1. PREAMBLE:

AMIT SECURITIES LIMITED (the "Company") has adopted the 'Code of Practices Procedure and Conduct to Regulate, Monitor and Report Trading by Insiders' (hereinafter referred as the Code of Conduct or the Conduct or the Code) is framed in line with Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time in order to protect the interest of stakeholders of the Company. This code is applicable to all designated employees, their dependent family members, connected persons, promoter and promoter group of the Company.

2. DEFINITIONS

2.1. Unless the context otherwise requires, the following words, expression and derivations shall have the meaning assigned to them as under:

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

b. **"Board"** means the Board of Directors of the Company.

c. **"Code" or "Code of Conduct"** shall mean the Code of conduct to regulate, monitor and report trading by insiders of **'AMIT SECURITIES LIMITED"** as amended from time to time.

c. **"Company"** means 'AMIT SECURITIES LIMITED'

d. **"Compliance Officer"** means Company Secretary or any senior officer designated by Board, who is financially literate (i.e. having ability to understand basic financial statements) and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the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.

Explanation – For the purpose of this code, **"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.

e. **"Connected person"** this term shall have the meaning given to it under Regulation 2(d) of the Regulations and shall also include such other persons as may be identified by the Board to be Connected Persons from time to time.

f. **"Dealing in Securities"** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.

g. **"Designated Person(s)",** means:

(i) Promoters of the Company;

(ii) Members of the Board of Directors of the Company including Executive or Non-Executive or Independent or Nominee Directors
(iii) Chief Executive Officer (CEO), Chief Operating Officer (COO), Chief Financial Officer (CFO) and Company Secretary (CS) of the Company;
(iv) Employees upto two levels below Chief Executive Officer of the Company and its material subsidiaries irrespective of their functional role in the company or ability to have access to unpublished price sensitive information;
(v) Such other persons who may have access to UPSI may be identified by Compliance Officer in consultation with Board from time to time.

i. **"Generally available information**" means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.

j. **"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.

k. **"Insider"** means any person who is:
(i) a connected person; or
(ii) in possession of or having access to unpublished price sensitive information including a person having access to such information by virtue of a legitimate purpose.

l. **"Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013

m. **"Promoter and 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;

n. **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual Fund.

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

p. **"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.

q. **"Trading Day"** means a day on which the recognized stock exchanges are open for trading.

r. **"Regulation"** means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

s. **"Unpublished price sensitive information"** or **"UPSI"** 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, delisting's, 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.

t. **"Whole time Director (WTD)"** this term shall have the meaning as assigned to it under Section 2(94) of the Companies Act, 2013, as amended.

3. INTERPRETATION:

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

This Code can be modified/amended/altered only by Board of Directors of the Company.

But in case of any statutory modification or amendment or alteration of the provisions of

Securities and Exchange Board of India (Prohibition of Insider Trading), Regulation 2015, the newly modified/amended/altered provisions of the Regulation shall be deemed to be implemented in the Code with effect from the date of the statutory notification for modification or amendment or alteration etc.

The amended code shall be placed before the Board of Directors of the Company in the Board Meeting held after the date of statutory notification for modification/ amendment/ alteration etc. of the Regulation for noting.

4. APPLICABILITY & DECLARATION:

a. The Code is applicable to all Directors / Designated Persons and to the extent specified, to their Immediate Relatives.

b. All Directors / Designated Persons are advised to carefully go through and familiarize themselves with and adhere to the Code.

c. In case a Director / Designated Person holds Securities jointly with any other person, related or not, such holding will be considered as the holding of the Director / Designated Person. Accordingly, all the provisions of the Code shall be applicable in totality.

d. All Directors / Designated Persons are required to confirm their understanding of an agreement to comply with the Code by signing a Declaration in the format prescribed in **'Annexure A'**

5. ROLE OF COMPLIANCE OFFICER:

The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors on annual basis.

The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.

