

ASIT C. MEHTA FINANCIAL SERVICES LTD

CIN: L65900MH1984PLC091326

Registered Office: 'Nucleus House', Saki Vihar Road, Andheri (East), Mumbai: 400072

Tel: 28570781 / 28583333

REVISED CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS

[Pursuant to Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015) and in compliance of SEBI(Prohibition of Insider Trading) (Amendment) Regulation, 2018]

I. The effective date for this revised code of conduct is October 01, 2023

II. DEFINITIONS

1. **“Board”** means the Board of Directors of the Company, viz. Asit C. Mehta Financial Services Limited (hereinafter referred to as “the Company”)
2. **“Code” or “Code of Conduct”** shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of Asit C. Mehta Financial Services Limited as amended from time to time.
3. **"Compliance Officer"** means Company Secretary or such other senior officer, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.
4. **“Company”** means “Asit C. Mehta Financial Services Limited”
5. **“Director”** means a member of the Board of Directors of the Company.
6. **“Employee”** means every employee of the Company including the Directors in the employment of the Company and such employee of the Company's Associate and/or subsidiary and/or associate company who undertakes any assignment/carries out any activity for and/or on behalf of the Company .
7. **“Connected Person”** means any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity, including by reason of frequent communication with its officers; or by being in any contractual, fiduciary or employment relationship; or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,

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- a. an immediate relative of connected persons; or
 - b. holding company or associate company or subsidiary company; or
 - c. an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - d. an investment company, trustee company, asset management company or an employee or
 - e. director thereof; or
 - f. an official of a stock exchange or of clearing house or corporation; or
 - g. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - h. a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - i. an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - j. a banker of the company; or
 - k. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest;
8. **“Dealing in Securities means”** an act of subscribing or selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.
9. **“Designated Persons” shall include:-**
- The term "designated person" shall consist of, Connected Persons who are:
- i. Promoters of the Company;
 - ii. Directors of the Company
 - iii. Key Managerial Persons
 - iv. Every employee and group company employee in the grade of Deputy Vice President and above;
 - v. Every employee and group company employee in the finance, accounts, compliance, secretarial and legal department as may be determined and informed by the Compliance Officer; and
 - vi. Any other Connected Person or employee designated by the Company on the basis of their functional role;
 - vii. Immediate Relatives of i to vi above.
10. **“Disclosure”** means Disclosure of trading in securities including trading in derivatives of securities and the traded value of the derivatives shall be taken into account for this purpose.
11. **“Generally available Information”** means information that is accessible to the public on a non-discriminatory basis.

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12. Group Company” employee means all employees working in any of the following companies: Asit C. Mehta Investment Interrmediates Limited (ACMIL) , Edgytal Fintech Investment Services Private Limited (Edgytal) and Asit C. Mehta Advisors Limited
13. **“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.
14. **“Insider”** means any person who is:
 - (i) A connected person; or
 - (ii) is in possession of or having access to unpublished prices sensitive information
15. **“Informant”** means an **individual(s) who voluntarily submits to the Securities and Exchange Board of India (SEBI), a Voluntary Information Disclosure Form relating to an alleged violation of insider trading laws that has occurred , is occurring or has a reasonable belief that it is about to occur, in a manner provided under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a reward**
16. **“Key Managerial Personnel”** means person as defined in Section 2(51) of the Companies Act, 2013
17. **“legitimate purposes”** shall include sharing of UPSI in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the said Regulations.

Any person in receipt of unpublished price sensitive information pursuant to a "Legitimate Purpose" shall be considered an "insider" for purposes of this Code and the Regulations and due notice shall be given to such persons by the Compliance Officer and/ or the person sharing such information to maintain confidentiality of such unpublished price sensitive information in compliance with this Code and the regulations.
18. **“Materially Financial Relationship”** means a relationship in which one person is recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions
19. **"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
20. **"Trading"** means and includes subscribing, redeeming. Switching, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

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21. **"Securities"** means and includes "Listed securities" or "proposed to be listed securities" of the company means those securities of the company which are listed or proposed to be listed on a Stock Exchange.
22. **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;
23. **"Specified Persons"** means the connected persons, the insiders, Designated Persons and their immediate relatives(s) are collectively referred to as Specified Persons.
24. **"Unpublished Price Sensitive Information" (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 include but is 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; and
 - (v) changes in key managerial personnel

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 leg - islation.

