



APOLLO FINVEST (INDIA) LTD.

CIN: L51900MH1985PLC036991

REGISTERED OFFICE:

Unit No. 803, Morya Blue Moon,
Veera Desai Industrial Estate, Andheri West,
Mumbai, Maharashtra 400053

Email: info@apollofinvest.com

Contact No. 022-62231667 / 68

August 11, 2021

To,
BSE Limited,
PJ Tower,
Dalal Street, Fort,
Mumbai – 400 001.

Ref: Scrip Code: 512437

Dear Sir/Madam,

Sub: Outcome of the Board Meeting

We are pleased to inform the Stock Exchange that, the Board of Directors at their meeting held today transacted the following Business inter-alia:

- Considered and approved the Unaudited Financial Results along with Limited Review Report provided by Statutory Auditor of the Company for the quarter ended June 30, 2021.
- Approved Payment of remuneration to Mr. Mikhail Innani (DIN: 02710749), Managing Director of the Company
- Amended code of Practices and procedures of Fair Disclosure of Unpublished Price Sensitive Information under (Prohibition of Insider Trading) Regulations, 2015
- Other routine business with the permission of the Chair.

The Meeting of the Board of Directors commenced at 2.30 p.m and concluded at 5.00 p.m.

For Apollo Finvest (India) Limited

Mikhail Innani
Managing Director
DIN: 02710749

Independent Auditor's Review report on quarterly and year-to-date unaudited financial results Of Apollo Finvest (India) Limited pursuant to the Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

**Review report to
The Board of Directors
APOLLO FINVEST (INDIA) LIMITED**

We have reviewed the accompanying statement of unaudited financial results of **Apollo Finvest (India) Limited** ("the Company") for the quarter ended June 30, 2021 ("the Statement") attached herewith, being submitted by the Company pursuant to the requirement of Regulations 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("Listing Regulation") read with circular (Circular No. CIR/CFD/CMD1/44/2019 dated March 29, 2019) issued by the SEBI under Regulation 33 (8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, as amended, to the extent applicable.

This statement is the responsibility of the Company's Management and has been approved by the Company's Board of Directors, has been prepared in accordance with the recognition and measurement principles laid down in the Indian Accounting Standard 34 "Interim Financial Reporting" (Ind AS 34), prescribed under Section 133 of Companies Act, 2013 read with relevant rules issued thereunder and other accounting principles generally accepted in India. Our responsibility is to issue a report on these financial statements based on our review.

We conducted our review of the Statement in accordance with the Standard on Review Engagements (SRE) 2410, "Review of Interim Financial Information Performed by the Independent Auditor of the Entity" issued by the Institute of Chartered Accountants of India. This Standard requires that we plan and perform the review to obtain moderate assurance as to whether the statement is free of material misstatement. A review is limited primarily to inquiries of company personnel and analytical procedures applied to financial data and thus provides less assurance than an audit. We have not performed an audit and accordingly, we do not express an audit opinion.

The Financial results includes the figures for the 3 months ended 31 March 2021 as reported in these financial results are the balancing figures between audited figures in respect of the full previous financial year and the published year to date figures up to the third quarter of the previous financial year. The figures up to the end of the third quarter of previous financial year had only been reviewed and not subjected to audit.



Based on our review, conducted as above, nothing has come to our attention that causes us to believe that the accompanying statement, prepared in accordance with applicable Indian Accounting Standards prescribed under section 133 of Companies Act 2013 read with rules issued thereunder and other recognized accounting practices and policies generally accepted in India, has not disclosed the information required to be disclosed in terms of Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 including the manner in which it is to be disclosed, or that it contains any material misstatement.

Emphasis of Matter

We draw attention to Note no. 4 of the Financial Results, which described the uncertainty caused by COVID-19 pandemic with respect to the company's estimates of impairment of loans to customers and that such estimates may be affected by the severity and duration of the pandemic.
Our conclusion is not modified in respect of this matter.

