

**APOLLO FINVEST
(INDIA) LTD.**

CIN: LS1900MH1985PLC036991

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

Date: 29th March, 2019

To,
The Corporate Relations Department,
Bombay Stock Exchange Limited,
PJ Tower,
Dalal Street, Fort,
Mumbai- 400 001.

Dear Sir/ Madam,

Ref - Scrip Code: 512437

Sub: Intimation under SEBI (Prohibition of Insider Trading) Regulations, 2015.

We wish to inform you that pursuant to the Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 and to give effect to the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Board of Directors of the Company vide Circular Resolution as on March 29, 2019 has adopted the revision in the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" ("The Code") pursuant to the SEBI (Prohibition of Insider Trading (Amendment) Regulations, 2018 to regulate and monitor the new Code of Practices and Procedures for fair disclosure of unpublished price sensitive information.

The Revised Code is effective from April 1, 2019 and shall be made available on the Company's website at www.apollofinvest.com.

Kindly acknowledge receipt and take the above information on your records.

Thanking you,

For Apollo Finvest (India) Limited,


Mikhail Innani
Managing Director
DIN: 02710749





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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Trading) (Amendment) Regulations, 2018, to put in place a Code of Practices and Procedures for fair disclosure of unpublished price sensitive information.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company to formulate and publish on its official website, a code of practices and procedures for fair disclosure or unpublished price sensitive information that it would follow to adhere to each of the principles set out in the regulations.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 Revised Code of practices and procedures of Fair Disclosure of Unpublished Price Sensitive Information for determination of "Legitimate Purpose" as a part of the Code.

OBJECTIVES:

1. The Company endeavours 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.



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SCOPE:

The Company endeavours to preserve the confidentiality of un-published price sensitive information (UPSI) and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

APPLICABILITY:

This Code shall be applicable with effect from April 1, 2019.

CODE OF FAIR DISCLOSURE:

A code of practices and procedures for fair disclosure of unpublished price sensitive information (UPSI) for adhering each of the principles is set out below:

- A. The Company shall ensure prompt public disclosure of Unpublished Price Sensitive Information ("UPSI") that would impact price discovery, as soon as it has credible and concrete information, in order to make such information 'generally available' i.e. to make the information accessible to the public on a non-discriminatory basis.
- B. The Company shall endeavour to make uniform and universal dissemination of UPSI to avoid selective disclosure.
- C. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer for the purpose of aforesaid SEBI Regulation and for dealing with dissemination of information and disclosure of unpublished price sensitive information. In the absence of the Company Secretary, Chief Financial Officer or such other officer, as may be authorized by the Board in this regard, shall act as the Chief Investor Relations Officer.
- D. The Company Secretary shall promptly disseminate the UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- E. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- F. The Company shall ensure that information shared with analysts, research personnel, Institutional Investors is not UPSI.
- G. Any interaction/ discussion with analysts/researchers, institutional and other large investors or the media or any investor relations conference may be preferably recorded through proceedings of the meeting or a transcript of the interaction or in any other suitable manner.





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- H. The Company shall develop 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.
- I. All unpublished price sensitive information to be handled on a need-to-know basis. No person shall procure from or cause the communication by any insider of UPSI, relating to the listed securities of the Company, except in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations.

SHARING OF PRICE SENSITIVE INFORMATION PURSUANT TO LEGITIMATE PURPOSE:

Legitimate Purpose shall include sharing of unpublished price sensitive information in ordinary course of business by an Insider with Partners, Collaborators/ Lenders, Customers, Suppliers, Merchant Banker, 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 these regulations.

Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of SEBI (Prohibition of Insider Trading) Regulations, 2015 and such persons are also required to ensure and maintain the confidentiality of unpublished price sensitive information shared with them, in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015.

MAINTENANCE OF DIGITAL DATABASE:

The Company shall maintain digital database with time stamping and audit trails to ensure non-tampering of the data base containing name and PAN of the person/entity(ies) with whom information is shared pursuant to Legitimate Purposes and name and PAN of Designated Person alongwith their immediate relatives.





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DISCLOSURE AND AMENDMENT:

This Code and any amendments hereto shall be promptly disclosed to the stock exchanges, as soon as they are approved and adopted by the Board of Directors.

Note: *This policy is only internal code of conduct and one of the measures to avoid Insider trading. It will be the responsibility of each employee to ensure compliance of SEBI Guidelines and other related statutes.*


