

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UNPUBLISHED PRICE SENSITIVE INFORMATION**

The Code of practices and procedures for fair disclosure of unpublished price sensitive information has been adopted by the Board of Directors pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as 'the said Regulations').

Purpose and Objective

The Code aims to formulate, without diluting the provisions of the said Regulations in any manner, and as per the Principles of Fair Disclosure set out in Schedule A of the said Regulations: a stated framework and policy for fair disclosure of:

- events and occurrences that could impact price discovery in the market for its securities.
- principles such as equality of access to information,
- publication of policies such as those on dividend,
- inorganic growth pursuits,
- calls and meetings with analysts, publication of transcripts of such calls and meetings, and the like

Definition:

In this Code, unless the context otherwise requires, the words, expressions and derivatives therefrom shall have the meanings assigned to them as per SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto

- A. unpublished price sensitive information
means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –
- (i) financial results;
 - (ii) dividends;
 - (iii) change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - (v) changes in key managerial personnel; and
 - (vi) material events in accordance with the listing agreement.
- B. Securities
shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;
- C. Act
means the Securities and Exchange Board of India Act, 1992.
- D. Board
means the Board of Directors of the Company.
- E. Company
means Antarctica Limited.

CODE:

1. The Company shall
 - a. promptly publish in the newspapers, both english and vernacular, having substantial circulation,
 - b. inform the Stock Exchange(s) promptly and
 - c. publish on the website of the Company

any 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 procedure as stated in point no 1 will assure uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Managing Director shall be designated as the chief investor relations officer for the purposes of this Code. In his absence, the Company Secretary shall act as the chief investor relations officer.
4. The Company will strive that no dissemination of unpublished price sensitive information gets disclosed selectively, inadvertently or otherwise. In case of such an untoward happening the Company will promptly make such information generally available by the process stated in point no 1.
5. The Company will always take utmost care to make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall lay down and implement best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company will take all necessary steps and precaution to ensure that handling of all unpublished price sensitive information is only on a need-to-know basis.

Disclosure:

This Code is published on the Company's website: www.antarctica-packaging.com and the Stock Exchange(s) are notified and every amendment thereto shall be promptly intimated to the stock exchanges where the securities are listed.