For GMJ & Co
Chartered Accountants
FRN: 103429W



CA Sanjeev Maheshwari
Partner
M. No.: 038755
UDIN : 210387 55AAAA EB2125



Place : Mumbai
Date : August 11, 2021

APOLLO FINVEST (INDIA) LIMITED
CIN L51900MH1985PLC036991
Reg Add: Unit No. 803, Morya Blue Moon,
Veera Desai Industrial Estate, Andheri West, Mumbai, Maharashtra 400053

STATEMENT OF UNAUDITED FINANCIAL RESULTS FOR THE QUARTER ENDED JUNE 30, 2021

(INR in Lakhs)

Sr No	Particulars	Quarter Ended			Year Ended
		30.06.2021	31.03.2021	30.06.2020	31.03.2021
		(Unaudited)	(Audited)	(Unaudited)	(Audited)
1	Revenue From Operations				
	Interest Income	177.28	89.84	124.71	464.13
	Rental Income	2.05	2.04	1.98	7.44
	Fees and Commission Income	576.31	516.81	178.30	1,006.21
	Dividend Income	-	0.02	-	0.02
	Net Gain on Fair Value Changes	26.31	16.86	11.12	38.71
2	Other Income	3.16	20.52	17.52	76.60
3	Total Revenue (1+2)	785.11	646.09	333.64	1,593.11
4	Expenses				
	(a) Changes in inventories of finished goods, work-in-process and Stock-in-Trade	-	-	-	-
	(b) Employee Benefits Expenses	40.52	39.87	23.82	109.09
	(c) Impairment on financial instrument	(10.01)	(16.55)	(15.27)	15.92
	(d) Depreciation and Amortisation Expenses	5.03	6.33	5.08	22.04
	(e) Other Expenditure	43.05	62.58	21.07	128.21
	(f) Fees and Commission Expense	540.35	290.85	163.90	756.07
	(g) Net Loss on Fair Value Changes	-	-	-	-
	(h) Finance cost	4.88	(2.13)	2.47	1.31
	Total Expenses	623.81	380.97	201.08	1,032.66
5	Profit / (Loss) from Operations before Other Income, Finance Costs and Exceptional Item(3-4)	161.30	265.12	132.56	560.45
6	Exceptional Items	-	2.90	-	-
7	Profit / (Loss) before Extra-ordinary items and Tax (5-6)	161.30	262.24	132.56	560.45
8	Tax Expense	45.31	79.29	30.30	150.50
9	Net Profit/(Loss) for the period (7-8)	115.99	182.96	102.26	409.96
10	Other Comprehensive Income	-	-	-	-
	A. Other Comprehensive income not to be reclassified to profit and loss in subsequent periods:	-	-	-	-
	Remeasurement of gains (losses) on defined benefit plans	(0.28)	(1.61)	0.17	(1.10)
	Income tax effect	0.08	0.45	(0.05)	0.31
	B. Other Comprehensive Income to be reclassified to profit and loss in subsequent periods:	-	-	-	-
	Debt Instruments through Other Comprehensive Income	-	-	-	-
	Income tax effect	-	-	-	-
	Other Comprehensive income for the year, net of tax	(0.20)	(1.17)	0.12	(0.80)
11	Total Comprehensive Income For The Period, Net Of Tax	115.79	181.80	102.38	409.16
12	Reserve excluding Revaluation Reserves as per Balance Sheet of previous Accounting Year	-	-	-	2,539.73
13	Paid-up Equity Share Capital (Face Value of Rs.10/- per Equity Share)	373.12	373.12	373.12	373.12
14	Earnings per Share (of Rs.10/- each) :	-	-	-	-
	(a) Basic	3.11	4.98	2.74	10.99
	(b) Diluted	3.11	4.98	2.74	10.99



Notes:

1) The above unaudited financial results have been reviewed by the Audit Committee and on its recommendation have been approved by the Board of Directors of Company in their meeting held on 11th August, 2021, pursuant to Regulation 33 of SEBI (Listing Obligation and Disclosure Requirement), Regulation 2015 for the quarter ended 30th June, 2021.

2) The above financial results have been prepared in accordance with Indian Accounting Standards (Ind AS) as prescribed under section 133 of the Companies Act, 2013 read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 and the Companies (Indian Accounting Standards) Rules, 2016. Any application guidelines/directions issued by RBI or other regulators are adopted/implemented as and when they are issued.

3) As the company's business activity falls within a single primary business segment, the disclosure requirements of Ind AS 10B "Operating Segments" is not applicable.