III. ROLE OF COMPLIANCE OFFICER

1. The Compliance Officer of the Company is responsible for formulating the Code of Conduct , with the approval of the Board of Directors to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons
2. The Compliance Officer of the Company is responsible for setting forth policies and procedures and monitoring adherence to the rules for the preservation of "Price Sensitive Information", approval of trading plans of all designated persons and their immediate relatives (as defined in this code), monitoring of trades and the implementation of the code of conduct under the overall supervision of the Board of Directors. For the purposes of this code, The Group Compliance Officer of the Company is the Compliance Officer of the Company.
3. The Compliance Officer shall report to the Board of Directors of the company
4. The Compliance Officer shall provide reports on compliance with this code to the Audit Committee of the company, at least once in a year
5. The Compliance Officer shall assist all the employees /directors in addressing any clarifications regarding SEBI (Prohibition of Insider

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Trading) Regulations, 2015 and the Company's code of conduct.

6. The Compliance Officer shall maintain a record of the designated persons and any changes made in the list of designated persons.
7. The Compliance Officer shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information, the names of such persons who have shared the information, and the names of such persons with whom information is shared under this Regulation with Permanent Account Number. This database shall not be outsourced and shall be maintained internally with adequate internal controls. Such digital database will be preserved for a period of at least eight years from any transaction.
8. The Compliance Officer in co-ordination with the Human Resources Department will hold awareness programs on a periodic basis for the employees of the company regarding this code of conduct.

IV. PROHIBITION ON COMMUNICATING OR PROCURING UPSI

1. The specified persons shall not –
 - i. communicate, provide, or allow access to any UPSI, relating to the Company or its listed or proposed to be listed securities, to any person including other insiders, except to the extent allowed by these Rules;
 - ii. Procure from or cause the communication by an Insider of UPSI, relating to the Company or its listed or proposed to be listed securities;

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- i. in furtherance of legitimate purposes, performance of duties (need to know basis) or discharge of legal obligations pursuant to appropriate confidentiality and non disclosure agreements being executed; or
- ii. in the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company; or
- iii. within a group of persons if such persons have been identified and secluded within an information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI and the execution of an undertaking by such persons to abstain and / or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI.
- iv. In connection with a transaction that would

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- Entail an obligation to make an open offer under the takeover regulations where the Board of Directors is of the Opinion that sharing of such information is in the best interests of the company;
- Not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the company is of the informed opinion that the sharing of 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.

For the purposes of (iv) above, 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 purpose of (iv) above and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

2. Chinese Wall

1. For ensuring compliance with the above, the company shall adopt a 'Chinese Wall' Policy which separates those areas of the organisation which routinely have access to confidential information, considered "inside areas" from "public areas" which deal with marketing/sales or other departments providing support services.
2. The accounts and finance, compliance and secretarial teams are designated as "inside areas" for this purpose and shall be separated from the other departments.
3. The employees in the "inside areas" are expected to maintain high levels of confidentiality and not to disclose any 'Price Sensitive Information' to anyone in 'public areas'
4. In exceptional circumstances, employees from "public areas" may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the Compliance Officer.

V. PROHIBITION ON INSIDER TRADING

An Insider shall not, directly or indirectly, –

- i. Trade in securities of the Company that are listed or proposed to be listed when in possession of UPSI;
- ii. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

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Provided the restriction in 4 (i) above shall not apply to a :

- a. transaction that is an off-market inter-se transfer between Insiders who were in possession of the same UPSI without being in breach of the applicable SEBI Regulations and both parties had made a conscious and informed trade decision; provided that such UPSI was not obtained under IV.1. 4 of this Code,
- b. and the transaction was carried out through the block deal window mechanism between persons who were in possession of the UPSI without being in breach of clause IV.1.4 of this code,
- c. The transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction
- d. the transaction in question was undertaken to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations,
- e. in the case of non-individual insiders:
 - i. the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade, and appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached
- f. Trades pursuant to a Trading Plan set up in accordance with this Code..

VI. TRADING PLAN

An insider shall be entitled 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 on his behalf in accordance with such plan.

- i. Such Trading Plan shall:
 - a. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - b. 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;
 - c. entail trading envisaged for a period of not less than twelve months;
 - d. not entail overlap of any period for which another trading plan is already in existence;
 - e. 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
 - f. not entail trading in securities for market abuse.
 - g. All Specified person who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time.

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- ii. The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he/she shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.
- iii. 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.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

- iv. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

VII. TRADING WINDOW

1. A trading period called "trading window" is available for trading in the securities of the Company.
2. The trading window shall be closed when the compliance officer 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.
3. The period during which the trading window is open, the designated persons can trade in the securities of the Company subject to the threshold limits specified in **clause 8** below.
4. The trading window closure is applicable from the end of every quarter till 48 hours after the declaration of financial results. .
5. The trading window shall also be closed when the compliance officer determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information.
6. The timing for re-opening of the trading window shall, in the case of VII.5 above, 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 48 hours after the information becomes generally available.

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7. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.

