

REPORT ON CORPORATE GOVERNANCE

I. Philosophy of Corporate Governance

Effective corporate governance practices constitute the strong foundation on which successful commercial enterprises are built to last. The Company's philosophy on corporate governance oversees business strategies and ensures fiscal accountability, ethical corporate behaviour and fairness to all stakeholders comprising regulators, employees, customers, vendors, investors and the society at large.

The Company has a strong legacy of fair, transparent and ethical governance practices.

The Company has adopted a Code of Conduct for its employees including the Managing Director and the Executive Directors. In addition, the Company has adopted a Code of Conduct for its non-executive directors which includes Code of Conduct for Independent Directors which suitably incorporates the duties of independent directors as laid down in the Companies Act, 2013 ("the Act"). The Company's corporate governance philosophy has been further strengthened through the Apollo Tricoat Code of Conduct for Prevention of Insider Trading and the Code of Corporate Disclosure Practices ("Insider Trading Code").

The Company is in compliance with the requirements stipulated under Regulation 17 to 27 read with Schedule V and clauses (b) to (i) of sub-regulation (2) of Regulation 46 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), as applicable, with regard to corporate governance.

II. Board of Directors

a. Composition of Board

- i. As on March 31, 2020, the Company's board comprises of 6 (six) Directors. Out of the six Directors, 4 (four) are Non-Executive Directors in which 3 (three) are Independent Directors. The profiles of Directors is available at www.apollotriccoat.com. The composition of the Board is in conformity with Regulation 17 of the SEBI Listing Regulations read with Section 149 of the Act.
- ii. None of the Directors on the Board holds directorships in more than 10 (ten) public companies. None of the Independent Directors serves as an independent director on more than 7 (seven) listed entities. Necessary disclosures regarding Committee positions in other public companies as on March 31, 2020 have been made by the Directors. None of the Directors is related to each other except Mr. Rahul Gupta and Ms. Megha Gupta, who are related as spouse to each other.
- iii. Independent Directors are non-executive directors as defined under Regulation 16(1)(b) of the SEBI

Listing Regulations read with Section 149(6) of the Act along with rules framed thereunder. In terms of Regulation 25(8) of SEBI Listing Regulations, they have confirmed that they are not aware of any circumstance or situation which exists or may be reasonably anticipated that could impair or impact their ability to discharge their duties. Based on the declarations received from the Independent Directors, the Board of Directors has confirmed that they meet the criteria of independence as mentioned under Regulation 16(1)(b) of the SEBI Listing Regulations and that they are independent of the management.

b. Board Meetings

4 (Four) Board Meetings were held during the year under review and the gap between two meetings did not exceed one hundred and twenty days. The board meetings were held on: May 17, 2019; July 22, 2019; October 15, 2019 and January 20, 2020 respectively. The necessary quorum was present for all the meetings.

The names and categories of the Directors on the Board, their attendance at Board Meetings held during the year under review and at the last Annual General Meeting (“AGM”), name of other listed entities in which the Director is a director and the number of Directorships and Committee Chairmanships / Memberships held by them in other public limited companies as on March 31, 2020 are given herein below. Other directorships do not include directorships of private limited companies, foreign companies and companies registered under Section 8 of the Act. Further, none of them is a member of more than 10 (ten) committees or Chairman of more than 5 (five) committees across all the public companies in which he/she is a Director. For the purpose of determination of limit of the Board Committees, Chairpersonship and membership of the Audit Committee and Stakeholder’s Relationship Committee has been considered as per Regulation 26(1)(b) of SEBI Listing Regulations.

Name of the Director	Category of Directorship ¹	Number of Board meetings attended out of 4 (four) held during the FY 2020	Whether attended last AGM held on September 28, 2019	No. of Directorships in other Public Companies				Directorship in other listed entity (Category of Directorship)
				Chairman	Director	Member#	Chairman#	
Mr. Rahul Gupta**	Non-Independent, Executive	4	Yes	-	-	-	-	-
Mrs. Megha Gupta***	Non-Independent, Non-Executive	4	Yes	-	-	-	-	-
Mr. Bharat Bhushan Sahny	Independent, Non-Executive	4	Yes	-	1	3	1	Rama Steel Tubes Limited
Ms. Neeru Abrol**	Independent, Non-Executive	NA	NA	-	5	5	2	- Apollo Pipes Limited - TCNS Clothing Co. Limited - APL Apollo Tubes Limited
Mr. Romi Sehgal***	Whole Time Director	NA	NA	-	4	-	-	APL Apollo Tubes Limited