6. PRESERVATION OF CONFIDENTIALITY OF UPSI / CONFIDENTIAL INFORMATION:

a. All information shall be handled within the Company on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

b. The Company shall however, in no circumstances share information solely for the purpose of evading the compliances of the Regulations or circumventing the prohibitions of these Regulations.

c. Notwithstanding anything contained in this regulation, unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:

(i) entail an obligation to make an open offer under the takeover regulations where the board of directors of the listed company is of informed opinion that sharing such information is in the best interests of the company;

(ii) not attract the obligation to make an open offer under the takeover regulations but where the board of directors of the listed company is of informed opinion that sharing such information is in the best interests of the company and the information that constitute 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 of directors may determine to be adequate and fair to cover all relevant and material facts.

However, the Board of Directors 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 limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

d. **Need to Know:**

"Need to Know" basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information. All non-public information directly received by any employee should immediately be reported to the head of the department.

e. Confidential Information / UPSI shall be kept with adequate security. Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

f. **Digital database of information:**

The Board of Directors shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall 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 of directors or head(s) of the organization of every person required to handle unpublished price sensitive information 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.

g. **Chinese Walls:**

To prevent the misuse of UPSI, the Company shall follow the 'Chinese Wall' approach and separate those departments which routinely have access to such information, considered as "inside areas" from other departments, considered as "public areas". Employees in the inside areas shall not be allowed to communicate any UPSI to anyone in the public areas, except as may be required on a need-to-know basis, performance of

duties or discharge of legal obligations or for Legitimate Purpose in accordance with the Code and the Regulations.

7. PREVENTION OF MISUSE OF 'UNPUBLISHED PRICE SENSITIVE INFORMATION' (UPSI):

Designated Persons and immediate relatives of designated persons in the Company shall be governed by an internal code of conduct governing dealing in securities.

No insider shall trade in securities of the Company on a stock exchange when in possession of unpublished price sensitive information.

8. TRADING PLAN:

1. An insider shall be entitled, at his option, to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out with such plan.
2. Such trading plan shall:
   a. not entail commencement of trading on behalf of the Insider earlier than one hundred and twenty calendar days from the public disclosure of the plan;
   b. not entail overlap of any period for which another trading plan is already in existence;
   c. set out following parameters for each trade to be executed:
      i. either the value of trade to be affected or the number of securities to be traded;
      ii. nature of the trade;
      iii. either specific date or time period not exceeding five consecutive trading days;
      iv. price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
      - for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
      - for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

   d. not entail trading in securities for market abuse.
3. The Compliance Officer shall review such trading plan to assess whether the plan would have any potential for violation of these 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 plan. Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan and trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.

   Trading window norms 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 plan, without being entitled to either deviate from it or to execute any trade

in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, any UPSI in possession of the Insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

If the insider has set a price limit for a trade, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

5. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

9. TRADING WINDOW AND WINDOW CLOSURE:

a. The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he determines that a designated person or class of designated persons 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.

b. However, for Unpublished price sensitive information not emanating from within the Listed Company, trading window may not be closed.

c. The trading period, i.e. the trading period of the stock exchanges, called 'trading window', is available for trading in the Company's securities.

d. The trading window shall be made applicable from the end of every quarter till 48 hours after declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information

During closure of trading window, Designated Persons (and their immediate relatives) shall not trade in the securities of the Company.

All Designated Persons (and their immediate relatives) shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as referred above or during any other period as may be specified by the Company from time to time.

e. The trading window restrictions mentioned in sub-clause (1) shall not apply in respect of –

(a) transactions specified in clauses (i) to (iv) and (vi) of the proviso to sub- regulation (1) of regulation 4 of Regulations and in respect of a pledge of shares for a Bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and compliance with the respective regulations made by the Board;

(b) transactions which are undertaken in accordance with respective regulations made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back

offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.

