



RESINS & PLASTICS LTD

CIN: L25209MH1961PLC012223

COMPANY'S INTERNAL CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

INTRODUCTION:

The Regulations are now called the SEBI (Prohibition of Insider Trading) Regulations 1992, (hereinafter referred to as "the regulations"). The Regulation seek to govern the conduct of the Insiders, Connected Persons and Persons who are deemed to be connected persons on matters relating to Insider Trading.

Chapter IV has been incorporated in the Regulations requiring all listed companies and other specified entities to set up an appropriate mechanism and to frame and enforce a code of conduct and internal procedures prescribing various disclosures of interests or holding to be made by directors, officers and substantial shareholders in the listed Companies.

OBJECTIVE

The Objects of the Regulations is to prevent insider trading by prohibiting dealing, communicating or counseling on matters relating to insider trading as specified in Chapter II of the Regulations.

The Regulation provides that no insider shall;

- Either on his own behalf or on behalf of any other person, deal in securities of a Company listed on any Stock Exchange(s) when in possession of any unpublished price sensitive information; or
- Communicate, counsel or procure, directly or indirectly, any unpublished price sensitive information to any person who while in possession of such unpublished price sensitive information shall not deal in securities.
- Such restriction shall not be applicable to any communication required in the ordinary course of business or under any law.
- Regulation also provides that no Company shall deal in the securities of another listed Company or associate of that other Company while in possession of any unpublished price sensitive information.

WHAT IS INSIDER TRADING?

Insider Trading is the buying or selling or dealing in the securities of a listed Company by a director, member of the management, an employees of the firm or by any other person such as internal and statutory auditor, agent, advisor, analyst, consultant, etc., who has knowledge of material inside information not available to the general public. The dealing in the securities of the Company is illegal by an "insider" when it is predicated upon the utilization of inside information to profit at the expense of other investors who do not have access to such information.



CERTAIN IMPORTANT EXPRESSIONS (DEFINITIONS)

1. **Board:** Board Means the Board of Directors of the Company.
2. **Regulations:** Regulations means SEBI (Prohibition of Insider Trading) Regulations, 1992 as amended from time to time.
3. **Connected Person:** Connected Person means any person who is a director, or is deemed to be a director of the Company or

A person who occupies the position as an officer or an employees of the Company or holds a position involving a professional or business relationship between himself and the Company whether temporary or permanent and who may reasonably be expected to have an access to unpublished price sensitive information in relation to the company, including any group company, or a company under the same management or subsidiary company, relative connected person, Bankers, Merchant Banker, Share Transfer Agents, Registrar to an Issue, Brokers, Portfolio Managers, Investment Advisors who have fiduciary relationship with the company.

Connected person shall also include any person who is connected person six months prior to an act of insider trading.

4. **Dealing in Securities:** Dealing in Securities means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in the securities of the Company by any person either as principal or agent.
5. **Insider:** Insider means any person who is or was connected with the Company or is deemed to have been connected with the Company and who is reasonably expected to have access to unpublished price sensitive information in respect of securities of the Company or who have received or had access to such unpublished price sensitive information.

Designated Employee: Designated employee means and includes;

- Directors of the Company
- Officers comprising the top three tiers of the Company management – Managing Directors, General Managers and Managers.
- All employees working in the Finance and Accounts, Sales, Purchase, Secretarial, Human Resource Department / function and, whether temporary or permanent.
- Employees designated by the Compliance Officer, in consultation with the Managing Director / Jt. Managing Director or Board of Directors.
- Officer: Officer means and includes all persons who are in the employment of the Company, includes the Statutory and Internal Auditors of the Company.



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- Price Sensitive Information: Price Sensitive Information means, any information relating to the Company, directly or indirectly, and which if published is like to materially affect the price of the securities of the Company. The following shall be deemed to be price sensitive information;-
 - ✓ Periodical Financial results of the Company (quarterly, half-yearly and annually);
 - ✓ Intended declaration of dividend (both interim and final);
 - ✓ Issue of securities or buy-back of securities;
 - ✓ Any major expansion plans or execution of new projects;
 - ✓ Amalgamation, mergers or takeovers;
 - ✓ Disposal of whole or substantial part of the undertaking;
 - ✓ Any significant changes in policies, plans or operations of the company including launch of new brands or new products of the Company where the contribution from such brand or product exceeds or is likely to exceed 5% of the total turnover of the Company during that financial year;
 - ✓ Disruption of operations due to natural calamities;
 - ✓ Commencement of any new commercial production / commercial operations where the contribution therefrom is likely to exceed 5% of the total turnover of the Company during the financial year;
 - ✓ Developments with respect to changes in pricing / realization on goods and services arising out of the changes in the government policies.
 - ✓ Litigation / disputes with material impact;
 - ✓ Revision of credit ratings assigned to any debt or equity instrument of the Company;
 - ✓ Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company;

