

POLYCHEM LIMITED

REGD. OFFICE: 7, JAMSHEDJI TATA ROAD, CHURCHGATE RECLAMATION, MUMBAI-400 020.



TELEPHONE : 91 22 2282 0048
FAX : 91 22 2285 0606
Web site : <http://www.polychemltd.com>
EMAIL : polychemltd@kilachand.com
CIN : L24100MH1955PLC009663

HO : CS&CO:192/2015

10th July, 2015

To,
Bombay Stock Exchange Ltd.
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001.

Kind Attn : Mr. Jaymin Modi
Relationship Manager
Company Code: 506605

Dear Sirs,

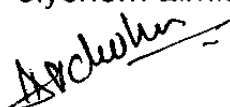
Sub : Adoption of new code SEBI (Prohibition of Insider Trading) Regulations, 2015

As per the SEBI (Prohibition of Insider Trading) Regulations, 2015 the Board of Directors in their meeting held on Monday, 11th May, 2015 approved and adopted a "Code of Practices and Procedures for Fair Disclosure" to regulate, monitor and report dealing in Securities by its employees and other connected persons designated on the basis of their functional role in the Company, the same is being uploaded on the Company's website.

The said code has come into force with effect from 15th May, 2015

You are requested to kindly take this on record.

Yours faithfully,
Polychem Limited


Deepali V. Chauhan
Company Secretary & Compliance officer



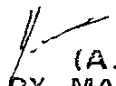
Code of Practices and Procedures for fair Disclosure of Unpublished Price Sensitive Information:

Regulation (8) of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 requires a listed company to formulate and publish on its official website a "code of Practices and Procedures of Unpublished Price Sensitive Information" in adherence to the Principles set out in Schedule A to the said Regulations.

Accordingly, a code is hereby framed as under:-

1. The Company shall ensure Prompt public disclosure of unpublished price sensitive information that would impact price discovery, as soon as it has credible and concrete information in order to make such information 'generally available'.
2. The Company shall ensure a uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer for the purpose of dealing with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'.
5. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with the analysts and research personnel is not unpublished price sensitive information.
7. The Company shall develop best practices ~~to make~~ transcripts or records of proceedings of meetings with analysts and other investors relations conferences on the official website to ensure official confirmation and documentation of disclosures made.


For POLYCHEM LIMITED


(A. H. MEHTA)
DY. MANAGING DIRECTOR
DIN : 00005523

8. The Company shall handle all unpublished price sensitive information on need-to-know basis. All the insiders having in possession of unpublished price sensitive information are required to handle such information with care and deal with such information when transacting their business strictly on need-to-know basis.

This Code was duly approved by the Board of Directors of the Company in their meeting held on Monday, 11th May, 2015 and the code shall come into force with effect from 15th May, 2015.

For POLYCHEM LIMITED


(A. H. MEHTA)
DY. MANAGING DIRECTOR
DIN : 00005523