VECTRAS ENPROCON LIMITED
(Formerly Known As Vectras Enprocon Private Limited)
GST No. : 24AAICV0721A1ZZ
CIN No. : U45309GJ2021PLC122680

Date: 6th November,2026

To,
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai – 400 001, India

Symbol: VECTRAS **Scrip Code: 545020**

Subject: Intimation pursuant to Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations")

Dear Sir/Madam,

Pursuant to Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended ("SEBI PIT Regulations"), please find enclosed herewith the "Policy on Code of Practices and Procedures for Fair Disclosure of UPSI" ("Code") approved and adopted by the Board of Directors of Vectras Enprocon Limited ("the Company") under Regulation 8(1) of the SEBI PIT Regulations.

In compliance with the aforesaid Regulations, the aforesaid Code is also available on the Company's website under the Policies section at: https://vectrasgroup.com

We request you to kindly take the same on record.

Thanking You,

Yours Sincerely,

For Vectras Enprocon Limited

Thakkar Arpit Nikunjbhai
Digitally signed by Thakkar Arpit Nikunjbhai
Date: 2026.11.06 16:33:29 +05'30'

Vectras Enprocon Limited * Head Office * Ahmedabad *

CS Arpit Nikunjbhai Thakkar

Company Secretary and Compliance Officer

Membership No.: A63532

Place: Ahmedabad

Encl.: As above

VECTRAS ENPROCON LIMITED

(Formerly Known as Vectras Enprocon Private Limited)

Registered Office:
601-602, Amrakunj Avis, Nr. Tapovan Circle, Chandkheda,
Ahmedabad – 382424, Gujarat, India

Contact No.: +91 79 3528 8452
Email: info@vectrasgroup.com
Website: www.vectrasgroup.com

CIN: U45309GJ2021PLC122680
GST No.: 24AAICV0721A1ZZ

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT

TRADING BY DESIGNATED PERSONS

Regulation 9 (1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Adopted by the Board on 16th September,2025

1. PREAMBLE

In terms of the Regulation 9 (1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended, **("SEBI PIT Regulations")**, the board of directors ("**Board**") of every listed entities shall ensure that the Chief Executive Officer or Managing Director formulates a code of conduct with the Board's approval to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving compliance with the SEBI PIT Regulations, adopting the minimum standards set out in Schedule B of the SEBI PIT Regulations.

Pursuant to Regulation 9 (1) of the SEBI PIT Regulations, Vectras Enprocon Limited ("**Company**") hereby adopts this code ("**Code**") to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving compliance with the SEBI PIT Regulations.

This Code aims to preserve the confidentiality and prevent the misuse of any Unpublished Price Sensitive Information and to put in place a policy for prohibition of insider trading on the basis of Unpublished Price Sensitive Information. All designated persons and immediate relatives thereof shall be bound by the SEBI PIT Regulations and this Code.

The Board of Directors have adopted the Code on 16th September,2025 and the Code shall be applicable to the Company with effect from the day of Listing of shares at the stock exchanges.

2. CODE

The Code shall be called "Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons". The Code will come into force with immediate effect.

3. DEFINITIONS

"Code" means this Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons.

"Company" means Vectras Enprocon Limited.

"Compliance Officer" means the Company Secretary of the Company. If there is no Company Secretary, any senior officer, designated so and reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations 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 these regulations under the overall supervision of the Board.

"Connected Person" shall have the meaning assigned to such term under the SEBI PIT Regulations.

"Designated Persons" shall mean:

(i) Promoters of the Company;
(ii) All persons forming a part of the promoter group of the Company;
(iii) Directors and key managerial personnel of the Company and its subsidiaries;
(iv) Senior management of the Company including employees up to two levels below the managing director of the Company and its subsidiaries;
(v) Auditors of the Company;
(vi) Officers in the grade of Manager and above of the Company and its subsidiaries;
(vii) Employees of such other functions of the Company and subsidiaries who are in possession or likely to be in possession of Unpublished Price Sensitive Information;
(viii) Operational heads and unit heads of the Company and its subsidiaries and employees up to two levels below operational heads and unit heads of the Company and its subsidiaries irrespective of their functional role in the company or ability to have access to Unpublished Price Sensitive Information;
(ix) Any support staff of the Company, subsidiaries, intermediaries or fiduciaries such as IT staff or secretarial staff or legal staff who have access to Unpublished Price Sensitive Information;
(x) Employees of other Departments/Divisions on a case-to-case basis, who could be reasonably expected to have access to UPSI(s) relating to the Company, to be decided by the Chairman/Managing Director/ Compliance Officer/Chief Financial Officer, on a case-to-case basis;

(xi) Employees of material subsidiaries of the Company designated on the basis of their functional role or access to UPSI in the organisation by their Board of Directors;
(xii) Other persons who may be designated as such from time to time, by the Board in consultation with the Compliance Officer, for the purpose of this Code, on the basis of their role and function in the organisation and the access that such role and function would provide to Unpublished Price Sensitive Information in addition to seniority and professional designation;
(xiii) Such other persons as may be identified by the Compliance Officer;
(xiv) Immediate Relatives of persons specified above and HUF of which such designated person is a member unless stated otherwise.

"Fiduciaries" collectively to be referred as professional firms such as auditors, accountancy firms, law firms, analysts, consultants, banks, valuation agencies, fund accountants etc. assisting or advising the Company.

"**Financially Literate**" shall mean a person who has the ability to read and understand basic financial statements i.e., balance sheet, profit and loss account, and statement of cash flows.

"Generally Available Information" means information that is accessible to the public on a non-discriminatory basis, including information published on the website of stock exchanges on which the securities of the Company are listed.

"Immediate Relative" means a spouse of a person, and includes parent, sibling, and child 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.

