Virtual Global Education Ltd.

CODE OF CONDUCT FOR INSIDER TRADING

(Review by Board of Directors in its Board Meeting held on 01.06.2021)

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Virtual
Global Education Ltd.

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

1. PREAMBLE

This code may be called as **Code of Conduct for prohibition of Insider Trading** (the **"Code"**)issued pursuant to Regulation9 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 aims to regulate, monitor and report trading in the securities of Virtual Global Education Limited (the **"Company"**) by the employees and other Connected Persons for achieving compliance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (the **"Regulations"**). This Code is effective from May 25, 2017 and supersedes the earlier Insider Trading Code.

2. DEFINITIONS

(a) "Act" means the Securities and Exchange Board of India Act, 1992.

(b) "Board" means the Securities and Exchange Board of India.

(c) "Board of Directors" means Board of Directors of the Company.

(d) "Compliance Officer" means the Company Secretary of the Company who shall report to the Board of Directors of the Company.

(e) "Connected Person" means

(i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional orbusiness relationship between himself and the company whether temporary orpermanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,-

(a) An immediate relative of connected persons specified in clause (i);or
(b) A holding company or associate company or subsidiary company; or
(c) An intermediary as specified in section 12 of the Act or an employee or

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Director thereof ; or
(d) An investment company, trustee company, asset management company or an Employee or director thereof; or an official of a stock exchange or of clearing house or corporation; or
(e)a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof ;or
(f) a member of the board of directors or an employee, of a public financial institution as defined in section2 (72)of the Companies Act, 2013;or
(g) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
(h) a banker of the Company; or
(i) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company has more than ten per cent. of the holding or interest;

(f) "Designated Persons" means

(i) All Directors of the Company and Immediate Relatives of the Directors;
(ii) The Designated Employees of the Company and Immediate relatives of Designated Employees; and
(iii) Other connected persons includes Statutory Auditor, Internal Auditor and Secretarial Auditor.

(g) "Designated Employee(s)"means

(i) Key Managerial Personnel of the Company.
(ii) All functional heads of the Company.
(iii) Every Employee in finance, Accounts, secretarial and legal department as may be determined and informed by the Compliance Officer.
(iv) Any other employee as may be determined and informed by the Compliance officer from time to time;

(h) "Generally Available Information" means information that is accessible to the public on a non-discriminatory basis. Information published on the website of a Stock Exchange, would ordinarily be considered generally available.

(i) "Immediate Relative" in respect of person means a spouse of a person, and includes parents, siblings, and children of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to Trading in Securities of the Company.

(j) "Insider" means any person who is:

(i) A connected person or

(ii) In possession of or having access to unpublished price sensitive information

(k)"Key Managerial Personnel" in relation to the Company means-

(i) The Chief Executive Officer or the Managing Director or the Manager;

(ii) The Company Secretary;

(iii) The Whole Time Director

(iv) Chief Financial Officer; and

Such other officer as may be prescribed under the Companies Act, 2013.

(l) "Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.

(m) "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund and shall include derivatives, if any, of the shares and securities of the Company, provided that trading in such derivatives is permitted by any law for the time being in force.

(n) "Threshold Limit" means for Trading in the Securities of the Company in any calendar quarter shall be the Traded value of Rs. 10,00,000 (Rupees Ten Lakh). Cumulative value of all the transactions in the Securities of the Company (whether acquired or disposed of) during the calendar quarter shall be considered while calculating the Threshold Limit.

(o) "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities of the Company, and **"trade"** shall be construed accordingly.

(p) "Trading Day" means a day on which the concerned stock exchanges where the securities of the Company are listed are open for trading.

(q) "Trading in Securities" means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any securities of the Company by any person and the word **"Trade"** shall be construed accordingly.

(q) "Trading Plan" means a plan to Trade in the securities of the Company ,which has been approved by the Compliance Officer and disclosed to the Stock Exchanges.

(r) "Trading Window" means the period of trading in Company's securities by The Designated Persons and their Immediate Relatives.

