

To, **BSE Limited,**Listing Compliance Monitoring Cell,
24th Floor, P.J. Towers,
Dalal Street, Mumbai -400001

04th December, 2021

(Scrip Code: 500418)

<u>Sub: Reclassification of status of Promoter's to public Category under Regulation 31 A</u> of Listing Obligation of Tokyo Plast International Limited.

Dear Sir.

This has reference to our application no. 138639 dated 21st September, 2021 for reclassification of Promoters. We have not received any email or rejection letter from Bombay Stock Exchange. However on 3rd December, 2021 the BSE (Listing Centre) is showing the status of "Case is rejected".

National Stock Exchange has given us opportunity to submit the clarification & other required documents.

In this regards, we have received requirement letter from National Stock Exchange on Wednesday, 01st December, 2021 therefore we request you to reconsider our application & for further clarification if any, we humbly request you to provide us hearing for the same.

We are in the process of submitting reply to National Stock Exchange & accordingly we will also submit the same documents to Bombay Stock exchange.

As per NSE's requirement letter, we are following amended regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) Regulations, 2021 for reclassification of Promoters. In previous submission we have followed old regulation. As per amended regulation, The Board Meeting will be held on Tuesday, 14th December, 2021 by company to reconsider the application of Promoter's for Reclassification of Promoters group to Public.

We have attached NSE Requirement letter & Board Meeting Notice for your reference.

Thanking you,

Rekha Bagda Company Secretary





National Stock Exchange Of India Limited

Ref: NSE/LIST/180. December 01, 2021

Tokyo Plast International Limited The Company Secretary Plot No. 363/1(1,2,3), Shree Ganesh Industrial Estate, Kachigam Road, Daman: 396210

Dear Sir/ Madam

Sub.: Requirements for application of Promoter Reclassification

This is with reference to your application Reclassification of Promoter/s. You are requested to provide following/ clarify following:

Sr. No.	Checklist				
1.	Kindly submit application on neaps portal under New Regulation 31A(3) and accordingly revise the Documents as per Checklist.				
2.	Application from Company seeking approval for re-classification on letterhead of the Company along with rationale for reclassification.				
3.	Outgoing Promoter Name under Promoter Details differs from List of promoters seeking reclassification. Kindly include details of promoter(s) seeking re-classification in the application (in the table for "Promoter Details") submitted over the NEAPS PORTAL.				
4.	Kindly provide appropriate list of persons related to the promoter(s) seeking reclassification specifying the relation with the person seeking reclassification as per Reg 2(1) (pp) of SEBI (ICDR), 2018.				
5.	As per the Regulation 31A (3) (b) (iv) and (v) the promoter(s) seeking re-classification and persons related to the promoter(s) seeking re-classification shall not be represented on the board of directors (including not having a nominee director) of the listed entity; and shall not act as a key managerial person in the listed entity, respectively –				
	As per the Corporate Governance Report submitted for the quarter ended September 30, 2021 it is observed that currently Mr. Velji Shah Chairperson & Executive Director, Mr. Haresh Shah, Executive Director and Mr. Priyaj Shah, Executive Director on the Board				

of the Company.

It is to be noted that Mr. Rayshi Shah, Mr. Malshi Shah, Mrs. Maniben Rayshi Shah is directly related to Mr. Velji Shah and Ms. Pushpa Shah and Heena Shah is directly related to Mr. Haresh Shah and Priyaj Shah. You are therefore requested to provide the legally acceptable document which will confirm the compliance of Regulation 31A (3) (b) (iv) and (v) of SEBI (LODR) Regulations, 2015.

6. As per Regulation 31A (3)(a) (ii) the board of directors of the listed entity has analyzed such request in the immediately next board meeting or within three months from the date of receipt of the request from its promoter(s), whichever is earlier and has placed the same before the shareholders in a general meeting for approval along with the views of the board of directors on the request:

Provided that there shall be a time gap of at least one month but not exceeding three months between the dates of the board meeting and the shareholders' meeting considering the request of the promoter(s) seeking reclassification.