Mr. Anil Kumar Bansal	Independent, Non-Executive	4	Yes	-	3	4	3	APL Apollo Tubes Limited
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NOTES:

** Appointed as Additional Directors w.e.f. January 20, 2020.

*** Appointed as Whole Time Director w.e.f. February 1, 2020.

#only covers Memberships/Chairmanships of Audit Committee and Stakeholders' Relationship Committee. Video/tele-conferencing facilities are also used to facilitate Directors travelling/residing abroad or at other locations to participate in the meetings.

- i. During FY 2019-20, information as mentioned in Part A of Schedule II of the SEBI Listing Regulations, has been placed before the Board for its consideration.
- ii. During FY 2019-20, one meeting of the Independent Directors was held on January 20, 2020. The Independent Directors, inter-alia, reviewed the performance of Non-Independent Directors, Board as a whole, taking into account the views of executive directors and non-executive directors.
- iii. The Board periodically reviews the compliance reports of all laws applicable to the Company.
- iv. Details of equity shares of the Company held by the Directors as on March 31, 2020 are given below:

Name	Category	Number of Equity Shares
Mr Romi Sehgal	Whole Time Director	6969
Mr. Anil Kumar Bansal	Director	500

c. Appointment of Directors

The Board has adopted the provisions with respect to appointment and tenure of Independent Directors consistent with the Companies Act, 2013 and the Listing Regulations. As per the provisions of the Companies Act, 2013, the Independent Directors shall be appointed for not more than two terms of maximum of five years each and shall not be liable to retire by rotation. At the time of appointment of an Independent Director, the Company issues a formal letter of appointment outlining his/her role, function, duties and responsibilities as a Director. The template of the letter of appointment is available on our website at www.apollotriccoat.com/investors. Details of Directors proposed for appointment/ re-appointment at the 38th Annual General Meeting (AGM) is provided in the notice convening the 38th AGM.

d. Policy for Selection and Appointment of Directors:

The Board Governance, Nomination and Compensation Committee has adopted a policy which, inter alia, deals with the manner of selection of Directors as described herein below.

Criteria of Selection of Independent Directors and Key Skills, Expertise, and Core Competencies of the Board.

The Board of the Company comprises of eminent personalities and leaders in their respective fields. These Directors are nominated based on well-defined selection criteria. The Board Governance, Nomination and Compensation Committee considers, inter alia, key qualifications, skills, expertise and competencies, whilst recommending to the Board the candidature for appointment as Independent Director. In case of appointment of Independent Directors, the Board Governance, Nomination and Compensation Committee satisfies itself about the independence of the Directors vis-à-vis the Company to enable the Board to discharge its functions and duties effectively.

The Board Governance, Nomination and Remuneration Committee ensures that the candidates identified for appointment as Directors are not disqualified for appointment under Section 164 and other applicable provisions of the Companies Act, 2013. In case of re-appointment of Independent Directors, the Board takes into consideration the performance evaluation of the Independent Directors and their engagement level.

As required under Rule 6 of the Companies (Appointment and Qualification of Directors) Rules, 2014, all the Independent Directors have completed the registration with the Independent Directors Databank.

In the opinion of the Board and the Board Governance, Nomination and Remuneration Committee, the following is a list of core skills/expertise/competencies required in the context of the Company's business and which are available with the Board, are as follows:

Skill/expertise/competence	Names(s) of directors having the respective skill/ expertise/ competence
Finance	Shri Anil Kumar Bansal, Ms. Neeru Abrol, Shri Rahul Gupta
Law	Ms. Neeru Abrol
Sales & Marketing	Shri Rahul Gupta, Shri Romi Sehgal
Operations	Shri Rahul Gupta, Shri Romi Sehgal, Ms. Neeru Abrol
Research	Shri Bharat Bhushan Sahny, Ms. Neeru Abrol, Ms. Megha Gupta
Corporate Governance	Shri Anil Kumar Bansal, Ms. Neeru Abrol
Education	Shri Rahul Gupta, Shri Anil Kumar Bansal, Ms. Neeru Abrol Ms. Megha Gupta
Community Service	Shri Bharat Bhushan Sahny, Ms. Megha Gupta

e. Familiarization Programme and Training for Independent Directors

The Company has an orientation process/familiarization programme for its Independent Directors that includes:

- a) Briefing on their role, responsibilities, duties, and obligations as a member of the Board.
- b) Nature of business and business model of the Company, Company's strategic and operating plans.
- c) Matters relating to Corporate Governance, Code of Business Conduct, Risk Management, Compliance Programs, Internal Audit, etc.

As a process when a new independent director is appointed, a familiarization programme as described above is conducted by the senior management team and whenever a new member is appointed to a Board Committee, information relevant to the functioning of the Committee and the role and responsibility of Committee members is informed.

Each of our Independent Directors have attended such orientation process/familiarization programme when they were inducted into the Board and these programs. The details of the familiarization programme are also available on the website of the Company at www.apollotricoat.com.

f. Board Evaluation

Details of methodology adopted for Board evaluation have been provided as part of the Board's Report

g. Remuneration Policy and Criteria of Making Payments to Directors, Senior Management and Key Managerial Personnel

Remuneration policy of the Company is designed to create a high-performance culture. It enables the Company to attract, retain and motivate employees to achieve results. Our business model promotes customer centricity and requires employee mobility to address project needs. The remuneration policy supports such mobility through pay models that are compliant to local regulations. The Company pays remuneration by way of salary, benefits, perquisites and allowances (fixed component) and commission (variable component) to its Managing Director and the Executive Directors. Annual increments are recommended by the Nomination and Remuneration Committee within the salary scale approved by the Board and Members and are effective April 1, each year. The Board of Directors, on the recommendation of the Nomination and Remuneration Committee, decides the commission payable to the Managing Director and the Executive Directors out of the profits for the financial year and within the ceilings prescribed under the Act, based on the Board evaluation process considering the criteria such as the performance of the Company as well as that of the Managing Director and each Executive Director.

The Company pays sitting fees to its Non-Executive Directors for attending meetings of the Board and meetings of committees of the Board. The Company also reimburses the out-of-pocket expenses incurred by the Directors for attending the meetings. The Remuneration policy is available on www.apollotriccoat.com.

III. Committees of the Board

(i) There are 4 (four) Board Committees as on March 31, 2020, which comprises of statutory committees that has been formed considering the need of the Company, details of which as are follows:

1. Audit Committee

Committee is constituted in line with the provisions of Regulation 18 of SEBI Listing Regulations and Section 177 of the Act. The terms of reference include:

- Oversight of financial reporting process.
- Reviewing with the management, the annual financial statements and auditors' report thereon before submission to the Board for approval.
- Evaluation of internal financial controls and risk management systems.
- Recommendation for appointment, remuneration and terms of appointment of auditors of the Company.
- Approve policies in relation to the implementation of the Insider Trading Code and to supervise implementation of the same.

Constitution of Audit Committee, detailed below:

S. No.	Name of Member	Category
1	Mr. Anil Kumar Bansal (Chairperson)	Independent, Non-Executive
2	Mr. Bharat Bhushan Sahny	Independent, Non-Executive

3	Mr. Rahul Gupta	Non-Independent, Executive
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- Four meetings of the Audit Committee were held during the year under review and the gap between two meetings did not exceed one hundred and twenty days.
- Committee invites such of the executives (particularly the head of the finance function), representatives of the statutory auditors and internal auditors, as it considers appropriate, to be present at its meetings.
- The Company Secretary acts as the Secretary to the Audit Committee.
- The Compliance Officer is the Officer to ensure compliance and effective implementation of the Insider Trading Code.
- Quarterly Reports are sent to the members of the Committee on matters relating to the Insider Trading Code.
- The previous AGM of the Company was held on September 28, 2019 and was attended by Sh. Anil Kumar Bansal, Chairman of the Audit Committee.
- All recommendation of the Committee have been accepted

2. Nomination and Remuneration Committee

Committee is constituted in line with the provisions of Regulation 19 of SEBI Listing Regulations and Section 178 of the Act. The terms of reference include:

- Recommend to the Board the setup and composition of the Board and its committees.
- Recommend to the Board the appointment/re-appointment of Directors and Key Managerial Personnel.
- Support the Board and Independent Directors in evaluation of the performance of the Board, its Committees and individual Directors.
- Recommend to the Board the Remuneration Policy for Directors, executive team or Key Managerial Personnel as well as the rest of employees.
- Oversee familiarization programs for Directors.