(s) "Unpublished Price Sensitive Information" means any information, relating to the 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 of the Company and shall, ordinarily including but not restricted to, information relating to the following:-

(i) Financial results;

(ii) dividends;

(iii) change in capital structure;

(iv) mergers, demergers, acquisitions, delisting, disposals and expansion of business and such other transactions;

(v) changes in key managerial personnel; and

material events in accordance with the listing agreement.

3. RESPONSIBILITY OF DESIGNATED PERSONS

(a) Designated Persons shall maintain confidentiality of the Unpublished Price Sensitive Information. All information shall be handled within the Company on a need-to-know basis. Designated Persons shall not communicate, provide or allow access to such Unpublished Price Sensitive Information to any person except where such communication is in furtherance of legitimate purposes of the Company, performance of duties of the Designated Person or discharge of legal obligations of the Company. In case any Unpublished Price Sensitive Information is required to be shared by a Designated Person, such information shall be shared only with the prior written approval of the Chairman or Executive Director-Finance. While granting such approval, they may impose such conditions as deemed necessary.

(b) Designated Persons or their Immediate Relatives shall not Trade in the Securities of the Company while in possession of Unpublished Price Sensitive Information.

(c) Designated Persons or their Immediate Relatives shall not Trade in the Securities of the Company during the period when the Trading Window is closed.

(d) Designated Persons or their Immediate Relatives shall not Trade in the Securities of the Company in excess of the Threshold Limits, whether singly or cumulatively, without obtaining pre-clearance from the Compliance Officer. This restriction shall not apply when Trades are executed pursuant to the Trading Plan.

(e) Files containing confidential information shall be kept secure. Computer files shall have adequate security of login and password, etc.

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4. COMPLIANCE OFFICER

(a) The Compliance Officer shall be responsible for compliance of the policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of Unpublished Price Sensitive Information, pre-clearing and monitoring of Trades and implementation of this Code, under the overall supervision of the Board of the Company.

(b) The Compliance Officer shall maintain records of the Designated Persons and any changes therein in **Form 1.**

(c) The Compliance Officer shall provide guidance and clarifications sought by the Designated Persons for effective compliance with this Code and the Regulations.

(d) The Compliance Officer shall be responsible for:-

(i) pre-clearing and monitoring of Trades;

approving the Trading Plan and notifying the same to the stock exchanges which the Securities of the Company are listed;

(ii) re-opening and closure of the Trading Window;

(iii) providing relaxation from the restriction of contra transaction(s)as stipulated in this Code; and

(iv)reporting violation of this Code or of the Regulations to the Board of the

Company and Securities and Exchange Board of India (**"SEBI"**).

(e) The Compliance Officer shall maintain relevant records under this Code for a minimum period of five years.

5. TRADING WINDOW

(a) Trading Window

The Trading Window shall be deemed to be open, unless specifically closed.

(b) Closing of Trading Window

The Compliance Officer shall, from time to time, notify the period during which the Trading Window shall remain closed.

(c) Closure timing

The Trading Window shall remain closed for such period as may be determined by the Compliance Officer, in the event, the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to

have possession of Unpublished Price Sensitive Information.

The trading window shall be, inter alia closed at the time:-

i. Declaration of financial results (quarterly, half-yearly and annually).
ii. Declaration of dividends (interim and final).
iii. Issue of securities by way of public/rights/bonus etc.
iv. Any major expansion plans or execution of new projects.
v. Amalgamation, mergers, take-over and buy-back.
vi. Disposal of whole or substantially whole of the undertaking.
vii. Any changes in policies, plans or operations of Company.
viii. And any other matter which is likely to be price sensitive.

Closure of trading window shall commence ***7 days*** before the date of meetings of Board of Directors are held to consider any of the items referred herein above, unless decided otherwise by the board.

In addition to the above, the Board of the Company or the Audit Committee or Chairman or the Compliance Officer may close the Trading Window during such time and for such period as deemed fit and proper.

Re-opening of Trading Window

The Trading Window shall re-open at a time determined by the Compliance Officer after considering various factors, including but not limited to the Unpublished Price Sensitive Information on account of which the Trading Window was closed becoming generally available or through other permissible means and becoming capable of assimilation by the market, provided however that under no circumstance shall the Trading Window be re-opened prior to the expiry of **48 hours** from the time at which the aforementioned Unpublished Price Sensitive Information becomes generally available.

