



VIPUL LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

PRINCIPLES OF FAIR DISCLOSURE

In pursuant to the Regulation 8 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (**“the Regulations”**), the Board of Directors of Vipul Limited has adopted the following code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information to adhere each of the principles is set out in the Regulations.

The Principles of Fair Disclosure adopted by the Company are as follows:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make disclosures of unpublished price sensitive information, as and when made, in a uniform and universal manner through forums like widely circulated media and/or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.
3. Company Secretary of the Company, unless any other senior officer designated so, shall serve as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.
5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To publish proceedings of meeting with analysts and other investor relations conferences on the official website www.vipulgroup.in to ensure official confirmation and documentation of disclosures made therein.
8. To handle all unpublished price sensitive information on a need-to-know basis only.