Prohibited Period:

1. All Promoter Director(s) / persons acting in concert with promoters and/or their relatives / officers / designated employees / employees working in Finance / Accounts / Marketing Department and their dependent family members. Period with the first day of the month in which Board is to consider any price sensitive information and ending after 24 hours from the time the Price Sensitive information is made public.
2. Other Directors and Officers / employees working in any other department and their dependent family members. The Prohibited period commences from the date of posting the Agenda of the Audit Committee / Board Meeting in which the price sensitive information is to be considered and ending after 24 hours from the time the price sensitive information is made public.



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Or

3. The Compliance Officer, from time to time, in consultation with Chairman and/or Managing Director/Jt. Managing Director may specify any other period as prohibited period.
4. Trading Window: Trading Window means the free period during which dealing in the securities of the Company is not specifically restricted or prohibited.
5. Unpublished Price Sensitive Information: means the information which is not published by the Company or its agents which is not specific in nature, copy of which are not provided to the Stock Exchange(s) where the securities of the Company are listed, for the information of shareholders / investors.
6. Speculative reports in print or electronic media shall not be considered as published information.
7. Securities: Securities means and includes the equity shares of the Company or any other marketable instruments as may be issued by the Company from time to time.

COMPLIANCE OFFICER

Compliance Officer: Compliance Officer means the Company Secretary of the Company or any other person appointed as the Compliance Officer under SEBI (Prohibition of Insider Trading) Regulations, and reporting to the Chairman and /or Managing Director/Jt. Managing Director of the Company.

DUTIES AND POWER OF COMPLIANCE OFFICER:

1. To set forth policies, procedures, monitoring adherence to the rules for the preservation of “Price Sensitive Information”, monitoring the transactions whether pre-clearance of designated employees and their dependents’, whether the trades are executed within one week and the implementation of the code of conduct.
2. Shall be subject to overall supervision of the Board of Directors reporting to the Managing Director / Jt. Managing Director.
3. To suggest any improvements required in the policies, procedures etc. to ensure effective implementation of the code.
4. To maintain a record of all connected persons covered and any changes made to the list of connected persons.
5. To assist all the employees in addressing any clarifications regarding the SEBI (Prohibition of Insider Trading) Regulations 1992 and the company’s code of conduct.



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6. To maintain a list of all information termed as “Price Sensitive Information”.
7. To maintain a record of names of files containing confidential information deemed to be price sensitive information and persons in charge of the same.
8. To keep the records of periods specified as “Prohibited Period”
9. To ensure that the “Trading Window” is closed at the time of;
 - a) Declaration of Financial results (quarterly, half-yearly and annually);
 - b) Declaration of dividends (interim and final);
 - c) Issue of securities by way of public/rights/bonus;
 - d) Any major expansion plans or execution of new projects;
 - e) Amalgamation, mergers, takeovers and buy-back;
 - f) Disposal of whole or substantially whole of the undertaking;
 - g) Any changes in policies, plans or operations of the company.
10. To process applications received for pre-clearance of transactions as per the procedure laid down.
11. To procure undertaking in favour of the Company from persons applying for pre-clearance of transactions in the prescribed format.
12. To ensure that a minimum holding period of 30 days is observed by all directors /officers/designated employees.
13. To waive the requirement of minimum holding period of 30 days under specified circumstances.
14. To receive and maintain records of periodic and annual statement of holdings from directors/officers/designated employees and their dependent members.
15. To maintain the records of all the declarations in the appropriate form given by the directors/officers/designated employees for a minimum period of three years.
16. To place before the Chairman, Managing Director/ Jt. Managing Director/Committee of Directors, as may be decided by the Board of Directors for the purpose, on a monthly basis all the details of the dealings in the securities by employees/ directors/designated employees of the company and the accompanying documents that such persons had executed under the pre-clearance procedure.



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17. To implement punitive measures or disciplinary action prescribed for any violation or contravention of the code of conduct.