"Insider" means any person who is: i) a Connected Person; ii) in possession of or having access to Unpublished Price Sensitive Information.

"Key Managerial Personnel" or "**KMP"** shall have the same meaning assigned to it under the Companies Act, 2013, as amended from time to time.

"Material Subsidiary" shall have the same meaning assigned to it under Regulation 16(1)(c) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

"Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

"Promoter Group" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

"SEBI" shall mean Securities and Exchange Board of India.

"SEBI PIT Regulations" shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and every modification and amendment thereof.

"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.

"Takeover Regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

"Trading" means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

"Unpublished Price Sensitive Information" 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;
iv. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions;
v. changes in key managerial personnel, other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;
vi. change in rating(s), other than ESG rating(s);
vii. fund raising proposed to be undertaken;
viii. agreements, by whatever name called, which may impact the management or control of the company;
ix. fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;
x. resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
xi. admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
xii. initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
xiii. action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
xiv. outcome of any litigation(s) or dispute(s) which may have an impact on the company
xv. giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business
xvi. granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals

Words and expressions used and not defined in herein but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in such legislation.

4. RESPONSIBILITIES OF THE COMPLIANCE OFFICER

Subject to the supervision of the Board, the Compliance Officer shall be responsible for:

i. Setting forth policies, procedures, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, approval and review of trading plans, pre-clearances of Trades and monitoring of Trades and implementation of the Code under the overall supervision of the Board of the Company.

ii. Assisting and addressing all the clarifications of the Insiders, Designated Persons and their Immediate Relatives, with respect to the Code and the SEBI PIT Regulations.

iii. The Compliance Officer shall maintain a record of persons and shall make changes to such record as and when the intimation of changes from the HR Department is received.

iv. Obtaining disclosures from Promoters, member of Promoter Group, Key Managerial Personnel, Directors, Designated Persons and their immediate relatives and to give information, in respect of such disclosures received, to all the Stock Exchange where the Securities of the Company are listed, in accordance with the SEBI PIT Regulations.

v. Maintaining and preserving all disclosures/ undertakings and applications made under the Code.

vi. Regulating and monitoring the trading window of the Securities of the Company.

vii. Reviewing the trading plan and assessing the potential of the plan for violation of the PIT Regulations, if any;

viii. Notify the trading plan to the stock exchanges where the securities are listed, on approval of the plan;

ix. Informing SEBI in case it is observed that there has been a violation of the Code.

x. Monitoring trades and the implementation of this Code under the overall supervision of the Board of the Company.

xi. Undertaking such other duties and responsibilities as set out under the SEBI PIT Regulations.

The Compliance Officer shall report to the Board and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board at least once in a financial year.

5. RESTRICTIONS ON COMMUNICATION OR PROCUREMENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. No insider shall communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to the Company or Securities of the Company, to any person including other Insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

2. No person shall procure from or cause the communication by any Insider of Unpublished Price Sensitive Information, relating to the Company or Securities of the Company, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

3. The board of directors of the Company shall make a policy for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct" formulated under regulation 8 of SEBI PIT Regulations.

4. Any person in receipt of Unpublished Price Sensitive Information pursuant to a "legitimate purpose" shall be considered an "Insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such Unpublished Price Sensitive Information in compliance with the SEBI PIT Regulations.

5. Notwithstanding anything contained in SEBI PIT Regulations or this Code, an Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:

a. entail an obligation to make an open offer under the Takeover Regulations, where the Board of the Company is of the informed opinion that sharing of such information is in the best interests of the Company;

b. not attract the obligation to make an open offer under the Takeover Regulations but where the Board of the Company is of informed opinion that sharing of such information is in the best interests of the Company and the information that constitutes Unpublished Price Sensitive Information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board may determine to be adequate and fair to cover all relevant and material facts.

6. For purposes of sub-paragraph (5) above, the Board shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of sub-paragraph (5) above, and shall not otherwise trade in Securities of the Company when in possession of Unpublished Price Sensitive Information.

7. INTERNAL CONTROL SYSTEMS FOR PREVENTION OF INSIDER TRADING

(i) The Managing Director or Chief Executive Officer of the Company, as applicable, shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in the SEBI PIT Regulations. Further, the Board is require to ensure that the Chief Executive Officer or the Managing Director, as applicable, ensures compliance with the internal controls set out below. Such internal controls shall inter alia include the following:

a) all employees who have access to Unpublished Price Sensitive Information are identified as Designated Person;
b) all the Unpublished Price Sensitive Information shall be identified and its confidentiality shall be maintained as per the requirements of the SEBI PIT Regulations;
c) adequate restrictions shall be placed on communication or procurement of Unpublished Price Sensitive Information as required by the SEBI PIT Regulations;
d) lists of all employees and other persons with whom Unpublished Price Sensitive Information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
e) all other relevant requirements specified under the SEBI PIT Regulations shall be complied with;
f) periodic process review shall be undertaken to evaluate effectiveness of such internal controls.

(ii) The Audit Committee of the Company or other analogous body for intermediary or fiduciary shall review compliance with the provisions of the SEBI PIT Regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

(iii) The Company shall have a whistle-blower policy and make employees aware of such policy to enable employees to report instances of leak of Unpublished Price Sensitive Information.

(iv) If an inquiry has been initiated by the Company in case of leak of Unpublished Price Sensitive Information or suspected leak of Unpublished Price Sensitive Information, the relevant intermediaries and Fiduciaries shall co-operate with the Company in connection with such inquiry conducted by the Company.

8. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

a) Designated Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. They shall, while in possession of any Unpublished Price Sensitive Information, neither Trade in the Securities of the Company on the basis of Unpublished Price Sensitive Information, nor pass on such information to any person directly or indirectly by way of making a recommendation for Trading in Securities of the Company.

b) Access to or handling of Unpublished Price Sensitive Information shall be on a "need-to-know" basis and no Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. Any person in receipt of Unpublished Price Sensitive Information shall be considered an "insider" for purposes of SEBI PIT Regulations and this Code. A due notice shall be given to such persons *inter alia* for the following purposes:

i. to maintain confidentiality of such Unpublished Price Sensitive Information in compliance with this Code and SEBI PIT Regulations.
ii. to make him aware of the duties and responsibilities attached to the receipt of such Unpublished Price Sensitive Information; and
iii. to make him aware about the liability attached to misuse or unwarranted use of such Unpublished Price Sensitive Information.

c) Files containing Unpublished Price Sensitive Information shall be kept secure. Computer files shall have adequate security of login and passwords, etc. guidelines for maintenance of electronic records and systems may be prescribed by the Compliance Officer from time to time in consultation with the person- in-charge of the information technology function of the Company.

d) To prevent the misuse of Unpublished Price Sensitive Information, the Company adopts the "Chinese Wall" policy which separates those areas of the Company which routinely have access to Unpublished Price Sensitive Information, considered "insider areas" from other areas or departments, considered "public areas". Only specified persons are permitted to "cross the wall".

e) Under the Chinese Wall policy:
i. Designated Persons in the inside area shall not communicate any Unpublished Price Sensitive Information to anyone in public area;
ii. Designated Persons in the inside area may be physically segregated from other Designated Persons or other persons in public area;
iii. Demarcation of the various departments of the Company, as inside areas may be set up by the Compliance Officer in consultation with the Board of the Company;

iv. Designated Persons who are working within the inside area of the Chinese Walls have a responsibility to ensure that the Chinese Wall is not breached deliberately or inadvertently; known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately;

v. The establishment of Chinese Wall shall be on such basis that Unpublished Price Sensitive Information cannot be circulated freely within inside areas.

vi. Only in exceptional circumstances, Designated Persons or other persons from the "public areas" may be permitted to "cross the wall" and provided with the Unpublished Price Sensitive Information on a "need-to-know" basis, subject to intimation to the Compliance Officer. In such cases, the Compliance Officer shall ensure that all necessary restrictions and provisions have been imposed on such persons for the protection of such Unpublished Price Sensitive Information.

9. PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

All insiders shall be subject to the trading restrictions as enumerated below;

A. Trading Plans

1. An Insider shall be entitled to formulate a Trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

2. Such Trading plan shall:–

i. not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;

ii. not entail trading 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 the disclosure of such financial results;

iii. entail trading for a period of not less than twelve months;

iv. not entail overlap of any period for which another Trading Plan is already in existence;

v. set out either the value of Trades to be effected or the number of securities 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 Securities for market abuse.

3. The Compliance Officer shall review the Trading Plan to assess whether the Trading Plan would have any potential for violation of the SEBI PIT Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the Trading Plan.

Pre-clearance of Trading shall not be required for a Trade executed as per an approved Trading Plan and trading window norms and restrictions on contra trade shall not be applicable for Trades carried out in accordance with an approved Trading Plan.

4. The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the Trading Plan, without being entitled to either deviate from it or to execute any Trade in the Securities outside the scope of the Trading plan.

5. The implementation of the Trading plan shall not be commenced if any Unpublished Price Sensitive Information is in the possession of the Insider at the time of formulation of the Trading Plan and has not become generally available at the time of the commencement of implementation. In such event the Compliance Officer shall confirm that the commencement ought to be deferred until such Unpublished Price Sensitive Information becomes Generally Available Information so as to avoid any violation of SEBI PIT Regulations and/or this Code.

6. Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.

B. Trading Window

a) The Designated Person and their immediate relatives shall trade in shares of the Company only if the trading window is open. The Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed.

b) The trading window for trading in securities of the Company shall be closed for the following events:
   - Declaration of financial results (quarterly, half yearly, and annual);
   - Declaration of dividends (interim and final);
   - Issue of securities by way of public/ rights/ bonus/ buy-back or any change in capital structure;
   - Change in key managerial personnel;
   - Any major expansion plans or execution plans or execution of new projects;
   - Mergers, de-mergers, acquisitions, delisting, disposals and expansions of business amalgamations, mergers, takeovers;
   - Disposal of whole or substantially whole of the undertaking; and
   - Such other information as may be specified by the Compliance Officer for this purpose.

c) In addition to the items specified above, the trading window shall also be closed when the Compliance Officer determines that Designated Person(s) or class of them can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such Securities to which such Unpublished Price Sensitive Information relates. Designated Persons and their Immediate Relatives shall not trade in Securities when the trading window is closed.

d) In case of declaration of financial results, the trading window shall be closed during the period from the end of each quarter till 48 (forty-eight) hours after the declaration of financial results. In all other circumstances, the time for commencement of closing of trading window shall be as determined by the Compliance Officer in consultation with the Board. The Compliance Officer after taking into account various factors including the Unpublished Price Sensitive Information in question becoming Generally Available Information and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, which however shall not in any event be earlier than 48 (forty-eight) hours after the information becoming Generally Available Information.

e) Trading window may be closed by the Company during such time in addition to the above period, as may be deemed fit by the Compliance Officer.

f) Trading window restrictions shall not be applicable in respect of any transactions exempted under the SEBI PIT Regulations or circulars issued by the SEBI.

C. Pre-clearance of Trade

a) All Designated Persons or their Immediate Relatives who intend to deal in the Securities of the Company exceeding Rs.10,00,000/- (Rupees Ten lakhs Only) in value (either in one transaction or in a series of transactions), during a calendar quarter should pre-clear the transactions as per the pre-clearing procedure as discussed hereunder:

   1. An application may be made to the Compliance Officer indicating the estimated number of Securities that the Designated Persons or their immediate relative intends to deal in, the detail of securities he already has and the details as to the depository participant(s) with which he has a security account.

