemicals & Plastics (India) Limited

Company Secretary & Compliance Officer

Encl.: a/a

TAINWALA CHEMICALS & PLASTICS (INDIA) LIMITED

Tainwala House, Road No. 18, M.I.D.C., Andheri (East), Mumbai - 93. Tel. : 6716 6100 To 199 • Fax : 022 - 2838 7039 / 2821 9592
Works - Plot No. 87, Govt. Indl. Estate, Khadoli Village, Silvassa, 396 230. Tel.: 0260-2699074 / 2699144 • Fax : 0260-2699145
E-mail : simran@tainwala.in / milind@tainwala.in
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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE
Pursuant to Regulation 8 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992, which was amended on 20th February, 2002 is replaced by the new Regulation namely "Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the 'Regulations') to put in place a framework for prohibition of Insider Trading in securities and to strengthen the legal framework thereof. The Regulations shall come in force on 15th May, 2015.

In terms of Regulation 8 of the Regulations, the Board of Directors of the Company has formulated this Code of practices and procedures for fair disclosure of unpublished price sensitive information to be followed in order to adhere to the principles set out below:

1. The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

2. The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

3. The Company Secretary is designated as Chief Investor Relation Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. In case any unpublished price sensitive information gets disclosed selectively, inadvertently or otherwise, the Company shall make prompt dissemination of such information to make it generally available.

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5. The Company shall give appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

7. The Company shall post transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website to ensure official confirmation and documentation of disclosures made.

8. The Company shall handle all unpublished price sensitive information on a need-to-know basis.

9. The Board of Directors may amend this Code from time to time.

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CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDER
Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992, is replaced by the new Regulation namely "Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the 'Regulations') to put in place a framework for prohibition of Insider Trading in securities and to strengthen the legal framework thereof. The Regulations shall come in force on 15th May, 2015.

The Board of Directors of the Company has approved and adopted revised Code of Conduct to regulate, monitor and report Insider trading and code of Fair Disclosure as per the terms of SEBI (Prohibition of Insider Trading) Regulation, 2015 vide a Circular resolution passed on 14th May, 2015.

The Code shall be applicable to the Promoters, Directors (Executive and Non-Executive), Designated Employees, Connected Persons, Insiders and their dependents.

1 Definitions

1.1 "Act" means Securities and Exchange Board of India Act, 1992(15 of 1992);

1.2 Board of Directors means Board of Directors of the Company.

1.3 Code means this Code of Conduct formulated under Clause 9 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

1.4 Company means Tainwala Chemicals & Plastics (India) Limited.

1.5 Compliance Officer: For the purpose of this Code, the Company Secretary shall be the Compliance Officer. In his or her absence any other senior officer, designated so and reporting to the Board of Directors as mentioned in the Regulations.

1.6 Connected Person shall have the same meaning designated in the Regulations

1.7 Dealing in Securities means subscribing, buying, selling or agreeing to subscribe, buy, sell, or dealing in any securities either as principal or agent.

1.8 Designated Employees shall include the following:

1.8.1 All Directors of the Company

1.8.2 Key Managerial Persons viz. Managing Director, Chief Executive Officer, Manager, Whole time Director, Company Secretary and Chief Financial Officer.

1.8.3 All employees of rank of Manager and Deputy Managers or equivalent or above in Finance, Accounts, Secretarial, Corporate Affairs, Corporate Planning and Human Resource department/functions.

1.8.4 Such other employees as may be determined by the Code and Board of Director in consultation with Compliance officer from time to time.

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1.9 "Insider" means any person who is a
1.9.1 Connected Person; or
1.9.2 in possession of or having access to Unpublished Price Sensitive Information;

1.10 Immediate Relative for the purpose of this Code means spouse of a Designated Employee and includes parents, siblings and child of such Designated Employee or of the spouse, any of whom is dependent financially on such Designated Employee or consultants of such Designated Employee in taking decisions relating to trading in securities.

1.11 Prohibited period means the period of time when the Trading Window is closed.

1.12 Trading means dealing in Securities of the Company

1.13 "Trading window" shall mean the period during which trading in the Securities of the Company by Promoters, Directors, Designated Employees, Connected Persons and Insiders shall be permissible.

