



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

INTRODUCTION:

Securities and Exchange Board of India (SEBI) has replaced existing SEBI (Insider Trading) Regulations 1992 new Trading Regulation viz., SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as "the regulations") with effect from 15th May 2015. These Regulations replaced SEBI (Prohibition of Insider Trading) Regulations 1992. The Regulations 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.

Regulations 9 requires 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 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behalf of any other person, deal in securities of a Company listed on any Stock Exchange(s) when in possession of any unpublished price sensitive information; or
- Communicate or counsel or procure, directly or indirectly, any unpublished price sensitive information to any person who while in possession of such unpublished price sensitive information shall not deal in securities.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 restrictions shall not be applicable to any communication required in the ordinary course of business or under any law.

Regulations also provide 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shall deal in the securities of another listed Company or associate of that other Company while in possession of any unpublished price sensitive information of the Other Company.

I. **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 employee of the Company or group Company 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 done upon utilization of inside information to profit at the expense of other investors who do not have access to such information.

II. **CERTAIN IMPORTANT EXPRESSIONS (DEFINITIONS)**

Board: Board Means the Board of Directors of the Company

Compliance officer means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be;

Connected Person: Connected Person means:

(i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -

(a). an immediate relative of connected persons specified in clause (i); or

(b). a holding company or associate company or subsidiary company; or

(c). an intermediary as specified in section 12 of the Act or an employee or director thereof; or

(d). an investment company, trustee company, asset management company or an employee or director thereof; or

(e). an official of a stock exchange or of clearing house or corporation; or

(f). a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

(g). a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

(h). an official or an employee of a self-regulatory organization recognised or authorized by the Board; or

(i). a banker of the company; or

(j). a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;

Generally available information: Generally available information means information that is accessible to the public on a non-discriminatory basis.

Immediate relative: Immediate relative means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

Insider: "insider" means any person who is:

- i) a connected person; or
- ii) in possession of or having access to unpublished price sensitive information;

Designated Person: Designated person for the means and includes;

- Promoters of the Company and person acting in concert with Promoters
- Directors of the Company
- Officers comprising the top three tiers of the Company management – Managers, Assistant Managers and Executives.

- All employees working in the Finance and Accounts Department / function, Legal Department, whether temporary or permanent.
- Employees designated by the Compliance Officer, in consultation with the Chairman or Managing Director or Whole time Director or Board of Directors.
- Immediate relatives of the above

Officer: Officer means and includes all persons who are in the employment of the Company in the Executive and above level, includes the Statutory and Internal Auditors of the Company.

Unpublished Price Sensitive Information (UPS I) : any information, relating to a Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- changes in key managerial personnel; and
- material events in accordance with the listing agreement.

Prohibited Period:

- **All Director(s) / Promoters / persons acting in concert with promoters and/or their relatives; officers / designated employees / employees working in associate or group Companies, Auditors and their dependent family members.**

Period starts with the first day of the month from the end of the quarter till the end of 48 hours from the time the Price Sensitive information considered by the Board is made public.

the Compliance Officer, from time to time and, in consultation with Wholetime Director / Managing Director / Chief Executive Officer and/or Chairman may specify any other period as prohibited period.

Takeover regulations: Takeover regulations means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Trading: Trading means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

Trading day: Trading day means a day on which the recognized stock exchanges are open for trading.

Trading Window: Trading Window means the free period during which dealing in the securities of the Company is not specifically restricted or prohibited.

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 any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization.

DUTIES AND POWER OF COMPLIANCE OFFICER;

1. To set forth policies, procedures, monitoring adherence to the rules for the preservation, secrecy 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 Wholetime Director / Managing Director / Chief Executive Officer.
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 2015 and the company's code of conduct.
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 annual)
 - b. Declaration of dividends (interim and final)
 - c. Issue of securities by way of public/ rights/bonus etc.
 - 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 6 months is observed by all directors / officers / designated employees.
13. To waive the requirement of minimum holding period 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 / Committee of Directors / Whole time Director / Managing Director, 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 established such persons had executed under the proper pre-clearance procedure.

