

ANNEXURE 10

Report by Peninsula Land Limited for violations related to Code of Conduct adopted by the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	Peninsula Land Limited
2.	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	<b>A. Details of Designated Person (DP)</b>	
	1. Name of the DP	Kishor Oza
	2. PAN of the DP	AAFPO6547H
	3. Designation of the DP	General Manager – Finance and Accounts
	4. Functional role of the DP	Handling Finance and accounts function of Peninsula Land Limited.
	5. Whether the DP is a Promoter or belongs to Promoter group	DP does not belong to Promoter or Promoter Group
	<b>B. If Reporting is for immediate relative of DP</b>	
	1. Name of the immediate relative of DP	Not Applicable
	2. PAN of the immediate relative of DP	Not Applicable
	<b>C. Details of transaction(s)</b>	
	1. Name of the scrip	Peninsula Land Limited Scrip Code - 503031 (BSE) Scrip Symbol - PENINLAND (NSE).



	2. No of shares traded and value (Rs.) (Date- wise)	500 equity shares at Rs.24,892.95/- on 01 <sup>st</sup> January 2024.
	<b>D. In case value of trade(s) is more than Rs.10 lakhs in a calendar quarter.</b>	Not Applicable
	1. Date of intimation of trade(s) by concerned DP/director/promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.	
	2. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015.	
4.	Details of violations observed under Code of Conduct	Trading in securities (selling of equity shares) of the Company on 01 <sup>st</sup> January 2024 during the trading window closure period. (trading Window is closed from 01 <sup>st</sup> January 2024 till the completion of 48 hours after declaration of the Audited Financial Results for the quarter ended 31 <sup>st</sup> December 2023).
5.	Action taken by Listed company/ <del>Intermediary/ Fiduciary</del>	In light of the violation of the Insider Trading Code as set out above, the Company has reported the incident to the Audit Committee, a committee of the Board, which discussed this matter at its meeting held on February 7, 2024. Pursuant

		<p>to the directions received from the Chairperson of Audit Committee, the Company has initiated disciplinary action against the Designated Person involving issuance of warning (without penalty) considering that the violation was a first instance and had low transaction value to Mr. Kishor Oza.</p> <p>Further he has been advised to strictly comply with the Insider Trading Regulations and the Code of Conduct of the Company and ensure that the same is not violated by him in future and also warned that any non-compliance would result in stringent disciplinary action.</p>
6.	Reasons recorded in writing for taking action stated above	<p>DP is not a part of the 'Promoter Group' of the Company. Notwithstanding the above, the DP is neither involved in any of the decisions of the Company nor takes part in control of any affairs of the Company. As submitted by him, the sale of shares by him during the period of closure of Trading Window was entirely</p>

		<p>inadvertent on account of omnibus value order placed by DP with his broker without taking details of name of scrip. However, the same is a violation in terms of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and considering all aspects including his submission that he was inadvertently sold the shares during the closure of Trading window and the sale at such time was unintentional and also the fact that it is the first case of violation, the Company has taken the aforesaid actions.</p>
7.	<p>Details of the previous instances of violations, if any, since last financial year</p>	NIL
8.	<p>If any amount collected for Code of Conduct violation(s)</p> <p>i. Mode of transfer to SEBI - IEPF (Online/Demand Draft)</p> <p>ii. Details of transfer/payment</p> <p><b>In case of online:</b></p> <p>Name of the transferor</p> <p>Bank Name, branch and Account number</p> <p>UTR/Transaction reference Number</p> <p>Transaction date</p>	Not applicable

	Transaction Amount (in Rs.) <b>In case of Demand Draft (DD)</b> Bank Name and branch DD Number DD date DD amount (in Rs.)	
9.	Any other relevant information	NIL

Date and Place: February 08, 2024

Name and signature of Compliance Officer : Mukesh Gupta

PAN: AHUPG5797M

Email id: mukeshgupta@peninsula.co.in

  
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