The timing for re-opening of the trading window shall be determined by the compliance officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

f. The Compliance Officer, after considering various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

10. PRE-CLEARANCE OF TRADES:

a. When the trading window is open, any Designated Person (and/or their immediate relative) shall trade in Securities of the Company subject to pre-clearance by the Compliance Officer 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 Lakhs** (market value) should pre-clear the transaction. However, no Designated Person shall be entitled for pre-clearance of any proposed trade if such Designated Person is in possession of UPSI even if the trading window is not closed.

b. Designated Person (and/or their immediate relative Specified Person) who proposes to execute trade in Securities of the Company shall submit an application duly filled and signed to the Compliance Officer. The format of application is annexed as **'Annexure B'**. It is clarified that the designated person should submit the application on behalf of his/her immediate relative(s), for trades proposed to be executed by the immediate relative(s).

c. Prior to approving any trades, the Compliance Officer shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

d. The Compliance Officer shall approve / reject pre-clearance application within four trading days in **'Annexure C'**.

e. Designated Person shall execute pre-cleared trade within seven trading days from approval and shall report his trade details to Compliance Officer in **'Annexure D'** within two trading days from the trade. In case non-trading, Designated Person shall report his decision of non-trading along with reasons to Compliance Officer in **'Annexure D'**.

f. In case of failure in executing trade within seven trading days, Designated Person shall be required to take fresh pre-clearance for the trades to be executed in **'Annexure B'**.

g. **Designated Person who is permitted to trade shall not execute a contra trade within next six months from previous transaction**. The Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing without violating the Regulations. If 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 the Securities and Exchange Board of India for credit to the Investor Protection and Education Fund.

11. DISCLOSURE BY CERTAIN PERSONS:

a. Initial Disclosure:

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

b. Continual Disclosure:

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 lakhs rupees.

The company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two working days of receipt of the disclosure or from becoming aware of such information.

c. Annual Disclosure:

Every promoter, director and Designated Person of the Company shall provide the annual disclosure to the company wherein they shall disclose their holding of Securities on annual basis within 60 days from conclusion of every financial year of the Company.

d. Other Disclosures:

Designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the Company on an annual basis and as and when the information changes:

a) Immediate Relatives
b) Persons whom such designated person(s) shares a material financial relationship; and
c) Phone, mobile and cell numbers which are used by them

The term “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.

Designated persons shall also disclose on a one time basis the names of educational institutions from which designated persons have graduated and names of their past employers.

12. PROCESS FOR HOW AND WHEN PEOPLE ARE BROUGHT ‘INSIDE’ ON SENSITIVE TRANSACTIONS:

The Compliance Officer in consultation with WTD of the Company shall decide on how and when any person(s) should be brought ‘inside’ on any proposed or ongoing sensitive transaction(s). The Compliance Officer (along with WTD) shall consider whether such person being wall – crossed, is being provided UPSI on a need – to – know basis. Further, information shared with such wall – crosser should be limited to the specific transaction or purpose for which their assistance is required.

Additionally, a person(s) may also be brought inside on any proposed or ongoing sensitive transaction(s) of the Company who may be an existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. for legitimate purpose which shall include the following;

a. in the ordinary course of business
b. in furtherance of performance of duty(ies);
c. for discharge of legal obligation(s).
d. for any other genuine or reasonable purpose as may be determined by the Compliance Officer of the Company.
e. for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

13. INTIMATION OF DUTIES AND RESPONSIBILITIES AND THE LIABILITY TO THE PERSON(S) WHO HAS/HAVE BEEN BROUGHT INSIDE' ON SENSITIVE TRANSACTION(S).

Any person(s) who has/have been brought inside on any proposed and/or ongoing sensitive transaction(s) and in receipt of unpublished price sensitive information shall be considered an 'insider' for purposes of this Code and due notice shall be given to such persons, in the format as set out in by the Compliance Officer in consultation with WTD and/or CFO of the Company;

a. To make such person aware that the information shared is or would be confidential.
b. To instruct such person to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.
c. To make such person aware of the duties and responsibilities attached to the receipt of such information and the liability attached to misuse or unwarranted use of such information.

14. PENALTY:

Any Designated Person who contravenes the Code of Conduct shall be penalised and shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback etc. The Company shall promptly inform Securities and Exchange Board of India regarding any violation of the Code of Conduct.