Constitution of Nomination & Remuneration Committee, detailed below:

S. No.	Name of the Member	Category
1	Mr. Bharat Bhushan Sahny (Chairperson)	Independent, Non-Executive
2	Ms. Megha Gupta	Non-Independent, Non-Executive
3	Mr. Anil Kumar Bansal	Independent, Non-Executive

- 3 (Three) Nomination and Remuneration Committee meetings were held during the year under review.
- The Company did not have any Employee Stock Option Scheme during the year under review.

3. Stakeholders Relationship Committee

Committee is constituted in line with the provisions of Regulation 20 of SEBI Listing Regulations and Section 178 of the Act. The terms of reference include:

- Consider and resolve the grievances of security holders.

- Consider and approve issue of share certificates etc.

Constitution of Stakeholders Relationship Committee members, as below:

S. No.	Name of the Member	Category
1	Ms. Megha Gupta (Chairperson)	Non-Independent, Non-Executive
2	Mr. Anil Kumar Bansal	Independent, Non-Executive
3	Mr. Rahul Gupta	Non-Independent, Executive

- 1 (One) meeting of the Stakeholders' Relationship Committee was held during the year under review.
- The Company has always valued its customer relationships. This philosophy has been extended to investor relationship as the Company focuses on servicing the needs of various stakeholders viz. investors, analysts, brokers and the general public.
- Details of Investor complaints and Compliance Officer as follows.

a. Details of investor complaints received and redressed during FY 2019- 20 are as follows:

Opening Balance	Received during the year	Resolved during the year	Closing Balance
Nil	Nil	Nil	Nil

b. Name, designation and address of the Compliance officer:

Ms. Surbhi Arora
 Company Secretary & Compliance Officer
 Apollo Tricoat Tubes Limited
 36, Kaushambi, Near Anand Vihar Terminal,
 Delhi-NCR-201010
 Telephone: +91-120-4041400
 Email: info@apollotricoat.com

4. Corporate Social Responsibility Committee

Committee is constituted in line with the provisions of Section 135 of the Act. The terms of reference of the Committee include:

- Formulate and recommend to the Board, a CSR Policy indicating the activities to be undertaken by the Company as specified in Schedule VII of the Act.
- Recommend the amount of expenditure to be incurred on the activities mentioned in the CSR Policy.
- Monitor the implementation of the CSR Policy.

Constitution of Corporate Social Responsibility Committee, as below:

S. No.	Name of the Member	Category
1	Ms. Megha Gupta (Chairperson)	Non-Independent, Non-Executive
2	Mr. Rahul Gupta	Non-Independent, Executive
3	Mr. Bharat Bhushan Sahny	Independent, Non-Executive

- 1 (One) meeting of the CSR Committee was held during the year under review.

The term of references of these committees are available on the website www.apollotriccoat.com.

(ii) Number of Committee meetings held and attendance records:

Name of the Committees	Audit Committee	Nomination and Remuneration Committee	Stakeholders Relationship Committee	Corporate Social Responsibility Committee	Preferential Allotment Committee
No. of meetings held	4	3	1	1	2
Date of Meetings	May 17, 2019; July 22, 2019; October 15, 2019 and January 20, 2020	May 17, 2019; October 15, 2019 and January 20, 2020	January 20, 2020	January 20, 2020	April 12, 2019 September 13, 2019
Number of meetings attended					
Sh. Rahul Gupta	4	NA	1	1	1
Sh. Bharat Bhushan Sahny	4	3	NA	1	NA
Ms. Megha Gupta	NA	3	1	1	1
Sh. Anil Kumar Bansal	4	3	1	NA	NA

iv. Shareholder Information

(i) Annual General Meeting (“AGM”)

Pursuant to the General Circular No. 14/2020 dated April 8, 2020, General Circular No. 17/2020 dated April 13, 2020 and General Circular No. 20/2020 dated May 5, 2020, issued by the Ministry of Corporate Affairs, the 38th Annual General Meeting (AGM) for the year ended March 31, 2020 is scheduled to be held on September 29, 2020 at 2 PM IST through Video Conferencing.