1.14 Unpublished Price Sensitive Information (UPSI) shall have the meaning given in the Regulations.

2: **Compliance Officer**

2.1 The Company has designated the Company Secretary as the Compliance Officer. The Compliance Officer shall report to the Board of Directors and in particular, shall provide reports, annually to the Chairman of the Board of Directors.

2.2 The Compliance Officer shall maintain a record of the Designated Employees and any changes in the list of Designated Employees from time to time in a format set out in **Annexure 1**

2.3 The Compliance Officer shall in consultation with the Chairman of the Company and as directed by the Board, make specifications and announcement of a Prohibited period.

2.4 Compliance Officer shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the Regulations and Code for the preservation of Unpublished Price Sensitive Information, monitoring of trades and implementation of this Code under the overall supervision of the Board of Directors of the Company.

2.5 The Compliance Officer shall assist the Promoters, Directors, Designated Employees, Connected Persons and Insiders in addressing any clarifications, when sought regarding the Regulations and this Code.

3. **Preservation of and Limited access to Unpublished Price Sensitive Information**

3.1 Designated person shall maintain the confidentiality of all Unpublished Price Sensitive Information. They shall, while in possession of any Unpublished Price Sensitive Information, neither deal in the securities of the Company on the basis of Unpublished Price Sensitive Information nor pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company.

3.2 Unpublished Price Sensitive Information is to be handled on a "need to know" basis and no Unpublished Price Sensitive Information should be communicated to any person except in furtherance of the Insider's legitimate purposes, performance of duties or discharge of legal obligations.

3.3 Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc. Files containing confidential information should be deleted/destroyed after its use. No such related documents should be kept lying at any place accessible to other employees/persons.

3.4 If any Designated Person wants to cross the "Chines Wall", they shall seek permission from the Compliance Officer in writing stating the reasons/justification for doing so and the permission for the same shall be obtained from the Board. The compliance Officer shall require such Designated Person to produce an undertaking that the information will not be shared with any other person except as permitted and neiher he or nor the person with whom the information is shared or immediate Relatives shall Trade in or induce others to Trade in the Securities of the Company.

4. **Restrictions on Communication and Trading by Insiders:**

4.1 Restrictions on Communication by Insiders:

No Insider shall communicate, provide or allow access to any Unpublished Price Sensitive Information, relating to the Company or its securities to any person including other Insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

No person shall procure from or cause the communication by any Insider of Unpublished Price Sensitive Information, relating to the Company or its securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

However, an Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:-

(i) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company;

(ii) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute Unpublished Price Sensitive Information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

(iii) The Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of the above clause, and shall not otherwise trade in securities of the Company when in possession of Unpublished Price Sensitive Information.

4.2 Restrictions on Trading by Insiders:

4.2.1 Trading when in possession of Unpublished Price Sensitive Information:
No Insider shall trade in the securities of the Company when in possession of Unpublished Price Sensitive Information.

In case of a Connected Person, the onus of establishing, that he was not in possession of Unpublished Price Sensitive Information, shall be on such person.

4.2.2 Exceptions:

i. <u>In case of Individual Insiders:-</u>
Where the transactions is an off-market inter-se transfer between Promoters who were in possession of the same Unpublished Price Sensitive Information without being in breach of this Code and that both the parties made a conscious and informed trade decision.

ii. <u>In case of Non – Individual Insiders:-</u>

a. the individuals who were in possession of such Unpublished Price Sensitive Information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such Unpublished Price Sensitive Information when they took the decision to trade; and

b. appropriate and adequate arrangements were in place to ensure that this Code is not violated and no Unpublished Price Sensitive Information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

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c. and such trades have taken place as per the Trading Plans of the Company.

5. Trading Plans

An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

5.1 Such trading plan shall:-

a. not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;

b. not entail trading for the period between the 20th trading day prior to the last day of any financial period for which results are required to be announced by the Company and the second trading day after the disclosure of such financial results;

c. entail trading for a period of not less than twelve months;

d. not entail overlap of any period for which another trading plan is already in existence;

e. set out either the value of trades to be effected or the number of securities of the Company to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and

f. not entail trading in securities for market abuse.