VIII. PRE CLEARANCE OF TRADES

1. All designated persons, who intend to deal in the securities of the Company when the trading window is opened, shall, if the value of the proposed trades is above 5,000 shares or up to Rs. 5 Lakhs (market value) or 1% of total shareholding of the Company, whichever is less, should obtain pre-clearance of the transaction, from the Compliance Officer.

Pre-Clearance Procedure:

2. In case the designated person intends to deal in securities over and above the prescribed limit mentioned above, an application should be made in the prescribed Form (**Annexure 1**) to the Compliance officer indicating the estimated number of securities that the such person intends to deal in, the details of the trading/investment account in which he intends to deal, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.

3. An undertaking (**Annexure 2**) should be executed in favour of the Company by such person incorporating, *inter alia*, the following clauses, as may be applicable:

- (a) That the designated person does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.
- (b) That in case the designated Person has access to or receives "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 change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- (c) That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- (d) That he/she has made a full and true disclosure in the matter.

4. All designated persons shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Specified person, shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed in the format prescribed in **Annexure 3**.

If the order is not executed within seven days after the approval is given, the designated person should re-apply for pre-clearance of the transactions.

If the Compliance Officer intends to deal in such securities beyond the prescribed threshold limit, he/she shall obtain pre-clearance of the transaction from the Managing Director of the Company.

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IX. .. TRADING GUIDELINES

1. All Promoters, Directors and employees (including group company employees) are mandated to have their securities trading accounts and demat accounts with Asit. C Mehta Investment Intermediates Ltd only and no other entity whatsoever
2. In case any promoter, director and/or employee is having such trading and/or demat account outside ACMIL, the same is required to be transferred to their account with ACMIL
3. In case any of the aforesaid persons mentioned in points 1 and 2 above are required to follow the code of conduct for any other organisation, the same needs to be justified in writing to the Compliance Officer, alongwith the documentary evidence thereof.

X. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

A. Initial Disclosure

1. Every designated person who is a designated person 'designation person' as defined in Clause II.9 as on the effective date of this code shall disclose

His/her holding of securities of listed Companies in which he/she is a connected person in the format specified in Annexure 6

- a) Name and Permanent Account Number or any other identified by law of himself as well as his immediate relatives and persons with whom such designated person shares a material financial relationship. He will also disclose in writing the phone, mobile and cell numbers which are used by such persons.
 - b) The designated person shall also submit the names of educational institutions from which they have studies as well as the names of their past employers
2. Any person who becomes or comes within the ambit of designated person as defined in Clause I.9 after the effective date of this code, shall disclose
 - a) His/her holding of securities of listed Companies in which he/she is a connected person in the format specified in Annexure 6
 - b) Name and Permanent Account Number or any other identified by law of himself as well as his immediate relatives and persons with whom such designated person shares a material financial relationship. He will also disclose in writing the phone, mobile and cell numbers which are used by such persons.
 - c) The designated person shall also submit the names of educational institutions from which they have studies as well as the names of their past employers

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B. Continual Disclosure

1. Every promoter, 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. Ten lakhs **in Form C (Annexure 7)**.

The disclosure shall be made within two working days of:

- (a) the receipt of intimation of allotment of shares, or
- (b) the acquisition or sale of shares or voting rights, as the case may be.

C. Disclosure by the Company to the Stock Exchange(s)

Within two days of the receipt of intimation under Clause B above, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated persons for a minimum period of five years.

D. Disclosures by other Connected Persons

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per **Form D (Annexure 8)** at such frequency as he may determine.

XI. DISSEMINATION OF PRICE SENSITIVE INFORMATION

No information shall be passed by Designated Persons by way of making a recommendation for the purchase or sale of securities of the Company or by disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors.

XII. PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT

- a. Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- b. Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and disciplinary actions including wage freeze, suspension, recovery, clawback etc, may be imposed by the Company

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in accordance with the Act.

- c. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

XIII. CODE OF FAIR DISCLOSURE

The aforesaid Code shall be implemented in order to adhere to each of the principles set out below:

1. Prompt public disclosure of unpublished price sensitive information that would impact price no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The **Chief Financial Officer/Chief Investment Officer** of the Company shall:
 - deal with dissemination of information and disclosure of unpublished price sensitive information.
 - Ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
 - Ensure appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
 - Ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
 - Develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
 - Handling/dissemination of all unpublished price sensitive information on a need-to-know basis.