Detailed instructions for participation are provided in the notice of the 38th AGM. The proceedings of the 38th AGM will be available through VC to the shareholders as on the cut-off date i.e. September 22, 2020.

Details of Annual General Meetings held during the last 3 (three) years are as follows:

Financial Year	AGM No.	Day, Date & Time	Venue	Special Resolution passed
2018-19	37	Saturday, September 28, 2019 10:00 A.M	JP Hotel & Resorts, 6B, IP Extension, Patparganj, Near Max Hospital, Delhi-110092	- Revision in remuneration payable to Mr. Rahul Gupta, Managing Director of the Company. - Re-appointment of Mr. Bharat Bhushan Sahny as an Independent Director of the Company.
2017-18	36	Saturday, September 29, 2018 at 4:00 PM	IMA-East Delhi, Building 35-X, Institutional Area, Karkardooma, Delhi-110092	-Appointment of Sh. Rahul Gupta as Managing Director of the Company.
2016-17	35	Wednesday, September 27, 2017 at 1:00 PM	IMA-East Delhi, Building 35-X, Institutional Area, Karkardooma, Delhi-110092	-

(ii) Extra- Ordinary General Meeting (“EOGM”):

No extra-ordinary general meeting of the members was held during the financial year 2019-20.

(iii) No special resolution was passed by means of Postal ballot during the year under review. However, the company had conducted a postal ballot vide notice dated March 16, 2020; for which the scrutinizer submit his report on April 23, 2020.

(iv) A certificate has been received from Anjali Yadav & Associates Practising Company Secretaries, that none of the Directors on the Board of the Company has been debarred or disqualified from being appointed or continuing as directors of companies by the Securities and Exchange Board of India,

Ministry of Corporate Affairs or any such statutory authority. (Kindly refer page no. 61)

(v) Other Disclosures:

Particulars	Regulations	Details	Website link of details/policy
Related Party Transactions	Regulation 23 of SEBI Listing Regulations and as defined under the Act	<p>There are no material related party transactions during the year that have conflict with the interest of the Company. Transactions entered into with related parties during the financial year were in the ordinary course of business and at arms' length basis and were approved by the Audit Committee. The Board's approved policy for related party transactions is uploaded on the website of the Company.</p> <p>Disclosures of transactions of the listed entity with any person or entity belonging to the promoter/promoter group which hold(s) 10% or more shareholding in the listed entity, in the format prescribed in the relevant accounting standards for annual results.</p>	http://www.apollotriccoat.com/pdfs/RELATED-PARTY-TRANSACTION-POLICY.pdf
Details of non-compliance by the Company, penalty, strictures imposed on the Company by the stock exchange, or Securities and Exchange Board of India ("SEBI") or any statutory authority on any matter related to capital markets	Regulation 17(1) of the SEBI Listing Regulations	<p>Non-Compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director.</p> <p>During the year under review, the company was served with a notice from BSE limited (stock exchange) on February 03, 2020 for non-compliance with the provisions of Reg. 17(1) of SEBI (Listing obligations & disclosure requirements) Regulations, 2015, wherein the stock exchange had imposed a penalty on company.</p> <p>In this regard, the Company on January 20, 2020 has complied with the Regulation 17(1) of SEBI Listing Regulations and had submitted the reply on February 11, 2020 wherein the company had requested the stock exchange to waive-off the penalty by withdrawing their letter.</p>	NA
Whistle Blower Policy and Vigil Mechanism	Regulation 22 of SEBI Listing Regulations	The Company has a Whistle Blower Policy and has established the necessary vigil mechanism for directors and employees to report concerns about unethical behavior. No person has been denied access to the Chairman of the Audit Committee. The said policy has been uploaded on the website of the Company.	http://www.apollotriccoat.com/pdfs/VIGIL-MECHANISM-POLICY.pdf
Discretionary requirements	Schedule II Part E of the SEBI Listing Regulations	<p>* The auditors' report on financial statements of the Company are unqualified.</p> <p>* Internal auditors of the Company, make quarterly presentations to the audit committee on their reports.</p>	
Policy on Determination of Materiality for Disclosures	Regulation 30 of SEBI Listing Regulations	The Company has adopted a Policy on Determination of Materiality for Disclosures.	http://www.apollotriccoat.com/pdfs/MATERIALITY-POLICY.pdf
Policy on Archival and Preservation of Documents	Regulation 9 of SEBI Listing Regulations	The Company has adopted a Policy on Archival and Preservation of Documents.	http://www.apollotriccoat.com/pdfs/ARCHIVAL-POLICY.pdf
Reconciliation of Share Capital Audit Report	Regulation 76 of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018	A qualified practicing Company Secretary carried out a share capital audit to reconcile the total admitted equity share capital with the National Securities Depository Limited ("NSDL") and the Central Depository Services (India) Limited ("CDSL") and the total issued and listed equity share capital. The audit report confirms that the total issued / paid-up capital is in agreement with the total number of shares in physical form and the total number of dematerialized shares held with NSDL and CDSL.	

