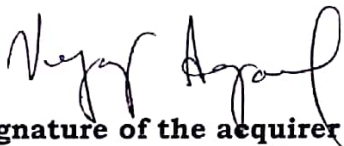


Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	Action Construction Equipment Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Vijay Agarwal		
Whether the acquirer belongs to Promoter/Promoter group	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 under consideration, holding of :			
a) Shares carrying voting rights.	41450820	36.53	36.53
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
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)	-	-	-
e) Total (a+b+c+d)	41450820	36.53	36.53
Details of acquisition :			
a) Shares carrying voting rights acquired	21917	0.02	0.02
b) VRs acquired otherwise than by shares	-	-	-
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired	-	-	-
d) Shares encumbered / invoked/released by the acquirer	-	-	-
e) Total (a+b+c+/-d)	21917	0.02	0.02

Vijay Agarwal

After the acquisition, holding of :			
a) Shares carrying voting rights	41472737	36.55	36.55
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)	41472737	36.55	36.55
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.	11.12.2019 to 11.12.2019		
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 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: Bangalore

Date: 13.12.2019