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**ANNEXURE 1
SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL**

Date:

To,
The Compliance Officer,
Asit C. Mehta Financial Services Limited,
Mumbai

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval to purchase/sale/subscription of _____ equity shares of the Company as per the details given below:

1.	Name of the Applicant	
2	Designation	
3.	Nature of securities held	Equity/Other securities
4.	Number and value of securities in the Company held as on date (with folio/DP ID/Client IDNo.)	
5.	Mode in which the securities are held	Physical/Demat
6.	The proposal is for	(a) Acquisition of securities (b) Subscription to the securities (b) Sale of securities
7.	Proposed date of dealing in securities	
8.	Estimated number of securities proposed to be acquired/subscribed/sold	
9.	Price at which the transaction is proposed	
10.	Current market price (as on date of application)	
11.	Whether the proposed transaction will be through stock exchange or off-market deal	
12.	Proposed mode of dealing in securities	
13.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.

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ANNEXURE 2

**FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE
APPLICATION FOR PRE-CLEARANCE
UNDERTAKING**

To,
The Compliance Officer
Asit C. Mehta Financial Services Limited

I, (Name, designation and dept) residing at, am desirous of dealing in.....* shares of the company as mentioned in my application dated, for pre-clearance of the transaction.

I further declare that I am not in possession of any unpublished price sensitive information up to the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from trading in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Rules as notified by the Company from time to time.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the trade within seven days of the receipt of approval failing which I shall seek pre-clearance afresh.

I declare that I have made full and true disclosure in the matter.

Signature: _____

Name:

Date:

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ANNEXURE 3

DISCLOSURE OF TRANSACTIONS

(To be submitted within two days of transaction / trading in securities of the Company)

To,

The Compliance Officer,

Asit C. Mehta Financial Services Limited.

I hereby inform that I

- have not bought /sold/ subscribed any securities of the Company
- have bought/sold/subscribed to_____securities as mentioned below on_____(date) (strike out whichever is not applicable)

Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer / SEBI any of the following documents:

1. Brokers' Contract Note
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (*applicable in case of purchase / subscription*).

I declare that the above information is correct and that no provisions of the Company's Rules and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Signature:_____

Name:

Date

Designation:

ASIT C. MEHTA FINANCIAL SERVICES LTD

CIN: L65900MH1984PLC091326

Registered Office: 'Nucleus House', Saki Vihar Road, Andheri (East), Mumbai: 400072

Tel: 28570781 / 28583333

ANNEXURE 4

FORMAT FOR PRE- CLEARANCE ORDER

To,

Name:

Designation:

Place:

This is to inform you that your request for dealing in _____(nos) shares of the Company as mentioned in your application dated _____is approved. Please note that the said transaction must be completed on or before _____(date) that is within 7 days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company.

Further, you are required to file the details of the executed transactions in the attached format within two days from the date of transaction/deal. In case the transaction is not undertaken a 'NIL' report shall be necessary.

For Asit C. Mehta Financial Services Limited

Compliance Officer

Encl: Format for submission of details of transaction

ASIT C. MEHTA FINANCIAL SERVICES LTD

CIN: L65900MH1984PLC091326

Registered Office: 'Nucleus House', Saki Vihar Road, Andheri (East), Mumbai: 400072

Tel: 28570781 / 28583333

ANNEXURE 5

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (a) read with Regulation 6 (2)]

To,
The Compliance Officer
Asit C. Mehta Financial Services Limited

ISIN of the company: INE041B01014

Details of Securities held by Promoter, Key Managerial Personnel, Director and other such persons as mentioned in Regulation 6(2) of SEBI Regulations.

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Date:

Designation:

Place:

ASIT C. MEHTA FINANCIAL SERVICES LTD

CIN: L65900MH1984PLC091326

Registered Office: 'Nucleus House', Saki Vihar Road, Andheri (East), Mumbai: 400072

Tel: 28570781 / 28583333

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/others etc	Date of appointment of Director /KMP OR Date of becoming Promote	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Share-holding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts* lot size)	Notional value in Rupee terms	

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

Signature:

Date:

Place:

Designation:

ASIT C. MEHTA FINANCIAL SERVICES LTD

CIN: L65900MH1984PLC091326

Registered Office: 'Nucleus House', Saki Vihar Road, Andheri (East), Mumbai: 400072

Tel: 28570781 / 28583333

ANNEXURE 7

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6(2)]

To,
The Compliance Officer
Asit C. Mehta Financial Services Limited
ISIN of the company: INE041B01014

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN, & address of Promoter/Employee/Director with contact nos.	Category of Person (Promoters/ KMP / Directors / immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts* lot size)	Value	Number of units (contracts* lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Date:

Place:

Designation:

ASIT C. MEHTA FINANCIAL SERVICES LTD

CIN: L65900MH1984PLC091326

Registered Office: 'Nucleus House', Saki Vihar Road, Andheri (East), Mumbai: 400072

Tel: 28570781 / 28583333

ANNEXURE 8

FORM D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by other connect persons as identified by the Company

Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public/rights/preferential offer / off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Date:

Designation:

Place: