



12 September 2022

Fax No.: 91 22 2272 3121

Mr Amit Kadam
Listing Department
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai – 400 001
India

Dear Sir,

We transmit herewith details of the holdings of Albula Investment Fund Ltd in Ashapura Minechem Ltd as at 09 September 2022.

for **Albula Investment Fund Ltd**

A handwritten signature in black ink, appearing to be "Amit Kadam", written over a horizontal line.

IQ EQ Fund Services (Mauritius) Ltd
(Company Secretary)

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

Name of the Target Company (TC)	Ashapura Minechem Ltd		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Albula Investment Fund Ltd		
Whether the acquirer belongs to Promoter/Promoter group	No		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	NSE & 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/disposal under consideration, holding of:			
a) Shares carrying voting rights (***)	7,857,345	8.5886%	8.5886%
b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	N/A	N/A	N/A
c) Voting rights (VR) otherwise than by shares	N/A	N/A	N/A
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)	N/A	N/A	N/A
Total (a+b+c+d)	7,857,345	8.5886%	8.5886%
Details of acquisition/sale:			
a) Shares carrying voting rights acquired/sold	(2,400,328)	-2.6237%	-2.6237%
b) VRs acquired/sold otherwise than by shares	N/A	N/A	N/A
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/sold	N/A	N/A	N/A
d) Shares encumbered / invoked/released by the acquirer	N/A	N/A	N/A
Total (a+b+c+d)	(2,400,328)	-2.6237%	-2.6237%

After the acquisition/sale, holding of:			
a) Shares carrying voting rights	5,457,017	5.9649%	5.9649%
b) Shares encumbered with the acquirer	N/A	N/A	N/A
c) VRs otherwise than by shares	N/A	N/A	N/A
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/sale	N/A	N/A	N/A
Total (a+b+c+d) (***)	5,457,017	5.9649%	5.9649%
Mode of acquisition / sale (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	09/09/2022		
Equity share capital / total voting capital of the TC before the said acquisition / sale	91,486,098 shares		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	91,486,098 shares		
Total diluted share/voting capital of the TC after the said acquisition/sale.	91,486,098 shares		

(*) Total share capital/voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

(***) Change of shareholding percentage is on account of warrant conversion into equity shares in March 2014 and August 2021.

Yours faithfully,

for **Albula Investment Fund Ltd**



IQ EQ Fund Services (Mauritius) Ltd
(Company Secretary)

Place: Mauritius

Date: 12.09.2022

ANNEXURE

Trade Date	Security Name	Trading member through whom the trade was executed with SEBI Registration no. of the TM	Exchange on which the trade was executed	Buy / (Sell) Quantity (shares)	Buy / (Sell) Value (INR)	Cum. Balance (shares)	% holding
	Opening balance			7,857,345		7,857,345	8.5886% ***
01/06/2021	Ashapura Minechem Ltd	SMIFS Limited	NSE	(25,000)	(3,751,224.00)	7,832,345	8.5613%
02/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(20,397)	(3,057,108.60)	7,811,948	8.5390%
03/06/2021	Ashapura Minechem Ltd	SMIFS Limited	NSE	(15,010)	(2,249,738.83)	7,796,938	8.5226%
04/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(10,300)	(1,546,402.96)	7,786,638	8.5113%
07/06/2021	Ashapura Minechem Ltd	ICICI Securities Limited	NSE	(50,000)	(7,650,320.00)	7,736,638	8.4567%
08/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(50,000)	(7,662,146.36)	7,686,638	8.4020%
09/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(33,890)	(5,093,398.14)	7,652,748	8.3650%
10/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(7,428)	(1,115,689.35)	7,645,320	8.3568%
11/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(50,000)	(7,557,666.75)	7,595,320	8.3022%
14/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(20,390)	(3,064,532.13)	7,574,930	8.2799%
15/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(16,779)	(2,518,578.29)	7,558,151	8.2616%
16/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(50,000)	(7,597,789.70)	7,508,151	8.2069%
17/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(50,000)	(7,852,264.25)	7,458,151	8.1523%
18/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(50,000)	(7,888,306.43)	7,408,151	8.0976%
21/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(50,000)	(8,098,003.44)	7,358,151	8.0429%
22/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(50,000)	(8,338,431.21)	7,308,151	7.9883%
23/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(1,134)	(183,303.26)	7,307,017	7.9871%
24/06/2021	Ashapura Minechem Ltd	Kim Eng Securities India Pvt Ltd	NSE	(50,000)	(7,500,731.85)	7,257,017	7.9324%
07/09/2022	Ashapura Minechem Ltd	ICICI Securities Limited	NSE	(200,000)	(20,772,960.00)	7,057,017	7.7138%
08/09/2022	Ashapura Minechem Ltd	ICICI Securities Limited	NSE	(150,000)	(15,429,915.00)	6,907,017	7.5498%
09/09/2022	Ashapura Minechem Ltd	ICICI Securities Limited	NSE	(1,450,000)	(147,666,591.00)	5,457,017	5.9649%
Total				5,457,017			5.9649%

Yours faithfully

For **Albula Investment Fund Ltd**



IQEQ Fund Services (Mauritius) Ltd
(Company Secretary)