5.2 The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the Code or Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

5.3 The trading plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

Provided that the implementation of the trading plan shall not be commenced if any Unpublished Price Sensitive Information in possession of the Insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such Unpublished Price

Sensitive Information becomes generally available information so as to avoid a violation of the Regulations

5.4 Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

6. **Pre-clearance of trades**

6.1 Designated Persons of the Company who intend to trade in the securities of the Company in quantities aggregating to 20,000 shares or more equity shares of INR 10 each in a single day shall pre-clear the transaction. In case of change in face value of share of the Company in future, the limit for taking pre-clearance shall change accordingly. No Designated Person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the Trading Window is not closed.

6.2 An application for pre-clearance of Trading shall be made to Compliance Officer substantially in the Form set out in Annexure 2.

6.3 The application shall have estimated number of securities the Designated Persons intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as required by the compliance Officer.

6.4 An Undertaking (Annexure 3) shall be executed in favour of Compliance Officer and the Company by such Designated Person which shall inter alia state that the applicant is not in possession of any unpublished price sensitive information.

6.5 The Compliance Officer shall consider the application made as above and shall approve/refuse (alongwith reasons therefore) in any case not later than two working days from the date of the receipt of the application in a Format as set out in Annexure 4. The decision of the Compliance Officer in this regard will be final. In the absence of the Compliance Officer, the pre-clearance application will be decided upon by the Managing Director.

6.6 *Designated Persons*, who is permitted to trade by the Compliance Officer, shall not execute a contra trade within a period of 6 months from the date of execution of trade.

6.7 Within period of 7 trading days of grant of pre-clearance approval under clause 6.5 the relevant Designated Persons shall complete the proposed transaction in respect of which such approval was granted. If such transaction is not executed within 7 trading days the relevant Designated Persons must seek a fresh pre-clearance in accordance with the Code.

6.8 The Designated Persons shall make declarations of pre-clearance transactions substantially in the form set out in Annexure 5. Even if the transaction is not undertaken, the same should be reported by the Designated Persons in the above format together with the reasons of non-execution of the trade. The Compliance Officer shall the maintain a record of the reasons provided in relation to non-execution of trades by Designated Persons

7 **Trading Window**

7.1 The Company shall specify a trading period, to be called "trading window" for trading in the Company's Securities. The trading window shall be closed for Designated persons during the time the information referred in point 7.3 is unpublished.

7.2 *Designated Persons* and their immediate relatives shall not trade in the securities of the Company when the Trading Window is closed except where trading plan has been approved by the Compliance Officer

7.3 The Trading window shall be, inter alia closed at the time of:

- Declaration of financial results (quarterly, half-yearly and annual);
- Declaration of Dividends (interim and final);
- Mergers, de-mergers, acquisitions, delisting and such other transactions;
- Any major expansion plans or execution of new projects;
- Change in capital structure by way of public/rights/preferential /bonus issue or buy-back and splitting of securities
- Material events in accordance with the listing agreement.
- Disposal of whole or substantial part of the undertaking; and
- Any significant changes in policies, plans or operations of the Company;

7.4 The Trading Window shall be closed and shall deemed to have been closed from the day the *Designated Persons* can reasonably be expected to have possession of Unpublished Price Sensitive Information.

Unless communicated otherwise, trading window will close atleast 48 hours before the information referred to in clause 7.2 becomes public.

7.5 The Trading Window shall open after the expiry of 48 hours from the time of announcement of the above mentioned Unpublished Price Sensitive Information.

7.6 The Compliance Officer shall intimate the beginning of Prohibited Period (Closure of Trading Window) to all *Designated Persons* in the form annexed hereto as Annexure 6. The Compliance Officer shall also intimate Stock Exchanges about the period for which the Trading Window will remain closed.

7.7 All Designated Persons shall conduct all their dealings in the Securities of the Company only in a valid trading window or as per approved trading plan and shall not deal in any transaction involving the purchase or sale of the Company's

Securities during the periods when trading window is closed or where there is no pre-approved trading plan or during any other period as may be specified by the Company from time to time.

