Thirumalai Chemicals Ltd.

CIN : L24100MH1972PLC016149

Regd. Office : Thirumalai House, Plot No.101/102, Sion-Matunga Estate, Scheme No. 6, Road No. 29, Sion (E), MUMBAI-400 022. India.
Phone : +91-22-4368 6200 / 2401 7841 • Fax : +91-22-2401 1699
E-mail : thirumalai@thirumalaichemicals.com • Website : http:// www.thirumalaichemicals.com

ISO 9001, ISO 14001
HACCP CERTIFIED COMPANY

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by the Board of Directors at their meeting held on May 06, 2015. This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

The Principles of Fair Disclosure adopted by the Company are as follows:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.

2. To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and / or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.

3. The company Secretary serves as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.

5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

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 To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

7. To publish proceedings of meetings with analysts and of other investor relations conferences on its official website http://www.thirumalaichemicals.com to ensure official confirmation and documentation of disclosures made.

8. To handle all unpublished price sensitive information on a need-to-know basis only.

THIRUMALAI CHEMICALS LTD. MUMBAI