



December 4, 2020

From:

**Gautam S Adani & Rajesh S. Adani
(on behalf of S. B. Adani Family Trust)**

*9th Floor, Shikhar, Near Adani House,
Mithakhali Six Roads, Navrangpura,
Ahmedabad-380009*

Adani Tradeline LLP

*801 Shikhar Complex,
Srimali Soc., Navrangpura,
Ahmedabad-380 009
LLP Identification No.: AAJ-0233*

To:

National Stock Exchange of India Limited

*Exchange Plaza, BKC, Bandra (East)
Mumbai – 400 051*

BSE Limited

*Floor 25, P J Towers, Dalal Street,
Mumbai – 400001*

Adani Ports and Special Economic Zone Limited (APSEZL)

*"Adani Corporate House",
Shantigram, Near Vaishno Devi Circle,
S.G. Highway, Khodiyar,
Ahmedabad-382421*

Sub: Disclosure under regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Please find attached herewith disclosure in the prescribed format relating to:

1. **Creation** of pledge on **31,34,000** equity shares of APSEZL held by Gautam S. Adani & Rajesh S. Adani (on behalf of S.B. Adani Family Trust);
2. **Release** of pledge on **3,39,32,000** equity shares of APSEZL held by Gautam S. Adani & Rajesh S. Adani (on behalf of S.B. Adani Family Trust)and
3. **Release** of pledge on **4,24,000** equity shares of APSEZL held by Adani Tradeline LLP;

This is in compliance with Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly take the same on record.

Thanking You,

For, S.B. Adani Family Trust

Authorised Signatory

For, Adani Tradeline LLP

Authorised Signatory

Encl: Disclosure in the prescribed format

Format for 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)	Adani Ports and Special Economic Zone Limited (APSEZL)
Name of the stock Exchanges where the shares of the target company are listed	BSE Ltd. & National Stock Exchange of India Ltd.
Date of reporting	04-12-2020
Name of the Promoter or PAC on whose shares encumbrance was created/ released/invoked	Gautam S. Adani & Rajesh S. Adani (on behalf of S.B. Adani Family Trust) and Adani Tradeline LLP

Details of the creation of encumbrance:

Name of 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 [(2)-(3)]]	
	No. of shares	% of total share capital	No. of shares	% of total share capital	Type of event(creation /release /invocation)	Date of creation /invocation/ release of encumbrance	Type of encumbrance (pledge /lien/non disposal undertaking/others)	Reason for encumbrance **	Number	% of total share capital	Name of the entity in whose favour shares encumbered ***	No. of shares	% of total share capital
Gautam S. Adani & Rajesh S. Adani (on behalf of S. B. Adani Family Trust)	799,353,935	39.34	557,139,942	27.42	creation	26-11-2020	pledge	security provided as per agreement with Lender / Trustee	3,134,000	0.15	Refer Note 1 below	-	-
					release	01-12-2020	pledge	release of additional security provided as per agreement with Lender / Trustee	1,500,000	0.07	Refer Note 2 below	-	-
					release	01-12-2020	pledge		1,500,000	0.07	Refer Note 3 below	-	-
					release	01-12-2020	pledge		4,700,000	0.23	Refer Note 3 below	-	-
					release	01-12-2020	pledge		2,940,000	0.14	Refer Note 4 below	-	-
					release	01-12-2020	pledge		700,000	0.03	Hero Fincorp Ltd.	-	-
					release	01-12-2020	pledge		2,300,000	0.11	Kotak Mahindra Prime Ltd.	-	-

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	No. of shares	% of total share capital	No. of shares	% of total share capital	Type of event(creation /release /invocation)	Date of creation /invocation/ release of encumbrance	Type of encumbrance (pledge /lien/non disposal undertaking/others)	Reason for encumbrance **	Number	% of total share capital	Name of the entity in whose favour shares encumbered ***	No. of shares	% of total share capital
Gautam S. Adani & Rajesh S. Adani (on behalf of S. B. Adani Family Trust) [CONTINUE FROM PAGE 1]	799,353,935	39.34	557,139,942	27.42	release	01-12-2020	pledge	release of additional security provided as per agreement with Lender / Trustee	600,000	0.03	Refer Note 5 below	-	-
					release	02-12-2020	pledge		2,000,000	0.10	Refer Note 6 below	-	-
					release	02-12-2020	pledge		700,000	0.03	Refer Note 6 below	-	-
					release	02-12-2020	pledge		2,000,000	0.10	Refer Note 6 below	-	-
					release	02-12-2020	pledge		4,200,000	0.21	Refer Note 7 below	-	-
					release	02-12-2020	pledge		1,500,000	0.07	Refer Note 8 below	-	-
					release	03-12-2020	pledge		900,000	0.04	Axis Bank Ltd.	-	-
					release	03-12-2020	pledge		3,000,000	0.15	Refer Note 9 below	-	-
					release	03-12-2020	pledge		3,000,000	0.15	Refer Note 9 below	-	-
					release	03-12-2020	pledge		650,000	0.03	STCI Finance Ltd.	-	-
					release	03-12-2020	pledge		650,000	0.03		-	-
					release	03-12-2020	pledge		650,000	0.03		-	-
					release	03-12-2020	pledge		118,000	0.01	Axis Finance Ltd.	-	-
					release	03-12-2020	pledge		324,000	0.02		526,341,942	25.91

