

APOLLO SINDOORI HOTELS LIMITED

**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY ITS DESIGNATED
PERSONS AND IMMEDIATE RELATIVES OF DESIGNATED PERSONS**

[Pursuant to Regulation 9(1) and Schedule B of the Securities AndExchange Board Of India
(Prohibition Of Insider Trading) Regulations, 2015]

APOLLO SINDOORI HOTELS LIMITED

Code of Conduct To Regulate, Monitor And Report Trading By Its Designated Persons And Immediate Relatives Of Designated Persons

1. Introduction

In terms of SEBI (Prohibition of Insider Trading) regulations, 2015 as amended (hereinafter referred to as PIT Regulation), the Board of Directors (the “board”) of Apollo Sindoori Hotels Limited (the “company”), has adopted the following policy to regulate, monitor and report the trading by Designated Persons and immediate relatives of designated persons of the company. The board may review and amend this policy from time to time. This policy is reviewed and approved by Board on 19th May, 2023.

This policy is intended to impose restrictions on trading in securities while in possession of unpublished price sensitive information (UPSI), including prohibition on procurement of UPSI, circulation of UPSI and give an option to persons who may be perpetually in possession of UPSI and enable them to trade in securities in a compliant manner.

2. Definitions

“**Act**” means the Securities and Exchange Board of India Act, 1992.

“**Board**” means the board of directors of the company.

“**Code**” or “**Code of Conduct**” shall mean the code of conduct for prevention of insider trading of Apollo Sindoori Hotels Limited as amended from time to time.

“**Company**” means Apollo Sindoori Hotels Limited.

“**Compliance Officer**” means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the board and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of the company. Board shall designate a person as compliance officer and in case of any intermittent vacancy of designated compliance officer, the Board may decide and designate any person for the time being.

Explanation - For the purpose of this code of conduct, "financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

“Connected Person” means:

- (i) any person who is or has during the six months prior to the concerned act been associated with a 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 per cent, of the holding or interest.

“Designated Person (s)” shall include:

- (i) every employee in the grade of Vice President and above,
- (ii) every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the compliance officer,
- (iii) Any other Employee as may be designated by the Compliance Officer in consultation with the Managing Director/ Chief Financial Officer considering the objectives of the Code, and
- (iv) All promoters.

“Immediate relative” means Spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such persons in taking decisions relating to trading in securities;

“Insider” means any person who is:

- (i) a connected person, or
- (ii) in possession of or having access to unpublished price sensitive information.

“Key Managerial Person (KMP)” means person as defined in Section 2(51) of the Companies Act, 2013.

“Material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

“Securities” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;

“Specified Persons” means the directors, connected persons, the insiders, the designated employees and the promoters and their immediate relatives collectively.

“Unpublished Price Sensitive Information” 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:

- (i) financial results,
- (ii) dividends,
- (iii) change in capital structure,
- (iv) mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions, and
- (v) changes in key managerial personnel

Words and expressions used and not defined in this code but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Securities Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2018 and the Depositories Act, 1996 (22 of 1996), SEBI (Prohibition of Insider Trading) regulations, 2015 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

3. Applicability

This code apply to all “Specified Persons”

4. Role of Compliance Officer

The compliance officer shall report on insider trading to the board of directors of the company and in particular, shall provide reports to the chairman of the audit committee, and to the chairman of the board at such frequency as may be stipulated by the board but not less than once in a year.

The compliance officer shall assist all employees in addressing any clarifications regarding the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the company’s code of conduct.

The Compliance Officer shall maintain a record (either manual or in electronic form) of the Register of Promoters / Directors / KMP / Designated Employees and changes thereto from time-to-time based on information (Annexure 1).

5. Preservation of Price Sensitive Information

All information shall be handled within the company on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations. Any person holding the UPSI should take due permission of the compliance officer or head of the department before communicating any UPSI to person other than in due discharge of duty.

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 consultant, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI (Prohibition of Insider Trading) Regulations, 2015. UPSI can be communicated, provided or allowed access to strictly in compliance with the PIT Regulation.

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

UPSI may be communicated, provided, allowed access to, or procured, in connection with a transaction which entails:

- an obligation to make an open offer under the takeover regulations where the board of the company is of informed opinion that the sharing of such information is in the best interests of the company, or
- not attracting the obligation to make an open offer under the takeover regulations but where the board of the company is of informed opinion that sharing of such information is in the best interests of the company and the information that constitute UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the board may determine to cover all relevant and material facts.

However, the board shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the company when in possession of UPSI.

Further, a structured database shall be maintained by compliance officer containing the names of such persons or entities as the case may be with whom information is shared along with Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available. Such databases shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

“Need to know” basis means that UPSI should be disclosed only to those within the company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

Chinese Walls

Additionally, while dealing with or handling Unpublished Price Sensitive Information within Company, the Company shall establish policies, procedures and physical arrangements (collectively “Chinese Walls”) designed to manage confidential information and prevent the inadvertent spread and misuse of Unpublished Price Sensitive Information, or the appearance thereof.

