



AMI ORGANICS LIMITED

**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS
AS PER SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

Corporate Identity Number: U24100GJ2007PLC051093
Registered Office: Plot No. 440/4, 5 & 6, Road No. 82/A, GIDC Sachin, Surat – 394 230 Gujarat, India
Telephone: +91 261 2397193-94-96 Web : www.amiorganics.com

CODE OF CONDUCT TO REGULATE MONITOR REPORT TRADING- AMI ORGANICS LIMITED

Chapter I

PREAMBLE

The Securities and Exchange Board of India (“SEBI”) has, in pursuance of the powers conferred on it under the Securities and Exchange Board of India Act, 1992, notified a Regulation for prohibition of Insider Trading, viz., SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the Regulations”), effective from 15/05/2015. This Code was initially adopted by the Board on May 24, 2018 and later substituted by the Board on April 28, 2021 in pursuance to the provisions as per SEBI (Prohibition of Insider Trading) Amendment Regulations, 2018. The same is placed at the website of the Company – www.amiorganics.com

OBJECTIVE OF THE CODE

The Code of Conduct aims to ensure monitoring, timely reporting and adequate disclosure of price sensitive information by the directors, key managerial personnel, designated persons and immediate relatives of designated persons and other connected persons towards achieving compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015.

Chapter II

DEFINITIONS

1. **“Act”** means Securities and Exchange Board of India Act, 1992.
2. **“Board”** means Securities and Exchange Board of India.
3. **“Board of Directors”** means Board of Directors of Ami Organics Limited
4. **“Code”** means Code of Conduct to Regulate, Monitor and Report and Report Trading by Designated Persons as modified from time to time.
5. **‘Company’** means Ami Organics Limited (“AOL”)
6. **“Compliance officer”** means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be;
7. **“Connected person”** means,- any person who is or has during the six months prior to the concerned act been associated with a 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

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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, -

- a. an immediate relative of connected persons specified above; or
- b. a 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 director thereof; or
- e. an official of a stock exchange or of clearing house or corporation; or
- f. 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
- g. 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
- h. an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
- i. a banker of the company; or
- j. 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. "Designated Person" means –

- i. Board of Directors
- ii. Key Managerial Personnel
- iii. Designated Employees of the Company, Intermediary or fiduciary designated on the basis of their functional role and access to UPSI.
- iv. Employees of Material Subsidiaries of the Company, if any, designated on the basis of their functional role and access to UPSI.
- v. All promoters of Company and promoters who are individuals or investment companies for intermediaries or fiduciaries.
- vi. Chief Executive Officer (CEO) and employees upto two levels below CEO of the Company, intermediary, fiduciary and its material subsidiaries irrespective of their functional role in the Company or ability to have access to UPSI.
- vii. Any support staff of Company, intermediary or fiduciary such as IT staff or secretarial staff who have access to UPSI.

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9. **“Designated Employee of the Company ”** means –
- i. All General Managers and above
 - ii. All Heads of the Spheres
 - iii. All Executives working in Secretarial, Planning & Business Development, Finance & Accounts Department
 - iv. All Executives working in Secretariat of Chairman & Managing Director , Functional Directors.
 - v. Any other executive which in opinion of Compliance Officer be covered under the designated employees
10. **“Generally available information ”** means information that is accessible to the public on a non-discriminatory basis;
11. **“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;
12. **“Insider ”** means any person who is:
- i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
13. **“Key Managerial Personnel ”** means–
- i. Chairman & Managing Director
 - ii. All whole time Directors
 - iii. Company Secretary
 - iv. Such other officer as may be prescribed under Companies Act 2013
14. **“Trading ”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
15. **“Trading day”** means a day on which the recognized stock exchanges are open for trading;
16. **“Trading Window”** means a trading period in which Com “Trading Window” Company’s securities can be traded.
17. **“Regulations”** means SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment thereto.

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18. **“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, delisting, disposals and expansion of business and such other transactions
 - v. changes in key managerial personnel
 - vi. Any such other information which may materially affect the price of securities

All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. Words and expressions used and not defined in these regulations 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 & Regulations made there-under shall have the meanings respectively assigned to them in that legislation.