(d) Restrictions pertaining to the Trading Window shall also be applicable to any connected person, as may be decided by the Compliance Officer from time to time having contractual or fiduciary relation with the Company assisting or advising the Company.

6. PRE-CLEARANCEOF TRADES

(a) Designated Persons and their Immediate Relatives who intend to Trade in the Securities of the Company in excess of the Threshold Limits (taking into account the cumulative value of all Trades undertaken by such Designated Person and its Immediate Relatives during the calendar quarter), shall obtain pre-clearance of their intended Trades by applying to the Compliance Officer in **Form2**. Alternatively, they can carry out Trades in the Securities of the Company by complying with the requirements of the Trading Plan as mentioned in this Code.

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(b) Designated Persons and their Immediate Relatives shall not apply for pre-clearance of a proposed Trade, while in possession of any Unpublished Price Sensitive Information. Further, while applying for pre-clearance of a proposed Trade, the Designated Persons and their Immediate Relatives shall furnish a declaration that they are not in possession of any Unpublished Price Sensitive Information in **Form 2.**

(c) The pre-clearance granted by the Compliance Officer shall be with reference to this Code only. Such pre-clearance shall not in any way be deemed to be confirmation of compliance with the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (the **"Takeover Code"**) if applicable. The person seeking pre-clearance shall be solely responsible for compliance with the provisions of the Takeover Code ,if applicable.

(d) Designated Persons and their Immediate Relatives shall execute their Trades in respect of the Securities of the Company within ***seven Trading Days*** from the date of pre-clearance by the Compliance Officer. If the Trade is not executed within this time period, such persons shall get the Trade pre-cleared from the Compliance Officer again. On execution of the Trade, such person shall intimate details thereof within ***two Trading Days*** of execution to the Compliance Officer in **Form C.**

Where a Trade is not executed after obtaining pre-clearance from the Compliance Officer for the same, such person shall intimate the same and the reasons thereof to the Compliance Officer within ***two Trading Days*** after expiry of the said period of ***seven trading days*** or prior to seeking fresh pre-clearance for the trade, whichever is earlier in **Form 2.**

(e) In case the Compliance Officer or his Immediate Relatives intend to Trade intheSecuritiesoftheCompanyrequiringpre-clearance,heshallobtainpre-clearance for the same from the Chairman, as per the pre-clearance procedure prescribed in this Code.

(f) Designated Persons and their Immediate Relatives, who Trade in the Securities of the Company pursuant to a pre-clearance or under an approved Trading Plan, shall not enter into a contra transaction, either themselves or through their Immediate Relatives i.e. ***Trade in the Securities of the Company during six months from the date of Trade in Securities of the Company by such person.*** The Compliance Officer may provide relaxation from the above provision, on an application made in this behalf by the Designated Persons or their Immediate Relatives and for reasons to be recorded in writing. Any such relaxation shall be granted by the Compliance Officer after obtaining prior approval of the Chairman of the Company, provided such relaxation does not violate the Regulations. If any Designated Person or an Immediate Relative of a

Designated Person contravenes with this provision, inadvertently or otherwise, the profits from any Trade in such contravention shall be required to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Securities and Exchange Board of India Act, 1992.

7. TRADING PLAN

The Designated Persons who may be perpetually in possession of Unpublished Price Sensitive Information and their Immediate Relatives have an option to formulate a Trading Plan for carrying out Trades in the Securities of the Company in a compliant manner as stated below:

(a) The Designated Persons or their Immediate Relatives shall be entitled to formulate and present a Trading Plan to the Compliance Officer in **Form 3** for approval and public disclosure pursuant to which Trades in the Securities of the Company maybe carried out on their behalf.

