

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

Head Off.: "The Ruby", 5th Floor, Office No.5 SC, South Wing on Level 8th Senapati Bapat Marg, Mumbai – 400 028 India.
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The Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”) mandates the companies listed on the Stock Exchange to formulate a Code of Conduct to regulate, monitor and report trading by its designated persons and immediate relative of designated persons and for the purpose of governing the conduct of insiders for avoiding unfair trading in company’s securities on the basis of Unpublished Price Sensitive Information (“UPSI”). Schedule B of PIT Regulations specify minimum standards which are to be adopted by the Companies for formulating this Code of Conduct.

1. **“Company”** means Pride Hotels Limited (“PHL”)

- (i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
- (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
 - (a). a relative of connected persons specified in sub point (i) above; or
 - (b). a holding company or associate company or subsidiary company; or
 - (c). an intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - (d). an investment company, trustee company, asset management company or an employee or director thereof; or
 - (e). an official of a stock exchange or of clearing house or corporation; or
 - (f). a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g). a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - (h). an official or an employee of a self-regulatory organization recognised or authorized by the Board; or

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- (i). a banker of the company; or
 - (j). a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. Of the holding or interest;
3. **“Compliance Officer”** means any senior officer, designated by the Board of Directors of the Company who shall be responsible for to administer and monitor compliances with the policies, procedure and codes under the PIT regulations.
4. **“Designated Person”** shall mean:
- (i) Directors, Key Managerial Personnel and Senior Management Personnel of the Company;
 - (ii) All Promoter(s) and Promoter Group;
 - (iii) Statutory Auditors of the Company;
 - (iv) Any other officer or staff of the Company who have access to the UPSI;
5. **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.
6. **“Immediate relative”** means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities;
7. **“Insider”** means any person who is:
- (i) a connected person;
 - (ii) Designated Person;
 - (iii) In possession of or having access to unpublished price sensitive information.
8. Words and expressions, other than mentioned above, used in this policy shall have the meanings respectively assigned to them in Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

PURPOSE

Pursuant to the PIT Regulations this code is to be formed for the purpose of regulating, monitoring and Reporting trading of securities by the designated persons and by their immediate relatives for ensuring adoption of minimum standards set out in the Schedule B of the PIT Regulations and for ensuring compliances with the provisions of PIT Regulations.

This Code shall be applicable to all designated persons, immediate relatives of designated persons and insiders.

1. The Board of Directors of the Company shall designate a Compliance Officer to administer this Code of Conduct and also administer the Compliances under PIT Regulations.

2. The Compliance Officer shall report to the board of directors and in particular, to the Chairman of the Audit Committee.

3. The Compliance officer shall assist all the employees in addressing any clarifications and provide necessary assistance on the Insider Trading Regulations and this Code of Conduct.

Prohibition on Communication or procurement of unpublished price sensitive information

1. Regulations 3 of PIT Regulations prohibits communication or procurement of unpublished price sensitive information relating to the company or securities listed or proposed to be listed.

2. It is an obligation on all the insiders who are essentially persons in possession of unpublished price sensitive information to handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis.

3. No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the company or securities of the company except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

All the information shall be handled within the organisation on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. The Company has developed a Chinese wall procedure to ensure that the UPSI is not been misuse. This procedure separates the employees who are continuously in access of UPSI from those employees who are “external” or not often in possession of UPSI. The employees who are inside the wall shall be

Trading Plans

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3. The Compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan. The Compliance officer may ask the insider to declare that he is not in possession of any UPSI before he commences executing his trades.

4. The pre-clearance of trades shall not be required for the trade which is been executed as per an approved trading plan.

5. The trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

6. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law. However the implementation of the trading plan shall not commenced if any UPSI in possession of the insider has not became generally available at the time of commencement of implementation. Further if the insider has set a price limit for a trade as mentioned in point 2 above, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

7. In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in point 6 above or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:

(i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.

(ii) Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.

(iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.

(iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct.

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8. Upon approval of the trading plan, the plan shall be notified to the stock exchange on which the securities are listed.

Trading Window

1. Designated Persons may execute trades subject to compliance with the PIT Regulations. A notional trading window shall be used as an instrument for monitoring trading by the designated persons. The trading window shall be closed when the Compliance officer determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates. Designated persons and their immediate relative shall not trade in securities when the trading window is closed. However this trading window restrictions shall not apply in respect of the following:

(i) The transaction undertaken is an off-market inter-se transfer between insiders who were in possession of the same UPSI without being in breach of Regulation 3 of PIT Regulations and both parties had made a conscious and informed trade decision.

Provided that such UPSI was not obtained under sub-regulation (3) of regulation 3 of the PIT Regulations.

Provided further that such off-market trades shall be reported by the insiders to the company within two working days. The company shall notify the particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.

