

VISCO TRADE ASSOCIATES LIMITED

CODE OF PRACTICES AND PROCEDURE AND PROCEDURE FOR FAIR DISCLOSURES OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Visco Trade Associates Limited (“the Company”) is committed to good governance practices and the Company has been sharing all important information about its various business segments and operations. In compliance with regulation 8(1) of SEBI (Prohibition of Insider Trading) regulation 2015, the Board of Directors of the Company has adopted a code of practice and procedures for fair disclosures of unpublished price sensitive information.

The code shall be applicable with effect from May 15, 2015, in terms of SEBI notification dated Jan 15, 2015.

The code as enumerated below ensures timely and adequate disclosures from time to time of UPSI to the stock exchange where the equity shares of the company are listed viz Bombay Stock Exchange and Calcutta Stock Exchange and also on the official website of the Company.

1. **Prompt public disclosures of UPSI:**

All UPSI, as envisaged in the SEBI (Prohibition of Insider Trading) Regulation, 2015, shall be disclosed promptly in order to make such information generally available to the public.

2. **Uniform and universal dissemination of UPSI:**

The Company shall disseminate the UPSI on uniform, continuous and universal manner and avoid selective disclosures.

3. **Chief investor relation officer to deal with disclosure of UPSI :**

The Company Secretary of the Company shall act as the Chief Investor Relation Officer to deal with the dissemination of information and disclosures of UPSI.

4. **Prompt dissemination of UPSI in respect of improper disclosures or otherwise:**

The Company shall avoid selective disclosure of UPSI. In any event if due to oversight or inadvertence the same information is not uniformly and universally made available to all the stakeholders, necessary steps shall be taken to make such information generally available on a non- discriminatory basis.

5. **Response to queries on news report and request for verification of market rumours:**

The Chief Investor Relation Officer shall also ensure the appropriate fair and prompt response to all queries received from the stock exchange including queries on news reports, if any. Such response from the company shall be submitted to the stock exchange and under the signature of Company Secretary and in his/her absence under the signature of Managing Director or Chief Financial Officer of the Company.

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6. **Sharing of information with analyst and research personnel:**

Only information which is publicly available shall be shared with the analyst, research personnel, prospective investors, etc. The Board of Directors shall identify the Directors/ executive of the Company, who shall be authorize to speak to and/ or participate at the meeting with the analyst, research personnel, prospective investors, etc. The authorize representative of the Company shall avoid making any forward looking statement in respect of its financial performance and shall also not share any UPSI with the analyst research personnel, prospective investors, etc. In case any UPSI is shared with them, disclosure thereof shall be made to the Stock exchange simultaneously.

7. **Documentation of disclosures made to the analyst or at investor relation conferences:**

The proceedings of the meeting with the analyst and other investor relations conferences shall be recorded and preserved. As a good, transcript thereof maybe uploaded on the official website of the company, which will ensure that the information is generally available.

8. **Handling of all UPSI on need to know Basis:**

All UPSI shall be handled by the employees on a Need to know basis, i.e., UPSI shall be disclosed only to those within the Company who need the information for legitimate purposes under legal obligation, to discharge the performance or duties and used only for the purpose for which it is meant for.

9. **Disclosures:**

The Company Secretary shall be responsible to ensure that the initial and continual disclosures are obtained from all the "Designated Person:" in compliance of the SEBI (Prohibition of Insider Trading) Regulation 2015 and the same be initiated to the stock exchanges. Such disclosures must be in the prescribed format as per the said regulation and/or as mentioned in the code of conduct to regulate, monitor and report insider trading within the stipulated time.

The above code may be amended with the approval of Board of Directors from time to time to adopt the best practice in the industry and also to comply with the SEBI (Prohibition of Insider Trading) Regulation 2015 as may be applicable from the time being in force. Any amendments to the aforesaid code shall be promptly initiated to the Stock Exchanges, where ever the Company shares is listed and shall be uploaded on the official website of the company.

On behalf of the Board of Directors

Vinay Kumar Goenka
Managing Director
DIN: 01687463