

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>	
	6. Name of the DP	Pankaj Kanodia
	7. PAN of the DP	AGPPK7665Q
	8. Designation of the DP	Independent Director
	9. Functional role of the DP	Provide value, expertise and perform advisory functions in the decision making of the Company.
	10. 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>	
	3. Name of the immediate relative of DP	Not Applicable
	4. PAN of the immediate relative of DP	Not Applicable
	<b>C. Details of transaction(s)</b>	
	3. Name of the scrip	Peninsula Land Limited Scrip Code - 503031 (BSE) Scrip Symbol - PENINLAND (NSE).
	4. No of shares traded and value (Rs.) (Date- wise)	

	<p><b>D. In case value of trade(s) is more than Rs.10 lakhs in a calendar quarter.</b></p> <p>3. 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>4. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015.</p>	Not Applicable
4.	Details of violations observed under Code of Conduct	Executing Trade (Purchase of securities) of 1000 Equity shares purchased at Rs.55,555/- on 24 <sup>th</sup> January, 2024 during the Trading Window closure period.
5.	Action taken by Listed company/ <del>Intermediary/</del> <del>Fiduciary</del>	<p>In light of the above violation of the Company's Insider Trading Code as well as the Regulation, the Company has suo moto undertaken action and reported the incidents to the Board.</p> <p>The Board at its meeting held on 12<sup>th</sup> March, 2024 has scrutinised the trade 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</p>

		<p>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. 8,000/-</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>
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 during the period of closure of Trading Window was done inadvertently and not with an intent to take undue advantage or earn gains from Unpublished Price Sensitive Information availed by him as a DP.</p> <p>The Company has evaluated the violation undertaken in terms of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and</p>

		Company's Code and after 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><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> <p>Transaction Amount (in Rs.)</p> <p><b>In case of Demand Draft (DD)</b></p> <p>Bank Name and branch</p> <p>DD Number</p> <p>DD date</p> <p>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: 12<sup>th</sup> March, 2024 , Mumbai

Name and signature of Compliance Officer : Mukesh Gupta

PAN: AHUPG5797M

Email id: mukeshgupta@peninsula.co.in

*Mukesh Gupta*