18. To inform the SEBI of any violation observed within 7 days of knowledge thereof.

PROHIBITION ON DEALING IN SECURITY MATTERS RELATING TO INSIDER TRADING REGULATIONS

No Insider shall;

- Either on his own behalf or on behalf of any other person deals in securities of the Company when in the possession of any unpublished price sensitive information.
- Communicate, counsel or procure, directly or indirectly any unpublished price sensitive information to any person. However these restrictions shall not be applicable to any communication required in the ordinary course of business or under any law.

Trading Restrictions for Insiders;

- All Directors/Officers/Designated employees or Connected persons of the Company;
- Shall conduct all their dealing in the securities of the Company only in the trading window during which the dealing is not specifically prohibited and shall not deal in any transactions involving the purchase or sale of the Company's securities during the prohibited period/period when the trading window is closed.
- Shall deal in the Securities of the Company only after fulfilling the conditions laid down hereinafter.
- Shall not deal in the securities of the Company on considerations of a short-term nature that is within intention of selling the securities within the period 30 days from the date of purchase.

The Compliance Officer may waive the minimum holding period of 30 days, in case sale of securities is necessitated by personal emergency, upon making an application in the prescribed form, attached herewith to these rules.

Pre-Clearance of Transactions;

All Directors/Promoters/Persons acting in concert with promotes and/or their relatives/Officers/Designated employees or Connected persons of the Company and their relatives:

- Shall deal in securities of the Company during the free period only.



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- Shall obtain the prior permission/consent in writing from the Compliance Officer in case they intend to deal in securities of the Company in the excess of
 1. 1000 (One Thousand) shares in number in case of Directors / Promoters / Persons acting in concert with promoters and/or their relatives
 2. 500 (Five Hundred) shares in number in case of other persons viz. Officers/Designated employees or Connected persons of the Company and their relatives.
- Shall make an application, in duplicate, for obtaining the prior permission/consent in prescribed form
- Shall deal in the securities of the Company for which prior permission/consent is obtained within seven days from the date of permission/consent.
- Shall apply afresh, in case he/she fail to execute the deal within one week from the date of permission/consent.
- Shall give an undertaking alongwith the application, in favour of the Company stating that;
 1. He/she doesn't have access to or has not received price sensitive information upto the time of signing the undertaking.
 2. He/she has access to or has received price sensitive information at the time of executing the undertaking, but he/she would refrain from dealing in the securities of the company till such time the information becomes public.
 3. He/she has not contravened these rules.
 4. He/she has made a full and true disclosure in the matter.
- Shall receive the permission/consent from the Compliance Officer within two days from the date of submission.
- Shall ensure that his/her stockbroker is authorized to disclose to the Company all matters relevant to his/her share dealings, if required by the Compliance Officer.
- Shall also inform the Compliance Officer, all deals in the securities of the Company below the threshold limit of;
 1. 1000 (One Thousand) shares in number in case of Directors/Promoters/ Persons acting in concert with promoters and/or their relatives
 2. 500 (Five Hundred) shares in number in case of other persons viz. Officers/Designated employees or Connected persons of the Company and their relatives.

Within one week from the date of execution of deal.

The Compliance Officer shall retain all copies of applications and acknowledgements.



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If the Compliance Officer feels opines that the proposed deal is on the basis of possession of any unpublished price sensitive information, he may reject the application for pre-clearance. The Compliance Officer is not obliged to give reasons for rejection/withholding the permission/consent.

DISCLOSURE REQUIREMENTS;

I. Initial Disclosure;

- a) Any person who holds more than **5%** shares or voting rights (substantial shareholders) in the Company shall disclose to the Company, the number of shares or voting rights held by such person, on becoming such holder, within 4 working days of;
 - The receipt of intimation of allotment of shares or
 - The acquisition of shares or voting rights, as the case may be.

- b) Any person who is a director or officer shall disclose to the Company the number of shares or voting rights held by him in the Company within 4 working days of his becoming a director or officer of the Company.

All designated employees are required to forward to the Compliance Officer details of all holdings in securities of the Company held by him and his dependent family members at the time of joining the Company. Similar disclosure should be forwarded by directors/officers of the Company in respect of securities of the Company held by their dependent family members.

II. Continual Disclosure:

- a) Substantial shareholders i.e. persons who hold more than **5%** shares or voting rights in the Company shall disclose to the Compliance Officer, the number of shares or voting rights held and change in their shareholding or voting rights, even if such change results in shareholding falling below 5%, and such change exceeds 2% of the total shareholding or voting rights from the last disclosure made to the Compliance Officer.