7.8 In case of Employees Stock Options (ESOP's), exercise of option may be allowed during the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOP's shall not be allowed when Trading Window is closed.

8 Disclosures

8.1 General Provisions:-

Every disclosure under this Code shall be made in applicable prescribed Form. The disclosures to be made under this Code shall include those relating to trading by such person's immediate Relative.

The disclosures made under this Code shall be maintained by the Company, for a minimum period of five years, in prescribed form.

8.2 Initial Disclosures by certain persons:

(a) Every Promoter, Key Managerial Personnel and Director of the Company shall disclose to the Company his holding of securities of the Company as on 15th May, 2015 within thirty days (Annexure 7);

(b). Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a Promoter (Annexure 7).

8.3 Continual Disclosures:

(a) Every Promoter, Employee and Director of the Company shall disclose to the Company the number of securities of the Company acquired or disposed of within two trading days of such transaction, if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees (Annexure 8);

(b). The Company shall notify the particulars of such trading to the stock exchanges on which the securities are listed within two trading days of receipt of the disclosure (Annexure 8).

Explanation: - The disclosure of the incremental transactions after any disclosure under this clause shall be made when the transactions effected after the prior disclosure cross the threshold specified in clause 5.3(a) above.

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8.4 Disclosures by other Connected Persons.

The Company may, at its discretion, require any other Connected Person to make disclosures of holdings and trading in securities of the Company in order to monitor compliance with the Code.

9 **Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015**

In case it comes to the knowledge of the Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, he/she shall keep SEBI informed about such violation.

10 **Power to amend the Code of Conduct**

The Board shall have absolute power to amend, modify, rescind and/or substitute this Code of Conduct and shall also have the powers to remove difficulty or settle any question that may arise under this Code of Conduct or any re-enactment thereof.

ANNEXURE 1

REGISTER OF DESIGNATED EMPLOYEES

(To be maintained by the Compliance Officer)

Employee No.	Name of the Employee	Grade/ Designation	Dept.	Name of Immediate Relative	Date of Joining	Date of Resignation	Remarks

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ANNEXURE 2

SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

To,
The Compliance Officer,
Tainwala Chemicals & Plastics (India) Limited,
Mumbai

Date:

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's **Code of Conduct for Prevention of Insider Trading**, I seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.)	
5.	The proposal is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be acquired/subscribed/sold	
8.	Price at which the transaction is proposed	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or off-market deal	
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.
Yours faithfully,

(Signature of Employee)

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ANNEXURE 3
FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

UNDERTAKING

To,
Tainwala Chemicals & Plastics (India) Limited,
Mumbai

I, _____, _____ of the Company residing at _____, am desirous of dealing in _____ * shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within four days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Date :
Signature : _____

* Indicate number of shares

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ANNEXURE 4

FORMAT FOR PRE- CLEARANCE ORDER

To,

Name : _____

Designation : _____

Place : _____

This is to inform you that your request for dealing in _____ (nos) shares of the Company as mentioned in your application dated _____is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company.

Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,

For TAINWALA CHEMICALS & PLASTICS (INDIA) LIMITED

Date : _____

COMPLIANCE OFFICER

Encl: Format for submission of details of transaction

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Annexure 5
[Form for Disclosure]
(To be submitted within 2 trading days of transaction/ dealing in securities of the Company)

To,
The Compliance Officer,
Tainwala Chemicals & Plastics (India) Limited,
Mumbai

Dear Sir/Madam,

I hereby inform that I (including through my Immediate Relatives):

- Have not bought / sold/ subscribed any securities of the Company for the following reasons:_____
- Have bought / sold/ subscribed to _____ securities of the Company as mentioned below on _____(date):

Name of the Holder	No. of Securities Dealt with	Bought/Sold/Subscribed	Folio No./ DP ID/ Client ID	Price (INR)

In connection with the aforesaid transation(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance Officer/ SEBI any of the following documents:

- Broker's contract note.
- Proof of payment to/from brokers.
- Extract of Bank passbook/statement (to be submitted in case of demat transaction).
- Copy of delivery of instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval along with reasons in writing (applicable in case of purchase/subscription)

I declare that the above information is correct and that no provisions of the Code and/or applicable laws/regulations have been contravened for effecting the above said transaction(s).

