

Date: December 30, 2020

To,
Securities and Exchange Board of India,
Plot No. C4-A, "G" Block, Bandra Kurla Complex,
Bandra East, Mumbai-400051, Maharashtra, India.

Reference:

NSE SYMBOL: ACE
BSE SCRIP CODE: 532762
ISIN: INE731H01025

Subject: Report under Regulation 10(7) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ["SEBI (SAST) Regulations"] Pursuant to inter-se transfer of equity shares amongst Promoters and Promoters Group.

Dear Sir/Madam,

I undersigned is writing to you in relation to the above captioned subject. As due compliance of Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, I hereby furnish the disclosure report in specified format under regulation 10(7) of the SEBI (SAST), Regulations, 2011 in respect of inter-se acquisition of 83,18,172 (7.33%) shares of Action Construction Equipment Limited being the Target Company ("TC") in the following manner,

Inter-se Transfer (by way of Gift) of 83,18,172 (7.33%) shares from Mr. Vijay Agarwal to Mrs. Mona Agarwal, being promoters of the TC.

The shares have been acquired by way of "Gift" from amongst the Promoter 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 after such inter-se acquisition of shares of TC.

This acquisition is only a private family arrangement, for smooth succession planning of the family and to streamline the Family's assets and businesses.

Further, the Application Fee of INR 1.50 Lakhs as required under Regulation 10(7) of SEBI (SAST) Regulations, 2011 in favour of Securities and Exchange Board of India, payable at Mumbai, is enclosed herewith.

The following are the details of Application Fees:

PARTICULARS	DETAILS
Instrument Type	Demand Draft No.006249, dated 28.12.2020
Drawn On	HDFC Bank
In favour of	Securities and Exchange Board of India
Amount in Rupees	INR 1,50,000 /- (Rupees One lakh Fifty Thousand Only)

Mona Agarwal
Rv

MONA AGARWAL

H.No.854, Sector-15A,
Faridabad-121007, Haryana, India
Email: mdoffice@ace-cranes.com
Phone: 01275-280188.

Kindly acknowledge the receipt.

Thanking you.

Yours Faithfully

X 

(Mona Agarwal)
Promoter of Action Construction Equipment Limited (Acquirer)

Enclosures:

1. Report under Regulation 10(7) of the SEBI (SAST) Regulations, 2011; along with Application fees vide Demand Draft No. 006249 dated 28.12.2020 drawn on HDFC Bank in favour of Securities and Exchange Board of India.

The following are the Annexures attached with the Report under Regulation 10(7) of SEBI (SAST) Regulations, 2011:

Annexure I: Intimation under Regulation 10(5) of SEBI (SAST) Regulations, 2011.

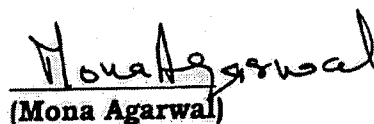
Annexure II: Disclosure under Regulation 10(6) of SEBI (SAST) Regulations, 2011.

Annexure III: Disclosures under Regulation 29(2) of SEBI (SAST) Regulations, 2011 from both, Acquirer (Mrs. Mona Agarwal) and Seller (Mr. Vijay Agarwal).

Copy of Report to:

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

Yours Faithfully



(Mona Agarwal)
Promoter of Action Construction Equipment Limited (Acquirer)

Pu

Received with...

Format under Regulation 10 (7) - Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1	General Details	
	a. Name, address, telephone no., e-mail of acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.}	The disclosure is pursuant to <i>inter-se</i> transfer of shares (by way of Gift) amongst Individual promoters. The Transferee/Acquirer in the above case is: Mona Agarwal H.No 854. Sector-15A, Faridabad-HR-121007 E-mail:- mdoffice@ace-cranes.com Telephone:- +91-1275-280188
	b. Whether sender is the acquirer (Y/N)	Yes
	c. If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	Not Applicable
	d. Name, address, Tel no. and e-mail of sender, if sender is not the acquirer	Not Applicable
2	Compliance of Regulation 10(7)	
	a. Date of report	December 30, 2020
	b. Whether report has been submitted to SEBI within 21 working days from the date of the acquisition	Yes, the report is being submitted to SEBI within 21 working days from the date of Acquisition.
	c. Whether the report is accompanied with fees as required under Regulation 10(7)	The application fees of INR 1,50,000/- (Rupees one lakh fifty thousand) is enclosed vide, Demand draft no. 006249 dated 28.12.2020, drawn on HDFC Bank, in favour of "Securities Exchange Board of India"
3	Compliance of Regulation 10(5)	
	a. Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed at least 4 working days before the date of the proposed acquisition.	The Intimation under regulation 10(5) of SEBI (SAST) Regulations, 2011, has been complied with. Copy of intimation is attached as "Annexure I"
	b. Date of Report	November 30, 2020
4	Compliance of Regulation 10(6)	
	a. Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days of the acquisition.	The disclosure as required under Regulation 10(6) of SEBI (SAST) Regulation, 2011 to be filed with the Stock Exchanges after the completion of acquisition has been complied with. Copy of disclosure is attached as "Annexure II"
	b. Date of Report	December 12, 2020