- b) Any person who is a director or officer shall disclose to the Compliance Officer, the total number of shares or voting rights held and change in shareholding or voting rights and change in shareholding or voting rights, if there has been a change in such holdings since the last disclosure made to the Compliance Officer and such change exceeds Rs.5, 00,000/- in value or 5000 shares or 2% of the total shareholding or voting rights whichever is lower.

- c) The continual disclosure as stated above in (a) and (b) above shall be made to the Compliance within 4 working days of;
 - The receipt of intimation of allotment of shares or
 - The acquisition or sale of shares or voting rights, as the case may be



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That means the disclosure is necessary if the change in the shareholding or voting rights occurs on account of acquisition or sale of shares or voting rights and the change exceeds the limits stipulated in the respective paragraphs. In other words the continual disclosure is necessary for every 2% change in holding from the last disclosure in the case of (a) above and at least of the levels compared to the last disclosure in the case of (b) above.

III. **Periodical Disclosure**

All Directors/Promoters/Persons acting in concert with promotes and/or their relatives/Officers/Designated employees or connected persons and their relatives, along-with dependent family members, shall disclosure to the Company periodically, whenever there is change in their shareholdings.

IV. **Annual Disclosure**

All Directors/Promoters/Persons acting in concert with promotes and/or their relatives/Officers/Designated employees or connected persons and their relatives, along-with dependent family members, shall disclosure to the Company their holding on or before 30th April every year.

DISCLOSURE BY COMPANY;

The Compliance Officer, within 5 days of receipt, shall disclose to all Stock Exchange(s) on which the Securities of the Company are Listed, the information(s) received under Para I(a), I(b), II(a) and II(b) above.

MAINTAINING CONFIDENTIALITY OF PRICE SENSITIVE INFORMATION;

- All Officers, designated employees shall maintain the confidentiality of all Price Sensitive Information and shall not pass on such information to any person directly or indirectly by way of making a recommendation for the dealing in Securities of the Company. The Officers, designated employee shall disclosure the Price Sensitive Information only to those within the company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appears to misuse the information;
- If any Officer, designated employees happens to receive any price sensitive information, he/she shall immediately report the same to the head of department, who in turn shall inform the same to the Compliance Officer in the prescribed form.
- Files containing confidential information shall be kept secure under the lock and key. Computer files must have adequate security of login and password etc. The departmental head shall nominate a member of depart for ensuring the compliance with this clause.



CORPORATE DISCLOSURE PRACTICES FOR PREVENTION OF INSIDER TRADING;

Before sharing any of the following information with analysts, shareholders and media, it shall be approved in advance by the Compliance Officer and Managing Director & Jt. Managing Director.

- a) Periodical Financial results of the Company (quarterly, half-yearly and annually);
- b) Intended declaration of dividend (both interim and final);
- c) Issue of securities or buy-back of securities;
- d) Any major expansion plans or execution of new projects;
- e) Amalgamation, mergers or takeovers;
- f) Disposal of whole or substantial part of the undertaking;
- g) Any significant changes in changes policies, plans or operations of the company including launch of new brands or new products of the Company where the contribution from such brand or product exceeds or is likely to exceed 5% of the total turnover of the Company during that financial year;
- h) Disruption of operations due to natural calamities;
- i) Commencement of any new commercial production / commercial operations where the contribution therefrom is likely to exceed 5% of the total turnover of the Company during the financial year;
- j) Developments with respect to changes in pricing / realization on goods and services arising out of the changes in the government policies.
- k) Litigation/Disputes with material impact;
- l) Revision of credit ratings assigned to any debt or equity instrument of the Company;
- m) Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company;

Any information approved by the Managing Director for disclosure, copy of same shall be forwarded to the Compliance Officer.

In case any information as listed above is disclosed inadvertently or without prior approval, the person responsible for disclosure shall immediately inform the Compliance Officer or the Managing Director, although the information is not considered price sensitive.

PROCEDURE FOR RESPONDING TO MARKET RUMOURS OR ANY QUERIES;

The Compliance Officer shall immediately consult the Managing Director/Jt. Managing Director, for verification of any rumours or queries forwarded to him.



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The Chairman of the Company or Managing Director/Jt. Managing Director shall reply to the queries or requests for verification of market rumours within 48 hours of receipt of such rumour or any further period as specified by the Stock Exchange.