(b) Such Trading Plan shall:

(i) not entail commencement of Trading in the Securities of the Company on behalf of the Designated Persons or their Immediate Relatives earlier than ***six months*** from the public disclosure of the Trading Plan;

(ii) not entail Trading in the Securities of the Company for the period between the ***twentieth Trading Day*** prior to the last day of any financial period for which results are required to be announced by the Company and the ***second Trading Day*** after disclosure of such financial results;

(iii) entail Trading in the Securities for a period of not less than *twelve months;*

(iv) not entail overlap of any period for which another Trading Plan is already inexistence;

(v) set out either the value of the Trades to be effected in the Securities of the Company or the number of the Securities of the Company to be Traded along with the nature of the Trade and the intervals at, or dates on which such Trades shall be effected; and

(vi) not entail Trading in the Securities of the Company for market abuse.

(c) The Compliance Officer shall review the Trading Plan to assess whether the Trading Plan would have any potential for violation of the Code or these Regulations and shall seek such express undertakings as may be necessary to enable such assessment and to approve and monitor implementation of the Trading Plan.

(d) The Trading Plan once approved shall be irrevocable and the Designated Persons and/ or their Immediate Relatives shall have to mandatorily implement the Trading Plan, without being entitled to either deviate from the same or to execute any Trade in the Securities of the Company outside the scope of the Trading Plan.

Provided that the implementation of the Trading Plan shall not be commenced if any Unpublished Price Sensitive Information in possession of the Designated Persons at the time of formulation of the Trading Plan has not become generally available at the time of the commencement of implementation of such Trading Plan. In such an event, the Compliance Officer shall ensure that the commencement of the Trading Plan is deferred until such Unpublished Price Sensitive Information becomes generally available.

(e) Upon approval of the Trading Plan, the Compliance Officer shall notify the Trading Plan to the stock exchanges on which the Securities of the Company are listed.

(f) Such person who has obtained approval of the Trading Plan shall intimate details of the Trades executed in accordance with such Trading Plan, within ***two Trading Days*** to the Compliance Officer in **Form C.**

(g) A Designated Persons who has availed the facility of Trading Plan shall not be eligible to Trade in the Securities of the Company through pre-clearance mechanism as mentioned in this Code.

8. DISCLOSURESANDREPORTINGREQUIREMENTS

The Designated Persons, their Immediate Relatives and promoters shall comply with the following:

INITIAL DISCLOSURES

(a) Every Promoter, key managerial personnel and director of the Company shall disclose details of the Securities of the Company held by him and his Immediate Relatives as on May15, 2015 to the Company in **Form A.**

(b) Every key managerial personnel and director shall disclose details of the Securities of the Company held by him and his Immediate Relatives as on the date of his appointment as the director or key managerial personnel of the Company, as the case may be. Similarly, every promoter of the Company shall disclose details of the Securities of the Company held by him and his Immediate Relatives as on the date of his becoming a promoter of the Company. Such disclosures shall be made to the Company within ***seven days*** of such

appointment or becoming a promoter in **Form B.**

(c) A person shall within 7 working days of becoming a Designated Person, shall furnish a statement of his Immediate Relatives to the Company in **Form 4.**

(I) CONTINUAL DISCLOSURES

(a) Every promoter, employee and director of the Company shall disclose details of the Securities of the Company acquired or disposed of by him and his Immediate Relatives, as the case may be, in **Form C** within ***two Trading Days*** of such transaction if the value of the Securities Traded, in one or series of transactions in a calendar quarter, aggregates to a traded value in excess of Rs.10,00,000 (Rupees Ten Lakh)or more.

(b) The Company shall notify the particulars of such Trading in the Securities to the stock exchange on which the Securities of the Company are listed, within ***two Trading Days*** of receipt of the disclosure or from becoming aware of such information.

Explanation: Any incremental transactions that take place after a transaction is disclosed under the above provisions shall be required to be made when the value of such incremental transactions exceed the threshold limit of Rs.10,00,000.

(c) All Designated Persons shall within *30 days* from the end of the relevantperiodmentionedbelow,forwardthefollowingdetailstotheComplianceOffi cer:

(i) Annual declaration of names of Immediate Relatives as at March 31 of each year in **Form 4.**

(ii) Annual statement of all holdings in the Securities of the Company held by the Designated Persons and their Immediate Relatives as at March 31 of each year in **Form 5.**

(d) The Compliance Officer shall present quarterly reports to the Board of the Company and the Chairman of the Audit Committee of the Company in respect of pre-clearance sought by the Designated Persons, Trading Plans, Trades executed pursuant to such pre-clearances and the Trading Plans and such other matters as maybe necessary in **Form 6.**

9. AMENDMENTS

This Code may be amended from time to time by the Board of Directors of the Company. However, amendments in the Regulations shall be binding even if not incorporated in this Code.