Chinese Walls shall be used to separate areas that have access to Unpublished Price Sensitive Information (“Insider Areas”) from those who do not have such access (“Public Areas”) within the Company.

Where Chinese Walls arrangements are in place Insiders working within an Insider Area are prohibited from communicating any Confidential or Unpublished Price Sensitive Information to Insiders in Public Areas without the prior approval of the Compliance Officer.

Insiders within a Chinese Wall have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately.

An Insider may cross the Chinese Wall to enter the Insider Areas only with the prior approval of the Compliance Officer, and would be subject to all restrictions that apply to such areas. The establishment of Chinese Walls does not suggest or imply that Unpublished Price Sensitive Information can circulate freely within Insider Areas. The provision shall be applicable within Insider Areas as well.

6. Prevention of misuse of “Unpublished Price Sensitive Information”

Specified Persons shall be governed by an internal code of conduct while dealing in securities of the company. Specified persons cannot trade in the securities of the company during the period of closure of trading window or during the period when generally the UPSI is deemed to be generally available to them. However, an insider can formulate a trading plan for trading in the securities as per conditions and details provided.

An insider shall be entitled to formulate a trading plan 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.

Trading Plan:

1. Trading plan above referred shall:

- a) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan,
- b) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results,
- c) entail trading for a period of not less than twelve months,
- d) not entail overlap of any period for which another trading plan is already in existence,
- e) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected, and
- f) not entail trading in securities for market abuse.

2. The compliance officer shall consider the trading plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the regulations.

3. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

4. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the insider is in possession of any UPI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the company, if the date of trading in securities of the company, as per the approved trading plan, coincides with the date of closure of trading window announced by the compliance officer.

7. Institutional Mechanism for Prevention of Insider trading

- i. The Chief Executive Officer, MD , CFO of the Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider trading.
- ii. The internal controls shall include the following:
 - (a) all employees who have access to unpublished price sensitive information are identified as designated person
 - (b) all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations
 - (c) adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;
 - (d) lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
 - (e) all other relevant requirements specified under these regulations shall be complied with
 - (f) periodic process review to evaluate effectiveness of such internal controls.
- iii. The board of directors or head(s) of the organisation shall ensure that the Chief Executive Officer or the Managing Director or CFO ensures compliance with regulation 9 and sub-regulations (1) and (2) of this regulation.
- iv. The Audit Committee shall review compliance with the provisions of these regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

8. Trading Window and Window Closure

- i. The trading window, i.e. the trading period of the stock exchanges, called ‘trading window”, is available for trading in the Company’s securities.
- ii. In the case of declaration of quarterly financial results: The trading window will remain closed for seven trading days prior to the date of publication of the financial results and will open after second trading day of the publication financial results, however, for the person who are involved in preparation of financial statements, including designated employees, the trading window shall remain closed from 20th day of last month of quarter for which financial results are being prepared till second trading day of the publication of financial results and specified persons shall not trade in the company’s securities in such period.
- iii. All specified persons shall conduct all their dealings in the securities of the company only in a valid trading window and shall not deal in any transaction involving the

purchase or sale of the company's securities during the periods when the trading window is closed or during any other period as may be specified by the company from time to time.

iv. In case of any unpublished price sensitive information other than quarterly financial results, the compliance officer shall intimate the closure of trading window to all the designated employees of the company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

v. The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

9. Pre-clearance of trades

i) Every Specified 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 is above 50,000 shares or value of transaction Rs. 10 lacs (market value) or 1% of total shareholding, whichever is less, should pre-clear the transaction. However, no specified 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:

a) An application may be made in Form E (Annexure- 2) to the compliance officer indicating the estimated number of securities that the specified persons 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.

b) An undertaking shall be executed in favour of the Company by such specified persons incorporating, *inter alia*, the following clauses, as may be applicable:

- That the employee/director/officer/others does not have any access or has not received UPSI up to the time of signing the undertaking.
- That in case the specified person has access to or receives UPSI after the

signing of the undertaking but before the execution of the transaction he/she shall inform the compliance officer of the change in his position and that he/she would completely refrain from dealing in the securities of the company till the time such information becomes public.

- That he/she has not contravened the code of conduct for prevention of insider trading as notified by the company from time to time.
- That he/she has made a full and true disclosure in the matter.

ii) All specified persons shall execute their order in respect of securities of the company within one week after the approval of pre-clearance is given. The specified person 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.

iii) If the order is not executed within seven days after the approval is given, the specified persons must pre-clear the transaction again.

iv) All specified 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 six months following the prior transaction. All specified 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 the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

8. Reporting Requirements for transactions in securities

i. Initial Disclosure

Every promoter/ member of the promoter group/ key managerial personnel /director /officers /designated employees of the company, within thirty days of these regulations taking effect, shall forward to the company the details of all holdings in securities of the company presently held by them including the statement of holdings of dependent family members in Form A (Annexure 3).

Every person on appointment as a key managerial personnel or a director of the company or upon becoming a promoter or member of the promoter group 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 in Form B (Annexure 4).

ii. Continual Disclosure

Every promoter, member of the promoter group, designated person and director of the company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction 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. ten lakhs.

