

Dated: October 16, 2020

The Manager  
Listing Department  
The BSE Limited,  
Phiroze Jee Jee Bhoy Towers,  
Dalal Street, Mumbai – 400001

The Secretary,  
The National Stock Exchange of India  
Limited,  
Exchange Plaza, 5th Floor,  
Plot No. C/1, G-Block, Bandra – Kurla  
Complex, Bandra (E), Mumbai – 400051

**Subject: Disclosure under Regulation 31(2) of Securities Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ('SEBI (SAST) Regulations, 2011')**

Dear Sir/ Madam,

With reference to the captioned subject, please note that we, APL Infrastructure Private Limited ('Acquirer') had created encumbrance on 76,000 (Seventy Six Thousand) Equity Shares representing 0.30% of the share capital of APL Apollo Tubes Limited ('Target Company') which has been released on October 15, 2020.

Accordingly, we are hereby submitting the disclosure as required under Regulation 31(2) of SEBI (SAST) Regulations, 2011.

Kindly take the above information on your records.

**For and on behalf of  
APL Infrastructure Private Limited**

  
**Sanjay Gupta  
Authorised Signatory**

**CC:  
To,  
The Compliance Officer  
APL Apollo Tubes Limited  
37, Hargobind Enclave, Vikas Marg,  
Delhi – 110092**



Sudesh Group

**APL INFRASTRUCTURE PRIVATE LIMITED**

CIN : U27310UP2006PTC076230

Regd. Office : 36, Kaushambi, Near Anand Vihar Terminal, Behind Wave Cinema  
Ghaziabad - 201010 (U. P.) India, Tel. : 0120-4041400 Fax : 0120-4041444

Disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance/ release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	APL Apollo Tubes Limited
Names of the Stock Exchanges where the shares of the target company are listed	National Stock Exchange of India Limited ('NSE') BSE Limited ('BSE')
Date of reporting	October 16, 2020
Name of the promoter or PAC on whose shares encumbrance has been created/ released/ invoked	APL Infrastructure Private Limited

**Details of the created/ released/ invoked of encumbrance:**

Name of the Promoter (s) or PACs with him*	Promoter holding in the target company (1)		Promoter holding already encumbered (2)		Details of events pertaining to encumbrance (3)							Post event holding of encumbered shares {creation [(2)+(3)] /release [(2)-(3)]/ invocation [(1)-(3)]}	
	Number	% of total share capital	Number	% of total share capital	Type of event (creation/ release/invocation)	Date of creation/ release/invocation of encumbrance	Type of encumbrance (pledge/lien/non disposal undertaken/other)	Reasons for Encumbrance**	Number	% of total share capital	Name of the entity in whose favour shares encumbered***		Number
Sanjay Gupta	35,000	0.14											
Veera Gupta	590,000	2.37											
Ashok Kumar Gupta	0	0.00											
Rahul Gupta	300200	1.20											

For APL INFRASTRUCTURE PVT. LTD.

DIRECTOR

APL Infrastructure Private Limited	8,925,187	35.81	76,000	0.30	Release	15.10.2020	Others	Margin Pledge	76,000	0.30	Integrated Master Securities Private Limited	-
<b>TOTAL</b>	<b>98,50,387</b>	<b>39.52</b>							<b>76,000</b>	<b>0.30</b>		<b>-</b>

For and on behalf of  
 APL Infrastructure Private Limited  
 For APL INFRASTRUCTURE PVT. LTD.

  
 (Authorised Signatory)  
 Place: New Delhi DIRECTOR  
 Date: October 16, 2020