17. To implement punitive measures or disciplinary action prescribed for any violation or contravention of the code of conduct by the Board of Directors or any other regulatory authorities of the Government.

18. To inform the SEBI of any violation observed or knowledge thereof.

PROHIBITION OF DEALING IN SECURITIES, COMMUNICATING OR COUNSELING ON MATERS RELATING TO THE INSIDER TRADING.

No Insider shall;

- Either on his own behalf or on behalf of any other person deal in securities of the Company when in the possession of any unpublished price sensitive information.
- Communicate or 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 and their dependants 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 enter into an opposite transaction (Reverse transaction) i.e. Sell or buy any number of shares during the next six months following the prior transaction of buying or selling of shares of the Company.

In the case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

The Compliance Officer may waive the minimum holding period of 6 months, in case sale of securities is necessitated by personal emergency, upon making an application in the prescribed Form IX, attached herewith to these rules.

PRE-CLEARANCE OF TRANSACTIONS:

All Directors / Promoters / Persons acting in concert with Promoters and/or their relatives / Officers / designated employees and their dependants or Connected persons of the Company and their relatives;

- Shall deal in securities of the Company only during the free period only.
- Shall obtain the prior permission/consent in writing of the Compliance Officer in case they intend to deal in securities of the Company in excess of Market Value exceeding Rs. 5 Lakhs in a calendar quarter.
- Shall make an application, in duplicate, for obtaining the prior permission/consent in prescribed Form I
- Shall give an undertaking in Form II along with the application, in favour of the Company stating that;
 - He/she doesn't have access to or has not received price sensitive information upto the time of signing the undertaking.
 - 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.
 - He/she has not contravened these rules.
 - He/she has made a full and true disclosure in the matter.
- Along with application shall submit Statement of Holding at the time of pre-clearance to the Company in Form III
- 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 receive the permission/consent from the Compliance Officer within two days from the date of submission of application.

- 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 in Form VIII, all deals in the securities of the Company between Market Value of Rs.2 Lakhs to Rs. 5 Lakhs within one week from the date of execution of deal.

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

If the Compliance Officer feels 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.

TRADING PLAN

- A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a "Trading Plan") and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out in his behalf in accordance with such plan.
- The Compliance Officer shall review and approve the Trading Plan if it complies with the SEBI Regulations and shall disclose the Trading Plan to the stock exchanges.
- The Trading Plan once approved shall be irrevocable and the Designated Person 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. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the Designated Person is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information. Further, the Designated Person shall also not be allowed to Trade in securities of the Company, if the date of Trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

DISCLOSURE REQUIREMENTS;

I. Initial Disclosure;

- a. Every promoter, key managerial personnel and director of Company whose shall disclose his holding of securities of the company as on the

date of these regulations taking effect, to the company within thirty days In Form A.

- 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 In Form B.

II. Continual Disclosure:

c. Every promoter, employee and director of Company shall disclose to the Company the number of such securities 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 in Form C.

- a. Every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

III. Disclosures by other connected persons:

At the Company's discretion the Company may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor compliance with these regulations In Form D.

IV. Periodical Disclosure

All Directors / Promoters / Persons acting in concert with promoters 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.

V. 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 2 working days of receipt, shall disclose to all Stock Exchange(s) on which the Securities of the Company are Listed, the information(s) received under above paras.

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 disclose 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 department 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, such information shall be approved in advance by the Compliance Officer and Chairman or any other Director.

1. Periodical Financial results of the Company (quarterly, half-yearly and annual);
2. Intended declaration of dividend (both interim and final);
3. Issue of securities or buy-back of securities;
4. Any major expansion plans or execution of new projects;
5. Amalgamation, mergers or takeovers;
6. Disposal of whole or substantial part of the undertaking;
7. Any significant changes in changes policies, plans or operations of the company including launch of new brands or new products of the Company;
8. Disruption of operations due to nature calamities;
9. 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;
10. Developments with respect to changes in pricing / realization on goods and services arising out of the changes in the government policies.

11. Litigation / disputes with material impact;
12. Revision of credit ratings assigned to any debt or equity instrument of the Company;
13. 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 Chairman / Managing Director / Wholetime 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 Managing Director / Wholetime Director, although the information may not be considered price sensitive.

