

ASSAM ENTRADE LIMITED

Regd. Office: 16 Tara Chand Dutta Street (2nd Floor), Kolkata 700 073

CIN No. U20219WB1985PLC096557

GSTIN 09AAECA3423G1ZZ

PAN NO. AAECA3423G

ASSAM ENTRADE LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(Approved by the Board of Directors of the Company on 21st May, 2019)

The Board of Directors has adopted the Code of practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("CODE") framed on the basis of the principles of fair disclosure outlined in the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018. Accordingly, the Board of Directors of the Company would follow the following practice and procedure for the fair disclosure of unpublished price sensitive information.

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance officer of the Company will be the chief investor relations officer to deal with the dissemination of information and disclosure of unpublished price sensitive information.
4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide, appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company will ensure that, information if any shared with analyst and research personnel is not unpublished price sensitive information.
7. The Company will make transcript 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.
8. The Company will handle all unpublished price sensitive information on need to know basis.

9. An Insider can share unpublished price sensitive information, subject to the prior approval of the Board of Directors or the Audit Committee of the Company, in the ordinary course of business and for legitimate purposes with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants of the Company, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI (Prohibition of Insider Trading), Regulations as amended.

This Code was adopted by the Board of Directors of the Company in its meeting held on 21st May, 2019.