

Code of Conduct

[Under the SEBI (Prohibition of Insider Trading) Regulations, 2015
Applicable to the Directors/Officers/Designated Employees and Connected Persons]

Amit Securities Limited

This code may be called as code of conduct of Amit Securities Limited for prevention of Insider Trading. This Code can be modified/amended/alterd by Directors/Compliance Officer authorized by the Board. But in case of any statutory modification or amendment or alteration of the provisions of SEBI (Prohibition of Insider Trading), Regulations 2015, the newly modified / amended / altered provisions of the Regulation shall be placed before the Board of Directors of the Amit Securities Limited for noting and the amended code shall be deemed to be implemented effective from the date of approval of the same by the Board.

1. PREAMBLE

Insider trading means dealing in securities of a listed company traded on any Stock Exchange in India by insiders which term includes Directors, Officers and Designated Employees of Amit Securities Limited based on or when in possession of unpublished price sensitive information (UPSI).

The SEBI, as part of its efforts to protect the interest of investors in general, had issued the SEBI (Prohibition of Insider Trading) Regulations, 2015, under the powers conferred on it by the SEBI Act, 1992, which is made applicable to all the listed companies. The Regulations prohibits insider trading.

2. APPLICABILITY

This code shall be applicable to all the Directors, Officers, and Designated Employees and their relatives of AMIT SECURITIES LIMITED.

3. DEFINITIONS

- (a) **Act** - means the Securities & Exchange Board of India Act, 1992;
- (b) **Board of Director**- means the Board of Directors of Amit Securities Limited
- (c) **Body Corporate**- means a body corporate as defined under Sub section 11 of Section 2 of the Companies Act, 2013
- (d) **The Company**- means Amit Securities Limited
- (e) **Compliance Officer**- The Officer appointed by the Board of Directors of AMIT SECURITIES LIMITED for the purpose of these regulations from time to time.
- (f) **Code**- means this Code of Conduct for Prevention of Insider Trading including modifications made thereto from time-to-time.
- (g) **Trading**- means and includes subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities and "trade" shall be construed accordingly.
- (h) **Promoter**- shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- (i) **Designated Employees**- shall mean and include –Top three tier of AMIT SECURITIES LIMITED Management, namely:-
 - i. Chief Executive Officer (CEO), Chief Financial Officer (CFO);
 - ii. General Manager and above of all the departments of AMIT SECURITIES LIMITED;

- iii. Senior Manager and above of Finance and Accounts, Secretarial, Banking Department of AMIT SECURITIES LIMITED.
- (j) **Officer-** shall mean and include –
- i. Statutory, Secretarial and Internal Auditor of AMIT SECURITIES LIMITED.
 - ii. Person occupying the position as an officer or an employee of AMIT SECURITIES LIMITED or holds a position involving a professional or business relationship between himself and AMIT SECURITIES LIMITED whether temporary or permanent and who may reasonably be expected to have an access to unpublished price sensitive information in relation to that company.
 - iii. Any other person as decided by the Board of Directors of AMIT SECURITIES LIMITED.
- (k) **Director-** means Directors on the Board of AMIT SECURITIES LIMITED both Executive and Non-Executive.
- (l) **Insider-** means any person who,
- i. is or was connected with AMIT SECURITIES LIMITED or is deemed to have been connected with AMIT SECURITIES LIMITED and who is reasonably expected to have access to unpublished price sensitive information in respect of AMIT SECURITIES LIMITED, or
 - ii. has received or has had access to such unpublished price sensitive information.
- (m) **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 and such other transactions;
 - (v) changes in key managerial personnel; and
 - (vi) material events in accordance with the listing agreement.
- (n) **Regulation-** means Securities and Exchange Board of India (Prohibition of Insider Trading), Regulations 2015 as amended from time to time.
- (m) **Securities-** shall mean the Equity Shares of Rs. 10/- each of AMIT SECURITIES LIMITED and such other securities of AMIT SECURITIES LIMITED issued from time to time as may be specified by the Board or the Managing Director or the CEO as the case may be of AMIT SECURITIES LIMITED.
- (o) **Trading Window-** means the period during which the Directors, Officers and Designated Employees of Company may trade in AMIT SECURITIES LIMITED's securities.
- (p) **Trading day-** means a day on which the recognized stock exchanges are open for trading;
- (q) **Connected person-** means,- As define in SEBI (Insider Trading) Regulation, 2015
- (r) **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;*

4. CODE