Mona Agarwal

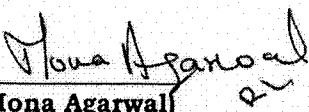
22

5 Details of the Target Company					
a.	Name & address of TC	Action Construction Equipment Limited CIN: L74899HR1995PLC053860 Address: Dudhola Link Road, Dudhola, Palwal, 121102, Haryana, India			
b.	Name of the Stock Exchange(s) where the shares of the TC are listed	1. BSE Limited 2. National Stock Exchange of India Ltd.			
6 Details of the acquisition					
a.	Date of acquisition	December 8, 2020			
b.	Acquisition price per share (in Rs.)	Nil. Shares have been transferred by way of Gift			
c.	Regulation which would have been triggered off, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2), 4 or 5)	3(1)			
d.	Shareholding of acquirer(s) and PAC individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)(*)	Before the acquisition		After the acquisition	
		No. of Shares	% w.r.t total share capital of TC (*)	No. of Shares	% w.r.t total share capital of TC
Name(s) of the acquirer(s) (**) 1. Mrs. Mona Agarwal		25839407	22.77%	34157579	30.10%
e.	Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)	Before the acquisition		After the acquisition	
		No. of Shares	% w.r.t total share capital of TC	No. of Shares	% w.r.t total share capital of TC
Name(s) of the seller(s) (**) 1. Mr. Vijay Agarwal		42554250	37.50%	34236078	30.17%
7 Information specific to the exemption category to which the instant acquisition belongs - Regulation 10(1)(a)(i)					
a.	Provide the names of the seller(s)	Mr. Vijay Agarwal			
b.	Specify the relationship between the acquirer(s) and the seller(s).	Mrs. Mona Agarwal (Acquirer) is wife of Mr. Vijay Agarwal (Seller).			
c.	Confirm whether the acquirer(s) and the seller(s) are 'immediate relatives' as defined in the regulation 2(1).	Yes			

Mona Agarwal

d.	If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	Not Applicable, Since shares were transferred by way of gift. Therefore, no consideration involved.
e.	If shares of the TC are infrequently traded, the price of such shares as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not Applicable, Since shares were transferred by way of gift. Therefore, no consideration involved.
f.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (e) or (f) above as applicable	Not applicable, (Gift deed has been executed to transfer the shares)
g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	November 30, 2020
h.	Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation/s as well as date on which the requisite disclosures were made along with the copies of the same.	Yes, it is hereby declares that both the acquirer and seller have complied with the provision of regulation 29(2) of the SEBI (SAST) Regulations, 2011. Copy of disclosure submitted as mentioned hereinabove are attached as "Annexure III"
i.	Declaration by the acquirer that all the conditions specified under regulation 10(1) (a)(i) with respect to exemptions has been duly complied with.	It is hereby declared that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions have been duly complied with.

I/We hereby declare that the information provided in the instant report is true and nothing has been concealed there from.


(Mona Agarwal)

Promoter of Action Construction Equipment Limited (Acquirer)

Date: December 30, 2020

Place: Faridabad

Note: (*) In case, percentage of shareholding to the total capital is different from percentage of voting right, indicate of percentage of shareholding and voting right of shareholding.

(**) Shareholding of each entity shall be shown separately as well as collectively in a group.

MONA AGARWAL

H.No.854, Sector-15A,
Faridabad-121007, Haryana, IndiaDate: 30th November, 2020

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

Sub: Prior Intimation under regulation 10(5) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for proposed acquisition of shares by way of gift.

