7SEAS ENTERTAINMENT LIMITED
CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS

(Approved/Amended by the Board of Directors on 18 July 2026)

CIN: L72900TG1991PLC013074

Registered Office: 5th Floor, Plot Nos. 92, 93 and 94, Kavuri Hills, Madhapur, Hyderabad, Telangana – 500081

Classification: Internal and confidential

1. Objective and applicability

This Code is adopted under Regulation 9 and Schedule B of the PIT Regulations and applies to Designated Persons, their immediate relatives and such connected persons as determined by the Board.

2. Designated persons and immediate relatives

Designation shall be based on role, function, access to UPSI, seniority and professional relationship and shall include promoters and specified support staff where required. Designated Persons shall disclose immediate relatives and persons with whom they share a material financial relationship in the prescribed manner.

3. Prohibition on trading and communication

- No insider shall trade while in possession of UPSI.
- UPSI shall not be communicated, procured or allowed to be accessed except for legitimate purposes, duties or legal obligations.
- Trading through another person, account, derivative, pledge or arrangement to circumvent this Code is prohibited.

4. Trading window

The Compliance Officer shall close the trading window when Designated Persons can reasonably be expected to possess UPSI, including financial-result periods. Closure shall apply to immediate relatives. The window shall reopen only after the prescribed cooling period following public dissemination.

5. Pre-clearance and execution

Trades above the Board-approved threshold require pre-clearance. The applicant shall confirm absence of UPSI and disclose pending orders. Approved trades shall be executed within the permitted period and completion/non-execution reported. Pre-clearance does not protect a person who actually possesses UPSI.

6. Contra trade and trading plans

Opposite transactions within six months are prohibited unless relaxation is granted for recorded reasons without violating the PIT Regulations. Trading plans may be formulated, approved and disclosed strictly under Regulation 5.

7. Disclosures and records

Initial, continual, annual and event-based disclosures shall be made in the prescribed forms and timelines. The Compliance Officer may seek holdings, account, trade, relative and educational/institution information authorised by law.

8. Structured Digital Database and restricted list

UPSI sharing shall be recorded in the SDD. The Compliance Officer may maintain restricted, watch and grey lists and impose additional safeguards for designated transactions.

9. Sanctions and reporting

Violations may result in disgorgement, wage freeze, suspension, termination, recovery, debarment and reporting to SEBI and stock exchanges. Penalties collected shall be dealt with as prescribed. Regulatory action remains unaffected.

10. Interpretation and overriding effect

Terms not specifically defined in this Policy shall have the meanings assigned to them under the Companies Act, 2013, the rules made thereunder, the applicable SEBI regulations and other governing law. References to statutes and regulations include amendments, clarifications, circulars and re-enactments. If any provision of this Policy conflicts with applicable law, the law shall prevail and this Policy shall be read as modified to the minimum extent necessary.

11. Administration and responsibility

The Board shall retain overall responsibility for this Policy. The committee or officer identified in this Policy shall administer it, maintain evidence of compliance and report material deviations. Every director, officer, employee, consultant and service provider within scope shall provide information and cooperation reasonably required for implementation.

12. Records, training and assurance

The Company Secretary/Compliance Officer shall ensure that approvals, registers, declarations, notices, reports, training records and supporting documents are retained for the period prescribed by law and the Company's document-retention schedule. Periodic awareness and role-based training shall be conducted. Internal audit or an independent reviewer may test compliance and recommend corrective action.

13. Review and amendment

This Policy shall be reviewed at least annually and earlier upon a material change in law, business model, organisation, risk profile or regulatory guidance. Material amendments shall be placed before the competent committee and the Board. The Managing Director and Company Secretary/Compliance Officer may jointly make clerical, contact-detail and statutory-reference corrections that do not alter substantive rights or obligations, subject to reporting to the Board.

For 7Seas Entertainment Limited

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Company Secretary / Compliance Officer

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