

Virat Industries Limited

ETHICS AND CODE OF CONDUCT

THE BOARD MEMBERS, COMPANY SECRETARY, PRESIDENT AND SENIOR OFFICERS:

- 1) Shall make all efforts to protect the interest of shareholders and stakeholders.
- 2) Shall maintain high standards of integrity, dignity and fairness in the conduct of Company's business.
- 3) Shall at all times exercise due diligence, ensure proper care and use independent professional judgment.
- 4) Shall endeavor to ensure that:
 - a) Inquiries from shareholders and stakeholders are expeditiously and judicially dealt with ;
 - b) Grievances of shareholders and stakeholders redressed in a timely and appropriate manner.
- 5) Shall not discriminate amongst its customers, business associates, and clients save and except on ethical and commercial considerations.
- 6) Shall maintain distinct distance between the Company's activity and any other activity.
- 7) Shall ensure that the Board is promptly informed about any action, legal proceedings, etc. initiated against it in respect of material breach or non compliance by it, of any law, rules and regulations & directions etc. of any regulatory body
- 8) Shall provide adequate freedom and powers to Company's compliance office for the effective discharge of his duties
- 9) Shall ensure that good corporate policies and corporate governance are in place.
- 10) Shall ensure that any person whom company employs or appoints to conduct business is fit and proper and qualified to act in the capacity so employed or appointed (including having relevant professional training and experience)
- 11) Shall ensure that the senior management, particularly decision makers have access to all relevant information about the business on timely basis.
- 12) Shall not be a party to or instrumental for:
 - a) Creation of false market or
 - b) Price rigging or manipulation or
 - c) Passing of unpublished price sensitive information in respect of securities which are listed and proposed to be listed on any stock exchange, to any person or intermediary in the securities market.

