

CS/CL-21/38

March 24, 2017

To :

apollo[®]

1. The Secretary, National Stock Exchange of India Ltd., Exchange Plaza, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051	2. The Secretary, BSE Ltd. Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400001.
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Dear Sir,

Sub : Information under Regulation 7(2) (b) of SEBI (Prohibition of Insider Trading) Regulations, 2015

In accordance with the requirements of Regulation 7(2)(a) of SEBI (Prohibition of Insider Trading) Regulations, 2015, M/s. Constructive Finance Pvt Ltd., Promoter entity of Apollo Tyres Ltd., informed vide its letter dated March 23, 2017 alongwith Forms-C that Constructive Finance Pvt Ltd has transferred inter-se, by way of Gift, 2,96,30,857 shares of Apollo Tyres Ltd. to Neeraj Consultants Pvt Ltd. on 23.03.2017.

We are enclosing herewith the above disclosures dated March 23, 2017 under Regulation 7(2) (b) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

You may kindly take note of the same.

Thanking you,

Yours faithfully,
For **APOLLO TYRES LTD.**

Seema Thapar

(SEEMA THAPAR)
COMPANY SECRETARY

Encl : as above

CONSTRUCTIVE FINANCE PVT. LTD.

Adm. Office : SF-202, Peach Tree, C-Block, Sushant Lok-1, Gurgaon - 122002

Ph.: 0124 - 4262305 / 07 / 08 ♦ Fax. 0124 - 4262306

CIN : U67120DL1988PTC250410

To,

Date: 23.03.2017

Company Secretary, Apollo Tyres Ltd., Apollo House, 7, Institutional Area, Sector 32, Gurgaon - 122001	Company Secretary, Apollo Tyres Ltd., 3rd floor, Arcekal Mansion, Near Manorama Junction, Panampilly Nagar, Kochi Ernakulam KL 682036
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Sub: Inter-se transfer of shares amongst Promoter Group

Ref: Sub: Disclosure under Regulation 7(2)(a) read with Regulation 6(2) of Securities and Exchange Board of India (Prohibition of insider Trading) Regulation, 2015.

Dear Sir,

This is to inform you that we, Constructive Finance Pvt Ltd, being a part of the Promoter Group of Apollo Tyres Ltd, gifted 29630857 equity shares of Re.1/- each of Apollo Tyres Limited, to Neeraj Consultants Pvt Ltd (which is also a part of the Promoter Group of Apollo Tyres Limited) on March 23, 2017.

Consequent to the above disposal/gift, the shareholding of Constructive Finance Pvt Ltd in Apollo Tyres Ltd has decreased from 29630857 (5.82%) to Nil.


Please find enclosed disclosure in terms of Regulation 7(2)(a) of SEBI(Prohibition of Insider Trading) Regulation ,2015, in relation to the gift of shares of Apollo Tyres Limited by us to Neeraj Consultants Pvt Ltd .

Kindly take the same on your records.

Thank you

Yours faithfully

For Constructive Finance Pvt Ltd


RAJAN SABHARWAL
Director
(026720910)
13-011-Tyres, Chhalimar (Appts),
Shakarp Garden,
M-Encl: a/a-201005

Date : 23.03.17
Place: Gurgaon



FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: Apollo Tyres Ltd.
ISIN of the company: INE438A01022

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ Immediate relative / others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/Disposed		Transaction Type (Buy/Sale/Pledge/Revoke/Invoke)	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Date of acquisition of shares/ sale of shares specify	Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-transfer, etc.) ESOPs		
		Type of security and % (For eg of Warrant, Convertible Debentures etc.)	No. and %	Value	No. and %								
1	2	3	4	5	6	7	8	9	10	11	12	13	14
Name: Constructive Finance Pvt Ltd. PAN:AACCC9252D CIN:U67120DL1988PTC250410 Address: 414/1, 4TH Floor, DDA Commercial Complex, District Centre, Janakpuri New Delhi - 110058 IN Tel:9811469005	Promoter Company	Equity shares and 5.82%	29630857 and 5.82%	Equity Shares	29630857 and 5.82%	Not applicable, Since the shares were transferred by way of gift	Gift (Disposal)	Equity Shares	Nil	23.03.2017	23.03.2017	23.03.2017	Inter-se transfer by way of gift



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

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
NA	NA	NA	NA	NA	NA	NA

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

RAJAN SABHARWAL

Director

(02572810)

13-GM-Tyga, Shalimar (Appts),

Shalimar Garden,

Main Dist Ghd-201005