4) The SARS-Cov-2 virus responsible for Covid-19 continues to spread across the globe and India, which has contributed to a significant decline and volatility in global and Indian financial markets and a significant decrease in global and local economic activities. The extent to which the Covid-19 pandemic will impact the NBFC's result will depend on the future developments, which are highly uncertain, including, among other things, any new information concerning the severity of the Covid-19 pandemic and any action to contain its spread or mitigate its impact whether government-mandated or elected by the NBFC. In the event the impacts are more severe or prolonged than anticipated, this will have a corresponding impact on the carrying value of financial assets, the financial position and performance of the NBFC.

5) In accordance with Disclosure as required under RBI notification no RBI/2019-20/220 DOR.No.BP.BC.63/21.04.048/2019-20 dated 17 April 2020 on COVID-19 Regulatory Package - Asset Classification and Provisioning :-

(INR in Lakhs)

Particulars	As at 30.06.2021	As at 31.03.2021
i) Respective amounts in SMA/overdue categories, where the Moratorium/deferment was extended*	128.3	226.7
ii) Respective amount where asset classification benefits is extended	NIL**	NIL**
iii) Provision made on the cases where asset classification benefit is extended	—	—
iv) Provisions adjusted during the respective accounting periods against slippages and the residual provisions	NIL**	NIL**

* Outstanding as on 30th June, 2021 and 31st March, 2021 respectively on account of all cases in SMA/ overdue categories where moratorium benefit was extended.

** There are NIL accounts where asset classification benefit is extended till 30th June, 2021. Post the moratorium period, the movement of ageing has been at actuals.

6) The figures of the quarter ended March 31, 2021 are the balancing figures between audited figures for the full financial year and unaudited published year to date figures upto the third quarter of the relevant financial year.

7) The Indian Parliament has approved the code of Social Security 2020 which subsumes the Provident fund and Gratuity Act and rules thereunder. The Ministry of Labour and Employment has also released draft rules thereunder on 13th November 2020 and has invited suggestions from the stakeholders which are under active consideration by the Ministry. The Company will evaluate the rules assess the impact if any and account for the same once the rules are notified and become effective.

8) In compliance with Regulation 33 of the Securities Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) Regulations, 2015, a limited review of financial results for the quarter ended 30 June 2021 has been carried out by the Statutory Auditors.

9) Disclosure pursuant to RBI Notification- RBI/2020-21/16 DOR.No.BP BC/3/21.04.048/2020-21 dated 6 August 2020

(INR in Lakhs except for Number of Accounts mentioned in "A" below)

Type of Borrower	A) Number of accounts where resolution plan has been implemented under this window	B) Exposure to accounts mentioned at (A) before implementation of the plan	C) Of (B), aggregate amount of debt that was converted into other securities	D) Additional funding sanctioned, if any, including between invocation of the plan and implementation	E) Increase in provisions on account of the implementation of the resolution plan
Personal Loans	-	-	-	-	-
Corporate persons*	-	-	-	-	-
Of which, MSMEs	-	-	-	-	-
Others	514	85.61	-	-	-
Total	514	85.61	-	-	-

* As defined in Section 3(7) of the Insolvency and Bankruptcy Code, 2016.

10) Figures of previous periods/year's have been regrouped/rearranged, wherever consider necessary.

By Order of the Board
For Apollo Finvest (India) Limited

Mikhi Innani (DIN: 02710749)
Managing Director



Place: Mumbai
Date: August 11, 2021



APOLLO FINVEST (INDIA) LIMITED

PROHIBITION OF INSIDER TRADING CODE

Effective August 11, 2021

[Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and as approved by the Board of Directors in their meeting held on August 11, 2021]

INTRODUCTION:

Securities and Exchange Board of India (“SEBI”) vide its Notification dated January 15, 2015, had issued the SEBI (Prohibition of Insider Trading) Regulations, 2015 and further amended the same vide its notification dated December 31, 2018, issued the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (“Regulations”), to put in place a Code of Practices and Procedures for fair disclosure of unpublished price sensitive information.

Regulation 8 of the Regulations requires the Board of Directors of every listed company to formulate and publish on its official website, a code of practices and procedures for fair disclosure or unpublished price sensitive information that it would follow to adhere to each of the principles set out in the regulations.

