May 29, 2023

BSE Limited National Stock Exchange of India Ltd., Phiroze-Jeejeebhoy Towers, Exchange Plaza, C-1, Block G, 5th Floor Bandra Dalal Street. Kurla Complex, Mumbai-400 001 Bandra (E), Scrip Code: 538902 Mumbai -400 051 Symbol: DTIL

Dear Sir/Madam,

Sub: Submission of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information of the Company as amended in terms of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

Pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, we enclose herewith the revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information of the Company as approved by the Board of Directors. The code is available on the Company's website at www.dhunseritea.com.

This is for your information and records.

Yours faithfully, For Dhunseri Tea & Industries Limited

R.Mahadevan Company Secretary

Encl: As above

Ph.: +91 33 2280 1950 (Five Lines) Email: mail@dhunseritea.com, Website: www.dhunseritea.com

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION AND POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

[As envisaged under the SEBI (Prohibition of Insider Trading) Regulations, 2015]

The Company will adhere to the following so as to ensure timely and adequate disclosure of Unpublished Price Sensitive Information (UPSI) with respect to it or its Securities which is likely to affect the price of securities.

- 1. The Company will ensure prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- 2. The Company will ensure uniform and universal dissemination of UPSI to avoid selective disclosure.
- 3. The Compliance Officer of the Company will be chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
- 4. The Company will ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 5. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with Insider Trading regulations.
 - Explanation –the term "legitimate purpose" shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
- 6. The Company will provide, appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- 7. The Company will ensure that, information, if any, shared with analysts and research personnel is not UPSI.
- 8. The Company will make transcripts or records of proceedings of meetings with analysts and other Investor relations conferences on the website of the company to ensure official confirmation and documentation of disclosures made.
- 9. The Company will deal with all UPSI on a need-to-know basis.

This Code was approved by the Board at its meeting held on 28th May, 2023.