10. PENALTIES

(a) Any contravention of this Code shall lead to such actions against the Designated Persons as the Board may decide, including but not limited to the following:

- Salary freeze;

- Suspension from duties; and

- Non eligibility for participation in the employees stock option plan of the Company.

(b) Violation of this Code or the Regulations shall also be reported by the Compliance Officer to SEBI.

(c) Any action taken by the Company for violation of this Code or the Regulations shall not preclude SEBI from taking any action against the concerned person.

FORM 1

[To be maintained by Compliance Officer]

[As per Paragraph4(b)of the Code of Conduct for Prevention of Insider Trading]

As on.....

LISTOFDESIGNATEDPERSONS

Name of the Designated Person	Employee Number, ifany	Designation	Department	Date of Joining in case of new appointee(*)	Date of ceasing to be a designated person

(*)Includes employees promoted to the category of Designated Persons.

FORM 2

[As per Paragraphs 6 (a) and (b) of the Code of Conduct for Prevention of Insider Trading]

*Date:*_____

To,

The Compliance Officer,

Virtual Global Education Limited ,
103, Palco House, Patel Nagar 110008

PRE-CLEARANCEAPPLICATIONCUMDECLARATION

I/My Immediate Relative(s) am/are desirous of undertaking the following transaction(s) in Securities of the Company, which I would request you to pre-clear and confirm tome:

OR

I/My Immediate Relative(s) have not undertaken trades as per the pre-clearance of trades obtained. Details of the trades not executed with reasons thereof are given below:

Name of the Designated Person	Folio No./ClientI DNo.	DP ID No.	Name and Relationship of the Immediate Relative with theDesignated Person	Nature and No. of Securities held	Details of proposed transaction			Reasons for not executing the Trade pre-cleared/variation between quantity pre-cleared and actual quantity traded
					No. of Securities	Approximate market value Rs.	Type of transaction /Nature of Trade	

I here by declare and confirm that:

• Neither In or any of my Immediate Relative(s) have had any access to nor have I or any of my Immediate Relative(s)received any Unpublished Price Sensitive Information until the time of signing of this declaration. In case

I get access to Unpublished Price Sensitive Information hereinafter, but before execution of above-mentioned transaction, I shall inform the Compliance Officer and shall refrain from Trading in the Securities of the Company till such Unpublished Price Sensitive Information becomes public.

- I have not contravened the Code of Conduct for Prevention of Insider Trading of the Company or the Regulations.

- I have made full and true disclosure in the matter.

- I do not have any approved Trading Plan in place.

All capitalized terms used but not defined here in shall have the meaning as cribbed to such terms in the Code of Conduct for Prevention of Insider Trading of the Company.

.....

Signature

Name:_____

Designation:_____

Office Address:_____

Employee No.,if any:_____

_____**Notes:**

1. TobesubmittedincaseaDesignatedPersonoranyImmediateRelativeofaDesignatedPersonintendstoTradein Securities of the Company in excess of the Threshold Limits. The Threshold Limits for dealing in Securities of the Company in any calendar quarter (i.e. January to March, April to June, July to September and October to December)by the Designated Persons together with their Immediate Relative(s) shall be traded value of Rs. 10,00,000 (Rupees Ten Lacs).

2. In case trades have not been executed as per pre-clearance obtained, details of the same with reason thereof shall be submitted in this form in accordance with Paragraph 6(d).