Date:

(Signature)

(Name)
(Designation & Department)

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ANNEXURE 6

DRAFT OF E-MAIL FOR INTIMATING CLOSURE OF TRADING WINDOW

Subject: Insider Trading Restriction Period

To: All Director, Key Managerial Persons, Employees of M/s. Tainwala Chemicals & Plastics (India) Limited the (the Company)

SEBI introduced the SEBI (Prohibition of Insider Trading Regulations) 2015 replacing the existing SEBI (Prohibition of Insider Trading) Regulations, 1992 pursuant to a notification issued in January 15, 2015 and is effective from 15th May, 2015. The reason for introducing the New Regulations in substitution of the Existing Regulations is to strengthen the legal framework for prohibition of insider trading thereby bringing it par with international laws and to overcome some loopholes in the Existing Regulations.

As you are aware that the Board Meeting for _____will be held on _____, 20__ at the Registered Office of the Company.

In view of this, as per the Code of Conduct for Prevention of Insider Trading of the Company, I request all of you(including immediate relative) to not to trade in the Company's equity shares from _____ till 48 hours after the public announcement is made.

Accordingly, BSE has been informed that the Trading Window of the Company will be closed with effect from _____ till 48 hours from after the public announcement is made.

Thank you for your co-operation in this regard.

Regards,

For Tainwala Chemicals & Plastics (India) Limited

Company Secretary

TAINWALA CHEMICALS & PLASTICS (INDIA) LIMITED

Tainwala House, Road No. 18, M.I.D.C., Andheri (East), Mumbai - 93. Tel. : 6716 6100 To 199 • Fax : 022 - 2838 7039 / 2821 9592

Works - Plot No. 87, Govt. Indl. Estate, Khadoli Village, Silvassa, 396 230. Tel.: 0260-2699074 / 2699144 • Fax : 0260-2699145

E-mail : simran@tainwala.in / milind@tainwala.in

SUBJECT TO SILVASSA JURISDICTION

TAiNWALA

Annexure 7
[Form for Initial Disclosure]

To,
The Compliance Officer,
Tainwala Chemicals & Plastics (India) Limited,
Mumbai

I, _____, in my capacity as _____ of the Company hereby submit the following details of securities held in the Company as on _____ (date of becoming Designated Employee/ Promoter/ member of Promoter Group).

I. Details of Securities held by me:

Full Name, PAN No. & address	Designation And/or Dept.	Date of joining	Date of Becoming. substantial shareholders/ Directors/ Officers	Type of securities	No. of Securities held	Folio No/DP ID/Client ID

II. Details of Immediate Relative(s):

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code, I hereby declare that I have the following Immediate Relatives:

Name of immediate relatives	PAN No. & address of the relative(s)	Relationship with the Designated Employee/ Promoter/ Member of Promoter Group

III. Details of Securities held by Immediate Relative(s)

Name of immediate relatives	Type of Securities	No. of Securities Held	Folio No/ DP ID/ Client ID

Date:

(Signature)

(Name)
(Designation & Department)

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Annexure 8

[DISCLOSURE OF CHANGE IN SHAREHOLDING]

To,
The Compliance Officer,
Tainwala Chemicals & Plastics (India) Limited,
Mumbai

I, _____, in my capacity as _____ of the Company hereby submit the following details of change in holding of securities of the Company:

Full Name, PAN No. & address	No. of Securities held before the transaction	Receipt of allotment advice/acquisition/ sale of securities	Nature of Transaction			Trading Member (TM) through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed
			Purchase	Sale	Others		

Details of Change in Securities held by Immediate Relative(s)

Name, PAN No. & address of the immediate relative(s) and relationship	No. of Securities held before the transaction	Receipt of allotment advice/acquisition/ sale of securities	Nature of Transaction			Trading Member (TM) through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed
			Purchase	Sale	Others		

I/We declare that I/We have complied with the requirement of the minimum holding period of six months with respect to the securities purchased/sold.

I hereby declare that the above details are true, correct and complete in all respects.

Date:

(Signature)

(Name)
(Designation & Department)

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