   2. An undertaking shall be executed in favour of the Company by such Designed Person incorporating, inter alia, the following clauses, as may be applicable:

   - That the Designated Person or his immediate relative does not have any access, is not in possession or has not received Unpublished Price Sensitive Information up to the time of signing the undertaking;

   - That in case the Designated Person has access to or receives Unpublished Price Sensitive Information after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the Company about change in his/her position and he/she would completely refrain from dealing in the securities of the company till the time such information becomes public;

   - That he/she has not contravened this Code, as notified by the Company from time to time.

- That he/she has made a full and true disclosure.

- The Compliance Officer shall either clear the requested deal or decline to clear the requested deal within 7 (seven) working days of the receipt of the application in the form as prescribed herein below. For the purpose of this clause, the term "Woking Days" shall mean days on which business is conducted at the registered office of the Company, and shall exclude Saturdays, Sundays, National Holidays and other declared holidays.

3. In case the Compliance Officer declines to clear the requested deal, he shall assign reasons in writing for doing so.

b) In case the Compliance Officer or any of his Immediate Relative(s) intend to deal in the Securities of the Company then an application shall be made to the Managing Director of the Company who would consider the requested deal within 7 (seven) working days as aforesaid. The remaining procedure for pre-clearance of Trade, as applicable to Designated Persons or their immediate relative(s), shall also apply to the Compliance Officer.

c) The person who has obtained the pre-clearance, shall complete execution of their pre-cleared trades in respect of Securities of the Company not later than 7 (seven) trading days after the approval of pre-clearance is given, failing which fresh pre-clearance would be required for the trades to be executed.

d) The person executing pre-cleared trades shall file within 2 (two) working days of the execution of the Trade, the details of such Trade, with the Compliance Officer in the format set out herein below in this Code. In the event such Trade is not executed, a report to that effect shall be filed with the Compliance Officer also in the format set out herein below in this Code.

e) All the persons who are permitted to trade shall not enter into a contra trade during the next 6 (six) months following the prior trade. However, this restriction shall not be applicable for trades pursuant to exercise of stock options.

f) In case the contra trade is necessitated by emergency, the Compliance Officer may waive the holding period after recording in writing reasons in this regard provided such waiver does not violate the SEBI PIT Regulations and the Code. Similarly in the case of emergency of Trade by a Compliance Officer, the Compliance Officer may obtain the waiver from the Managing Director or in his absence, the Chairman of the Board, provided that such waiver does not violate the Code or the SEBI PIT Regulations. The application for waiver shall be made in the format prescribed in as set out herein below in this Code.

g) In case a contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Securities and Exchange Board of India Act, 1992.

10. DEALING IN CASE OF SUSPECTED LEAK OR LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(a) Inquiry for Leakage of Unpublished Price Sensitive Information

All Unpublished Price Sensitive Information shall be handled on a need-to-know basis only. In case of any Unpublished Price Sensitive Information is proposed to be provided, the person proposing to provide the information shall consult the Chief Financial Officer / Company Secretary / Chairman and Managing Director in advance.

In case any Unpublished Price Sensitive Information is leaked or is suspected to be leaked by any insider, the Compliance Officer / Chief Financial Officer / Managing Director will investigate the matter and collect / gather the evidences and will report to the Chairman of Audit Committee. The Chairman of the Audit Committee will thereafter convene a meeting of Audit Committee depending on severity of the matter.

(b) Process for inquiry

All the matters concerning leak of Unpublished Price Sensitive Information or suspected leak of Unpublished Price Sensitive Information, will be thoroughly investigated by the Compliance Officer / Chief Financial Officer. The Compliance Officer / Chief Financial Officer may at their discretion, consider involving external investigators

for the purpose of the investigation.

The Compliance Officer / Chief Financial Officer may ask the concerned insider to remain present for investigation, discussion etc. and for such investigation task team may ask for personal bank account statement or such other details or documents as it deems fit.

(c) Report to Audit Committee for appropriate action:

The Compliance Officer / Chief Financial Officer will report to the Chairman of the Audit Committee and upon receipt of report by the Chairman, he will convene meeting of the Audit Committee, depending on severity of the matter. The Audit Committee will, based on such report, decide the suitable action including but not limited to withholding of salary / termination of employment / monetary penalty.

The Compliance Officer / Chief Financial Officer and the Chairman of the Audit Committee, as applicable, shall also promptly inform the Board of any leaks, inquiries and the results of such inquiries.

11. RESTRICTION ON CONTRA TRADE

Designated Persons who buy or sell any number of Securities of the Company shall not execute a contra trade i.e. sell or buy any number of Securities of the Company during the next 6 (Six) months following the prior transaction. This restriction shall not apply to shares acquired through exercise of employee stock options. The Compliance Officer is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing, provided that such relaxation does not violate the PIT Regulations.

Inadvertently or otherwise, if any trade is executed in violation of the contra trade restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

The Designated Person shall not take a position in derivative transactions in the Securities of the Company at any time.

12. REPORTING REQUIREMENTS

a) Every person on appointment as a key managerial personnel or a director of the company or upon becoming a promoter or member of the promoter group shall disclose his / her holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter.

b) Every promoter, member of the promoter group, Designated Person and director of the Company shall disclose to the Company the number of such Securities acquired or disposed of within two trading days of such transaction if the value of the Securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs.10,00,000 (Rupees Ten Lakh) or such other value (either in one transaction or in a series of transactions) as may be specified.

c) The Company shall notify the particulars of such trading to the stock exchange on which the Securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information. The disclosure of the incremental transactions after any continual disclosure under this para, shall be made when the transactions effected after the prior disclosure cross the threshold specified above in paragraph 10 (b).

d) Every Designated Person shall disclose mandatory details viz, Permanent Account Number, details of demat accounts, names of educational institutions from which they have graduated and names of their past employers.

e) Every Designated Person shall disclose mandatorily name, Permanent Account Number or any other identifier authorized by law and Phone/ Mobile numbers of the following persons to the Company on an annual basis and as and when the information changes:
   - Immediate relatives
   - persons with whom such Designated Person(s) shares a material financial relationship.

