

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

Name of the Target Company (TC)	APL Apollo Tubes Limited		
Names of the Sellers	APL Infrastructure Private Limited Ashok Kumar Gupta Veera Gupta (Hereinafter collectively referred to as 'Sellers')		
Whether the Sellers belong to Promoter/ Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited National Stock Exchange of India Limited		
Details of the acquisition 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			
- APL Infrastructure Private Limited	4,46,25,935	35.76	35.76
- Ashok Kumar Gupta	3,25,000	0.26	0.26
- Veera Gupta	37,50,000	3.01	3.01
b) Shares in the nature of encumbrance (pledge/ lien/non-disposal undertaking/ others)	Nil	NA	NA
c) Voting rights (VR) otherwise than by equity shares	Nil	NA	NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding			



Sudesh Group

APL INFRASTRUCTURE PRIVATE LIMITED

CIN : U27310UP2006PTC076230

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in each category)	Nil	NA	NA
e) Total (a+b+c+d)	4,87,00,935	39.03	39.03
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold			
- APL Infrastructure Private Limited	41,25,000 ¹	3.31	3.31
- Ashok Kumar Gupta	3,25,000	0.26	0.26
- Veera Gupta	8,15,000	0.65	0.65
b) VRs acquired /sold otherwise than by shares	Nil	NA	NA
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	Nil	NA	NA
d) Shares encumbered/ invoked/released by the acquirer	Nil	NA	NA
e) Total (a+b+c+d)	52,65,000	4.22	4.22
After the acquisition/sale, holding of:			
a) Shares carrying voting rights			
- APL Infrastructure Private Limited	4,05,00,935	32.46	32.46
- Ashok Kumar Gupta	0	0.00	0.00
- Veera Gupta	29,35,000	2.35	2.35
b) Shares encumbered with the acquirer	Nil	NA	NA
c) VRs otherwise than by equity shares	Nil	NA	NA
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	Nil	NA	NA
e) Total (a+b+c+d)	4,34,35,935	34.81	34.81
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights	a) 26.06.2019 – Market sale of 3,25,000 shares by Ashok Kumar Gupta b) 26.06.2019 to 27.06.2019– Market sale of		



issue /preferential allotment / inter-se transfer etc.)	8,00,000 shares by Veera Gupta c) 18.12.2020 – Inter-se sale of 11,25,000 shares by APL Infrastructure Private Limited d) 05.02.2021– Market sale of 15,000 by Veera Gupta e) 16.02.2021 – Market sale of 30,00,000 shares by APL Infrastructure Private Limited
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	26.06.2019 to 16.02.2021
Equity share capital / total voting capital of the TC before the said acquisition/sale	₹24,95,68,250 divided into 12,47,84,125 of ₹2/- each
Equity share capital/ total voting capital of the TC after the said acquisition/sale	₹24,95,68,250 divided into 12,47,84,125 of ₹2/- each
Total diluted share/voting capital of the TC after the said acquisition/sale	₹24,95,68,250 divided into 12,47,84,125 of ₹2/- each

¹In total 41,25,000 shares were sold by APL Infrastructure Private Limited, out of which 11,25,000 shares were sold as inter-se transfer amongst promoters on December 18, 2020 and 30,00,000 shares were sold on February 16, 2021 as market sale.

Note:

All the share numbers have been mentioned on the basis of post-sub-division numbers (sub-division of shares from one equity share of face value of ₹10 into 5 equity shares of face value of ₹2 was effected on 16/12/2020), irrespective of the actual date of holding/transaction, in order to achieve symmetry and facilitate comparison.

For and on behalf of Sellers

(Authorised Signatory of
APL Infrastructure Private Limited)



Place: New Delhi

Date: February 18, 2021