

September 27, 2021

To,

<p>The Department of Corporate Services, <b>BSE Limited</b> 14<sup>th</sup> Floor, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001</p>	<p>The Listing Compliance Department, <b>National Stock Exchange of India Limited</b> Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex Bandra (E) Mumbai - 400 051.</p>	<p><b>Mr. Kamlesh Bhagia</b> Company Secretary &amp; Compliance Officer, <b>Adani Ports and Special Economic Zone Limited</b> Adani Corporate House, Shantigram, Near Vaishnav Devi Circle, S. G. Highway, Khodiyar, Ahmedabad, Gujarat, 382421</p>
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**DISCLOSURE UNDER REGULATION 29(2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011**

1. Name of the Target Company (TC)	Adani Ports and Special Economic Zone Limited ('Company')		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Visra ITCL (India) Limited ('Visra') (In our capacity as Security Trustee) The IL&FS Financial Centre, Plot C-22, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai 400051		
3. Whether the acquirer belongs to Promoter/Promoter group	No		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited (BSE) National Stock Exchange of India Limited (NSE)		
5. Details of the acquisition / disposal as follows	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever applicable (*)</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>
<b>Before the acquisition under consideration, holding of:</b> a) Shares carrying voting rights 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 TC (specify holding in each category)	----- 3,42,22,062 ----- -----	----- 1.68% ----- -----	----- ----- ----- -----
<b>Total (a+b+c+d)</b>	<b>3,42,22,062</b>	<b>1.68%</b>	<b>----</b>
<b>Details of acquisition/Sale</b> a) Shares carrying voting rights acquired (pledge) / sold b) VRs acquired/sold 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/sold d) Shares encumbered/ <del>invoked</del> /released by the acquirer	----- ----- ----- 1,15,35,000 (4,09,40,062)	----- ----- ----- 0.56% (2.01%)	----- ----- ----- ----- -----
<b>Total (a+b+c+d)</b>	<b>(2,94,05,062)</b>	<b>(1.45%)</b>	<b>----</b>

<b>After the acquisition/ sale-holding of:</b>			
a) Shares carrying voting rights	----	----	----
b) Shares encumbered with the acquirer	48,17,000	0.23%	----
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	----	----	----
<b>Total (a+b+c+d)</b>	<b>48,17,000</b>	<b>0.23%</b>	<b>----</b>
Mode of acquisition/ <del>sale</del> (e.g. open market /off market/ public issue / rights issue / preferential allotment / inter-se transfer, etc.)	Release and Pledge of Equity shares		
Date of acquisition / sale of shares/VR or date of receipt of intimation of allotment of shares, whichever is applicable	<b>Pledge dates:</b> March 02, 2020, March 04, 2020, March 12, 2020 and March 23, 2020. <b>Release dates:</b> October 31, 2019, March 19, 2020, April 15, 2020, September 8, 2020, December 7, 2020, December 21, 2020, February 8, 2021, March 4, 2021, May 31, 2021, September 17, 2021 and September 23, 2021.		
Equity share capital / total voting capital of the TC before the said acquisition/ sale	2,04,17,51,761 Equity Shares (As per the Shareholding pattern available on BSE website for the quarter ended June 2021)		
Equity share capital/ total voting capital of the TC after the said acquisition/ sale	2,04,17,51,761 Equity Shares (As per the Shareholding pattern available on BSE website for the quarter ended June 2021)		
Total diluted share/voting capital of the TC after the said acquisition	-----		

(\*) 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.

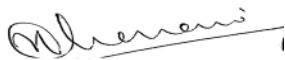
(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

**Notes:**

- 4,09,40,062 Equity shares of the Company have been released by Vistra on the abovementioned dates in capacity of Debenture Trustee, which were released in order to secure the NCDs issued by Udipi Power Corporation Limited, Adani Rail Infra Private Limited, Adani Infra India Limited, Adani Properties Private Limited and Adani Infrastructure Management Services Limited.
- 15,35,000 Equity shares of the Company have been pledged with Vistra on the abovementioned dates in capacity of Debenture Trustee, which were released in order to secure the NCDs issued by Adani Properties Private Limited, Adani Infra India Limited and Adani Infrastructure Management Services Limited.

*The primary onus of complying with the provisions of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 is of the lender, debenture holder and not on the Trustee. However, out of abundant caution, Vistra in its capacity as security trustee and debenture trustee is disclosing and filing this disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.*

**For Vistra ITCL (India) Limited**



**Authorised Signatory  
Place: Mumbai**