Note:

i. **"Material Financial Relationship"** shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a Designated Person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such Designated Person but shall exclude relationships in which the payment is based on arm's length transactions.

f) The Compliance Officer or the Company may, at its discretion require any other Connected Person or class of Connected Persons to make disclosures of his/ its/ their holdings and trading the Securities of the Company in the format specified in as set out herein below in this Code, at such frequency as may be determined by the Compliance Officer in order to monitor compliance with the SEBI PIT Regulations.

g) The disclosure to be made by any person under the Code shall include those relating to Trading by such person's Immediate Relatives, and by any other person for whom such person takes trading decisions.

h) The disclosures of Trading in Securities shall also include trading in derivatives of Securities and the traded value of the derivatives shall be taken into account for purposes of disclosure. Provided that trading in derivatives of Securities is permitted by any law for the time being in force.

i) In addition to other disclosures under the SEBI PIT Regulations, the Designated Persons will be required to forward details of their Securities transactions including the statement of immediate relative(s) to the Compliance Officer;

i. All holding of Securities of the Company at the time of joining the Company within 7 (seven) days of appointment.
ii. Monthly statement of transactions in Securities of the Company within 7 (seven) days from the end of each month. If there are no transactions in particular month, then "NIL" statement is not required to be submitted.
iii. Annual Statement of all holdings in securities of the Company to be submitted within 30 (thirty) days of the close of the financial year.

j) The Compliance Officer shall place before the Managing Director on a quarterly basis details of the dealings in the Securities of the Company by the Designated Persons or their immediate relative(s) and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged under this Code.

k) All submissions envisaged in this Code should be addressed to the Compliance Officer and forwarded to the Secretarial Department of the Company at its registered office, for administrative purpose and taking appropriate action.

Disclosure/ Declaration/ Application and Undertaking may be given in the attached Form-A to Form- H, as may be applicable.

13. MAINTENANCE OF STRUCTURED DIGITAL DATABASE

a) The Board or the Chief Executive Officer or the Managing Director, as applicable, shall ensure that a structured digital database is maintained containing the nature of Unpublished Price Sensitive Information and the names of such persons or entities as the case may be who have shared the information and also the names of such persons with whom information is shared under the SEBI PIT Regulations along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Every Designated Person or his/her Immediate Relative who is in receipt Unpublished Price Sensitive Information or who shares Unpublished Price Sensitive Information regarding the Company or its Securities pursuant to legitimate purpose or for any other purpose as provided in this Code and/or the SEBI PIT Regulations, are required to provide the details including, their name, Permanent Account Number, nature of Unpublished Price Sensitive Information and other details as may be required to maintain the Company's digital database under the SEBI PIT Regulations. The information not originating from within the organisation into a structured digital database may be completed no later than two (2) calendar days from the date of receipt of such information.

b) The database will be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. The Board or the Chief Executive Officer or the Managing Director, as applicable, shall ensure that the structured digital database is

preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

14. RULES REGARDING INFORMANTS

i. Any individual may voluntarily inform the SEBI and nothing in this Code precludes any person from submitting to the SEBI information regarding an alleged violation of insider trading laws (as defined under the SEBI PIT Regulations) that has occurred, is occurring or has a reasonable belief that it is about to occur, in the manner prescribed under the SEBI PIT Regulations. Such an individual is an "Informant".

ii. An Informant is entitled to be protected from retaliation and victimization and any retaliation or victimization is strictly prohibited under this Code and the Company's whistle blower policy. Complete protection shall be given to an Informant against any "unfair treatment" by virtue of: (a) his/her having reported Original Information (as defined under the SEBI PIT Regulations) by filing a Voluntary Information Disclosure Form (as defined under the SEBI PIT Regulations) under the SEBI PIT Regulations; (b) testifying in, participating in or otherwise assisting the SEBI in any investigation, inquiry, audit, examination of proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by the SEBI; or (c) breaching any confidentiality agreement or any terms and conditions of employment or engagement, solely to prevent any employee from co-operating with the SEBI in any manner. "Unfair treatment" includes, but is not limited to, discharge, termination, demotion, suspension, threats, harassment, discrimination (directly or indirectly) against an Informant.

iii. No one should compel the disclosure of the identity and/or existence of an Informant or the information provided by the Informant, except to the extent required under the SEBI PIT Regulations and other applicable laws. The Informant shall not be required to notify the filing of any Voluntary Information Disclosure Form to the Company or seek prior permission or consent or guidance of any person engaged by the Company before or after such filing.

iv. Informants are not exempt from the consequences of their own misconduct, unethical or improper practice, inadequate performance or other disciplinary issues unrelated to a disclosure made under Chapter IIIA of the SEBI PIT Regulations.

15. PRESERVATION OF DISCLOSURE

All undertakings, disclosure and applications made/ submitted under the SEBI PIT Regulations shall be maintained by the Compliance Officer, for a minimum period of 8 (eight) years.

16. PENALTY FOR CONTRAVENTION

Any person who Trades in Securities or communicates, provides or allows access to any Unpublished Price Sensitive Information for Trading in Securities in contravention of this Code, shall be penalized and appropriate action shall be taken against him/her by the Company. He/she shall also be subject to disciplinary action as deemed appropriate by the Board, which may include disciplinary action including suspension, wage freeze, recovery etc. or other such action as the Board may deem fit. However, an employee shall not be discharged, terminated, demoted, suspended, threatened, harassed, directly or indirectly or discriminated if he has filed a Voluntary Information Disclosure Form, irrespective of whether the information is considered or rejected by the SEBI or he is eligible for a reward under SEBI PIT Regulations.