(ii) the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained by either person under sub-regulation (3) of regulation 3 of these regulations.

(iii) the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.

(iv) the trades were pursuant to a trading plan set up in accordance with regulation 5.

2. Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.

4. When the trading window is open, trading by designated persons shall be subject to preclearance by the compliance officer, if the value of the proposed trades is above Rs.10,00,000/-

1. When trading window is open, trading by designated persons shall be subject to pre-clearance by the Compliance officer if the value of the proposed trades is above INR 10,00,000/- (Rupees Ten Lakh only).

3. The Compliance officer will issue pre-clearance in the format as mentioned in **Annexure – 3**.

3. Once the Compliance officer issues pre-clearance to execute the trade, such trade has to be executed with 7 (Seven) trading days from the date of issuance of pre-clearance, failing which fresh pre-clearance would be needed for the trades to be executed.

4. No Contra trade shall be permitted for 6 (Six) months from the date when the trade, for which pre-clearance is obtained, is been executed, unless the Compliance officer grant relaxation from such restrictions with the reasons to be recorded in writing provided that such relaxation should not violate the PIT Regulations. In case the contra trade is executed, inadvertently or otherwise, in violation of such restriction, the profits from such trade shall be liable to be disgorged and such profit shall be credited to the Investor Protection and Education Fund administered by the SEBI under Securities Exchange Board of India, Act 1992. This shall not be applicable for trades pursuant to exercise of stock options.

Structural Digital Database (SDD)

1. The Structural Digital Database (“SDD”) is to be maintained by the company under the guidance of the Board of Directors of the Company, containing following information:

- (a) Nature of Unpublished Price Sensitive (UPSI) which is been shared
- (b) Names of the persons who have shared the UPSI along with Permanent Account Number (PAN) or any other identifier authorized by law
- (c) Names of the persons with whom the UPSI is been shared along with Permanent Account Number (PAN) or any other identifier authorized by law
- (d) Time of sharing such UPSI
- (e) Mode of sharing such UPSI

2. The SDD shall not be outsourced and shall be maintained internally with adequate internal controls and regular audit trails to ensure non-tampering of the database.

3. The data shall be preserved for not less than 8 (Eight) years after the relevant transactions and in the event of any investigation or enforcement proceedings by SEBI, the relevant information in the SDD shall be preserved till the completion of such proceedings.

4. Any of the data which is required to be entered in SDD is required to be entered within Two days from the date of occurrence of the event.

Disclosures

1. Every person on appointment as a key managerial personnel or a director of the company or upon becoming a promoter or member of the promoter group shall disclose his/her holding of securities of the company in the format as specified in **Annexure – 7** within 7 (seven) days of such appointment or becoming a promoter.

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2. All promoters, member of promoter group and designated persons of the Company shall disclose to the Company in the format as specified in **Annexure – 4** the number of securities acquired or disposed off within 2 (two) trading days of such transaction if the value of securities traded over any calendar quarter, aggregates to a traded value in excess of 10 (Ten) Lakh rupees. Further the Company shall after receiving the disclosure or becoming aware of such transaction shall disclose such trading to the stock exchange on which the securities of the company are listed within 2 (two) trading days.

3. All Designated persons shall be required to disclose names and Permanent Account Number or other identifier authorized by law in the format as specified in **Annexure – 6**, of the following persons to the Company on an annual basis and as and when the information changes:

- (a) Immediate relatives
(b) persons with whom such designated persons shares a material financial relationship
(c) Phone, Mobile and cell number which are used by them

In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall be disclosed on a one time basis.

Explanation – The term “material financial relationship” shall mean a relationship in which one person is a recipient of kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm’s length transactions.

4. Reporting of decisions not to trade after securing pre-clearance shall be given as specified in **Annexure – 5**

5. In case the Company observes that there has been violation of the PIT Regulations same is to be informed to the Stock Exchange.

Penalty for Contravention

In case of any contravention of this Code, the disciplinary action, including wage freeze, suspension or any other penalty as may be decided by the Board of Directors may be levied on the person who contravenes this code. Any amount collected as penalty shall be credited by the Company to Investor Protection and Education Fund which is been administered by the SEBI.

APPLICATION FOR PRE-CLEARANCE

Name of the person	
Designation	
Permanent Account Number (PAN) or any other identifier as per the law	
Folio No./DP ID/Client ID	
Name and address of the Depository participants (DP)	
Nature of the securities of the Company in which transaction is to be undertaken (Equity shares, Preference shares, Debentures etc.)	
Nature of transaction which is to be undertaken (Buy, Sell, etc.)	
Proposed date of dealing in securities	
Price at which the transaction is proposed	
Whether the transaction is off-market or through stock exchange	
Folio No./DP ID/Client ID of the Demat account where the securities will be debited/credited	

Signature

Date:

ANNEXURE – 2

DECLARATION BY THE APPLICANT FOR PRE-CLEARANCE

To,
The Compliance Officer,
Pride Hotels Limited

I, hereby undertake that do not have access to any Unpublished Price Sensitive Information (UPSI) at the time of signing this declaration for pre-clearance.

