



MALANKARA PLANTATIONS LIMITED

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Malankara Plantations Limited

POLICY FOR DETERMINING LEGITIMATE PURPOSES

(Pursuant to Regulation 3(2A) of SEBI (Prohibition of Insider Trading) Regulations, 2015)

1. Preamble

This "Policy for Determining Legitimate Purposes" ("Policy") is formulated in compliance with Regulation 3(2A) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") as amended from time to time.

The objective of this policy is to identify **legitimate purposes** for sharing Unpublished Price Sensitive Information ("UPSI") in the ordinary course of business and ensure that such sharing is conducted in a fair, lawful, and transparent manner.

2. Definition of Legitimate Purpose

"Legitimate Purpose" shall include sharing of UPSI in the ordinary course of business by an insider with:

- Partners, collaborators, lenders, customers, suppliers, or advisors;
- Legal advisors, auditors, merchant bankers, consultants, or credit rating agencies;
- Insolvency professionals or resolution professionals;
- Any other person as may be required by law, judicial process, or regulatory authorities;
- Any other person who requires the information for legitimate purposes as decided by the Board of Directors or Compliance Officer.

Such sharing must be in the best interest of the Company and not carried out to evade or circumvent the provisions of the PIT Regulations.

3. Principles for Sharing UPSI for Legitimate Purposes

- UPSI shall be shared only on a **need-to-know basis** and for performance of legitimate duties or discharge of legal obligations.
 - The person with whom the UPSI is shared shall be informed of the confidentiality obligations and shall execute a **Non-Disclosure Agreement (NDA)** or be bound by confidentiality terms.
 - The Company shall maintain a **Structured Digital Database** of such persons and their details as required under the SEBI Regulations.
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4. Compliance Responsibility

The **Compliance Officer** of the Company shall:

- Review the legitimate purpose framework regularly;
 - Ensure internal controls and recordkeeping of all such disclosures;
 - Ensure compliance with SEBI regulations, including maintaining a list of persons with whom UPSI is shared.
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5. Amendments

This Policy may be amended or modified by the Board of Directors at any time in accordance with the provisions of the SEBI Regulations and other applicable laws.

For Malankara Plantations Ltd


Managing Director