

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FOR FAIR DISCLOSURE OF UNPUBLISHED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

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



Registered Office: 103, Palco House 2162/T-10, Main Patel Road New Delhi West Delhi DL 110008
Tel: 011-25702148, CIN: L67120DL1993PLC052256
Email: csvirtualeducation@gmail.com, website: www.virtualeducation.in

Introduction:

The Board of Directors of Virtual Global Education Limited ("the Company") is expected to manage their affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interest of all stakeholders. The Company has since time immemorial, been committed to transparency and fairness in dealing with all the stakeholders.

Preface:

1. SEBI on 15th January, 2015 has introduced SEBI (Prohibition of Insider Trading) Regulations 2015 to be effective from 15th May, 2015.
2. Chapter-IV of SEBI (Prohibition of Insider Trading) Regulations 2015 Regulation 8 provides for the formulation of a Code of Practices and Procedures for fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as "Code").
3. The company endeavor to preserve the confidentiality of Unpublished Price Sensitive Information (UPSI) and to prevent the misuse such information. To achieve these objectives and in compliance with the aforesaid SEBI Regulations, the company notifies this code.
4. The code shall be applicable on all the Board of Directors of the Company w.e.f. 15th May, 2015.
5. Any subsequent modification and/or amendment brought by the SEBI in the aforesaid Regulation shall automatically apply this code.

Principles for Fair disclosure for purpose of the Code of Practices & Procedures for fair Disclosure of Unpublished Price Sensitive Information

1. Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes in to being in order to make such information generally available.
2. Uniform and universal dissemination of Unpublished Price Sensitive to avoid selective disclosure, shall be ensured.
3. The Company Secretary of the Company shall act as a Chief Investor Relation Officer to deal with dissemination of information and disclosure of UPSI.
4. There shall be prompt disclosure of UPSI get that disclosed selectively, interactively or otherwise. It shall be ensured that such information is made generally available.
5. The Board of Directors shall ensure that appropriate and fair response shall be provided to queries on news reports and request for verification of market numerous by regulatory authorities.

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6. The Board of Directors shall ensure that information shared with analysts and research personnel is not UPSI.
7. The Board of Directors shall develop best practices to make transcripts or record of proceedings of meetings with analyst or other investor relations conferences on the official website to ensure official confirmation and documentation of disclosure made.
8. UPSI shall be followed on a need-to-know basis.

Power of Board of Directors

The Board of Directors of the company will be responsible for implementation of this "Code". Board reserves the right to modify this code in whole or in part, at any time without any assigning any reason whatsoever but within the framework of the aforesaid regulations.

Disclosure of Code in public Domain

This Code shall be published on the Official website of the Company.



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