

Corporate Relations Department
BSE Limited,
1st 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, 5th Floor,
Plot No C/1, G Block,
Bandra-Kurla Complex,
Bandra (E), Mumbai - 400 051.

Date: 28th March, 2019

Dear Madam/ Sir,

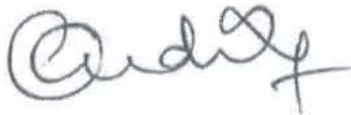
Ref: Peninsula Land Limited (Company Code: 503031, NSE: PENINLAND)

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 amendments of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018. The amended Code is enclosed herewith as **Annexure-A** and simultaneously been updated on the website of the Company.

Request you to kindly take the above on record.

Yours Sincerely,
For Peninsula Land Limited



Rajashekhar Reddy
Company Secretary



Encl.: As Above

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A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below: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 Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.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. Shardul A. Doshi - Head Group Treasury and Investor Relations to act as the chief investor relations officer and shall deal with dissemination of information and disclosure of unpublished price sensitive information.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 Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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.*