

STELLANT SECURITIES (INDIA) LIMITED

(formerly known as SELLAIDS PUBLICATIONS (INDIA) LIMITED)

CIN No.: L67190MH1991PLC064425

Regd.Off.: .305, Regent Chambers
3rd Floor, Jamnalal Bajaj Marg,
Nariman Point,
Mumbai - 400 021
Ph.No.: 022-2206 1606
E-mail Id: sellaidspublication@yahoo.in

5th April, 2019

BSE Limited
P. J. Towers,
Dalal Street, Fort,
Mumbai – 400 001

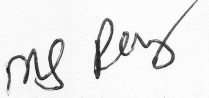
Dear Sir,

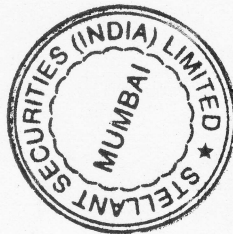
Ref: Company /Scrip Code – 526071

Sub: Intimation under Regulation 8 of Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, about amendment in "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

This is to inform you that the Company's code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information has been amended effective 1st April, 2019 and the Company has adopted a Policy on Determination of Legitimate Purpose, in accordance with the provisions of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018. The revised code is made available on the website of the Company. Kindly take the same on record and acknowledge the receipt.

Yours faithfully,
For Stellant Securities (India) Ltd.


(Mangala Rathod)
Whole-time Director
Din No.02170580



STELLANT SECURITIES (INDIA) LIMITED

(formerly known as SELLAIDS PUBLICATIONS (INDIA) LIMITED)

CIN No.: L67190MH1991PLC064425

Regd. Off.: 305, Regent Chambers
3rd Floor, Jamnalal Bajaj Marg,
Nariman Point,
Mumbai - 400 021
Ph.No.: 022-2206 1606
E-mail Id: sellaidspublication@yahoo.in

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

I. PREAMBLE:

Pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the said Regulations"), the Company has a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI), as adopted by the Board of Directors of the Company.

The SEBI has vide notification dated 31st December 2018 amended SEBI (Prohibition of Insider Trading) Regulations, 2015 which is effective from 1st April, 2019. As required under the said regulations, a revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI), (hereinafter referred to as the "Code") has been framed. The said Code shall supersede the earlier Code and shall be effective from 1st April, 2019.

II. OBJECTIVE:

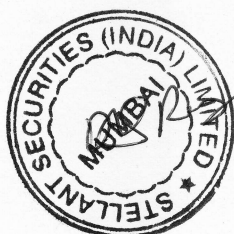
The Code is required for the Company to prevent the misuse and ensure timely and adequate disclosure of Unpublished Price Sensitive Information ('UPSI') and to maintain the uniformity, transparency and fairness in dealing with the stakeholders.

III. DEFINITIONS:

a) The term "legitimate purposes" shall include sharing of UPSI in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of the said Regulations.

b) Unpublished Price Sensitive Information ("UPSI") means any information relating to a Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall ordinarily including but not restricted to information relating to the following;

1. Periodical financial results of the Company;
2. Declaration of dividends (Interim and Final);

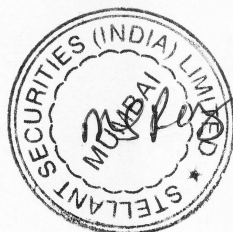


3. Change in capital structure i.e. Issue of securities, buy , back of securities or any forfeiture of shares or change in market lot of the Company's shares;
4. Mergers, De-mergers, Amalgamation, Acquisitions, De-listing of Securities, Scheme of Arrangement or Takeover, disposals, spin off or selling division of whole or substantially whole of the undertaking and expansion of business and such other transactions;
5. Changes in key managerial personnel;
6. Any other matter as may be prescribed under the Listing Regulations and/or Corporate Law to be price sensitive, from time to time

IV PRINCIPLES OF FAIR DISCLOSURE FOR PURPOSES OF CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

This Code intends to formulate a frame work & policy for fair disclosure of events and occurrences that could impact price discovery in the market for the Company's securities. So as to ensure fair discourse of events and occurrences that could impact price discovery in the market, the Board of Directors of the Company shall adhere to the following principles of fair disclosure of unpublished price sensitive information envisaged in Schedule A of SEBI (Prohibition of Insider Trading) Regulations, 2015

1. The Company shall ensure 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. The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Managing Director of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.



6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall develop and follow best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all unpublished price sensitive information on a need to-know basis.

V POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES:

The unpublished price sensitive information can be shared as an exception by an insider for legitimate purposes as per its "Policy for determination of legitimate purposes" provided it is not shared to evade or circumvent the prohibitions under these regulations.

The said policy forms part of this code as Annexure — I.

VI PUBLICATION OF CODE:

This Code and any amendment thereof shall be published on the Company's website and shall be intimated promptly to the Stock Exchanges where the securities of the Company are listed.

VII AMENDMENT TO THE CODE:

The Managing Director of the Company, subject to approval of the Board, is authorized to amend or modify this Code in whole or in part.

The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information.

This Code and every subsequent modification, alteration or amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the Company are listed.



Annexure-I

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

I. PREFACE

This Policy is an integral part of "Codes of Practices and procedure for Fair Disclosure of UPSI" formulated under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations 2015 and will be known as "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy". This Policy is being prepared in accordance with Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

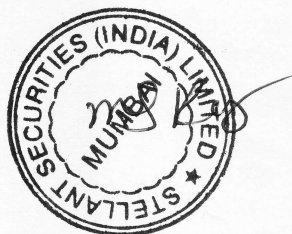
II. OBJECTIVE

The objective of this policy is to identify legitimate purposes for performance of duties or discharge of legal obligations that can be considered as an exception for procuring or communicating UPSI which is likely to materially affect the price of the securities of the Company.

III. LEGITIMATE PURPOSES

"Legitimate Purposes" shall mean sharing of UPSI in the ordinary course of business by an insider with the following persons mentioned below provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations:

- a) Auditors (Statutory, Internal, Secretarial, and any other auditors as applicable)
- b) Collaborators
- c) Lenders
- d) Customers
- e) Suppliers
- f) Bankers/Merchant Bankers
- g) Legal Advisors
- h) Insolvency professionals
- i) Consultants
- j) Any other advisors/consultants/partners
- k) Any other person with whom UPSI is shared



IV. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

The Board of Directors shall require the parties to execute confidentiality and nondisclosure agreements on the part of such parties and such parties shall keep information so received confidential and shall not otherwise trade in securities of the company when in possession of UPSI.

Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered as an insider for purpose of these regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI.

The provisions of this code of conduct shall be applicable to the above said insider, who has obtained UPSI in pursuance of performance of his duties or discharging legal obligation.

UPSI as defined in this code of conduct shall be handled within the company on a need-to-know basis and the same should be disclosed only to those who need such information to discharge their duties or legal obligations by virtue of their respective role and function.

V AMENDMENT

The Board of Directors or any person authorised by the Board shall be empowered to do necessary modifications in the policy to meet the legal requirements notified by the regulator from time to time and such changes shall be effective from the date that the Board may notify in this regard.