The Compliance Officer, in consultation with the Chairman and/or Managing Director/Jt. Managing Director, makes a public announcement for verifying or denying rumours before making the disclosure.

DEALING WITH ANALYSTS / INSTITUTIONAL INVESTORS;

The Chairman and/or Managing Director/Jt. Managing Director of the Company shall interact with Analysts, Institutional and other Large Investors. Compliance Officer and a designated employee shall be present while addressing the Analysts, Institutional or Large Investors.

No price sensitive information shall be disclosed to analysts or institutional and other large investors unless it is confirmed with the Compliance Officer that the information has been made public. All questions raised in the analysts / investors meet, relating to the price sensitive information, shall be taken note of and considered response shall be given only after consulting the Compliance Officer.

The Managing Director or a Designated Employee shall forward the copy of minutes of meeting with the Analysts/institutional investors to the Compliance Officer in prescribed Form, within 2 working days from the conclusion of the meeting.

The Compliance Officer shall make a press release or post relevant information on the Company's website immediately after every analyst meet and such information shall also be sent to the Stock Exchange immediately, where price sensitive information is disclosed.

PENALTY FOR NON-COMPLIANCE WITH COMPANY'S INTERNAL CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

The Compliance Officer shall recommend for the disciplinary action to the Chairman and/or Managing Director/Jt. Managing Director, for not complying with the code of conduct by any of the designated employees. The disciplinary action may include wage freeze, suspension, ineligibility for future participation in any schemes / plans of the Company like employees stock option etc.

The Compliance Officer shall report non-compliance with the code of conduct to SEBI.

The action by the company shall not absolve the person from prosecution by SEBI under SEBI (Prohibition of Insider Trading) Regulations, 1992.



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All connected persons shall also ensure compliance with the SEBI (Prohibition of Insider Trading) Regulations 1992, as amended from time to time. The copy of which is enclosed for reference.

(List of Various forms from Form A to J mentioned below)

For any clarifications else further information Shri. Sunita R Satpalkar can be contacted.



RESINS & PLASTICS LTD

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Form A

INITIAL DISCLOSURE OF HOLDING/VOTING RIGHTS

Date _____

The Compliance Officer,
Resins and Plastics Limited
A-8, Marol Industrial Estate of MIDC
Cross Road – B, Street No. 5,
Andheri (E), Mumbai- 400 093

1	Name	
2	Designation	
3	Department/Date Joining	
4	Date of becoming substantial shareholder, Director/Officer	
5	No or Shares held	
6	Date of Acquisition	
7	Folio No./DP ID and Client ID	

Details of Shares held by Dependent Family Members:

Name of Relative	Relationship	No. of Shares held	Folio no. / DP ID / Client ID

(_____)
Name and Signature



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Form B

CONTINUAL DISCLOSURE OF HOLDING / VOTING RIGHTS

Date _____

The Compliance Officer,
Resins and Plastics Limited
A-8, Marol Industrial Estate of MIDC
Cross Road – B, Street No. 5,
Andheri (E), Mumbai- 400 093

1	Name	
2	Designation	
3	Department	
4	No or Shares held on date	
5	No of shares bought / sold	
6	No. of shares held (Balance)	
7	Folio No. / DP ID and Client ID	

Details of Shares held by Dependent Family Members:

Name of Relative	Relationship	No. of Shares held as on date	No of shares bought / sold	No of shares held (balance)	Folio no. / DP ID / Client ID

(_____)
Name & Signature



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Form C

APPLICATION FOR PRE-CLEARANCE

(This form to be submitted in duplicate)

Date _____

The Compliance Officer,
Resins and Plastics Limited
A-8, Marol Industrial Estate of MIDC
Cross Road – B, Street No. 5,
Andheri (E), Mumbai- 400 093

With reference to the Company's Code for Prohibition of Insider Trading, I seek your approval to subscribe to/agree to subscribe/purchase/sell/deal as an agent/principal in the securities of the Company. The required details are given below;

1	Name	
2	Designation	
3	Department	
4	Person Making Dealing – Self / Dependent Family Member (Please specify the name and relationship)	
5	Intended Date of Dealing	
6	No of Securities	
7	Folio no. / Name of DP/ DP Id / Client Id	
8	Total Consideration Payable Receivable (in Rs.)	

