

APL Apollo Tubes Limited

January 25, 2020

General Notice regarding compliance with the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 (the Regulations), duly amended

APL Apollo Tubes Limited adopted (a) *“the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” (Fair Disclosure Code)* and (b) *“the Code of Conduct for listed companies to regulate, monitor and report trading by Designated persons (Code of Conduct on Insider Trading)”* by amending existing Codes to incorporate the various amendments brought about by SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 notified on 31.12.2018, effective from 01.04.2019., duly approved by its Board of Directors.

1. The above ‘Fair Disclosure Code’ is available on Company’s website: www.aplapollo.com. The above SEBI Regulations are available on SEBI’s website: www.sebi.gov.in.
2. The ‘Code of Conduct on Insider Trading’ as mentioned above is applicable to all ‘designated persons’ as defined in Para No. 1.7 of the Code.
3. The Provisions of the Regulations are applicable to all ‘connected persons’ ‘insiders’ as defined under Clause 2 (1) (d) and 2 (1) (g) of the Regulations.
4. By default the following persons are deemed to be ‘connected persons’ (to the Company) unless the contrary is established:
 - a. an immediate relative of connected persons; 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 a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest;
5. Further, all the persons with whom the unpublished price sensitive information (as defined in Clause 2 (1) (n) of the Regulations) pertaining to the Company are shared, are required to maintain confidentiality of the same. In this regard this circular may be deemed to be adequate notice requiring all concerned to maintain confidentiality as stipulated under Regulation 9A of the Regulations.
6. All concerned are advised to comply with the provisions of the Regulations while dealing with the Company and dealing in its equity shares.

Sd/-

Deepak C S
Company Secretary

To all concerned