Dear Sir/ Ma'am,


As due compliance of Regulation 10(5) of the SEBI (SAST) Regulations, 2011, the undersigned being part of the Promoter and Promoter Group of the Company, hereby furnish the PRIOR INTIMATION in the specified format under regulation 10(5) in respect of proposed *inter-se* acquisition of **83,18,172 (7.33%)** shares of **Action Construction Equipment Limited** being the Target Company ("TC") in the following manner:

Inter-se Transfer (by way of Gift) of 83,18,172 (7.33%) shares from Mr. Vijay Agarwal to Mrs. Mona Agarwal, being promoters of the TC.

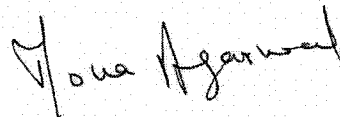
The shares are proposed to be acquired by way of "Gift" amongst the Promoter and Promoter Group pursuant to exemption provided in Regulation 10(1)(a)(i) (Immediate Relatives) and there will be no change in the Total Shareholding of the Promoters Group after such *inter-se* transfer of shares of TC.

Thanking You.

Yours Faithfully


(Mona Agarwal)
Promotor of Action Construction Equipment Limited
(Acquirer)

Encl: As Above



Disclosures under Regulation 10(5) - Intimation to Stock Exchanges in respect of acquisition under Regulation 10(l)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	Action Construction Equipment Limited
2.	Name of the acquirer(s)	The disclosure is pursuant to <i>inter-se</i> transfer of Shares (by way of Gift) amongst Promoter and Promoter Group. The Transferee/Acquirer is: Mrs. Mona Agarwal.
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes. The disclosure pertains to <i>inter-se</i> transfer (by way of Gift) of shares between promoter and promoter group.
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	The Transferor(s) is: Mr. Vijay Agarwal
	b. Proposed date of acquisition	On or after December 07, 2020
	c. Number of shares to be acquired from each person mentioned in 4(a) above	83,18,172 shares to be acquired by Mrs. Mona Agarwal from Mr. Vijay Agarwal: (8318172 Shares)
	d. Total shares to be acquired as % of share capital of TC	Mrs. Mona Agarwal will acquire 7.33% of the shares pursuant to gift from Mr. Vijay Agarwal
	e. Price at which shares are proposed to be acquired	NIL. Shares are proposed to be transferred by way of Gift. Therefore, no consideration involved.
	f. Rationale, if any, for the proposed transfer	The proposed acquisition is only a private family arrangement, for smooth succession planning of the family and to streamline the Family's assets and businesses.
5.	Relevant sub-clause of regulation 10(l)(a) under which the acquirer is exempted from making open offer.	Sub clause (i): Immediate Relative.

Mona Agarwal

Mona Agarwal

6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum Volumes of trading in the shares of the TC are recorded during such period.	Not Applicable, since the Shares are proposed to be transferred by way of Gift. Therefore, no consideration involved.			
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8	Not Applicable, since the Shares are proposed to be transferred by way of Gift. Therefore, no consideration involved.			
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable	Not Applicable, since the Shares are proposed to be transferred by way of Gift. Therefore, no consideration involved.			
9.	Declaration by the acquirer, that the transferor and transferee have complied/will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	Enclosed as "Annexure A"			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(l)(a) with respect to exemptions has been duly complied with.	Enclosed as "Annexure A"			
11.	Shareholding Details	Before the proposed transaction		After the proposed transaction	
		No. of shares /voting Rights	%w.r.t total share capital of TC	No. of shares /voting Rights	%w.r.t total share capital of TC
a.	Acquirer(s) and PACs (other than sellers)(*)				
	i. Mrs. Mona Agarwal	25839407	22.77%	34157579	30.10%
	TOTAL: Acquirer(s) and PACs (other than sellers)	25839407	22.77%	34157579	30.10%
b.	Seller (s)				
	i. Mr. Vijay Agarwal	42554250	37.50%	34236078	30.17%
	TOTAL: Seller (s)	42554250	37.50%	34236078	30.17%

Mona Agarwal

(Mona Agarwal)

Promoter of Action Construction Equipment Limited (Acquirer)

Date: November 30, 2020

Place: Faridabad

Mona Agarwal

Annexure-A

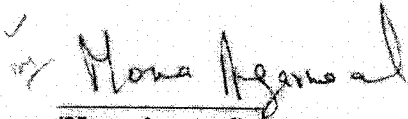
DECLARATION BY ACQUIRER

This is with respect to the following proposed acquisition of shares by way of "Gift," inter-se, within the Promoters and Promoter Group of the Company viz. Action Construction Equipment Limited (a company incorporated under the Companies Act, 1956, having its registered office at Dudhola Link Road, Dudhola, Palwal 121102, Haryana, India):

- i. *Inter-se* Transfer (by way of Gift) of **83,18,172 (7.33%)** shares from Mr. Vijay Agarwal to Mrs. Mona Agarwal, being promoters of the TC;

In this regard, the undersigned being the proposed acquirer to the proposed "Gift", hereby declare that:

- a) *the transferor and transferee have complied/will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)*
- b) *all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.*

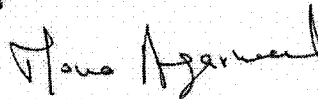


[Mona Agarwal]

Promoter of Action Construction Equipment Limited (Acquirer)

Date: November 30, 2020

Place: Faridabad



Date: December 12, 2020

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

**Sub: Report under Regulation 10(6) of Securities and Exchange Board of India
(Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

Ref: Prior Intimation filed under regulation 10(5) dated November 30, 2020.

Dear Sir/Ma'am,

As due compliance of Regulation 10(6) of the SEBI (SAST) Regulations, 2011, the undersigned being part of the Promoter and Promoter Group of the Company, hereby furnish the **REPORT** in the specified format under regulation 10(6) in respect of post inter-se acquisition of **83,18,172 (7.33%)** shares of **Action Construction Equipment Limited** being the Target Company ("TC") in the following manner.

Inter-se Transfer (by way of Gift) of 83,18,172 (7.33%) shares from Mr. Vijay Agarwal to Mrs. Mona Agarwal, being promoters of the TC.

The shares have been acquired by way of "Gift" from amongst the Promoter 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 after such inter-se acquisition of shares of TC.

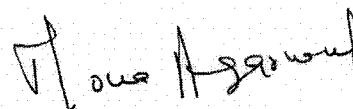
Thanking You

Yours Faithfully,



(Mona Agarwal)
Promoter of Action Construction Equipment Limited
(Acquirer)

Encl: As Above



Disclosures under Regulation 10(6) - Report to Stock Exchange in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1.	Name of the Target Company (TC)	Action Construction Equipment Limited	
2.	Name of the acquirer(s)	The disclosure is pursuant to <i>Inter-se</i> transfer of Shares (by way of Gift) amongst Promoter and Promoter Group. The Transferee/Acquirer is Mrs. Mona Agarwal.	
3.	Name of the stock exchange where shares of the TC are listed	1. BSE Limited 2. National Stock Exchange of India Ltd.	
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Date of Transaction: December 08, 2020. <i>Inter-se</i> transfer (By way of Gift) of shares between promoter and promoter group. This acquisition is only a private family arrangement, for smooth succession planning of the family and to streamline the Family's assets and businesses.	
5.	Relevant regulation under which the acquirer is exempted from making open offer.	Regulation 10(1)(a)(i)	
6.	Whether disclosure of proposed acquisition was required to be made under regulation 10(5) and if so, - Whether disclosure was made and whether it was made within the timeline specified under the regulations. -Date of filing with the stock exchange.	Yes. Disclosure u/r 10(5) was made within timeline specified under the regulations. Date: November 30, 2020	
7.	Details of acquisition	Disclosures required to be made under regulation 10(5)	Whether the disclosures under regulation 10(5) are actually made
	a. Name of the transferor/seller	1. Mr. Vijay Agarwal	Yes
	b. Date of acquisition	December 08, 2020	Yes

Mona Agarwal
-
Mona Agarwal

	c.	Number of shares/voting rights in respect of the acquisitions from each person mentioned in 7(a) above	83,18,172 shares are acquired by Mrs. Mona Agarwal from Mr. Vijay Agarwal	Yes
	d.	Total shares proposed to be acquired/actually acquired as a % of diluted share capital of TC	Mrs. Mona Agarwal acquired 7.33% of the shares pursuant to gift from: i. Mr. Vijay Agarwal	Yes
	e.	Price at which shares are proposed to be acquired/actually acquired	Nil. Shares were transferred by way of Gift. Therefore, no consideration involved.	Yes
8.	Shareholding Details		Before the proposed transaction	After the proposed transaction
			No. of shares /voting Rights	%w.r.t total share capital of TC
	a.	Acquirer(s) and PACs (other than sellers)(*) I. Mrs. Mona Agarwal	25839407	22.77%
		TOTAL: Acquirer(s) and PACs (other than sellers)	25839407	22.77%
	b.	Seller (s) I. Mr. Vijay Agarwal	42554250	37.50%
		TOTAL: Seller (s)	42554250	37.50%
			34157579	30.10%
			34157579	30.10%
			34236078	30.17%
			34236078	30.17%

Note:

- (*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.

✓
Mona Agarwal

(Mona Agarwal)
Promoter of Action Construction
Equipment Limited (Acquirer)
Date: December 12, 2020
Place: Faridabad

Mona Agarwal

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

**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,

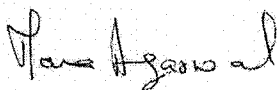
Please find attached the disclosure under Regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in connection with the acquisition of 83,18,172 shares (7.33%) in off market transaction pursuant to "Gift" on December 08, 2020.

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.

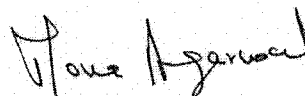
Thanking You

Yours Faithfully,



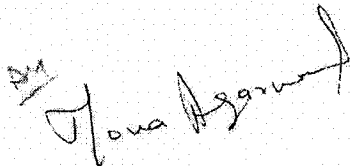
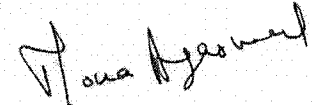
(Mona Agarwal)
Promoter of Action Construction Equipment Limited
(Acquirer)

Encl: As Above



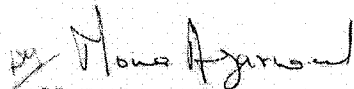
Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

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 promoters 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.	25839407	22.77	22.77
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)	25839407	22.77	22.77
Details of acquisition/sale :			
a) Shares carrying voting rights acquired	8318172	7.33	7.33
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)	8318172	7.33	7.33

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 (<i>inter-se</i> 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		

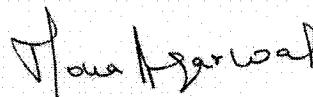
Signature



Mona Agarwal

Promotor of Action Construction Equipment Limited

Place: Faridabad



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

**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,

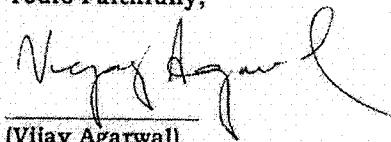
Please find attached the disclosure under Regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, in connection with the transfer of 83,18,172 shares (7.33%) in off market transaction pursuant to "Gift" on December 08, 2020.

The shares have been transferred 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.

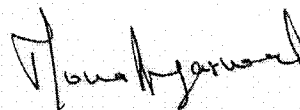
Thanking You

Yours Faithfully,



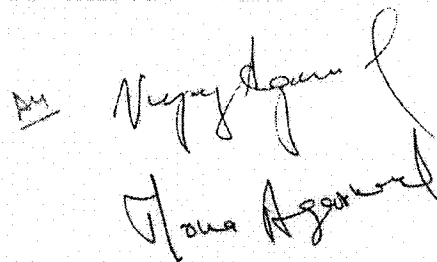
(Vijay Agarwal)
Promoter of Action Construction Equipment Limited
(Transferor)

Encl: As Above

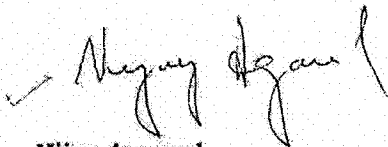


Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

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-transfer</i> of share (by way of gift) amongst individual promoters. 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.	42554250	37.50	37.50
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)	42554250	37.50	37.50
Details of acquisition/sale :			
a) Shares carrying voting rights sold	8318172	7.33	7.33
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)	8318172	7.33	7.33


 Mrs. Mona Agarwal

After the acquisition/sale, holding of :			
a) Shares carrying voting rights	34236078	30.17	30.17
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)	34236078	30.17	30.17
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Off Market transaction (<i>inter-se</i> 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		



Vijay Agarwal
Promotor of Action Construction Equipment Limited
Place: Faridabad