Particulars	Regulations	Details	Website link of details/policy
Code of Conduct	Regulation 17 of the SEBI Listing Regulations	The members of the Board and Senior Management Personnel have affirmed compliance with the Code of Conduct applicable to them during the year ended March 31, 2020. The Annual Report of the Company contains a certificate by the Managing Director, on the compliance declarations received from Independent Directors, Non-Executive Directors and Senior Management.	http://www.apollotriccoat.com/pdfs/CODE-OF-CONDUCT.pdf
Subsidiary Company	Regulation 24 of SEBI Listing Regulations	The Company has no Subsidiary as on March 31, 2020	
Terms of Appointment of Independent Directors	Regulation 46 of SEBI Listing Regulations and Section 149 read with Schedule IV of the Act	Terms and conditions of appointment/re-appointment of Independent Directors are available on the Company's website.	http://www.apollotriccoat.com/pdfs/POLICY-ON-BOARD-OF-DIVERSITY-POTENTIAL.pdf
Familiarization Program	Regulations 25(7) and 46 of SEBI Listing Regulations	Details of familiarization program imparted to Independent Directors are available on the Company's website.	http://www.apollotriccoat.com/pdfs/POLICY-ON-FAMILIRASATION.pdf
Disclosure under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2018		The details have been disclosed in the Corporate Governance Report forming part of the Annual Report.	

Means of Communication

- i. Publication of quarterly/half yearly/nine monthly/annual results:

Quarterly and annual financial results are normally published in Pioneer, Jansatta and Financial Express. etc. and are promptly furnished to the Stock Exchanges for display on their respective websites. The results are also displayed on the web-site of the Company "www.apollotriccoat.com".
- ii. Press release:

To provide information to investor, monthly production figures and other press release are sent to the stock exchanges as well as displayed on the Company's website i.e. www.apollotriccoat.com before it has been released to the media.
- iii. Presentations to analysts:

Four presentations were made to analysts/investors during the financial year 2019-20. The same are available on the Company's website. The presentations broadly covered operational and financial performance of the Company and industry outlook.

Fees Paid to Statutory Auditors

The details of total fees for all services paid by the Company to the statutory auditor network firm/network entity of which the statutory auditor is a part, are as follows:

(₹ in lakhs)		
Type of Services	FY 19-20	FY 18-19
Audit fees	1.00	1.00
Taxation matters	1.00	1.00
Others	0.50	-
Total	2.50	2.00

General Shareholders' Information

Financial Year : 2019-20

Financial Calendar (tentative and subject to change)

Period	Board Meetings
Unaudited results for first quarter ended June 30, 2020	Held on July 27, 2020
Unaudited results for second quarter/ half year ended September 30, 2020	On or before November 14, 2020
Unaudited results for third quarter/ nine months ended December 31, 2020	On or before February 14, 2021
Audited results for the fourth quarter and year ended March 31, 2021	On or before May 30, 2021