PROCEDURE FOR RESPONDING TO MARKET RUMOURS OR ANY QUERIES;

The Compliance Officer shall immediately consult the Chairman, for verification of any rumours or queries forwarded to him.

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

The Compliance Officer, in consultation with the Chairman, will make a public announcement for verifying or denying rumours before making the disclosure.

DEALING WITH ANALYSTS / INSTITUTIONAL INVESTORS;

The Chairman / Managing Director / Wholetime 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.

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 INSIDER TRADING

The Compliance Officer shall recommend for the disciplinary action to the Chairman, 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, 2015.

All connected persons shall also ensure compliance with the SEBI (Prohibition of Insider Trading) Regulations 2015, as amended from time to time. The copy of which is enclosed for reference.

MISCELLANEOUS

- The Board of Directors shall be empowered to amend, modify, interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.
- The Compliance Officer shall provide the Audit Committee of the Board, on a quarterly basis, all the details of Trading in securities by the Designated Persons including any violations of the Rules.
- The Compliance Officer shall maintain (a) updated list of Designated Persons, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years and (c) a confidential list of any 'restricted securities' to which the Compliance Officer may require Designated Persons to seek pre-clearance before Trading in such 'restricted securities'.

Form I

APPLICATION FOR PRE-CLEARANCE

(This form to be submitted in duplicate)

Date _____

The Compliance Officer,
Sunshield Chemicals Limited
1501-A, Universal Majestic,
P.L.Lokhande Marg, Opp.RBK International School,
Chembur West, Mumbai 400043

With reference to the company's Code of Conduct 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 and Signature

Form II
UNDERTAKING TO BE SUBMITTED ALONGWITH THE APPLICATION FOR
PRE-CLEARANCE

(This undertaking to be submitted in duplicate)

Date _____

The Compliance Officer,
Sunshield Chemicals Limited
1501-A, Universal Majestic,
P.L.Lokhande Marg, Opp.RBK International School,
Chembur West, Mumbai 400043

I, Mr. _____, (Name, Designation and Department) residing at _____, I 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 6 months

The shares to be sold are held by me/us are held for a minimum period of 6 months.

(_____)

Name & Signature

Form III

STATEMENT OF HOLDINGS AT THE TIME OF PRE-CLEARANCE
(This statement to be submitted in duplicate along with 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 of 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 6 months.

(_____)
Name & Signature

Form IV

APPROVAL FROM THE COMPANY

Date _____

To
_____ (Applicant)

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 6 months, in order to be considered as being held for investment purpose. The holding period can be waived, incase 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 2 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 **Sunshield Chemicals Limited**

Compliance Officer

Form V
TRADE INFORMATION FORM

Date _____

The Compliance Officer,
Sunshield Chemicals Limited
1501-A, Universal Majestic,
P.L.Lokhande Marg, Opp.RBK International School,
Chembur West, Mumbai 400043

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

Form VII
ANNUAL DISCLOSURE

Date _____

The Compliance Officer,
Sunshield Chemicals Limited
1501-A, Universal Majestic,
P.L.Lokhande Marg, Opp.RBK International School,
Chembur West, Mumbai 400043

Statement of shareholdings of Directors / Officers / Designated Employees;

1	Name	
2	Designation	
3	Department	
4	No or Shares held on 1 st April _____	
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 on 1 st April _____	
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 6 months.

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

(_____)
Name & Signature

Form VIII

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,
Sunshield Chemicals Limited
1501-A, Universal Majestic,
P.L.Lokhande Marg, Opp.RBK International School,
Chembur West, Mumbai 400043

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

Form IX

REQUEST FOR WAIVER OF MINIMUM HOLDING PERIOD

(This form is to be submitted in duplicate)

Date _____

The Compliance Officer,
Sunshield Chemicals Limited
1501-A, Universal Majestic,
P.L.Lokhande Marg, Opp.RBK International School,
Chembur West, Mumbai 400043

Kindly grant me waiver of the minimum holding period of 6 months as required under the Company's Internal 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