



SAHARA
INDIA PARIWAR

SAHARA ONE MEDIA AND ENTERTAINMENT LIMITED

CIN: L67120MH1981PLC024947

REGISTERED OFFICE Sahara India Point, CTS 40 - 44, S.V. Road, Goregaon (West),
Mumbai - 400 104.

Tel: 022 4293 1818. **Fax:** 022 4293 1870.

E-mail: investors@sahara-one.com **Website:** www.sahara-one.com

April 08, 2019

To,
BSE Ltd.
Phiroze Jeejeebhoy Towers, "
Dalal Street, Bandra
Mumbai -400 001

Scrip Code: 503691

Sub: Intimation under Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Dear Sir/Madam,

We wish to inform you that pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Board of Directors of the Company, vide Circular Resolution dated March 29, 2019 has approved and adopted revised "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information". This Code will be effective from April 08, 2019.

The aforesaid information is also being hosted on the website of the Company viz., www.sahara-one.com

We request you to take the above information on record.

Yours truly

For Sahara One Media and Entertainment Limited


P.C. Tripathy
Chief Financial Officer

Encl: As above



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**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

1. OBJECTIVE

The Board of Directors of **Sahara One Media and Entertainment Limited** ("the Company") has laid down this Code for Fair Disclosure of Unpublished Price Sensitive Information and Conduct.

2. DEFINITION

Words and expressions used and not defined herein but defined in Code of Internal Procedure and Conduct for Regulating, Monitoring and Reporting of trading by Designated Persons in the securities of Sahara One Media and Entertainment Limited, as amended from time to time shall have the meanings respectively assigned to them in those legislation.

3. DISCLOSURE OF PRICE SENSITIVE INFORMATION

1. Disclosure/ dissemination of any Unpublished Price Sensitive Information (UPSI) shall be done promptly by the Compliance Officer in consultation with Board of Directors (hereinafter individually referred to as Authorised Person"), by intimating to the Stock Exchanges and posting of the said information on the website of the Company and/or otherwise making it generally available.

2. The Authorised Person shall ensure uniform dissemination/ disclosure of UPSI, so as to avoid selective disclosure (except legitimate purpose).

3. No UPSI shall be shared with any person except for legitimate purpose unless the information is made generally available i.e. only public information can be shared.

4. In absence of the Authorised Person, such person as may be authorised by the Board of Directors shall discharge the duties of the Authorised Person.



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4. PROCEDURE FOR RESPONDING TO ANY QUERIES/REQUESTS FOR VERIFICATION OF MARKET RUMOURS BY STOCK EXCHANGES

- a. The Compliance Officer shall under guidance of Board of Directors shall give an appropriate, fair and prompt response to the queries, rumours or requests by regulatory authorities.
- b. As and when necessary, the Compliance Officer shall under guidance of Board of Directors make appropriate public announcement with respect to market rumours.
- c. The Authorised Person shall make a prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise, to make such information Generally Available.
- d. In absence of the Authorised Person, such person as may be authorised by the Board of Directors, shall discharge the duties of the Authorised Person.

5. SHARING OF UPSI FOR LEGITIMATE PURPOSE

1. Notwithstanding anything contained in this Code, the UPSI may be shared by any person(s) authorised by the Managing Director/Compliance Officer or any appropriate authority of the Company. in this behalf, only for legitimate purpose(s) which shall include the following:
 - Sharing of UPSI in the ordinary course of business by an Insider, Designated Person or by any Authorised Person with existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, or other advisors or consultants.
 - ❖ Sharing of UPSI where such communication is for performance of duties.
 - ❖ Sharing of UPSI towards discharge of legal obligations.
 - ❖ Sharing of UPSI for any other purpose as may be prescribed under the applicable law for the time being in force.

Provided that such sharing should not be carried out to evade or circumvent the prohibition of SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").



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2. What shall constitute "legitimate purpose" and what shall not constitute "legitimate purpose" will be based on the business related needs of the Company. In general Legitimate purpose shall, inter-alia, include the following purposes:

- Business Strategy and Corporate Action
- Operational efficiency
- Regulatory Obligation
- Need based specific purposes
- Contractual Obligation

6. ISSUE OF NOTICE TO THE RECIPIENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION

a. The recipient of UPSI which is communicated for any "legitimate purpose" shall be considered as an "insider" under the "Code of Conduct" adopted by the Company and such notice shall be given to the recipient of UPSI by the person making communication of UPSI in order;

- To make aware recipient that the information shared is or would be UPSI
- To make aware to recipient the duties and responsibility attached to the receipt of such UPSI and the liability attached to misuse or unwarranted
- To instruct recipient to maintain confidentiality of such UPSI in compliance with the Code of Conduct for Prevention of Insider Trading and the other applicable laws.
- To advise recipient to be in compliance with applicable provisions of PIT Regulations.

7. RESPONSIBILITY OF THE RECIPIENT OF UPSI

- To maintain and keep secret and confidential the information received.
- To use the confidential information only for the legitimate purpose.



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- To disclose the confidential information to any other person strictly on a need to know basis.
- To safeguard the UPSI with the same degree of care so avoid unauthorized disclosure as the receiving party. uses to protect its own confidential information, but in no case less than reasonable care.
- To ensure compliance with applicable provisions of PIT Regulations.

AMENDMENT TO THE POLICY

Every amendment to this Policy (other than the deemed amendments in view of changes in SEBI PIT Regulations) shall be promptly intimated to stock exchanges where the securities are listed. This Fair Disclosure Policy shall be hosted on the website of the Company.