Form 3

[As per Paragraph 7 (a) of the Code of Conduct for Prevention of Insider Trading]

For Office Use Only
Trading Plan Approval No.:___of_____ [Year]

Date:_____

To,

The Compliance Officer,

Virtual Global Education Limited ,
103, Palco House, Patel Nagar 110008

TRADINGPLAN

I hereby submit the Trading Plan for carrying out Trades in the Securities of the Company by me and/or my Immediate Relatives as per the following particulars for your consideration and approval:

1. Name and designation of the Designated Person for whom Trading Plan is submitted

   _____

2. Name and relationship with Immediate Relative for whom Trading Plan is submitted:

   _____

3. Permanent Account Number of the Designated Person/Immediate Relative:

   _____

4. Address of Designated Person/Immediate Relative:

   _____

5. Date of commencement of Trading Plan (not earlier than 6 months and 15 days from date of application):

   _____

6. Duration of Trading Plan(atleast12months):From_____To _____

7. Details of previous Trading Plan, if any[Approval Number, Date and Duration]:

8. Details of proposed trades:

Sr. No.	Nature of Trades	Dates of Trades or time interval between Trades(ReferNote-1)	Nature of Securities to be Traded	Value of Trades (in Rs.)or number of Securities to be Traded	Remarks ,if any

I hereby confirm that I am not in possession of any Unpublished Price Sensitive Information on the date of this application.

OR

I hereby undertake that the above Trading Plan shall be implemented only after Unpublished Price Sensitive Information in my possession as on the date of this application is generally available.

.....

Signature

Name:_____

Designation:_____

Office address:_____

Employee No., if any:_____

Notes:

1. No Trading is permitted between 20thTrading Day prior to the last day of the financial period for which results are to be announced by the Company and the 2ndTrading Day after disclosure of such financial results.

2. "Immediate Relatives" means spouse of a person, and include parents, sibling and children of such person or of the spouse, any of whom is either financially dependent on such person or consults such person in taking decisions relating to Trading in the Securities of the Company.

3. All capitalized terms used but not defined herein shall have the meaning as cribbed to such terms in the Code of Conduct for Prevention of Insider Trading of the Company.

FORM 4

[As per Paragraphs 8(I)(c) and 8(II)(c)(i) of the Code of Conduct for Prevention of Insider Trading]

Date: _____

To,

The Compliance Officer,

Virtual Global Education Limited ,
103, Palco House, Patel Nagar 110008

DECLARATION REGARDING IMMEDIATE RELATIVES AS ON_____

I hereby declare that I have the following Immediate Relatives:

Sr. No.	Relationship	Name	Age (in case of minor only)	Permanent Account Number(PAN)	Folio No./ DPID/Client ID
1	Spouse				
2	Father				
3	Mother				
4	Daughter (including stepdaughter)				
5	Son(including stepson)				
6	Brother				
7	Sister				

Note: The above referred relatives need to be disclosed if they are financially dependent on the Designated Person or consult him for investment decisions.

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Signature Name:_____

Designation:_____

Office address:_____

Employee No. ,if any:_____

Note: To be submitted within 7working days of becoming Designated Person and also annually by April 15 by Designated Persons of the Company.



FORM 5

[As per Paragraph 8 (II)(c) (i)of the Code of Conduct for Prevention of Insider Trading]

Date:_____

To,

The Compliance Officer,

Virtual Global Education Limited ,
103, Palco House, Patel Nagar 110008

ANNUALSTATEMENTOFSECURITIESHELD

I give here in below details of Securities of the Company held by me/my Immediate Relatives as atMarch31 _____:

1. BY SELF

Folio No. / Client ID No.	DPID	Nature of Securities	No. of Securities held

2. BY IMMEDIATE RELATIVES

Folio No. / Client ID No.	DPID	Nature and Relationship	Nature of Securities	No. of Securities held

Note: "Immediate Relative" in respect of a person means spouse of a person, and includes parents, sibling and children of such person or of the spouse, any of whom is either financially dependent on such person, or consults such person in taking decisions relating to Trading in the Securities of the Company.

.....

Signature

Name:_____

Designation:_____

Office address:_____

Employee No.,if any:_____

Note: Annual statement of holdings in Securities of the Company held by the Designated Persons or their Immediate Relatives to be informed annually by April 15.