Further, I undertake that I will not be executing any contra trade within next six (6) months from the date of execution of this transaction.

The disclosures which I have made for the purpose of Pre-clearance are true and nothing is false.

Place:

Date:

(Name and Signature of
the applicant)

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PRE-CLEARANCE BY COMPLIANCE OFFICER

To, _____
Name of the Applicant: _____
Employee Code: _____
Department: _____

Reference is made to your application dated _____ seeking pre-clearance of the proposed transaction in the securities of the Company as per the Company's Code of Conduct for Prevention of Insider Trading.

Details of the Proposed Transaction:

- Type of Transaction (Buy/Sell/Subscribe): _____
- No. of Securities: _____
- Estimated Value (Rs.): _____
- Trading Account/DP Details: _____
- Name of Depository Participant: _____

Please note the following:

1. You shall not enter into an opposite transaction (contra trade) within six months from the date of execution of the above transaction, unless permitted as per the Code.
2. You shall report the details of the executed transaction within **2 working days** in the prescribed format.
3. In case the transaction is not executed, a "Nil" report must be submitted.

For Pride Hotels Limited

Place: _____

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ANNEXURE-4

REPORTING OF TRADE EXECUTED

To,
Compliance officer,
Pride Hotels Limited

Subject: Reporting of trade executed in accordance with SEBI (Prohibition of Insider Trading) Regulations, 2015

This is with reference to the pre clearance application made by me dated_____ and Pre Clearance order issued by the Compliance officer dated_____. I hereby inform that I have undertaken the trade the details of which are as under:

Personal Details:

Name of the Applicant: _____
Employee Code: _____
Department: _____
Relationship with the Company: Employee / Director / KMP / Immediate Relative *(Please strike off whichever is not applicable)*

Trade Details:

Date of Pre-clearance _____
Date of Execution of Trade _____
Type of Trade Buy / Sell / Subscribe *(choose one)*
No. of Securities Traded _____
Price at which trade executed _____ (per share/unit)
Value of Trade (approx.) Rs. _____
Name of Trading Account Holder _____
DP ID / Client ID _____
Name of Depository Participant _____
Exchange on which trade done NSE / BSE / Other *(specify)*

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I hereby confirm that the above trade was executed after obtaining necessary pre-clearance and was not based on any unpublished price sensitive information (UPSI). I also confirm that I shall not execute a contra trade for a period of **six months** from the date of this transaction unless permitted under the Code.

Signature: _____
Name: _____
Designation: _____

Date: _____
Place: _____

ANNEXURE-5

REPORTING OF DECISIONS NOT TO TRADE AFTER SECURING PRE-CLEARANCE

Date: _____

To,
The Compliance Officer
Pride Hotels Limited

Subject: Reporting of Non-Execution of Trade after Pre-Clearance under SEBI (Prohibition of Insider Trading) Regulations, 2015

Personal Details:

Name of the Applicant: _____

Employee Code: _____

Department:

Relationship with the Company: Employee / Director / KMP / Immediate Relative (*Please strike off whichever is not applicable*)

Pre-Clearance Details:

- Date of Pre-Clearance Application: _____
- Approved Transaction Type (Buy/Sell/Subscribe): _____
- No. of Securities Approved: _____
- Validity Period of Pre-Clearance: **From** _____ **to** _____

Declaration of Non-Execution:

I hereby declare that **no trade** in the securities of the Company was executed by me (or on behalf of me) during the validity period of the above pre-clearance.

The reason(s) for not executing the trade is/are:

I confirm that I shall obtain a fresh pre-clearance before executing any trade in the future, as required under the Code of Conduct for Prevention of Insider Trading.

Signature:_____

Name: _____

Designation: _____

Date:

Place:

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FORM A

[Regulation 7(1)(a) read with Regulation 6(2) –Initial Disclosure to the Company]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulations 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	4	5	6

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

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Details of Open Interest (OI) in derivatives on the securities of the company held on Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulations 6(2).

Open Interest of the Future contracts held as on date of regulations coming in to force			Open Interest of the Option Contracts held as on date of regulations coming in to force		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12
NA					

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options

Signature: _____
 Name: _____
 Designation: _____

Date: _____
 Place: _____

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ANNEXURE – 7

FORM B

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(1)(b) read with Regulation 6(2) – Disclosure on becoming a Key Managerial Personnel/Director/Member of the Promoter group]**

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

Note: “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

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Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12
NA					

Signature: _____
Name: _____
Designation: _____

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