Date of Book Closure/Record Date	:	As mentioned in the Notice of this AGM
Listing on Stock Exchanges	:	BSE Limited 25th Floor, P. J. Towers, Dalal Street, Mumbai 400 001 Phone: +91 22 2272 1233; Fax: +91 22 2272 1919 Website: www.bseindia.com
Stock Codes/Symbol	:	BSE: 538566 Listing fees as applicable has been paid.
International Securities Identification Number (ISIN) allotted to the Company's shares	:	INE919P01029
Corporate Identification Number (CIN) of the Company	:	L74900DL1983PLC014972
Depositories	:	National Securities Depository Limited Central Depository Services (India) Limited
Registrar & Share Transfer Agent	:	M/s Bigshare Services Private Limited 1st Floor, Bharat Tin Works Building, Opposite Vasant Oasis, Makwana Road, Marol, Andheri East, Mumbai-400059 Maharashtra Tel. No. +91-22-6263 8200 E-mail: investor@bigshareonline.com
Place for acceptance of documents	:	Documents will be accepted at the above address between 11:00 AM and 4:00 PM (Monday to Friday)

For the convenience of the shareholders, documents will also be accepted at the following offices of Bigshare Services Private Limited.:

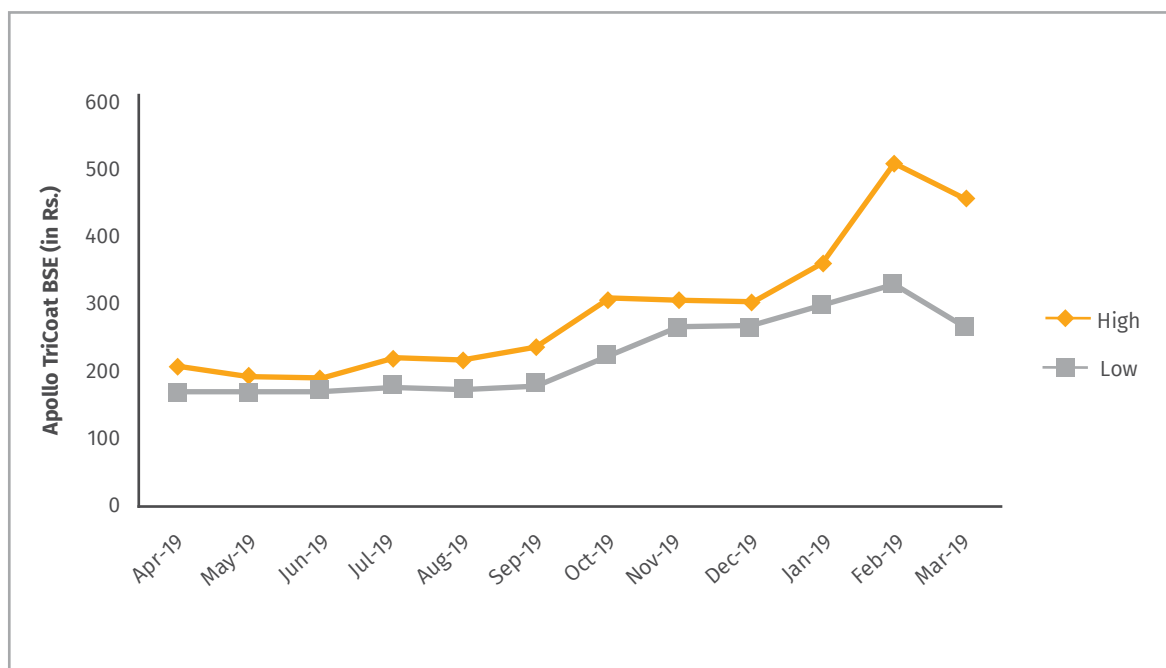
- Bigshare Services Private Limited
302, Kushal Bazar, 32-33, Nehru place
New Delhi-110019
Tel No. 011-42425004
Email Id: bssdelhi@bigshareonline.com

