GRATEX INDUSTRIES LIMITED

CODE OF CONDUCT

FOR

BOARD AND SENIOR MANAGEMENT PERSONNEL

(Pursuant to Regulation 17(5) of the SEBI (Listing Obligation And Disclosure Requirements) Regulations, 2015)

ACKNOWLEDGEMENT FORM

The Compliance Officer

GRATEX INDUSTRIES LIMITED

Mumbai

I, Rekha Nagori W/o Pradip Nagori, residing at 21/51, Sagar Apts, Adarsh Nagar Off New Link Rd, Andheri west Mumbai -400102 being an Independent Director of GRATEX INDUSTRIES LIMITED, acknowledge that I have received, read and understood the provisions and policies of the Code of Conduct and agree to comply with the said Code.

| | 7 |
|-------------|----------------------|
| Signature | RN 6900 |
| Name | Rekha Nagori |
| Din | 06945982 |
| Designation | Independent Director |
| Date | 31.03.2020 |
| Place | Mumbai |

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GRATEX INDUSTRIES LIMITED

CODE OF CONDUCT

FOR

BOARD AND SENIOR MANAGEMENT PERSONNEL

(Pursuant to Regulation 17(5) of the SEBI (Listing Obligation And Disclosure Requirements) Regulations, 2015)

Annual Affirmation of Compliance Form

The Compliance Officer

GRATEX INDUSTRIES LIMITED

Mumbai

I, Rekha Nagori W/o Pradip Nagori, residing at 21/51, Sagar Apts, Adarsh Nagar Off New Link Rd, Andheri west Mumbai -400102 being an Independent Director of GRATEX INDUSTRIES LIMITED, affirm to the best of my knowledge and belief, that I have fully complied with the Code of Conduct during the year 2019-2020.

| Signature | priogen |
|-----------|--------------|
| Name | Rekha Nagori |
| Din | 06945982 |
| | |

Designation Independent Director

Date 31.03.2020

Place Mumbai