Based on the details submitted by the company in the application, following is understood:

Date of Board meeting in which the	Date of Shareholder's Approval	
request received from promoter was		
placed		
March 03, 2021	September 01, 2021	

Here the gap between the board meeting and shareholder approval is more than 3 months.

In this regard, you are requested to explain compliance of Regulation 31A (3)(a) (ii) of SEBI (LODR) Regulations, 2015.

- 7. As per Regulation 31A (8) The following events shall deemed to be material events and shall be disclosed by the listed entity to the stock exchanges as soon as reasonably possible and not later than twenty four hours from the occurrence of the event:
 - a. receipt of request for re-classification by the listed entity from the promoter(s) seeking re-classification,
 - b. minutes of the board meeting considering such request which would include the views of the board on the request,
 - c. submission of application for re-classification of status as promoter/public by the listed entity to the stock exchanges,
 - d. decision of the stock exchanges on such application as communicated to the listed entity.

As per the intimations submitted by the company on NSE portal it is understood that company have intimated about Board meeting but not filled minutes of the board meeting considering such request which would include the views of the board on the request and also not disclose regarding submission of application for re-classification of status as promoter/public by the listed entity to the stock exchanges.

In this regard, you are requested to explain compliance of Regulation 31A (8)(b) and (c)

	of SEBI (LODR) Regulations, 2015.				
8.	Provide appropriate Pre and Post shareholding pattern pursuant to proposed re- classification certified by authorized signatory in the format prescribed by SEBI vide				
	circular dated November 30, 2015.				
9.	Undertaking from each promoter(s) seeking reclassification separately as per the format				
	enclosed in Annexure II				
10.	Certified true copy of request for re-classification made by the promoter(s) seeking				
	reclassification should be signed by all Promoters seeking reclassification.				

11. It has been observed that there is below mentioned outstanding amount is shown in the books from your company.

Symbol	Company Name		Pending Fine	Remark
			Including GST	
TOKYOPLAST	Tokyo	Plast	8,67,300/-	There is pending
	International			SOP fine for the
	Limited			Regulation 17 of
				(LODR)
				Regulation 2015
				for the quarter
				ended June 30,
				2020 and
				September 30,
				2020 For
				Regulation 33 of
				(LODR)
				Regulation 2015
				for the quarter
				ended March 31,
				2020.

Please note that as per Regulation 31A (3) (c) (iii) the listed entity shall not have any outstanding dues to the stock exchanges therefore you are requested to clear all outstanding dues at earliest.

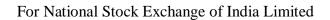
You may kindly reach out to our SOP team member at following email ids, in case any concern –

- 1. mdesai@nse.co.in
- 2. rrai@nse.co.in
- 3. bpunjabi@nse.co.in
- 4. consultant_dshah@nse.co.in

You are requested to note that all pages of the documents/details provided are to be rubber stamped and initialed by the authorized signatory of the company. We would be in position to take necessary action at our end on receipt of the above documents/details.

Yours faithfully,

Continuation Sheet



Devika Bhootka

P.S. Checklist of all the further issues is available on website of the exchange at the following URL: http://www.nseindia.com/corporates/content/further issues.htm



Saturday, December 04, 2021

To,

BSE Limited

1st Floor, New Trading Ring,

National Stock Exchange Of India
Limited

Rotunda Building, P.J. Towers,
Dalal Street, Fort, Mumbai-400001

Exchange Plaza, C-1, Block G,
BandraKurla Complex,
Bandra (E), Mumbai – 400 051

Scrip Code: 500418

NSE Symbol: TOKYOPLAST

Sub: Intimation under Regulation 29(1) of SEBI (Listing Obligations & Disclosures Requirements) Regulations, 2015.

Dear Sir/Madam,

Pursuant to Regulation 29(1) of SEBI (Listing Obligations & Disclosures Requirements) Regulations, 2015, we wish to inform you that a meeting of Board of Directors of the Company will be held on Tuesday, 14th December, 2021, to re-consider application from promoter's for "reclassification of promoters from promoter group to public" under SEBI (LODR) (Second Amendment) Regulation, 2021 as per NSE's Requirement letter.

Thanking you,

For Tokyo Plast International Limited

Rekha Bagda

Company Secretary