Share Transfer System	: Share transfer and related operations for Apollo TriCoat Tubes Limited is conducted by M/s Bigshare Services Private Limited, which is registered with the SEBI as Category I Registrar. Share transfer is normally affected within stipulated period, provided all the required documents are submitted.
Dematerialization of & liquidity Shares (Equity)	: The Company shares are compulsorily traded in dematerialized form BSE. Equity shares of the Company representing 99.99 percent of the Company's equity share capital are dematerialized as on March 31, 2020.
Outstanding ADRs/GDRs	: The Company has not issued any GDRs/ADRs in the past and hence as on March 31, 2020, the Company does not have any outstanding GDRs/ADRs.
Warrants and other convertible	: NIL

Market Price Data:

High, Low (based on daily closing prices) and number of equity shares traded during every month in the year 2019-20 on BSE:

Month & Year	High	Low	Total number of equity shares traded
April, 2019	203.8	166.5	800,223
May, 2019	191.1	166.55	515,160
June, 2019	189	170	703,284
July, 2019	214.9	177	1,035,810
August, 2019	212.45	173	526,607
September, 2019	232	180.1	1,021,145
October, 2019	303.7	221.1	2,974,995
November, 2019	301.6	260.5	491,952
December, 2019	298.9	260.1	1,257,342
January, 2020	354.9	295.2	2,939,521
February, 2020	503	326	2,571,173
March, 2020	450	264.25	1,766,246



Shareholding as on March 31, 2020 :

a. Distribution of equity shareholding as on March 31, 2020:

Number of Shares	Number of Shareholders	Percentage to shareholders	Number of Shares	Percentage to total capital
Up to 500	6875	82.73	654982	2.16
501-1000	542	6.52	423593	1.39
1001-2000	350	4.21	527342	1.73
2001-3000	139	1.67	352012	1.16
3001-4000	113	1.36	406370	1.34
4001-5000	41	0.50	185843	0.61
5001-10000	113	1.36	850624	2.80
10000 & above	137	1.65	26999234	88.81
TOTAL	8310	100	30400000	100

b. Categories of equity Shareholding as on March 31, 2020:

Category	Number of equity shares held	Percentage to holding
Promoters	1,54,60,000	50.86
Other Entity to the Promoter Group*	35,48,321	11.67
Public Individual	71,67,394	23.59
Foreign Portfolio Investors / Financial Institutions/ Alternate Investment Fund	14,23,575	4.68
Bodies Corporate	11,62,774	3.82
HUF	6,59,600	2.17
Mutual Fund	4,21,615	1.39
Non Resident Indian	3,92,357	1.29
Clearing Member/Trust/Firm	1,64,364	0.53
TOTAL	3,04,00,000	100

*Sh. Saket Agarwal is currently classified as 'promoter', but having met the eligibility criteria prescribed under Regulation 31 A of SEBI-LODR, has made an application for re-classification of category to 'public' which is under process

Commodity price risk or foreign exchange risk and hedging activities:

The Company does not deal in commodities and hence the disclosure pursuant to SEBI Circular dated November 15, 2018 is not required to be given. For a detailed discussion on foreign exchange risk and hedging activities, please refer to Management Discussion and Analysis Report.

Transfer of unclaimed/unpaid amounts to the Investor Education and Protection Fund:

Pursuant to Sections 124 and 125 of the Act read with the Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016 ("IEPF Rules"), dividend, if not claimed for a consecutive period of 7 years from the date of transfer to Unpaid Dividend Account of the Company, are liable to be transferred to the Investor Education and Protection Fund ("IEPF").

The Company has not paid dividend in any financial year hence, disclosure pursuant to above section not required to be given.

Plant locations:

The Company's manufacturing units situated at:

- Plot No. 53, Part-1, Malur, Sy Nos28 to 33, 4th Phase, Industrial Area, Kurandhalli Village, Malur, Taluk, Kolar, Karnataka-563130.
- Village Bisnoli, Khasra No. 527 to 530 and 569, Dujana Road, Tehsil, Dadri, GautamBudh Nagar, UP-203207.

Address for correspondence

- Registered Office:
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Telephone: +91-11-22373437
Designated email address for investor services: info@apollotricoat.com
Website: www.apollotricoat.com
- Corporate Office:
36, Kaushambi, near Anand Vihar Terminal, behind Wave cinema, Delhi-NCR-201010
Telephone: +91-120-4041400
Designated email address for investor services: info@apollotricoat.com
Website: www.apollotricoat.com