CHAPTER-III

CONFIDENTIALITY & COMMUNICATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

A. Compliance Officer

1. Compliance officer 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 AOL.
2. The record of Designated Employees and designated persons shall be maintained under the overall supervision and control of the Compliance Officer and changes taking place in the list from time to time shall be incorporated therein.
3. The Compliance Officer shall provide any clarifications with regard to this Code.

B. 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 a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in

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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 a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
3. Notwithstanding anything contained in this regulation, an 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 of 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 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.
4. For purposes of sub-regulation (3), 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 sub-regulation (3), and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

C. Preservation of the price sensitive information

1. The board of directors or heads(s) of the organization of every person required to handle unpublished price sensitive information 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 databases 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.
2. It shall be ensured that the structured digital database shall preserved for 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

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proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

3. Insider shall maintain the confidentiality of all unpublished price sensitive information. He/she should not pass such information to any person including the other insider.
4. Need to Know :Unpublished Price Sensitive Information shall be handled on a “Need to Know” basis, i.e. such information shall be shared with any person including the other insider except where such information is required to be passed for legitimate purposes and for performance of duties or discharge of legal obligation.
5. Limited access to confidential information:
Files containing unpublished price sensitive information or any such related confidential information shall be kept secure. Computer files must have adequate security of login and password etc. Files containing confidential information should be deleted / destroyed after its use.
6. Chinese Wall:
The Company shall adopt a Chinese wall policy to prevent the misuse of confidential information, which separates those areas of the Company which routinely have access to confidential information.
7. The Company shall have a process for how and when people are brought ‘inside’ on sensitive transactions. Individuals should be made aware of the duties and responsibilities attached to the receipt of Inside Information, and the liability that attaches to misuse or unwarranted use of such information.

CHAPTER-IV

RESRICTION ON TRADING BY INSIDERS

A. Trade in securities when in possession of unpublished price sensitive information

1. No insider shall trade in securities of the company when in possession of unpublished price sensitive information provided that the insider may prove his innocence by giving valid reasons of the circumstances like:
 - a. the transaction is an off-market *inter-se* transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision.
 - b. the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without

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being in breach of regulation 3 and both parties had made a conscious and informed trade decision;

- 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 pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.]
- e. In case of non – individual insiders (company, firm etc), the individuals who were in possession of the unpublished price sensitive information were different from the individuals who took the decision for trade and there are such appropriate and adequate arrangements were in place that the information of the unpublished price sensitive information is not transferred from the individuals who were in possession of the unpublished price sensitive information to the individuals who took the decision for trade.
- f. Trading is done pursuant to the trading plan.
- g. Trade by connected person, the onus of establishing that they were not in possession of unpublished price sensitive information shall be on such connected person.
- h. In any other case, the onus would be on the Board.

B. Trading Plan

1. Insider may formulate a trading plan and the same shall be approved by the Compliance Officer after evaluation with regard to the regulations and shall be notified to the stock exchange.
2. By virtue of the pre-planned trading plan, he/she shall not be prohibited from execution of such trades being that he had pre-decided even before the unpublished price sensitive information came into existence.
3. The following are the requirements of the trading plans
 - a. Trading can be done after six months of commencement / public disclosure of trading plan.
 - b. Trading plan should not entail trading between period twentieth trading day prior to the 31st March every year and second day after the disclosure of such financial results.
 - c. Insider can give one trading plan at a time. Plan should not entail overlap of any period for which another trading plan is in existence.
 - d. The trading plan should not be for less than 12 months.

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e. Insider should entail the basic parameters i.e. acquisition or disposal should be set out and also he/she may set out the value/number /type of securities to be invested or divested, along with specific dates and time intervals.

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. Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information 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 and 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 a violation of sub-regulation (1) of regulation 4.

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

C. Trading Window

1. The Designated persons and their immediate relatives can trade in company shares only during the trading window.

2. The trading window shall be closed when Compliance Officer determines that designated person or a class of designated person are expected to be in possession of unpublished price sensitive information.

3. The trading window shall remain closed for a period of atleast seven days prior to the happening of any of the following events in general:

- Declaration of financial results (quarterly, half-yearly and annually)
- Declaration of dividend
- Issue of securities by way of public / rights / bonus etc.
- Any major expansion plans or execution of new projects
- Amalgamation, mergers, acquisitions, takeovers and buy back of shares
- Disposal of whole or substantially the whole of the company
- Any changes in policies, plans or operations of the company

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- Acquisition, de-merger, restructuring, scheme of arrangement, spin-off of divisions etc.
 - Consolidation / splitting of shares
 - Voluntary de-listing of shares by the company
 - Forfeiture of shares
 - ADR / GDR or any other class of securities to be issued abroad
 - Cancellation of dividend/right/bonus etc.
4. The Compliance Officer (in consultation with the Board of directors of the company) may for a longer period, close the Trading Window for the events mentioned above or on any such other matter as they deem fit after taking into account the sensitivity of the event / case.
5. The Compliance Officer shall take all reasonable steps to ensure that the designated persons and/or Insiders are informed in advance, about the date of closing and opening of the Trading Window.
6. 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.
7. The trading window shall also be applicable to any person having contractual or fiduciary relation with the company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the company.
8. In case of Employee Stock Option Plans (ESOPs), exercise of option may be allowed during the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when the Trading Window is closed.

D. Pre-Clearance of trades :

1. All Designated persons of the Company who intend to deal, on their behalf and / or on behalf of their dependent family members, in the securities of the Company and where the market value of shares intended to be dealt exceeds Rs. 5 Lakhs (Five Lakhs) should pre-clear the transactions as per the pre-clearing procedure as described hereunder.
2. Any pre cleared trade not executed by the designated person within 7 days of its pre clearance would require fresh clearance for the trades to be executed.

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3. An application may be made in the prescribed format (Annexure 1) to the Compliance Officer indicating the estimated number of securities that the Designated person intend to deal in, 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 specified in this behalf.
4. Along with the request for pre-clearance of transaction, an undertaking shall be executed in favour of the Company by such Designated person, that he is not in possession of unpublished price sensitive information.
5. An undertaking shall be executed by the director / officer / designated persons as per prescribed format. (Annexure 2)
6. No contra trade shall be executed by the designated person within the period six months from date of execution of the pre-cleared trade. Provided that this shall not be applicable for trades pursuant to exercise of stock options.
7. The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations.
8. In case of execution of a contra trade, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the Board under the Act.

CHAPTER –V

DISCLOSURE OF TRADING

A. Initial Disclosure

1. Every Promoter, Key Managerial Personnel and Director shall provide the disclosure of his holding of securities of the company within 30 days of the implementation of the Regulations to the Compliance officer as per prescribed format.
2. Every person appointed as Key managerial personnel or a Director of the company or upon becoming the promoter or member of promoter group shall within 7 days of such appointment provide disclosure of his securities to the Compliance Officer as per prescribed format.

B. Other Disclosure

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1. Every promoter, member of the promoter group, designated person, employee and director of the company shall disclose, within 2 trading days, to the Compliance officer the number of securities acquired or disposed of, whether in one transaction or in series of transactions over any calendar quarter and the value of such transactions is in excess of Rs 10 lakhs by self, such person's immediate relatives, and of any other person for whom such person takes trading decisions in Form C (Annexure 7). 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 this Code.
2. The Compliance Officer shall notify the stock exchanges within 2 trading days of either receipt of disclosure or becoming aware of such information.
3. The Company may at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company in Form D (Annexure 8) and at such frequency as may be determined by the Compliance Officer in order to monitor compliance with the Regulations.
4. 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 of immediate relatives persons with whom such designated person(s) shares a material financial relationship, Phone, mobile and AOL numbers which are used by them. In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

C. Reporting to the Board of Directors and Audit Committee & maintenance of disclosure.

The Compliance Officer shall report to the Board of Directors and in particular, shall provide reports to the Chairman of Audit Committee, if any, or to the Chairman of the Board of Directors as may be stipulated by the Board of Directors, but not less than once in a year. The disclosures made under this chapter shall be maintained for a period of five years.

CHAPTER-VI

PENALTY & RESTRICTION

1. Every insider / director / employee / designated person / connected 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 immediate relatives/other person for whom such person takes trading decisions) Any such persons who trades in securities or communicates or procures any information for trading in securities in contravention of the Code of Conduct may

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be penalized by the Board of Directors as they may deem fit and appropriate action would be taken.

2. Any insider / director / employee / designated person / connected person who violate the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback, ineligibility for future participation in employee stock option plans, etc. as may be decided by the Board of Directors.
3. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulation, 2015.
4. In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Compliance Officer shall inform SEBI promptly.

CHAPTER-VII

AMENDMENT TO THE CODE

1. This Code and any subsequent amendment(s) thereto, shall be carried out with the approval of the Board.
2. Any or all provisions of this Code would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications, etc. on the subject as may be issued by relevant statutory authorities, from time to time.
3. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this Code shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.



ANNEXURE -1

(SPECIMEN FOR APPLICATION FOR SEEKING APPROVAL FOR PRE-CLEARANCE IN SECURITIES OF THE COMPANY)

To,
The Compliance Officer
Ami Organics Limited
Plot No. 440/4, 5 & 6, Road No. 82/A, GIDC Sachin, Surat – 394 230

Dear Sir/Madam,

Application for seeking approval for Pre-clearance dealing 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 wish to inform you that I myself and / or dependent family members / relatives as mentioned below hereby seek approval to purchase / sale / subscription of equity shares of the Company and request you to give approval for Pre-clearance for dealing in securities of the Company.

1.	Name of the applicant		
2.	Designation		
	Name of the person on whose behalf the trade is to be undertaken		
	Relationship with the person		<ul style="list-style-type: none">- Self *- immediate relative dependent financially on me or on whose behalf I take / am consulted for taking financial decisions *- other person for whom I take trading decisions *- connected person * (* strike off which is not applicable)
3.	Number of securities held as on date		
	Name of the Company whose securities are proposed to be traded		
	Nature of Securities proposed to be traded		Equity / Debt / Preference / Derivative / security receipt / Rights or interest in securities /Other (pl specify)
4.	Folio No. / DP ID / Client ID No.)		
5.	The proposal is for		<ul style="list-style-type: none">(a) Purchase of securities(b) Subscription to securities(c) Sale of securities(d) Derivative transaction – option/ future – buy / sell
6.	Proposed date of dealing in securities		

7	Estimated number of securities proposed to be acquired/subscribed/sold		
8	Mode of Trade		Mode On- Market / Off Market
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		
12	Folio No. / DP ID / Client ID No. where the securities will be credited / debited		

Further, I enclose the Undertaking for your records. I confirm that I have read the Company's Insider Trading Policy and am not in possession of any Unpublished Price Sensitive Information consciously or otherwise. The above is full and true disclosure in the matter. In the light of the above, please communicate your clearance to enable me to deal in the securities.

I declare that the securities to be sold, as proposed above, have been held by me for a minimum six months.

I further declare that the securities to be purchased, as proposed above, will be held by me for a minimum period of Six months from the date of purchase.

Name of Applicant :

Designation :

PAN :

Address :

Date :

Place :

Signature :

ANNEXURE - 2

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

UNDERTAKING

To,
The Compliance Officer
Ami Organics Limited
Plot No. 440/4, 5 & 6, Road No. 82/A, GIDC Sachin, Surat – 394 230

I _____ (Name, Designation,
Department) of the Company residing at _____ my
application dated _____ for pre-clearance of the transaction.

I further declare that neither have I procured, accessed, being communicated, received nor am I in possession of or otherwise privy to any unpublished price sensitive information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the "Code") up to the time of signing this Undertaking.

In the event that I have procured, accessed, being communicated or received any information that could be construed as unpublished price sensitive information as defined in the Code, 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 until such information becomes generally available (as defined in the Code).

I also undertake that as regards the securities, I have not and shall not enter into a contra transaction prior to completion of the holding period of six months.

I have held the securities of the Company being sold by me for a period of less than six months and as the sale of securities is necessitated by the following personal emergency, the minimum holding period may kindly be waived: (please clearly state the reasons for requesting waiver of minimum holding period)

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

I undertake to submit the necessary report within 2 (Two) trading days of execution of the transaction / a Nil report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 (Seven) trading days of the receipt of approval failing which I shall seek pre-clearance.

I acknowledge that the Compliance Officer shall have regard to assess whether the undertaking is reasonably capable of being rendered inaccurate.

I undertake that these trades will be undertaken for / on behalf of the person details of which are mentioned in the application.

I shall indemnify the Company as given below.

- i) To hold the Company faultless in the event of any investigation against me for insider trading by any regulatory authority.
- ii) To make good to the Company for all economic losses, fines or penalty if any, imposed on the Company as a result of any investigation by any regulatory authority/ authorities into any of the transactions entered by me in dealing with the securities of the Company.
- iii) To compensate the Company for and towards all legal expenses incurred in defending itself in such investigations.

