

APG/PLL/CS/SE/040/2020-21

Corporate Relations Department  
**BSE Limited,**  
1<sup>st</sup> Floor, New Trading Wing,  
Rotunda Building, P J Towers,  
Dalal Street, Fort,  
Mumbai - 400 001.

The Market Operations Department  
**National Stock Exchange of India  
Limited,**  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No C/1, G Block,  
Bandra-Kurla Complex,  
Bandra (E), Mumbai - 400 051.

Date: November 13, 2020

Dear Madam/ Sir,

**Ref: Peninsula Land Limited (Company Code: 503031, NSE: PENINLAND)**

**Sub: Intimation under Regulation 8 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015**

Pursuant to the provisions of Regulation 8 (2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby inform that the Board of Directors of the Company has made necessary amendments to the "Code of fair disclosure and conduct" in order to accommodate the change of the chief investor relations officer. The amended Code is enclosed as **Annexure-A** and simultaneously been uploaded on the website of the Company.

Request you to take the above on record.

Thanking You,

Yours Sincerely,  
**For Peninsula Land Limited**



**Vidyadhar A. Apte**  
**Company Secretary & Compliance Officer**

*Encl.: As Above*

**PENINSULA LAND LIMITED**

503, 5<sup>th</sup> Floor, Peninsula Tower-1,  
Peninsula Corporate Park,  
Ganpatrao Kadam Marg,  
Lower Parel (w), Mumbai - 400 013

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Email : info@peninsula.co.in  
URL : www.peninsula.co.in  
CIN : L17120MH1871PLC000005



## Code of Conduct for Prevention of Insider Trading

### Exhibit - I

#### Code of Fair Disclosure

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Mr. Rakesh Bajaj-General Manager, Group Treasury of the Company, to act as the chief investor relations officer and shall deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Any interaction/ discussion with analysts/researchers, institutional and other large investors or the media or any investor relations conference may be preferably recorded through proceedings of the meeting or a transcript of the interaction or in any other suitable manner.
8. The Chief Investor Relations Officer shall issue a press release/ transcript or post relevant information on the Company's website immediately after every analyst meet. Simultaneously, such information shall also be sent to the Stock Exchanges where any unpublished price sensitive information is disclosed.
9. All unpublished price sensitive information to be handled on a need-to-know basis. No person shall procure from or cause the communication by any insider of UPSI, relating to the listed securities of the Company, except in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations.
10. For the purpose of this Code Legitimate Purpose shall include sharing of UPSI in the ordinary course of business by an insider:
  - a. with, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, analysts, insolvency professionals or other advisors or consultants,
  - b. by operation of law, as mandated or directed by courts, judicial, statutory or regulatory authorities,
 Provided that such sharing has not been carried out to evade or circumvent the prohibitions of this Code of the SEBI (Prohibition of Insider Trading Regulations), 2015.
11. This Code and any amendments hereto shall be promptly disclosed to the stock exchanges, as soon as they are approved and adopted by the Board of Directors.