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

| Name of the Target Company (TC) | APL Apollo Tubes Limited |
|---|--|
| Name(s) of the Acquirer and Persons Acting in Concert (PAC) with the acquirer | Sanjay Gupta HUF |
| Whether acquirer belong to Promoter / Promoter Group | Yes |
| Name(s) of the Stock Exchange(s) where the shares of TC are listed | National Stock Exchange of India Ltd (NSE) and BSE Limited (BSE) |

| Details of | the acquisitions / disposal as follows | Number | % w.r.t. total shares / Voting capital wherever applicable(*) | % w.r.t. total diluted shares/voting capital of the TC (**) |
|------------|---|---------|--|---|
| Before th | ne acquisition under consideration, holding of: | | | |
| a) | Shares carrying voting rights | 9735187 | 41.53% | 41.53% |
| b) | Shares in the nature of encumbrance (pledge / lien / non-disposal undertaking / others) | NIL | Nil | NIL |
| c) | Voting rights (VR) otherwise than by shares | NIL | NIL | NIL |
| d) | Warrants / convertible securities / any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) | NIL | NIL | NIL |
| e) | Total (a+b+c+d) | 9735187 | 41.53% | 41.53% |
| Details o | f acquisition / sale | | 2 20 25 2 2 2 | |
| a) | Shares carrying voting rights acquired / sold | 210000 | 0.90% | 0.90% |
| b) | VRs acquired / sold otherwise than by shares | NIL | NIL | NIL |
| 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 | NIL | NIL |
| d) | Shares encumbered / invoked / released by the acquirer | NIL | NIL | NIL |
| e) | Total (a+b+c+d) | 210000 | 0.90% | 0.90% |
| After the | acquisition / sale, holding of: | . 1 | | |
| a) | Shares carrying voting rights | 9525187 | 40.64% | 40.64% |
| b) | Shares encumbered with the acquirer | NIL | NIL | NIL |
| c) | VRs otherwise than by shares | NIL | NIL | NIL |
| 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 | NIL | NIL |
| e) | Total (a+b+c+d) | 9525187 | 40.64% | 40.64% |

| Mode of acquisition / sale (e.g. open market / off market / public issue / right 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 | Date of sale 17.12.2015 |
| Equity Share Capital / total voting capital of the TC before the said acquisition / sale | 234386360 |
| Equity share capital / total voting capital of the TC after the said acquisition / sale | 234386360 |
| Total share capital / voting capital of the TC after the said acquisition | 234386360 |

^(*)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.

Signature of the acquirer / seller / Authorized Signatory

Place: Delhi

Date: 17.12.2015

^(**) 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.