Please find enclosed herewith, my undertaking for pre-clearance of trade and a statement of holding at the time of pre-clearance.

(_____)
Name & Signature



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Form D

UNDERTAKING TO BE SUBMITTED ALONGWITH THE APPLICATION FOR PRE-CLEARANCE

(This undertaking to be submitted in duplicate)

Date _____

The Compliance Officer,
Resins and Plastics Limited
A-8, Marol Industrial Estate of MIDC
Cross Road – B, Street No. 5,
Andheri (E), Mumbai- 400 093

I, Mr. _____, (Name, Designation and Department) residing at _____, am desirous of dealing in _____ (no. of securities) of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

As required by the Company's Internal Code of Conduct for prohibition of Insider Trading, I hereby state that;

1. I have no access and have not received any Unpublished Price Sensitive Information, which means any information, directly/indirectly relating to the Company, in case published, is likely to significantly affect the price of shares of the company, till the time of executing this undertaking.
2. I am obliged to inform the Compliance Officer, in case, I happen to receive / had access to the Unpublished Price Sensitive Information, after execution of this undertaking, but before actual buying / selling of the Shares of the Company and will totally abstain from dealing in the shares of the Company till the time such information is made public / published.
3. I have not been violated the Code of Conduct for prohibition of insider trading, set by the Company from time to time, for prevention of Insider Trading.
4. I have made full and true disclosure in this matter.
5. If approval is granted, I shall execute the deal within 7 days of the receipt of approval, failing which I shall again seek pre-clearance.
6. I hereby undertake that;
I/we will hold the shares to be bought for a minimum period of 30 days
The shares to be sold are held by me/us are held for a minimum period of 30 days.

(_____)

Name & Signature



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Form E

STATEMENT OF HOLDINGS AT THE TIME OF PRE-CLEARANCE

(This statement to be submitted in duplicate alongwith application for pre-clearance)

DETAILS OF SHAREHOLDING OF DIRECTOR / OFFICER / DESIGNATED EMPLOYEES HELD IN THEIR OWN NAME

1	Name	
2	Designation	
3	Department	
4	No or Shares held on date application.	
5	Folio no. DP Id / Client Id	
6	Nature of Transaction for which approval is sought	
7	No of Securities to be dealt with	

Details of Shares held by Dependent Family Members:

Name of Relative	Relationship	No. of Shares held	Folio no. / DP ID / Client ID	No. of securities to be dealt with

I / we hereby declare that the shares to be sold have been held by me/us for a minimum period of 30 days.

(_____)
Name & Signature



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Form F

APPROVAL FROM THE COMPANY

Date _____

_____.

Dear Sir,

This is with reference to your application dated _____, for pre-clearance of trade, submitted alongwith an undertaking and a statement of holding on the date of application, seeking prior approval for buying / selling of _____ no. of Equity Shares of the Company.

We hereby grant the permission to buy / sell not more than _____ no. of Equity Shares of the Company, subject to the following conditions, in line with Company's Code of Conduct for prohibition of insider trading.

1. The grant of permission is valid for one week only, in case the transaction is not executed within one week after grant of approval, an application shall be submitted afresh for grant of prior permission.
2. You have to hold the shares of the Company, so purchased, for a minimum period of 30 days, in order to be considered as being held for investment purpose. The holding period can be waived, in case of any personal emergency, on justifiable reasons, recorded in writing.
3. All transaction in the Shares of the Company, under this approval, shall be communicated to the Company within 4 working days of the execution of the transaction.
4. Kindly note that any violation in compliance with aforesaid regulations, will attract penal provisions by the Company, including Wage/Salary Freeze, Suspension, ineligibility to participate in future in any schemes of the Company for the Employees.

Also note that this would not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 1992.

Yours faithfully
for **Resins & Plastics Limited**

Compliance Officer



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Form G

TRADE INFORMATION FORM

Date _____

The Compliance Officer,
Resins and Plastics Limited
A-8, Marol Industrial Estate of MIDC
Cross Road – B, Street No. 5,
Andheri (E), Mumbai- 400 093

Transaction in the name of substantial shareholder/director/officer/designated employees

1	Name	
2	Designation	
3	Department	
4	Person who dealt in securities of company - Self / dependent Family Member (Please specify the name and relationship)	
5	No. Shares held before transaction	
6	Nature of Transaction – Purchase / Sale	
7	Date of Transaction	
8	No. of Shares Transacted	
9	Approval Date	
10	Balance Holding on (date)	
11	Folio no./ DP Id / Client Id	

