
ONKAR KANWAR

3/3, Shanti Niketan,
New Delhi – 110021

Date:02.09.2024

The Secretary BSE Ltd. Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400001	The Secretary National Stock Exchange of India Ltd. Exchange Plaza, Bandra-Kurla Complex, Bandra (E), Mumbai – 400051
Company Secretary Apollo Tyres Limited Apollo House, 7, Institutional Area, Sector 32, Gurgaon - 122001 Corporate office	Company Secretary, Apollo Tyres Ltd., 3rd floor, Areekal Mansion, Near Manorama Junction, Panampilly Nagar, Kochi Ernakulam- 682036, Registered office

Dear Sir(s),

Subject: Submission of Revised Disclosure for Apollo Tyres Ltd.

Ref: Discrepancy in disclosure under Regulation 31 of SEBI (SAST) Regulations 2011. Target

Company: Apollo Tyres Ltd (500877)

Dear Mr. Parekh,

In reference to your email dated August 28, 2024, regarding the discrepancies in the disclosure under Regulation 31(1) and 31(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, pertaining to Apollo Tyres Ltd. (Target Company), we have reviewed the discrepancies you highlighted and have made the necessary corrections.

The revised disclosure now includes:

1. Post-Event Holding of Encumbered Shares: Detailed percentages and transaction information for each entity are now provided.
2. Promoter Holding: The number and percentage of shares that are already encumbered for each entity have been included as required.
3. Share Release Details: The number of shares released under the encumbrance details for each entity is now specified.

We have attached the revised disclosure document along with a supporting letter outlining the details of the revisions made.

Please let us know if there are any further requirements or clarifications needed.

Best regards,



Onkar Kanwar

Promoter of Apollo Tyres Ltd.

Encl. as above

Annexure-1

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 ("Takeover Regulations")

Name of the Target Company (TC)	Apollo Tyres Limited ("the Company")	
Names of the stock exchanges where the shares of the target company are listed	- BSE Ltd. - National Stock Exchange of India Ltd.	
Date of reporting	May 27, 2024	
Name of the promoter or PAC on whose shares encumbrance has been created/released/invoked	Sunrays Properties & Investment Co. Private Limited, PTL Enterprises Ltd., Classic Industries and Exports Limited, Onkar Kanwar, Taru Kanwar, Simran Kanwar, Neeraj Kanwar	

Details of the Release of encumbrance:

Name of the 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 [(1)-(3)]}	
	Number	% of total share capital	Number	% of total share capital	Type of event (creation / release / invocation)	Date of creation/ release/ invocation of encumbrance	Type of encumbrance (pledge/ lien/ non disposal undertaking/ others)	Reasons for Encumbrance [(please refer to note (***) below]	Number [(please refer to note (***) below]	% of share capital [(please refer to note (***) below]	Name of the entity in whose favor shares encumbered	Number	% of total share capital
Apollo Green Energy Ltd.	984485	0.16	984485	0.16	-	-	-	[(please refer to note (***) below]	-	-	-	984485	0.16

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Amrit Dyechem Private Ltd.	1574595	0.25	1560595	0.24	-	-	-	1560595	0.24			
Sunrays Properties & Investment Co. Pvt. Ltd.	202277626	31.85	165748533	26.10%	release	Covenant in the nature of non-disposal undertaking and other encumbrance on the equity shares of Apollo Tyres Ltd. pursuant to the investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	165748533	26.10%	Emerald Sage Investment Ltd.	-	-
PTL Enterprises Ltd.	10745232	1.69	8804762	1.39%	release	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	8804762	1.39%	Emerald Sage Investment Ltd.	-	-
Classic Industries and Exports Limited	18696005	2.94	15319714	2.41%	release	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	15319714	2.41%	Emerald Sage Investment Ltd.	-	-
Onkar Kanwar	100000	0.02	81941	0.01%	release	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	81941	0.01%	Emerald Sage Investment Ltd.	-	-
Taru Kanwar	12250	0.00	10038	0.00%	release	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	10038	0.00%	Emerald Sage Investment Ltd.	-	-
Simran Kanwar	18500	0.00	15159	0.00%	release	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	15159	0.00%	Emerald Sage Investment Ltd.	-	-
Neeraj Kanwar	671380	0.11	550136	0.09%	release	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	Investment agreement entered into by and amongst Apollo Tyres Ltd., Emerald Sage Investment Ltd. and certain specified persons belonging to the promoter and promoter group of Apollo Tyres Ltd. [(please refer to note (***) below)]	550136	0.09%	Emerald Sage Investment Ltd.	-	-

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