



ROYAL ORCHID HOTELS LTD.,

Regd. Office :
1, Golf Avenue, Adjoining KGA Golf Course,
HAL Airport Road, Kodihalli, Bangalore - 560 008, India
T : +91 80 41783000, F : +91 80 252 03366
www.royalorchidhotels.com
CIN : L55101KA1986PLC007392
email : investors@royalorchidshotels.com

Date: February 13, 2023

**To,
The Manager,
Listing Compliance,
Department of Corporate Services,
BSE Limited,
Floor 25, P. J. Towers,
Dalal Street,
Mumbai – 400 001
BSE Scrip Code: 532699**

**To,
The Manager,
Listing Compliance,
Department of Corporate Services,
National Stock Exchange of India Limited,
Exchange Plaza, Plot no. C/1, G Block
Bandra Kurla Complex, Bandra (E)
Mumbai – 400 051
NSE Scrip Symbol: ROHLTD**

Dear Sir/Madam,

Subject: Reporting of Violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Ref: SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

With respect to the above subject and reference, enclosed find the report of Violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the prescribed format **Annexure –A**.

The undersigned has brought the violations to the notice of the Audit Committee of the company and Cautionary Letter has been issued by the company.

We request you to kindly take the above information on record and confirm Compliance.

Thanking you

Yours sincerely,

For **ROYAL ORCHID HOTELS LIMITED**

**RANABIR SANYAL
COMPANY SECRETARY & COMPLIANCE OFFICER
FCS: 7814**

Encl: as above



Annexure A

Report by Royal Orchid Hotels Limited for violations related to Code of Conduct 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	Royal Orchid Hotels Limited
2	Reporting in capacity of : ✓ Listed Company Intermediary Fiduciary	Listed on BSE Ltd & National Stock Exchange of India Ltd
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Sunil Sikka
	ii. PAN of the DP	AAUPS4596D
	iii. Designation of DP	Non-Executive Director
	iv. Functional Role of DP	Attending & Giving input in the Board Meetings.
	v. Whether DP is Promoter or belongs to Promoter Group	Yes
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Royal Orchid Hotels Limited NSE: ROHLTD BSE: 532699
	ii. No of shares traded and value (Rs.) (Date-wise)	Buy: 425 Shares Date: 02-01-2023 Value: 1,10,933.05
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	



Sr. No.	Particulars	Details
	i. Date of intimation of trade(s) by concerned Director of the Company under regulation 7 of SEBI (PIT) Regulations, 2015	1. 15/11/2022 2. 01/12/2022 3. 17/12/2022 4. 05/12/2022 5. 23/12/2022 6. 31/12/2022 7. 03/01/2023
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	1. 15/11/2022 2. 01/12/2022 3. 17/12/2022 4. 05/12/2022 5. 23/12/2022 6. 31/12/2022 7. 03/01/2023
4	Details of violations observed under Code of Conduct	Purchased 425 shares of the Company amounting to Rs. 1,10,933.05 on 02-01-2023 i.e. during the period of Trading window closure without the approval of the Compliance Officer. The window was closed from January 01, 2023 till the second day after the submission of the Unaudited Financial Results for the third quarter ended 31st December 2022.
5	Action taken by Listed company	In light of the violation of the Insider Trading Code, the Company has reported this incident to the Audit Committee, which discussed this matter and directed issue of Cautionary Letter, which has been issued by the Compliance Officer of the Company.
6	Reasons recorded in writing for taking action stated above	Explanation received from Mr. Sunil Sikka is that he erroneously missed the closure intimation email sent by the Company and purchased 425 shares on January 02, 2023, after the closure of trading window.
7	Details of the previous instances of violations, if any, since last financial year	-
8	If any amount collected for Code of Conduct violation(s): i. Mode of transfer to SEBI - IPEF (Online/Demand Draft) ii. Details of transfer/payment In case of Online:	
	Particulars	Details
	Name of the transferor	-
	Bank Name, branch and Account number	-
	UTR/Transaction reference Number	-
	Transaction date	-



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Transaction Amount (in Rs.)	-	
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In case of Demand Draft (DD):		
Particulars	Details	
Bank Name and branch	-	
DD Number	-	
DD date	-	
DD amount (in Rs.)	-	
9.	Any other relevant information	Nil

Yours faithfully,

Date: 13.02.2023

Place: Bangalore

Ranabir Sanyal
Company Secretary and Compliance officer
FCS: 7814
Email ID: cosec@royalorchidhotels.com