VIKSIT ENGINEERING LIMITED

CIN: - L99999MH1983PLC029321   **e mail id: - investor_viksit@yahoo.com**

Regd. Office: A-9/2, MIDC Taloja Industrial Estate, Taloja, District Raigad, Maharashtra – 410208
Corp. Office: 20 Johari Palace, 51, M.G. Road, Indore (M.P.) – 452 001, Phone: 0731-2514950

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This Code is called Viksit Engineering Limited Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") and is framed based on the principles of fair disclosure outlined in Schedule A to the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Definitions

1.   **"Compliance Officer"** means any senior officer, designated so and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in the SEBI (Prohibition of Insider Trading) Regulations, 2015, under the overall supervision of the Board of Directors of the Company;

2.   **"Unpublished Price Sensitive Information" ("UPSI")** means any information, relating to a company or its securities, directly or indirectly, that is not generally available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;

VIKSIT ENGINEERING LIMITED

CIN: - L99999MH1983PLC029321   **e mail id: - investor_viksit@yahoo.com**

Regd. Office: A-9/2, MIDC Taloja Industrial Estate, Taloja, District Raigad, Maharashtra – 410208
Corp. Office: 20 Johari Palace, 51, M.G. Road, Indore (M.P.) – 452 001, Phone: 0731-2514950

(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.

The Company Secretary or any other person appointed and authorized by the Board of Directors would be the Chief Investor Relation Officer, who shall deal with dissemination of information and disclosure of UPSI and report to the Board of Directors, for purpose of this Code.

The Chief Investor Relation Officer shall ensure the following:

1.   Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available;

2.   Uniform and universal dissemination of UPSI to avoid selective disclosure;

3.   Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available;

4.   Appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities;

5.   The information shared with analysts and research personnel is not UPSI;

6.   Develop 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;

VIKSIT ENGINEERING LIMITED

CIN: - L99999MH1983PLC029321   **e mail id: - investor_viksit@yahoo.com**

Regd. Office: A-9/2, MIDC Taloja Industrial Estate, Taloja, District Raigad, Maharashtra – 410208
Corp. Office: 20 Johari Palace, 51, M.G. Road, Indore (M.P.) – 452 001, Phone: 0731-2514950

7.   Handling of all unpublished price sensitive information on a need-to-know basis.

Note: Words not defined herein shall have the meaning as per the SEBI (Prohibition of Insider Trading) Regulations, 2015

* * * * * * * * * *