



**THE GROB TEA CO. LTD.**

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**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION.**

(as envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

(Effective from 15<sup>th</sup> June 2015)

1. The Grob Tea Co. Ltd. (GROB) will make prompt public disclosure of unpublished price sensitive information as soon as credible and concrete information is available or the decisions are validated by the Board to Calcutta Stock Exchange Ltd., and simultaneously upload such information on Company's official website [www.grobtea.com](http://www.grobtea.com) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. GROB shall disclosure information in portal of CSE Limited and its official website to avoid selective disclosure.
3. The compliance officer of the Company is authorized to act as Chief Investor Relations Officer(s) to take required action for dissemination of information and disclosure of unpublished price sensitive information.
4. In the event of inadvertent selective disclosure of un-published price sensitive information, prompt action shall be taken by Chief Investor Relations Officer(s) to ensure such information is generally available.
5. Chief Investor Relations Officer(s) shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Chief Investor Relations Officer(s) shall further ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

7. GROB shall take reasonable steps to make generally available any discussion on unpublished price sensitive information at the meeting of analyst or investors relations through the official website to ensure official confirmation and documentation of disclosures made.
  
8. Unpublished Price Sensitive Information shall be handled on a "need to know" basis i.e. Unpublished Price Sensitive Information shall be disclosed only to those within GROB who need the information to discharge their duty.

The code is duly approved by the Board on 28<sup>th</sup> May 2015 and shall be effective w.e.f. 15<sup>th</sup> June 2015.