In the above context, in supersession of the previous Code, the Board of Directors of Apollo Finvest (India) Limited (“Apollo” or “Company”) has formulated this Prohibition of Insider Trading Code

OBJECTIVES:

1. The Company endeavors to preserve the confidentiality of unpublished price sensitive information (UPSI) and to prevent its misuse. To achieve these objectives, and in compliance with the aforesaid Regulations, the Company has adopted this Fair Disclosure Code.
2. This Code ensures timely and adequate disclosure of UPSI which would impact the price of its securities and maintenance of uniformity, transparency and fairness in dealing with all its stakeholders.
3. The Company is committed to timely and accurate disclosure based on applicable legal and regulatory requirements.
4. The Code intends to formulate a stated framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for the Company’s securities and to maintain the uniformity, transparency and fairness in dealings with all stakeholders and ensure adherence to applicable laws and regulations.

APPLICABILITY:

This Code shall be applicable with effect from August 11, 2021.

DEFINITIONS:

Connected person means

- (i) any person who is or has during the six months prior to the concerned act been associated with the 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 UPSI 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. an immediate relative of connected persons specified in clause (i); 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
 - i. a banker of the Company; or
 - j. a concern, firm, trust, hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten percent, of the holding or interest.

Designated Person:

The term “designated person” shall consist of, Connected Persons who are:

- I. Promoters of the Company;
- II. Directors of the Company ;
- III. All employees in the Finance and Accounts Team, Compliance Team, Credit Team and Business Development Team
- IV. Any other Connected Person designated by the Company on the basis of their functional role;
- V. Immediate Relatives of above;

Immediate Relative:

“Immediate Relative” of a person means a spouse, or the parent, sibling or child of that person or his or her spouse if they are either dependent financially on such person or consult such person in taking decisions relating to Trading in securities.

Insider:

An insider means any person who is:

- (i) a Connected Person or
- (ii) in possession of or having access to UPSI.

Securities:

“Securities” shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 or any modification thereof except units of a mutual fund.

Unpublished Price Sensitive Information (UPSI):

Means any information, relating to 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:-

- Financial results, financial condition, projections or forecasts of the Company;
- Dividends (both interim and final);
- Change in capital structure;
- Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- Changes in Board of Directors or Key Managerial Personnel (KMP);
- Any other event as may be determined by the Company/ the Compliance Officer which is likely to materially affect the price of the Securities of the Company.
-

Trading:

“Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly.

Words and expressions used and not defined in these Rules but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

Trading Plan

An Insider shall be entitled to formulate a Trading Plan in compliance with SEBI Regulations for dealing in Securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan in ‘Annexure IV’

Pre-clearance of trades:

All Designated Persons, who intend to deal in the securities of the Company when the Trading Window is opened and if the value of the proposed trades, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs 10,00,000 (Rupees Ten lakhs only) (market value), should pre-clear the transaction. However, no Designated Person shall be entitled to apply for pre-clearance of any proposed trade if such Designated Person is in possession of UPSI even if the trading window is not closed and hence he shall not be allowed to trade. The pre-dealing procedure shall be hereunder:

- (i) An application may be made in the prescribed Form (**Annexure I**) to the Compliance officer indicating the estimated number of securities that the Designated Person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this behalf.
- (ii) The Compliance Officer shall either clear the requested trade or decline to clear the requested trade within 3 (Three) working days from the receipt of the application (duly completed in all respects) in the prescribed form. In case the Compliance Officer declines to clear the requested deal, he shall assign reasons in writing for doing so. If the designated person doesn't receive any response from the Compliance Officer within the aforesaid period of 3 (Three) working days, the requested deal can be deemed to have been cleared by the Compliance Officer.
- (iii) All Designated Persons shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Designated Persons shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed. (**Annexure II**).
- (iv) If the order is not executed within 7 (seven) trading days after the approval is given, the Designated Person must pre-clear the transaction again.
- (v) All Designated Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction, i.e. sell or buy any number of shares during the next 6 (six) months following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

Digital Database of recipient of UPSI

As required under Regulation 3(2) of the SEBI Regulations, Compliance Officer as may be authorized by the Board, shall maintain a structured digital database of such persons or entities as the case may be with whom UPSI is shared, along with the information pertaining to the recipients; Name of such recipient of UPSI; Name of the Organization or entity which the recipient represents, Postal Address and E-mail ID of such recipient Permanent Account Number (PAN) or any other identifier authorized by law, if PAN is not available. Such database shall be maintained in accordance with the SEBI Regulations from time to time, including through adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of such database.