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	No. of shares	% of total share capital	No. of shares	% of total share capital	Type of event(creation /release /invocation)	Date of creation /invocation/ release of encumbrance	Type of encumbrance (pledge /lien/non disposal undertaking/others)	Reason for encumbrance **	Number	% of total share capital	Name of the entity in whose favour shares encumbered ***	No. of shares	% of total share capital
Rajesh S. Adani & Shilin R. Adani (on behalf of Rajesh S. Adani Family Trust)	30,000	0.00	-	-	-	-	-	-	-	-	-	-	-
Adani Tradeline LLP (earlier known as Parsa Kente Rail Infra LLP)	138,193,549	6.80	27,590,447	1.36	release	26-11-2020	pledge	release of additional security as per agreement with Lender / Trustee	209,000	0.01	Yes Bank Ltd.	-	-
					release	26-11-2020	pledge		215,000	0.01	Yes Bank Ltd.	27,166,447	1.34
Worldwide Emerging Market Holding Ltd.	77,756,181	3.83	-	-	-	-	-	-	-	-	-	-	-
Universal Trade and Investments Ltd.	79,541,248	3.91	-	-	-	-	-	-	-	-	-	-	-
Afro Asia Trade and Investments Ltd.	89,945,212	4.43	-	-	-	-	-	-	-	-	-	-	-
Emerging Market Investment DMCC	84,179,195	4.14	-	-	-	-	-	-	-	-	-	-	-
Gautam S. Adani	1	-	-	-	-	-	-	-	-	-	-	-	-

Name of 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 [(2)-(3)]}	
	No. of shares	% of total share capital	No. of shares	% of total share capital	Type of event(creation /release /invocation)	Date of creation /invocation/ release of encumbrance	Type of encumbrance (pledge /lien/non disposal undertaking/others)	Reason for encumbrance **	Number	% of total share capital	Name of the entity in whose favour shares encumbered ***	No. of shares	% of total share capital
Rajesh S. Adani	1	-	-	-	-	-	-	-	-	-	-	-	-
Flourishing Trade and Investment Ltd.	24,306,696	1.20	-	-	-	-	-	-	-	-	-	-	-
Adani Properties Pvt. Ltd.	1,685,000	0.08	-	-	-	-	-	-	-	-	-	-	-

Note 1: Shares pledged in favour of IDBI Trusteeship Services Ltd. for the benefit of Canara Bank

Note 2: Shares released by Catalyst Trusteeship Ltd. which were pledged for the benefit of original debentureholder being DB International (Asia) Ltd.

Note 3: Shares released by Catalyst Trusteeship Ltd. which were pledged for the benefit of original debentureholder being Barclays Merchant Bank (Singapore) Limited

Note 4: shares released by Catalyst Trusteeship Ltd. which were pledged for original debentureholders being Credit Suisse AG, Singapore Branch & Credit Suisse Finance (India) Pvt. Ltd.

Note 5: Shares released by SBI CAP Trustee Co. Ltd. which were pledged for original debentureholder being DB International (Asia) Ltd.

Note 6: Shares released by Catalyst Trusteeship Ltd. which were pledged for the benefit of Tata Capital Financial Services Ltd.

Note 7: shares released by Axis Trustee Services Ltd. which were pledged for original debentureholder being UBS AG

Note 8: Shares released by IDBI Trusteeship Services Ltd. which were pledged for original debentureholder MUFG Securities EMEA plc

Note 9: Shares released by IDBI Trusteeship Services Ltd. which were pledged for original debentureholder Copthall Mauritius Investment Ltd.

For S.B. Adani Family Trust

For Adani Tradeline LLP

Authorized Signatory

Place: Ahmedabad

Date: 04-12-2020

Authorized Signatory