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FORM6

[As per Paragraph 8 (II) (d) of the Code of Conduct
for Prevention of Insider Trading]

Date _____

To

The Chairman of Audit Committee

Virtual Global Education Limited ,

103, Palco House, Patel Nagar

110008

QUARTERLYREPORTBYCOMPLIANCEOFFICERFORTHEQUARTERENDED_____

Sr. No.	Date of Trade	Name of Designated Person, Designation& Department /Division	Whether transaction by Designated Persons and /or their Immediate Relatives	Name of the Immediate Relative and relationship with the Designated Person	Nature, no. and value of Securities Traded	Details of Pre-clearance/Trading Plans/Trades executed/ Other matters

FORMA

SEBI (Prohibition of Insider Trading) Regulations, 2015[Regulation7(1)(a)readwithRegulation6(2)–Initialdisclosuretothecompany]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel(KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN,CIN/DIN & address with contact nos.	Category of person(Promoters/ KMP/Directors/Immediate Relative to/ Others etc)	Securities held on the date of regulation coming into force		% of Shareholding
		Type of Security(Fo reg.-Shares, Warrants ,Convertible Debentures etc.)	No.	
1	2	3	4	5

Note:*"Securities"shallhavethemeaningasdefinedunderregulation2(1)(i)ofSEBI(ProhibitionofInsiderTrading) Regulations,2015.*

Details of Open Interest(OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned inRegulation6(2)

Open Interest of the Future contracts held as on the date of regulation coming into force			OpenInterestoftheOptionContractsheldason thedateofregulationcomingintoforce		
Contract Specifications	Number of units(contracts *lot size)	Notional value in Rupee terms	Contract Specifications	Number of units(contracts *lot size)	Notional value in Rupee terms
6	7	8	9	10	11

Note: *In case of Options, notional value shall be calculated based on premium plus strike price of option*

Name & Signature:
Designation:
Date:
Place:

FORMB

SEBI (Prohibition of Insider Trading) Regulations, 2015[Regulation7(1)(b)readwithRegulation6(2)–Disclosureonbecominga director/KMP/Promoter]

Name of the Company:_____

ISIN of the Company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation6(2).

Name, PAN,CIN/DIN& Address with contact nos.	Category of person(Promoters/KMP/ Directors/Immediate Relative to/ Others etc.)	Date of appointment of Director /KMPOR Date of becoming Promoter	Securities held at the time of becoming promoter/appointment Of Director/KMP		% of Shareholding
			Type of Security (For eg.- Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

Note: *"Securities" shall have the meaning as defined under regulation2(1)(i)of SEBI(Prohibition of Insider Trading)Regulations, 2015.*

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

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Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract specifications	Number of units(contracts *lot size)	Notional value in Rupee terms	Contract specifications	Number of units(contracts *lot size)	Notional value in Rupee terms
7	8	9	10	11	1

Note: *In case of Options, notional value shall be calculated based on premium plus strike price of options*

Name & Signature:
Designation:
Date:
Place:

Virtual Global Education Ltd.

FORMC

SEBI (Prohibition of Insider Trading) Regulations,
2015[Regulation7 (2)read with Regulation 6(2)–Continual disclosure]

Name of the Company:_____

ISIN of the Company: _____

DetailsofchangeinholdingofSecuritiesofPromoter,EmployeeorDirectorofalistedcompanyandothersuchpersonsasmentionedinRegulation6(2).

Name, PAN,CIN/DIN &Addresswithcontactnos.	Category of Person(Promoters/KMP / Directors/immediaterelativeto/othersetc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/ sale of shares specify		Date of intimation to company	Mode ofacquisition /disposal (onmarket/public/rights/preferentialoffer / offmarket/ Inter-setransfer, ESOPsetc.)
		Type ofsecurity (Foreg. – Shares,Warrants, Convertible Debentures etc.)	No. and % Of shareholding	Type ofsecurity(Foreg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	TransactionType (Buy/Sale/Pledge /Revoke /Invoke)	Type ofsecurity(Foreg. – Shares, Warrants, ConvertibleDebenturesetc.)	No. and %of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation6(2).

Trading in derivatives(Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contracts specifications	Buy		Sell		
		Notional Value	Number of units(contracts *lot size)	Notional Value	Number of units(contracts *lot size)	
15	16	17	18	19	20	21

Note:*IncaseofOptions,notionalvalueshallbecalculatedbasedonPremiumplusstrikepriceofoptions.*

Name & Signature:
Designation:
Date:
Place: