

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.	A. Details of Designated Person (DP)	
	1. Name of the DP	Harsh Mehta in his individual capacity and in capacity of Director and shareholder of S. Amit Speciality Chemicals Private Limited and Finorga (India) Private Limited.
	2. PAN of the DP	Harsh Mehta - AFDPM0031M S. Amit Speciality Chemicals Private Limited – AAACB1880A Finorga (India) Private Limited - AAACF2318K
	3. Designation of the DP	Independent Director
	4. Functional role of the DP	Provide value, expertise and perform advisory functions in the decision making of the Company.
	5. Whether the DP is a Promoter or belongs to Promoter group	DP does not belong to Promoter or Promoter Group

B. If Reporting is for immediate relative of DP	
1. Name of the immediate relative of DP	Not Applicable
2. PAN of the immediate relative of DP	Not Applicable
C. Details of transaction(s)	
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)	<p><u>Harsh Mehta(DP)</u> 3,200 Equity Shares purchased at Rs.1,81,708/- on 20th January 2024. (Trade executed at the time of closure of trading window).</p> <p><u>S. Amit Speciality Chemicals Pvt Ltd</u> 7,500 Equity Shares purchased at Rs.4,38,018/- on 16th January, 2024. (Trade executed at the time of closure of trading window).</p> <p>3,200 Equity Shares purchased at Rs. 1,81,708/- on 17th January, 2024. (Trade executed at the time of closure of trading window).</p> <p><u>Finorga (India) Private Limited</u> 3,200 Equity Shares purchased at Rs.1,81,708/- on 16th January, 2024. (Trade executed at the time of closure of trading window).</p> <p><i>Other trades executed by Harsh Mehta in individual</i></p>

		<p><i>capacity and in capacity of Director and Shareholder of S. Amit Speciality Chemicals Private Limited and Finorga (India) Private Limited whose traded value taken together with all transaction in calendar quarter of 01st January 2024 – till date are in excess of Rs.10,00,000/-</i></p> <p><u>Harsh Mehta</u> 2,600 Equity Shares purchased at Rs.1,53,398/- on 27th February, 2024.</p> <p><u>Finorga (India) Private Limited</u> 2,600 Equity Shares purchased at Rs.1,53,398/- on 27th February, 2024.</p> <p><u>S. Amit Speciality Chemicals Private Limited</u> 2,600 Equity Shares purchased at Rs.1,53,398/- on 27th February, 2024.</p>
	<p>D. In case value of trade(s) is more than Rs.10 lakhs in a calendar quarter.</p>	<p>No intimation was provided by the DP to the Company.</p>
	<p>1. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.</p>	<p>Due to the failure by DP to provide intimation, Company was not able to file the required intimation with the Stock Exchange.</p>
	<p>2. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015.</p>	

4.	Details of violations observed under Code of Conduct	<p>DP has undertaken and executed trades as mentioned in Point C of this Disclosure in individual capacity and in capacity of Director and Shareholder of S. Amit Speciality Chemicals Private Limited and Finorga (India) Private Limited which are in violation of the Regulations.</p> <p>He had failed to intimate the Company of the trades executed in his individual capacity as well as trades undertaken by S. Amit Speciality Chemicals Private Limited and Finorga (India) Private Limited when the value of such trade(s) undertaken had exceeded the value of Rs. 10,00,000/-.</p> <p>Further he had also executed trades during the closure of trading window resulting in violation of the Regulations.</p>
5.	Action taken by Listed company/ Intermediary/ Fiduciary	<p>In light of the above violation of the Company's Insider Trading Code as well as the Regulation, the Company has suo moto taken action and reported the incidents to the Board.</p>

		<p>The Board at its meeting held on 12th March, 2024 has scrutinised the trades executed by DP which resulted in violation of the Company's Code as well as the Regulation. It has also reviewed the submission made by the DP in this regard.</p> <p>After review and discussion by the Board on the said matter, Board has directed the Company to initiate disciplinary action against the Designated Person involving issuance of strict warning alongwith the penalty amounting to Rs. 29,834/- to Harsh Mehta. Rs. 29,834/- to Finorga (India) Private Limited and Rs. 78,575/- to S. Amit Speciality Chemicals Private Limited on account the violation of the provisions of the Company's Code and Regulations.</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 any capacity in future.</p>
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6.	Reasons recorded in writing for taking action stated above	<p>DP is not a part of the 'Promoter Group' of the Company.</p> <p>He submitted to the Board that the transaction undertaken by him in individual capacity and in capacity of Director and Shareholder of S. Amit Speciality Chemicals Private Limited and Finorga (India) Private Limited during the period of closure of Trading Window and in value of excess of Rs. 10,00,000/- in the calendar quarter of January 2024 – till date were not done with an intent to take undue advantage or earn unfair gains by using Unpublished Price Sensitive Information available with him as a DP.</p> <p>He further submitted he has taken cognizance of the violations done by him of the Company's code and Regulations and regretted the same.</p> <p>The Company has evaluated the violation done in terms of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Company's Code and after</p>
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		considering all aspects including his submission the Company has decided to issue strict warning and levy penalty on DP as mentioned above.
7.	Details of the previous instances of violations, if any, since last financial year	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>In case of online: Name of the transferor Bank Name, branch and Account number UTR/Transaction reference Number Transaction date Transaction Amount (in Rs.)</p> <p>In case of Demand Draft (DD) Bank Name and branch DD Number DD date DD amount (in Rs.)</p>	Amount of penalty will be deposited to SEBI Investor Education and Protection Fund ("IEPF") and intimation of such deposit will be made done.
9.	Any other relevant information	NIL

Date and Place: 12th March, 2024, Mumbai

Name and signature of Compliance Officer : Mukesh Gupta

PAN: AHUPG5797M

Email id: mukeshgupta@peninsula.co.in

Mukesh Gupta