The Compliance Officer shall report all the breaches of this Code to the Board. In the event of a breach of the PIT Regulations, the Company shall promptly inform the stock exchanges where Securities of the Company are traded, in such form and manner as may be specified by SEBI from time to time.

If it is observed by the Company that there has been violation of SEBI PIT Regulations, it shall inform Stock Exchanges on which the Securities are listed in accordance with the process ascribed by SEBI in this behalf, if any.

In addition to the action which may be taken by the Company, the persons violating the SEBI PIT Regulations or

the Code shall also be subject to action under the Securities and Exchange Board of India Act, 1992 and other applicable laws.

17. INTERPRETATION

Any ambiguities, difficulties and interpretative issues regarding this Code shall be resolved by the Board of Directors of the Company in line with the intent of this Code read with the applicable provisions of the Securities and Exchange Board of India Act, 1992 and the rules and regulations made thereunder, including the SEBI PIT Regulations.

In any circumstance where the terms of this Code differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Code and procedures until such time as this Code is amended to conform to the law, rule, regulation or standard.

In the event of any conflict between the provisions of this Code and the Securities and Exchange Board of India Act, 1992 or the SEBI PIT Regulations or any other cognate statutory enactments or rules then the provisions of the Securities and Exchange Board of India Act, 1992 or the SEBI PIT Regulations or such other cognate statutory enactments or rules made thereunder shall prevail over to this Code and the part(s) so repugnant shall be deemed to severed from this Code and the rest of the Code shall remain in force.

18. AMENDMENTS

The decision of the Board of Directors with regard to any or all matters relating to the Code shall be final and binding on all concerned. The Board of Directors shall have the power to modify, amend and replace the Code in part or full, as may be thought fit from time to time in their absolute discretion.

19. DISCLAIMER

This Policy is only internal code of conduct and one of the measures to avoid insider trading. It will be the responsibility of each person to ensure compliance of SEBI regulations and other related statutes fully.

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

1. Introduction

Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time (hereinafter referred to as "**PIT Regulations**") requires *inter alia* every listed company to formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to the PIT Regulations.

Accordingly, the Board of Directors of **Vectras Enprocon Limited** (hereinafter referred to as "**the Company**") at their ` held on 16th September,2025 has formulated code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to the regulations.

2. Objective of the Code of Fair Disclosures

The Code of Practices and Procedures for Fair Disclosures is required for the Company to ensure timely and adequate disclosure of unpublished price sensitive information which would impact the price of the Company's securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavors to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information.

3. Prompt disclosure of Unpublished Price Sensitive Information

The Company shall promptly make 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.

4. Uniform and Universal dissemination of Unpublished Price Sensitive Information

The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

5. Chief Investor Relations Officer

The Company hereby designates the Compliance Officer & Company Secretary as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

6. Dissemination of Unpublished Price Sensitive Information disclosed selectively

The Company shall promptly disseminate the unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

7. Overseeing and coordinating disclosure:

The Chief Investor Relations Officer, for the purpose of these regulations, shall oversee corporate disclosures and deal with dissemination of information and disclosure of unpublished price sensitive information.

The Chief Investor Relations Officer shall be responsible for ensuring that the Company complies with continuous disclosure requirements and; overseeing and coordinating disclosure of unpublished price sensitive information to stock exchanges, on the website of the Company and media.

If the information is accidentally disclosed without prior approval of Chief Investor Relations Officer, the person responsible may inform the Chief Investor Relations Officer immediately, even if the information is not considered as unpublished price sensitive information. In such event of inadvertent, selective disclosure of unpublished price sensitive information, the Chief Investor Relations Officer shall take prompt action to ensure such information is generally available.

8. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities

8.1 Any queries or requests for verification of market rumours by exchanges should be forwarded immediately to the Chief Investor Relations Officer who shall decide on the response / clarification.

8.2 The Chief Investor Relations Officer shall decide whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.

8.3 The Company will, subject to non-disclosure obligations, aim to provide appropriate and fair response to the queries on news reports and requests for verification of market rumours by regulatory authorities.

8.4 As a general practice, if the rumour appears in a responsible media channel which has reasonably wide audience and the rumour can have material impact on pricing of securities, then the Company would immediately make a proper announcement to present the correct position.

9. Timely Reporting of shareholdings/ ownership and changes in ownership:

Disclosure of shareholdings/ ownership by major shareholders and disclosure of changes in ownership as provided under any regulations made under the Act shall be made in a timely and adequate manner.

10. Disclosure/ dissemination of Price Sensitive Information with special reference to Analysts, Institutional Investors

The guidelines given hereunder shall be followed while dealing with analysts and institutional investors:-

(i) Only Public information to be provided

Only public information should be provided to the analyst/ research persons alternatively, the information given to such persons should be made generally available at the earliest.

(ii) Recording of discussion

In order to avoid misquoting or misrepresentation, it is desirable that at least two representatives of the Company be present at meetings with analysts, brokers or Institutional Investors and the discussions should preferably be recorded.

(iii) Handling of unanticipated questions

Sufficient care should be exercised while dealing with analysts' questions that raise issues outside the intended scope of discussion. Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, the same should be promptly made generally available.

(iv) Prompt release of Information

The Company will make transcripts or records of the proceedings of the meetings with Analysts, Investor Relation meetings available on the website of the Company promptly. The Company may also consider live webcasting of analyst meets.

11. Medium of disclosure / dissemination

(a) Disclosure/ dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination.

(b) Chief Investor Relations Officer shall ensure that disclosure to stock exchanges is made promptly.

(c) Company may also facilitate disclosure through the use of their dedicated Internet website.