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'ANNEXURE A'
Declaration by Director / Designated Person

To
The Compliance Officer
Amit Securities Limited

R.O.: 1st Floor,Swadeshi Market 316,Kalbadevi Road, Mumbai City, Maharashtra, India, 400002

I, the undersigned, being a Director / Designated Person as defined under Code of Conduct to Regulate, Monitor and Report Trading by Directors / Designated Persons (the 'Code') of Amit Securities Limited (the 'Company'), hereby declare and confirm as under:

1. I have received, read and understood the Code;
2. I agree to comply with the Code and that I and my Immediate Relatives shall be bound by the Code to the extent applicable to us;
3. I agree to hold the Company harmless in the event of any investigation against me and / or my Immediate Relatives for any insider trading by the regulatory agencies;
4. I agree to compensate the Company for all economic losses, loss / damage to the Company's public image, fines imposed on the Company, any penalty imposed on the Company, suffered in or as a result of any investigation by regulatory agencies into my or my Immediate Relatives Trades; and
5. I agree to compensate the Company for all legal expenses incurred in defending itself in such investigations.

Yours faithfully,

Signature:
Name:
Designation:

Date:
Place:

'ANNEXURE B'

Application cum Undertaking for Pre-clearance

Date:

To,
The Compliance Officer
Amit Securities Limited

R.O.: 1st Floor,Swadeshi Market 316,Kalbadevi Road, Mumbai City, Maharashtra, India, 400002

Sub.: Application for Pre-dealing in securities of the Company

Dear Sir/Madam,

With reference to Amit Securities Limited Code of Practices Procedure and Conduct to Regulate, Monitor and Report Trading by Insiders ('Code of Conduct'), I, (Designation & Dept.) of the Company, would like to purchase / sale ___equity shares of the Company as per details given below:

Sr. No.	Particulars	
1	Total No. of Securities held as on application date	
2	DP & Client ID / Folio No.	
3	Nature of Transaction – Purchase / Sale	
4	No. of Securities to be purchased / sold	
5	Name of Person who proposed to Trade	

I hereby declare that there will be no opposite transaction for 6 (six) months as per the Code of Conduct of the Company.

I hereby further declare and undertake that I do not have any access nor have I received 'Unpublished Price Sensitive Information' (UPSI) upto the date of this application. In the event of me having access to or receiving UPSI after the date of signing this application but before the execution of the transaction, I undertake to inform the Compliance Officer of the change in this position and shall completely refrain from trading in the Company's Securities till the time such information becomes public.

I hereby also declare that I have not contravened the Code as notified by the Company from time to time. I have made full and true disclosure to the Company in the matter.

Yours faithfully,

Signature:
Name:
Designation:

'ANNEXURE C'

Approval / Rejection of Pre-clearance

To,

_____

Name:
Designation:

Dear Sir/Madam,

With reference to your application and on the basis of information submitted by you and relying entirely upon the application cum undertaking given dated_____, we would like to inform you that your application to purchase / sale _____equity shares of the Company is hereby approved / rejected. Now, you can execute your trade within 7 trading days from the date of this approval. Further, you are required to submit a report your trade details within two trading days from trade or in case, no trade was executed, you are required to submit a 'Nil' report. In case, you do not execute a trade before within the specified time, you shall submit a fresh pre-clearance application before executing any transaction in the Securities of the Company.

Yours faithfully,

For Amit Securities Limited

Company Secretary & Compliance Office

Date:
Place:

'ANNEXURE D'

Reporting of Trade / Transaction

To,
The Compliance Officer
Amit Securities Limited

R.O.: 1st Floor,Swadeshi Market 316,Kalbadevi Road, Mumbai City, Maharashtra, India, 400002

Dear Sir/Madam,

According to approval of pre-clearance dated _____, I have executed a trade / transaction on_____(date). The detail of said trade / transaction is as under:

Sr. No.	**Particulars**	
1	Name of holder	
2	No. of Securities purchased / sold	
3	Average gross price per security (In Rs.)	
4	DP ID & Client ID / Folio No.	

Yours faithfully,

Signature:
Name:
Designation: