



CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING (Pursuant to Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

1. Objective

This Code aims to regulate, monitor, and report trading in securities of the Company by Designated Persons and their Immediate Relatives, and to ensure that Unpublished Price Sensitive Information ("UPSI") is handled in a fair and transparent manner in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015.

2. Applicability

This Code shall apply to:

Directors,

Key Managerial Personnel (KMP),

Designated Employees,

Connected Persons,

Immediate Relatives of the aforementioned persons.

3. Definitions

UPSI: Information not generally available and which upon becoming generally available is likely to materially affect the price of the securities of the Company.

Designated Person: Employees and individuals identified by the Compliance Officer in consultation with the Board, based on their role and access to UPSI.

Trading: Buying, selling, or agreeing to buy, sell or deal in the securities of the Company.

Immediate Relative: Spouse and dependent family members who are financially dependent or consult for trading decisions.

4. Compliance Officer

The Board shall appoint a senior officer as the Compliance Officer who shall:

Report to the Board and SEBI as required;

Maintain a record of Designated Persons and their trades;

Monitor and approve pre-clearance of trades and compliance of the Code;

Oversee the maintenance of Structured Digital Database (SDD);

Conduct periodic awareness sessions.

5. Trading Window

The trading window shall be closed during the period in which UPSI exists.

The window shall open 48 hours after the information becomes generally available.

Designated Persons shall not trade when the window is closed.

6. Pre-Clearance of Trades

Designated Persons who intend to trade in the securities above the threshold limit (e.g. ₹10 lakhs or as specified by the Company) must obtain pre-clearance from the Compliance Officer.

The trade must be executed within 7 trading days from approval.

7. Contra Trade

No opposite transaction shall be entered within 6 months of the prior transaction.

Violation will result in the profits being disgorged and transferred to SEBI's Investor Protection and Education Fund.

SAKETH SEVVENSTAR INDUSTRIES LIMITED



8. Disclosures

Initial, continual, and annual disclosures shall be submitted by Designated Persons in the formats prescribed under the SEBI PIT Regulations.

Records of all disclosures shall be maintained for a minimum of 5 years.

9. Penalty for Non-Compliance

Violation of this Code shall lead to disciplinary action which may include wage freeze, suspension, recovery of gains, or termination of employment, in addition to SEBI-imposed penalties.

10. Review and Amendments

This Code shall be reviewed at least annually and amended by the Board as necessary to ensure continued compliance with applicable laws.

Approved by the Board of Directors on May 28, 2025

SAKETH SEVVENSTAR INDUSTRIES LIMITED

Plot No. PAP - D 146 - 147, Turbhe MIDC, TTC Industrial Area, S Central Road, Opp. Balmer Lawrie Van Leer Co.,

Turbhe, Navi Mumbai - 400 705, Maharashtra - India. **Tel:** + 91 022 2762 0641/42/43 | **E-Mail:** info@sssipl.in

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