(d) Company websites may provide a means of giving investors direct access to analyst briefing material,

significant background information and questions and answers.

(e) The information filed by the Company with stock exchanges under continuous disclosure requirements may be made available on the Company website.

12. Unpublished price sensitive information on a Need-to-Know basis

Unpublished Price Sensitive Information shall be handled on a "need to know" basis i.e., unpublished price sensitive information shall be disclosed only to those where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

13. Disclosure of Code on Public Domain

This Code and any amendment thereof will be published on the Company's website at https://vectrasgroup.com

14. Amendment of the Code

This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchange(s) where the securities of the Company are listed.

ANNEXURE A

Legitimate Purposes: For the purposes of this policy, "legitimate purposes" may include:

a. Sharing of Unpublished Price Sensitive Information, by an Insider, in the ordinary course of business, with any person, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.

b. Without prejudice to the provisions of sub-para (a) above, "legitimate purposes" for which Unpublished Price Sensitive Information can be shared by an Insider, shall include the following:

- Sharing the relevant Unpublished Price Sensitive Information with any person, for advice, consultation, valuation, fund raising or other intermediation and approvals, in relation to the subject matter of a proposed deal/assignment/tie-up/venture/investment/fund raising, resulting into Unpublished Price Sensitive Information itself or otherwise;

- Sharing the relevant Unpublished Price Sensitive Information with intermediaries, fiduciaries, merchant bankers, advisors, lawyers, bankers, consultants, valuers, rating agencies, accountants, auditors, insolvency professionals, business support agents, IT tools/system providers/facilitators, transaction processing service providers, in order to avail professional services from them in relation to the subject matter of Unpublished Price Sensitive Information;

- Sharing of relevant information with regulators (including any judicial or quasi-judicial body or any governmental authority as a part of litigation or regulatory proceedings);

- Sharing the relevant Unpublished Price Sensitive Information for advice, consultation, transaction support, intermediation and approvals on projects relating to enterprise transformation, strategy, change management, analytics, re-organization, operation, improvement, technology and similar domains;

- Sharing the relevant Unpublished Price Sensitive Information with business partners and other counter parties, which is essential and necessary to fulfil the terms and conditions of the relevant business arrangement with such partner, counter party, which may include a client, vendor, collaborator or a lender or financier;

- Sharing the relevant Unpublished Price Sensitive Information for advice, consultation, transaction support, intermediation and approvals in the process of evaluation of new products or services, business opportunities and new lines of business;

- Sharing the relevant Unpublished Price Sensitive Information for statutory consolidation requirements or disclosure obligations;

- Sharing the relevant Unpublished Price Sensitive Information for performance monitoring and oversight duties of relevant decision makers;

- Sharing the relevant Unpublished Price Sensitive Information with persons engaged or involved in the processes leading to disclosure of events set out in Schedule III to SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;

- Sharing the relevant Unpublished Price Sensitive Information, in case necessary for performance of duties or discharge of legal obligations.

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a 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 or member of promoter group of the Company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/Promoter group/ KMP / Directors/ immediate relative to/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter or member of promoter group	Securities held at the time of becoming Promoter/member of the promoter group/ appointment of Director/ KMP		% of Shareholding
			Type of Security- (For eg. Shares, Warrants, Convertible Debentures, rights entitlement etc.)	No.	
1	2	3	4	5	6

Note: "Securities" shall have the meaning as defined under regulation 2(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/member of the promoter group of the Company and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of becoming Promoter/member of the promoter group/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/member of the promoter group/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	12

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

Name & Signature: from [●]
Designation: [●]
Date: [●]
Place: [●]

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: [●]
ISIN of the company: [●]

Details of change in holding of Securities of Promoter, member of the promoter group, Designated Person or Director of the Company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ members of the promoter group/ KMP / Directors/immediate relative to/others etc.)	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 of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, rights entitlement etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures, rights entitlement etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures, rights entitlement etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Details of trading in derivatives of the company by Promoter, member of the promoter group, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name & Signature: [●]

Designation: [●]

Date: [●]

Place: [●]

FORM D (Indicative format)

SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other Connected Persons as identified by the Company

Details of trading in Securities by other Connected Persons as identified by the Company

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	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 of acquisition/disposal (on market/public/ rights/ Preferential offer/ off market/Inter- se transfer, ESOPs etc.)	Exchange on which trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, rights entitlement etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures, rights entitlement etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke /Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures, rights entitlement etc.)	No. and % of Shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Details of trading in derivatives by other Connected Persons as identified by the Company

Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
Type of	Contract	Buy	Sell	

Contract	specifications	Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name: [●]
Signature: [●]
Place: [●]

Form E

(Application and Undertaking for pre-clearance of trade by Designated Person(s) and their immediate relative under Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons applicable to dealing in securities of Vectras Enprocon Limited exceeding Rs.10,00,000/- in value (either in one transaction or in a series of transactions), during a calendar quarter

From [●]
Mr./Mrs. [●]
Address [●]
*Designation [●]
*Employee Code [●]
*_(applicable to employees only)_

Date:
The Compliance Officer,
Vectras Enprocon Limited Dear Sir,

Sub: Pre-clearance of Trades

*I/My immediate relative Mr./Ms. [●] intend to deal in equity shares of the company for which *I/ on behalf of my immediate relative request pre-clearance of the trade.

The particulars of intended trade are as under:

Sr. No.	Details of the proposed Trade	Information provided by Declarant
1	Number of shares proposed to be traded	
2	Proposed date of trading in securities	
3	Current market price (as on date of application)	
4	Demat A/c details	DP I.D. Client I.D.
5	Nature of Trade	* Purchase of securities Subscription to securities Sale of securities Pledge of securities Any other form of dealing in securities
6	The Depository for this Trade	*NSDL / CDSL
7	The trade is proposed to be carried out by	Myself / My immediate relative
8	My/ My immediate relative's current holding	

My undertaking for the purpose of pre-clearance is furnished herein below. This is to request you to pre-clear the proposed trade.

