| To, | То, | To, | |
|-----------------------------|----------------------------|------------------------|--|
| The Manager Listing | The Manager Listing | Action Construction | |
| BSE Limited | National Stock Exchange of | Equipment Limited | |
| 5th Floor, P.J. Towers, | India Ltd. Exchange Plaza, | Dudhola Link Road, | |
| Dalal Street, | Bandra Kurla Complex, | Dudhola, Distt.Palwal- | |
| Mumbai-400001 | Bandra (E), | Haryana-121102 | |
| Scrip Code: 532762 | Mumbai-400051 | | |
| (10) | CM Quote: ACE | | |
| Email: | Email: | Email: | |
| corp.relations@bseindia.com | takeover@nse.co.in | cs@ace-cranes.com | |

Sub: Disclosure under regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Dear Sir/Ma'am,

Please find attached the disclosure under Regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in connection with the acquisition of 83,18,172 shares (7.33%) in off market transaction pursuant to "Gift" on December 08, 2020.

The shares have been acquired by way of "Gift" from amongst the Promoters and Promoter Group pursuant to exemption provided in Regulation 10(1)(a)(i) (Immediate Relatives) and there has been no change in the Total Shareholding of the Promoters Group post such inter-se transfer of shares of TC.

You are requested to take note of the same on your records.

Thanking You

Yours Faithfully,

(Mona Agarwal)

Promoter of Action Construction Equipment Limited

(Acquirer)

Encl: As Above

Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

| Name of the Target Company (TC) | Action Construction Equipment Limited | | |
|---|---|--|--|
| Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer | The disclosure is pursuant to <i>inter-se-</i> transfer of share (by way of gift) amongst individual promotors. The Acquirer is Mrs. Mona Agarwal | | |
| Whether the acquirer belongs to Promoter/Promoter group | Yes, Promoter | | |
| Name(s) of the Stock Exchange(s) where the shares of TC are Listed | NSE and BSE | | |
| Details of the acquisition / disposal as follows | Number | % w.r.t.total share/voting capital wherever applicable(*) | % w.r.t. total diluted share/voting capital of the TC (**) |
| Before the acquisition/sale under consideration, holding of: | | | |
| a) Shares carrying voting rights.b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others) | 25839407 | 22.77 | 22.77 |
| c) Voting rights (VR) otherwise than by shares | | - | - |
| d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) | | - | ā * |
| e) Total (a+b+c+d) | 25839407 | 22.77 | 22.77 |
| Details of acquisition/sale : | | | |
| a) Shares carrying voting rights acquired b) VRs acquired otherwise than by shares c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting | 8318172 | 7.33 - - | 7.33 |
| rights in the TC (specify holding in each category) acquired d) Shares encumbered / invoked/released by the acquirer | | - | = |
| e) Total (a+b+c+d) | 8318172 | 7.33 | 7.33 |

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| After the acquisition, holding of: | | | | |
|---|--|-------|-------|--|
| a) Shares carrying voting rights | 34157579 | 30.10 | 30.10 | |
| b) Shares encumbered with the acquirer | - | - | - | |
| c) VRs otherwise than by shares d) Warrants/convertible securities/any other instrument that entitles the | - | - | - | |
| acquirer to receive shares carrying voting rights in the TC (specify holding in each | | - | * | |
| category) after acquisition e) Total (a+b+c+d) | 34157579 | 30.10 | 30.10 | |
| Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc). | Off Market transaction (inter-se Transfer pursuant to "Gift") | | | |
| Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable. | 08.12.2020 | | | |
| Equity share capital / total voting capital of the TC before the said acquisition/sale. | Number 11,34,83,196 Equity Shares of Rs. 2/- each Amount Rs. 22,69,66,392 | | | |
| Equity share capital/ total voting capital of the TC after the said acquisition/sale. | Number 11,34,83,196 Equity Shares of Rs. 2/- each Amount Rs. 22,69,66,392 | | | |
| Total diluted share/voting capital of the TC after the said acquisition/sale. | Number 11,34,83,196 Equity Shares of Rs. 2/- each Amount Rs. 22,69,66,392 | | | |
| | | | | |

Signature

Mona Agarwal

Promotor of Action Construction Equipment Limited

Place: Faridabad