

VAMA INDUSTRIES LIMITED

Code of Practices and Procedures for Fair disclosure of Unpublished Price Sensitive Information

[As envisaged under Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

1. Corporate Disclosure Policy

To ensure timely and adequate disclosure of price sensitive information, the following norms are being followed by the Company.

2. Prompt disclosure of price sensitive information

- a. The Company will endeavor to make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- b. The Company will ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- c. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- d. The Company will handle all unpublished price sensitive information on a need-to-know basis for legitimate purposes only.

3. Overseeing and Co-ordinating disclosure

- a. The Company Secretary will be the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
 - b. The Company Secretary shall also be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of price sensitive information to stock exchanges.
4. The Company will subject to non-disclosure obligation, aim to provide appropriate and fair response to the queries, news reports and requests for verification of market rumors by regulatory authorities.
 5. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
 6. The Company has developed 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 and shall endeavor to update the practices from time to time.