Details of transaction by dependent family members;

1	Name of Relative	
2	Relationship	
3	No. Shares held before transaction	
4	Nature of Transaction – Purchase / Sale	
5	Date of Transaction	
6	No. of Shares Transacted	
7	Approval Date	
8	Balance Holding on (date)	
9	Folio no./ DP Id / Client Id	

(_____)

Name & Signature



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Form H

ANNUAL DISCLOSURE

Date _____

The Compliance Officer,
Resins and Plastics Limited
A-8, Marol Industrial Estate of MIDC
Cross Road – B, Street No. 5,
Andheri (E), Mumbai- 400 093

Statement of shareholdings of Directors / Officers / Designated Employees;

1	Name	
2	Designation	
3	Department	
4	No or Shares held	
5	No of shares bought during the year	
6	No. of shares sold during the year	
7	No of Shares held as on 31 st March ____	
8	Folio No. / DP ID and Client ID	

Details of shares held by Dependent Family Members;

1	Name Relative	
2	Relationship	
3	No or Shares held	
4	No of shares bought during the year	
5	No. of shares sold during the year	
6	No of Shares held as on 31 st March ____	
7	Folio No. / DP ID and Client ID	

I / we hereby declare that the shares sold during the year have been held by me/us for a minimum period of 30 days.

I / we further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given.

(_____)
Name & Signature



RESINS & PLASTICS LTD

CIN: L25209MH1961PLC012223

Form I

TRADE INFORMATION FORM FOR DEALING BELOW THRESHOLD LIMIT

(This form is to be submitted within 7 days of dealing in securities)

Date _____

The Compliance Officer,
Resins and Plastics Limited
A-8, Marol Industrial Estate of MIDC
Cross Road – B, Street No. 5,
Andheri (E), Mumbai- 400 093

Transaction below threshold limits, in the name of substantial shareholder/director/officer/
designated employees

1	Name	
2	Designation	
3	Department	
4	Person who dealt in securities of company - Self / dependent Family Member (Please specify the name and relationship)	
5	No. Shares held before transaction	
6	Nature of Transaction – Purchase / Sale	
7	Date of Transaction	
8	No. of Shares Transacted	
9	Balance Holding on (date)	
10	Folio no./ DP Id / Client Id	

Details of transaction by dependent family members;

1	Name of Relative	
2	Relationship	
3	No. Shares held before transaction	
4	Nature of Transaction – Purchase / Sale	
5	Date of Transaction	
6	No. of Shares Transacted	
7	Balance Holding on (date)	
8	Folio no./ DP Id / Client Id	

(_____)

Name & Signature



RESINS & PLASTICS LTD

CIN: L25209MH1961PLC012223

Form J

REQUEST FOR WAIVER OF MINIMUM HOLDING PERIOD

(This form is to be submitted in duplicate)

Date _____

The Compliance Officer,
Resins and Plastics Limited
A-8, Marol Industrial Estate of MIDC
Cross Road – B, Street No. 5,
Andheri (E), Mumbai- 400 093

Kindly grant me waiver of the minimum holding period of 30 days as required under the Company's Code of Conduct for prohibition of Insider Trading in the securities of the Company. The required details for considering the waiver of minimum holding period are given below;

1	Name	
2	Designation	
3	Department	
4	No. Shares held (on date of application)	
5	No of Shares to be sold	
6	Date of purchase of these shares	
7	Balance Holding on (date)	
8	Folio no./ DP Id / Client Id	
9	Reason for waiver of minimum holding period	

(_____)

Name & Signature



RESINS & PLASTICS LTD

CIN: L25209MH1961PLC012223

Designated Employees list

- **Tier I - Directors of the Company**

Shri Abhay Vakil

Shri Ashwin Dani

Shri Rupen Choksi

Shri Gobind Lulla

Shri Bharat Chovatia

Shri Dhiren Mehta

Shri Chetan Thakkar

Smt. Hemangi Modi

- **Tier II - General Managers, Managers, Employees**

Smt. Sunita Satpalkar

Shri Dadaso Patil

Shri Amar Kumashi

Smt Manju Mohan

- **Tier III - Statutory Auditors**

Shri Ashish Shah

Shri Navin Choksi

Shri Manish Khemka

(Note:- Specified Persons mentioned in the List are having access to Financial results and other sensitive Information)