## 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<br>Concert (PAC) with the acquirer  | Vijay Agarwal                         |  |  |
| Whether the acquirer belongs to Promoter/Promoter group   | Promoter  NSE and BSE                 |  |  |
| Name(s) of the Stock Exchange(s) where the shares of TC are Listed  |                                       |  |  |
| Details of the acquisition / disposal as follows  | Number                                | % w.r.t.total<br>share/voting<br>capital wherever<br>applicable(*) | % w.r.t. total diluted share/voting capital of the TC (**) |
| Before the acquisition under consideration, holding of:   |                                       | *  |  |
| <ul> <li>a) Shares carrying voting rights.</li> <li>b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)</li> <li>c) Voting rights (VR) otherwise than by</li> </ul> | 41748092                              | 36.78  | 36.78  |
| 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) e) Total (a+b+c+d)     | 41748092                              | 36.78  | 36.78  |
| Details of acquisition :  |                                       |  |  |
| <ul> <li>a) Shares carrying voting rights acquired</li> <li>b) VRs acquired otherwise than by shares</li> <li>c) Warrants/convertible securities/any</li> </ul>   | 35000                                 | 0.03   | 0.03   |
| other instrument that entitles the<br>acquirer to receive shares carrying voting<br>rights in the TC (specify holding in each<br>category) acquired   |                                       |  |  |
| <ul><li>d) Shares encumbered / invoked/released by the acquirer</li><li>e) Total (a+b+c+d)</li></ul>  | 35000                                 | 0.03   | 0.03   |

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| After the acquisition, holding of:  a) Shares carrying voting rights 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 |  | 36.81 | 36.81 |  |
|--|--|-------|-------|--|
| e) Total (a+b+c+d)   | 41783092   | 36.81 | 36.81 |  |
| Mode of acquisition (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).  | Open Market  |       |       |  |
| Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable.  | 09.09.2020   |       |       |  |
| Equity share capital / total voting capital of the TC before the said acquisition.   | 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.   | Number 11,34,83,196 Equity Shares of Rs. 2/- each<br>Amount Rs. 22,69,66,392 |       |       |  |
| Total diluted share/voting capital of the TC after the said acquisition.   | Number 11,34,83,196 Equity Shares of Rs. 2/- each Amount Rs. 22,69,66,392    |       |       |  |

Signature of the acquirer

Place: Faridabad Date: 10.09.2020