I/My immediate relative is aware that I/we have to execute the order in respect of securities of the company within seven trading days (as defined in the Code) after the approval of pre-clearance is given.

If the order is not executed within seven trading days after the approval is given, I/We would have to apply for pre-clearance of the transaction again.

Thanking You

(Signature)
*_(Retain as applicable)_

Undertaking

*I on my own behalf/ on behalf of immediate relative (we) do hereby solemnly state as under

That I/We do not have any access nor have we received "Unpublished Price Sensitive Information" up to the time of signing this undertaking.

That in case I/We get access to or receive "Unpublished Price Sensitive Information" after the signing of this undertaking but before the execution of the transaction I/We shall inform the Compliance Officer of the change in my/our position and that I/We would completely refrain from dealing in the securities of the Company till the time such information becomes public.

That I/We have not contravened the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons as notified by the company from time to time.

I/ we undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken within the stipulated period following receipt of pre-clearance.

That I/We have made a full and true disclosure in the matter. Given

under my hand this [●] day of [●]

(Signature)
**(Retain as applicable)*

Note: This form to be filed for self and immediate relative, separately.

Form F

(Application and Undertaking for pre-clearance of trade by Compliance Officer and his/her immediate relative under Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons applicable to dealing in securities of Vectras Enprocon Limited exceeding Rs.10,00,000/- in value (either in one transaction or in a series of transactions), a calendar quarter.

From [●]
Mr./Mrs. [●]
Address [●]
*Designation [●]
*Employee Code [●]
**(applicable to employees only)*

Date:
The Managing Director,
Vectras Enprocon Limited Dear Sir,

Sub: Pre-clearance of Trades

*I/My immediate relative Mr./Ms. [●] intend to deal in equity shares of the company for which *I/ on behalf of my immediate relative request pre-clearance of the trade.

The particulars of intended trade are as under:

Sr. No.	Details of the proposed Trade	Information provided by Declarant
1	Number of shares proposed to be traded	
2	Demat A/c details	DP I.D. Client I.D.
3	Nature of Trade	*Buy / Sale
4	The Depository for this Trade	*NSDL / CDSL
5	The trade is proposed to be carried out by	Myself / My immediate relative
6	My/ My immediate relative's current holding	

My undertaking for the purpose of pre-clearance is furnished herein below. This is to request you to pre-clear the proposed trade.

I/My immediate relative is aware that I/we have to execute the order in respect of securities of the company within one week after the approval of pre-clearance is given.

If the order is not executed within one week after the approval is given. I/We would have to pre-clear the transaction again.

Thanking You

(Signature)
**(Retain as applicable)*

Undertaking

*I on my own behalf/ on behalf of immediate relative (we) do hereby solemnly state as under

That I/We do not have any access nor have we received "Unpublished Price Sensitive Information" up to the time of signing this undertaking.

That in case I/We get access to or receives "Unpublished Price Sensitive Information" after the signing of this undertaking but before the execution of the transaction I/We shall inform the Compliance Officer of the change in my/our position and that I/We would completely refrain from dealing in the securities of the company till the time such information becomes public.

That I/We have not contravened the code of conduct for prevention of insider trading as notified by the company from time to time.

That I/We have made a full and true disclosure in the matter. Given

under my hand this [●] day of [●]

(Signature)
**(Retain as applicable)*

Note: This form to be filed for self and dependent family member, separately.

FORM G

Annual Disclosure of Securities held by Promoter, Key Managerial Personnel, Director and Designated Persons and Immediate Relatives

Date: [●]

To,
The Company Secretary & Compliance Officer
[●],

Sub: Disclosure of Trading in Securities of Vectras Enprocon Limited during the year ended [●] and holding of securities of the Company as on that date.

Dear Sir,

Pursuant to Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons ("**Code**"), I hereby disclose trading in securities of the Company during the year ended and holding as on that date.

Name:[●]

Disclosure of Securities by Director and Designated Persons					
Type of Securities	Number of securities held as on _____	Number of securities bought during the year _____	Number of securities sold during the year _____	Number of securities held as on _____	DP. ID & Client ID
Equity					

Details of my immediate relatives are as under "immediate relative" means a spouse of a person, and includes parent, sibling, and child 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.

S. No.	Name of Relative	PAN	DP ID & Client ID

Disclosure of Securities by Immediate Relative of Director and Designated Persons						
Name(s) of Immediate Relatives	Type of Securities	Number of securities held as on [●]	Number of securities Bought during the year [●]	Number of securities sold during the year	Number of securities held as on [●]	DP. ID & Client ID
	Equity					

I hereby declare that the above details are complete and correct. I further declare that I have complied with the provisions of Code. I am fully aware about consequences in case of any non-compliance by me and shall be responsible for any action/inaction.

Full Name: [●]

Signature: [●]

Designation: [●]

Mobile No.: [●]

Department: [●]

Emp. Code or DIN: [●]

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD
(For Designated Persons and their Dependents)

To,

The Compliance Officer,
Vectras Enprocon Limited
_____

Through Division/ Department Head/ Managing Director/ Compliance Officer

Date: _____

Dear Sir/ Madam,

I request you to grant me waiver of the restriction mentioned in clause 9 of the Code of Conduct for prevention of insider trading with respect to _____ shares of the Company. I desire to deal in the said purchase/ sell the said shares on account of the following reasons: _____

Thanking you,
Yours faithfully,

(Name)
(Designation)
(Department)
(Employee PL No.)

APPROVAL GRANTED / REJECTED
FOR _____

Compliance Officer
Date:

Reasons to be given, if rejected