Disclosures

Initial Disclosure:

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company **within seven days** of such appointment or becoming a promoter.

Continual Annual Disclosure:

Every promoter, designated employee and Director of every Company shall disclose to the Company the number of such securities acquired or disposed of within **two trading days** of such transactions if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs.10 lakhs or such other value as may be specified by the Compliance Officer in Form C as detailed in **Annexure III**;

Every Company shall notify the particulars of such trading to the stock exchanges on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Disclosure by the Company

The Compliance Officer shall maintain records of all the declarations made by Designated Persons for a minimum period of five years.

Trading window

1. The Company shall specify a trading period, to be called the "Trading Window", for trading in the Company's Securities. Any Designated/Connected Person shall not trade in any Securities of the Company during the period when Trading Window is closed;
2. The Trading Window shall re-open 48 hours after the information of the specific event has been made public.
3. The Compliance Officer would inform all the designated/connected persons by way of an email about the closure of the Trading Window period. Confirmation of whether the Trading Window is open on any particular date can be obtained from the Compliance Officer at any time.
4. The Compliance Officer shall inform the stock exchange about the details of the closure of trading window notice as and when the need arises.

Consequence of non-compliance with the policy:

Failure to comply with this Code is a disciplinary issue and may also constitute a criminal offence in certain cases. Any employee including their Immediate Relatives who violates the provisions of this Code shall be liable for such penal/disciplinary/remedial action as may be considered appropriate by the Board of Directors. All Breaches of this Code with actions taken by the Directors shall be reported to the Audit Committee & Board of Directors of the Company on a quarterly basis. The above actions of the Company will be without prejudice to any civil or criminal action that the regulatory authorities may initiate against such an employee.

Review by Audit Committee

The Audit Committee of the Company shall review compliance with the provisions of these regulations at least once in a year financial year and shall verify that the systems for internal control are adequate and are operating effectively.

ANNEXURE I

APPLICATION FOR PRE - CLEARANCE OF TRADING

The Compliance Officer
Apollo Finvest (India) Limited

Date: _____

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Policy, I seek approval for purchase/sale of the Securities of the Company as per the details given below:

Details of Designated Person	
Name	
Designation	
PAN	
Location	
Email Id.	
Contact No.	
Preclearance sought for	Self/ Immediate Relative
<i>If pre-clearance sought for Immediate Relative, then</i>	
Name of the Immediate Relative for whom pre-clearance sought	
Nature of Relationship	
PAN of Immediate Relative	
Details of Security held by self/ Immediate Relative for whom the pre-clearance is sought	
No. of Securities held as on date In physical form	
In dematerialized form	
Details of Proposed Transaction	
Nature of Proposed Transaction	Sale/ Purchase
No. of Securities proposed to be transacted	
Details of identified account	
Name & contact details of Broker with Account No.	
Name of Depository Participant	
DP ID	
Client ID	
Details of previous pre-clearance, if any	

No. of Shares for which pre-clearance was taken	
Date of approval of pre-clearance	
Whether transaction was executed	
If yes, No. of shares transacted & Value	
Reasons if not traded	

I hereby confirm and declare that:

- a) I am not in possession/ knowledge of any information that could be construed as Unpublished Price Sensitive Information (UPSI) as defined in the Policy upto the time of signing this undertaking;
- b) In the event that I am in possession/knowledge of any information that could be construed as UPSI, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer immediately and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- c) I have not and shall not enter into any opposite transaction (buy/sell) during the previous/ next six months from the date of the last transaction.
- d) I undertake to submit the necessary forms/ documents within the prescribed timelines.
- e) I am aware that, I shall be liable to face penal consequences including disciplinary action in case the above declarations are found to be misleading or incorrect at any time;
- f) I agree to comply with the provisions of the Code at all times and provide any information relating to the trade as may be required by the Compliance Officer and permit the Company to disclose such detail to SEBI if so required by SEBI.
- g) I further hereby agree to indemnify and keep the Company and its Directors indemnified from and against all and any penalties/fines that may be imposed on them by the SEBI and/or any other statutory authorities as a result of violation by me of the SEBI (Prohibition of Insider Trading) Regulations 2015 as amended from time to time and the Code prescribed by the Company.

