





30th October 2020

To,	To,
The Manager - Listing Department,	The Manager-Department of Corporate Services
The National Stock Exchange of India Ltd	BSE Limited
Exchange Plaza, 5th floor,	Jeejeebhoy Towers,
Plot no. C/1, "G" Block,	Dalal Street, Fort,
Bandra-Kurla Complex,	Mumbai - 400 001
Mumbai-400051	
Symbol: APCOTEXIND	Security Code: 523694

Dear Sir,

Sub: Compliance under Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) (LODR) Regulations, 2015

In accordance with regulation 23(9) of SEBI (LODR) Regulation 2015, we are enclosing herewith the disclosure of Related party transactions for the half year ended on 30th September 2020.

The said disclosure will be uploaded on the website of the company i.e. https://www.apcotex.com

This is for your information and record.

Thanking you,

For Apcotex Industries Limited

Anand V Kumashi

GM - Finance & Company Secretary

Related Party Transaction Disclosures:

(I) Disclosures under IND AS 24 on Related Party Transactions:

A. Names of Related Parties and nature of relationship:

(Related Parties and the transactions with Related Parties are identified by the management and relied upon by Auditors).

(i) Key Management Personnel and their relatives

- a) Atul Choksey-Chairman and Non-Executive Director
- b) Abhiraj Choksey-Managing Director
- c) Parul Atul Choksey-Relative of Chairman and Non-Executive Director
- d) Y B Gadgil-Executive Director (upto 31st March, 2020)
- e) Ravishankar Sharma-Executive Director (Appointed w.e.f 1st May, 2020)
- f) Anand Kumashi-Company Secretary
- g) Suraj Badale-Chief Financial Officer

(ii) Non-Executive Directors and Independent Directors:

- a) Atul Choksey- Chairman and Non-Executive Director
- b) Amit Choksey- Non Executive Director
- c) Dr Sivaram- Independent Director
- d) Shailesh Vaidya- Independent Director
- e) Kamlesh Vikamsey- Independent Director
- f) Priyamvada Bhumkar- Independent Director
- g) Udayan Choksi- Independent Director

(iii) Entities in which some of the Directors are interested:

- a) Abhiraj Trading & Investments Pvt. Limited
- b) Aeonian Investments Company Limited
- c) Amisha Habitat Private Limited
- d) Apco Enterprises LLP
- e) Aquamarine Trading & Investments Pvt. Limited
- f) Aquamarine Investment Managers LLP
- g) Balasesh Leafin Limited
- h) Bhuvantray Investments & Trading Co. Pvt. Limited
- i) Choksey Chemical Pvt. Limited
- j) Cons Holdings Limited
- k) Jareepa Trading LLP
- I) Gauriputra Investments & Trading Co. Pvt. Limited
- m) Haridwar Trading & Investments Pvt. Limited
- n) HMP Mineral Pvt. Limited
- o) Mazda Colours Limited

- p) Colortek India Ltd
- g) Sammelan Investments & Trading Limited
- r) Shyamal Fin-vest (India) Limited
- s) The Hindustan Mineral Products Co. Limited

B. Transactions with Related Parties

(i) Key Managerial Personnel Compensation

(Rs. in Lakh)

Short Term and Post-Employment Benefits	Year 2020-21 (Upto Sept'2020)	Year 2019-20
Remuneration Abhiraj A. Choksey - Managing Director Y. B. Gadgil - Executive Director* Ravishankar Sharma - Executive Director** Anand Kumashi - Company Secretary Suraj Badale - Chief Financial Officer	56.86 - 30.16 14.47 10.38	112.88 46.05 - 29.95 21.62
Total	111.87	210.50

^{*} Upto 31st March, 2020

Key Managerial Personnel who are under the employment of the company are entitled to postemployment benefits and other long term employee benefits recognized as per Ind AS 19-'Employee Benefits' in the financial statements. As these employee benefits are lump sum amounts provided on the basis of actuarial valuation, the same is not included above.

(ii) Transactions with other Related parties

(Rs. in Lakh)

Sr No	Particulars	Relationship	Year 2020-21 (Upto Sept'2020)	Year 2019-20
a.	Sale of Goods Choksey Chemicals Pvt. Ltd	Entities in which some of the Directors are interested	15.46	4.47
b.	Rent and Other expenses (Reimbursement) Apco Enterprises LLP	Entities in which some of the Directors are interested	7.18	14.34
b.	Reimbursement of Medical Expenses Shri. Atul C. Choksey	Chairman and Non-Executive Director	1.21	2.72
d.	Leasing of Premises and allied expenses			
	Parul Atul Choksey	Relative of Chairman and Non- Executive Director	9.43	26.55

^{**} Appointed w.e.f from 1st May, 2020

e.	Sitting Fees Atul C. Choksey Other	Chairman and Non-Executive Director Non-Executive Director and Independent Directors	0.45 5.05	1.20 9.20
f.	Commission paid during the year Atul C.Choksey Other	Chairman and Non-Executive Director Non-Executive Director and Independent Directors	35.00 15.00	48.00 14.00
g.	Outstanding as at 30 th Sept'2020 Trade and Other Payable Abhiraj A. Choksey – Remuneration Payable	Managing Director	5.79	6.60
	Trade and Other Receivable Choksey Chemicals Pvt Ltd	Entities in which some of the Directors are interested	13.08	1.84
	Rent Deposits Apco Enterprises LLP	Entities in which some of the Directors are interested	7.02	7.02