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

Date :

Place :

Signature :

ANNEXURE - 3
FORMAT FOR PRE- CLEARANCE ORDER

To,
Name :
Designation :
Address :

This is to inform you that your request for dealing in securities as mentioned in your application dated _____ is approved / rejected.

If request is approved:

Please note that the said transaction must be completed on or before (date) that is within 7 trading 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 any securities.

You are required to file the details of the executed transactions in the prescribed format within 2 (two) trading days from the date of transaction/deal.

In case the trading transaction is not undertaken a "Nil" report shall be necessary.

If request is rejected:

Please note that you will not trade in the securities, application for which was submitted vide your application dated _____.

Yours faithfully,
For AMI ORGANICS LIMITED

COMPLIANCE OFFICER

Date :

Place :

ANNEXURE - 4

FORMAT FOR DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 trading days of transaction / dealing in securities of the Company)

To,
The Compliance Officer
Ami Organics Limited
Plot No. 440/4, 5 & 6, Road No. 82/A, GIDC Sachin, Surat – 394 230

I hereby inform that I

- have not bought / sold / subscribed any securities
- have bought/sold/subscribed to the following securities as per details mentioned below:

S. No	Date of Approval	Date of Transaction	Name of the holder	Relationship	Name of Company	Type of security	Nature of trade	Quantity	Price (Rs.)	DP ID/Client ID / Folio No

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance officer / SEBI any of the following documents:

1. Broker's 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 declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/ regulations including Insider Trading Regulations have been contravened for effecting the above said transactions(s).

Date :

Name :

Designation :

Signature :

**ANNEXURE 5
FORM A**

[Regulation 7 (1) (a) read with Regulation 6 (2)]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, member of the promoter group, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoter / KMP / Directors/ immediate relatives/others etc)	Securities held as on the date of regulation coming into		% of Shareholding	Open Interest of the Future contracts held as on the date of		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6		7	

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

Name :

Designation:

Date:

Place :

Signature

ANNEXURE 6

FORM B

[Regulation 7 (1) (b) read with Regulation 6(2)]

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, member of promoter group of a listed company and other such persons as mentioned in Regulation 6(2).

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 Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	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	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4		5	6		7	

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

Name :

Designation :

Signature :

Date:

Signature

ANNEXURE 7 - FORM C

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

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, member of Promoter Group, Designated Persons, 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		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, Warrant s, Convertible Debenture s etc.)	No.	Type of security (For eg. – Share s, Warrant s, Convertible	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.

Name :

Designation

Date

Signature

Annexure 8

Form D

Regulations, 2015 Regulation 7(3) – Transactions by Other connected persons as identified by the company

Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connec ti on with compan y)	Securities held prior to acquisition/disposal		Securities acquired/Dis posed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimati on to compan y	Mode of acquisition (market purchase/pub lic/ rights/ preferential offer / off market/ Inter- se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)			Excha nge on which the trade was execut ed	
		Type of security (For eg. – Shares, Warran ts, Conver tible Debent ures	No.	Type of security (For eg. – Shares, Warrant s, Converte ble Debentu res etc.)	No.	Pre transac tion	Post transac tion	From	To			Buy	Sell			
												Numbe r of units (contr acts * lot size)	Value	Nu mbe r of units (con tract s * lot		
1	2	3	4	5	6	7	8	9	10	11	12	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.

Name

Signature

Date:

Place:

To,
The Compliance Officer
Ami Organics Limited
Plot No. 440/4, 5 & 6, Road No. 82/A, GIDC Sachin, Surat – 394 230

As per the provisions of SEBI (Prohibition of Insider Trading Regulations) 2015, I hereby furnish the following particulars :

SR, NO.	PARTICULARS	PARTICULARS		
1.	NAME			
2.	DESIGNATION / DEPARTMENT			
3.	IMMEDIATE RELATIVES (includes spouse, parents. Brother, sister. Child of person and child of his / her spouse)	NAME	PHONE / MOBILE	PAN
4.	PERSON WITH WHOM I HAVE MATERIAL RELATIONSHIP			
5.	PHONE NO. / MOBILE NO.			
6.	EDUCATIONAL QUALIFICATION			
7.	EDUCATIONAL INSTITUTION			
8.	PAST EMPLOYERS			

Explanation – 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 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.]

Signature :

Date :

Place :