Date

Signature _____

Signature _____

Name:

Designation:

Please provide all the information. Incomplete forms will not be accepted.

For use of Compliance Officer:

Sr. No.	Application recd. date	Approval Date	Approval Granted for (Type of transaction)	Approval granted for (No. of shares)	Pre-clearance valid upto (dd/mm/yyyy)[Maximum 7 days]	Compliance Officer's signature
			Sale/ Purchase			

ANNEXURE II
FORM OF DISCLOSURE OF TRANSACTIONS

(To be furnished within 2 days from of transaction/dealing in Securities of the Company)

Name of Designated Person	
Designation	
PAN	
Email Id	
Contact No.	
<i>If the trade was effected in the name of Immediate Relative</i>	
Name of Immediate Relative	
Nature of Relationship	
PAN	
<i>Details of Pre-clearance approved:-</i>	
Type of Transaction for which pre-clearance was applied	Purchase/ Sale
No. of Shares for which pre-clearance was applied	
Pre-clearance approved for (No. of security & date of Approval)	
<i>Details of Transaction executed</i>	
No. of Securities bought/sold	
DP ID/Client ID/Folio Number	
No. of Securities held prior to the date of transaction	
Price at which the transaction executed	
Reasons, if transaction not executed or if executed for lower quantity	
Total number of Securities held after acquisition/sale	

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance Officer / SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery Instruction Slip (applicable in case of sale transaction).

I agree to hold the above Securities for a minimum period of six months. In case there is any urgent need to

sell these Securities within the said period, I shall approach the Compliance Officer for necessary approval. (applicable in case of purchase/subscription).

I declare that the above information is correct and that no provisions of the Company's Code, SEBI Regulations and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

.....

Signature of Designated Employee

ANNEXURE III

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: **Apollo Finvest (India) Limited**

ISIN of the company: **INE412D01013**

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group /designated person/ Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimat ion to compa ny	Mode of acquis ition / dispos al	Exch ange on whic h The trade was exec uted
		Type of securi ty	No. and % of shareholding	Type of securit y	N o .	Val ue	Transa ct ion Type	Type of securit y	No. and % of shareholdi ng	Fro m	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2). – N.A.

Signature : _____

Name : _____ Designation : _____

Date : _____ Place : _____

ANNEXURE IV

APPLICATION FOR ANNUAL TRADING PLAN

To,
The Compliance Officer
Apollo Finvest (India) Limited

Date: _____

1. Name of the Applicant: _____
2. PAN _____
3. No. of securities held in the Company as on date: _____
4. Approval sought for: ____ Self ____ Immediate Relative (IR)
5. Trading plan belongs for a period of _____ months i.e. for a period commencing from _____ and ending on _____

Details of the proposed trade:

S. No.	Nature of transaction (Sale/Purchase)	Date of transaction/period/interval for transaction	Value of trade/ No. of securities transacted	Conditions /Remarks

Undertaking:

- a) I will not commence trading earlier than six months from the public disclosure of the plan.
- b) I do not have overlapping trading plan for the same period.
- c) In the event that I am in possession/knowledge of any information that is construed as “Unpublished Price Sensitive Information” as defined in the Policy, at the time of formulation and approval of this plan but which is not made public at the time of trading as per the approved time schedule in the said plan, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- d) I have not contravened the provisions of the Insider Trading Policy as notified by the Company from time to time;
- e) I have made full and true disclosure in the matter.
- f) I undertake to abide by this trading plan once approved and shall furnish such declarations/ disclosures as may be deemed necessary by compliance officer for the monitoring of this plan.
- g) I shall not use this trading plan as a tool for market abuse

Signature:

Date:

For use of compliance officer:

Application recd. date	Approval Date	Approval No.	Compliance Officer's signature

Approval granted for Trading Plan for a period of _____ months commencing from _____ up till _____

Notification to Stock Exchange _____

Signature of Compliance Officer: _____