The disclosure shall be made in Form C within 2 working days of:

- a) the receipt of intimation of allotment of shares, or
- b) the acquisition or sale of shares or voting rights, as the case may be.

iii. Disclosure by the company to the stock exchange

Within 2 days of the receipt of intimation under Clause 8 (ii), the compliance officer shall disclose to the stock exchange on which the company is listed, the information received.

The compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

iv. Annual Disclosure

Every designated Persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the intermediary or fiduciary on an annual basis and as and when the information changes:

- a) Immediate relatives
- b) Persons with whom such designated person(s) shares a material financial relationship
- c) Phone, mobile and cell numbers which are used by them.

In addition, the names of educational institutions from which designated persons and names of their past employers shall also be disclosed on a one-time basis.

v. The designated person, who has got the approval through pre-clearance for the trade, shall report in Form F, within 2 days from the execution of trade to the Compliance officer

9. Inquiry

- i. In case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, investigation on the same shall be conducted as per the Investigation clause of Whistle Blower Policy of the Company.
- ii. Such inquiry/investigation shall be promptly informed to Securities Exchange Board of India of such leaks, inquiries and results of such inquiries.

10. Penalty for contravention of the code of conduct

- iii. Every specified person shall be individually responsible for complying with the provisions of the code (including to the extent the provisions hereof are applicable to his/her dependents).
- iv. Any specified person who trades in securities or communicates any information for trading in securities, in contravention of this code may be penalised and appropriate action may be taken by the company.
- v. Specified Persons who violate the code shall also be subject to disciplinary action by the company, which may include wage freeze, suspension, recovery, claw back, ineligibility for future participation in employee stock option plans, etc.
- vi. The action by the company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

9. Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below and compliance officer shall ensure following:

- i. Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- ii. Uniform and universal dissemination of UPSI to avoid selective disclosure.
- iii. The Company's Chief Financial Officer and Compliance Officer serve as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

- iv. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- v. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- vi. Ensuring that information shared with analysts and research personnel is not UPSI.
- vii. Developing 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.
- viii. Handling of all UPSI on a need-to-know basis. i.e., UPSI should be disclosed only to those within the company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- ix. For “legitimate purposes” the Company may share information including unpublished price sensitive information in the ordinary course of business by an insider, with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the regulation.
- x. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for the purpose of the regulation and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with the regulation and Insider Trading policy of the Company, which is available in the website of the Company.
- xi. A structured database containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available. Such databases shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.
- xii. The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

ANNEXURE 1
APOLLO SINDOORI HOTELS LIMITED
REGISTER OF PROMOTERS / DIRECTORS / KMP / DESIGNATED PERSONS

Sr.no	Name of the Specified person	Designation

Annexure 2

Form E

FORMAT OF APPLICATION FOR PRE-CLERANCE

To,
The Compliance Officer,
Apollo Sindoori Hotels Limited,

Dear Madam,

Application for Pre-clearance for trading in securities of the Company.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval to _____ of equity shares of the Company as per details given below:

1. Name of the applicant	
2. Designation	
3. Name of the person, who is trading	
4. Number of securities held as on date	
5. DP ID / Client ID No.	
6. The Proposal is for	
7. Proposed date of trading in securities	
8. Estimated number of securities proposed to be purchased	

9. Price at which the transaction is proposed	
10. Current market price (As on date of application)	
11. Whether the proposed transaction will be through stock exchange	
12. DP ID / Client ID No. where the securities will be credited/debited	

I hereby confirm and declare that:

- a. I am not in possession of, or otherwise privy to, any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking. In the event that I have access to or receive any information that could be construed as "Price Sensitive Information" as defined in the Code after the signing of this undertaking but before executing the transaction for which approval is sought, 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.
- b. I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.
- c. If approval is granted, I shall execute the trade within 7 trading days of the receipt of approval failing which I shall seek pre-clearance again, if necessary.
- d. I undertake to submit the necessary report within two days of execution of the transaction/ a 'Nil' report if the transaction is not undertaken (within 9 days from the date of pre-clearance).
- e. I have made full and true disclosure in the matter.

Yours faithfully,

(Signature of Applicant)

Place:

Date :

ANNEXURE 3**FORM A****Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (a) read with Regulation 6 (2)]**

Name of the company : Apollo Sindoori Hotels Limited

ISIN of the company : INE451F01024

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ immediate relatives/ others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.		Contract Specifications	Number of Units (contract size) * lot size)	Notional value in Rupee terms	Contract Specifications	Number of Units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Designation:

Date:

Place:

Annexure - 4

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6(2)]

Name of the company : Apollo Sindoori Hotels Limited

ISIN of the company : INE451F01024

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ immediate relatives/ others etc.)	Date of appointment of Director/ KMP or Date of becoming Promoter	Securities held at the time of becoming Promoter/ appointment of Director/ KMP		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.		Contract Specifications	Number of Units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of Units (contracts * lot size)	Notional value in Rupee terms

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

Name:

Signature:

Date:

Place:

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Signature:

Designation:

Date:

Place:

Details of trading in derivatives by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.

Signature

Name :

Place :

Date: