

ALIPURDUAR TEA CO LIMITED

CODE OF CONDUCT AND FAIR DISCLOSURE

The Code of Conduct and Fair Disclosure had been framed pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 ('the Regulations'). The Regulations have since undergone amendments and this Code seeks to address the amended provisions and is in supersession of the earlier one and shall be applicable from 1st April, 2019.

The purpose of this Code is to formulate:

- (i) A Code of Conduct to regulate, monitor and report trading by designated persons and their immediate relatives towards achieving compliance with the Regulations; and
- (ii) A Code of Practice and Procedure for Fair Disclosure of unpublished price sensitive information that would be followed by the Company in order to adhere to the principles set out in the Regulations.
- (iii) A Policy for Determination of Legitimate Purposes as a part of this Code.

Words and expressions used and not defined here but defined in the SEBI (Prohibition of Insider Trading) Regulations 2015, shall have the meanings assigned to them in those Regulations.

1. Role of Compliance Officer

1.1 The Compliance Officer means the Company Secretary who shall report to the Board of Directors of the Company ('the Board') and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board at such frequency as may be stipulated by the Board.

1.2 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Regulations and this Code.