

Saldhar Investments and Trading Company Private Limited

NKM International House, 178 Backbay Reclamation, B C Marg, Mumbai 400 020.

Telephone (022) 22838302 / 22838304 Email: apmaniar@apcotex.com

CIN: U67120MH1979PTC021881 Fax (022) 22838291

Date: 28th November 2016

To,

| | |
|--|--|
| BSE Limited Scrip Code: 523694 Department of Listing, P. J. Towers, Dalal Street, Mumbai - 400 001 | National Stock Exchange of India Limited Symbol: APCOTEXIND Exchange Plaza, Bandra-Kurla Complex, Bandra (East), Mumbai - 400 051 |
|--|--|

Dear Sir/Madam,

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

Notice is hereby given under Regulation 29(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, that the Company being promoter, has acquired 1,20,200 shares of Apcotex Industries Limited.

Subsequent to the same, the Company holds 1,05,60,200 shares (i.e. 50.92%) shares in Apcotex Industries Limited.

Please find enclosed the information in the prescribed format. You are requested to take the same on record.

For Saldhar Investments and Trading Company Private Limited



Atul Choksey
Atul Choksey

Director

DIN: 00002102

Encl: as above

CC:-

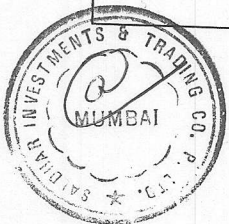
Apcotex Industries Limited
Plot No 3/1, MIDC Industrial Area,
Taloja 410208, Maharashtra

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

| | |
|---|--|
| Name of the Target Company (TC) | Apcotex Industries Limited |
| Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer | <p>Saldhar Investments and Trading Company Private Limited*</p> <p>Person Acting in Concert</p> <ol style="list-style-type: none"> 1. Atul Champaklal Choksey (Promoter) 2. Parul Atul Choksey (Promoter) 3. Abhiraj Atul Choksey HUF (Promoter) 4. Devanshi Anant Veer Jalan (Promoter) 5. Abhiraj Atul Choksey (Promoter) 6. Apco Entreprises Limited (Promoter) 7. Rita Ashok Parekh (PAC) 8. Amit Champaklal Choksey (PAC) 9. Namrata Amit Choksey (PAC) 10. Ankita Amit Choksey (PAC) 11. Priti Amit Choksey (PAC) 12. Amit Champaklal Choksey HUF (PAC) 13. Biyash Abhiraj Choksey (PAC) 14. Girish Champaklal Choksey (PAC) 15. Ankur Girish Choksey (PAC) 16. Prashant Girish Choksey (PAC) 17. Sunita Girish Choksey (PAC) 18. Devaki Ashok Parekh (PAC) 19. Janaki Ashok Parekh (PAC) 20. Abhiraj Trading And Investment Pvt Ltd (PAC) 21. Bhuvantray Investments And Trading Company Private Limited (PAC) 22. Aquamarine Trading & Investments Private Limited (PAC) 23. Gauriputra Investments And Trading Company Private Limited (PAC) 24. Hmp Minerals Private Limited (PAC) 25. Forest Hills Trading And Investment P Ltd (PAC) 26. Haridwar Trading And Investments Pvt Ltd (PAC) 27. Choksey Chemicals Private Ltd (PAC) <p>* Scheme of Amalgamation between Titan Trading and Agencies Limited ("Titan") and Dhumraketu Investments and Trading Company Private Limited ("Dhumraketu") and Trivikram Investments and Trading Company Limited ("Trivikram") and Saldhar Investments and Trading Company Private Limited ("Saldhar") was approved by the Hon'ble High Court of Judicature at Bombay vide their order dated 12th August 2016 (which became effective on 6th September 2016). As a result, shares of Apcotex Industries Limited (which were earlier held by Trivikram and Dhumraketu) have been effectively transferred to and vested in Saldhar. Thus, Trivikram and Dhumraketu have ceased to exist and are effectively succeeded by Saldhar</p> |



| | | | |
|---|--|---|---|
| Whether the acquirer belongs to Promoter/Promoter group | Yes | | |
| Name(s) of the Stock Exchange(s) where the shares of TC are Listed | BSE Limited and National Stock Exchange of India Limited | | |
| Details of the acquisition / disposal as follows*** | Number | % w.r.t total share/voting capital wherever applicable(*) | % w.r.t total diluted share/voting capital of the TC (**) |
| <p>Before the acquisition under consideration, holding of :</p> <p>a) Shares carrying voting rights</p> <p>b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)</p> <p>c) Voting rights (VR) otherwise than by shares</p> <p>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)</p> <p>e) Total (a+b+c+d)</p> | As per Annexure I | | |
| <p>Details of acquisition/sale</p> <p>a) Shares carrying voting rights acquired/sold</p> <p>b) VRs acquired /sold otherwise than by shares</p> <p>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</p> <p>d) Shares encumbered / invoked/released by the acquirer</p> <p>e) Total (a+b+c+d)</p> | As per Annexure II | | |



| | |
|---|---|
| After the acquisition/sale, holding of: a) Shares carrying voting rights b) Shares encumbered with the acquirer 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 e) Total (a+b+c+d) | As per Annexure III |
| Mode of acquisition / sale (e.g. open market / off-market / public issue / rights 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 | 25 th November, 2016 |
| Equity share capital / total voting capital of the TC before the said acquisition / sale | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |
| Equity share capital/ total voting capital of the TC after the said acquisition / sale | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |
| Total diluted share/voting capital of the TC after the said acquisition | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |

(* Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 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.



For Saldhar Investments and Trading Company Private Limited

Atul Choksey
Director
DIN 00002102

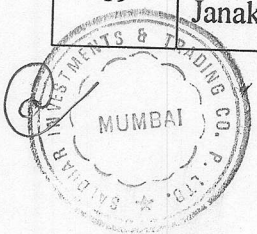
Place: Mumbai
Date: 28th November 2016

Annexure to disclosure under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover Regulations, 2011

Annexure I

Details of shareholding of promoters/promoter group and person acting in concert before acquisition

| Sr. No | Name of the Shareholders | Number of Shares | % w.r.t. total share/voting capital wherever applicable (*) | % w.r.t. total diluted share/voting capital of TC (**) |
|--------|---|------------------|---|--|
| 1 | Saldhar Investments and Trading Company Pvt Ltd(Refer Note 1) | 1,04,40,000 | 50.34 | 50.34 |
| 2 | AtulChampaklalChoksey(Refer Note 1) | 1,31,398 | 0.63 | 0.63 |
| 3 | ParulAtulChoksey(Refer Note 1) | 72,770 | 0.35 | 0.35 |
| 4 | AbhirajAtulChoksey HUF(Refer Note 1) | 14,217 | 0.07 | 0.07 |
| 5 | DevanshiAnant Veer Jalan | 1,85,353 | 0.89 | 0.89 |
| 6 | AbhirajAtulChoksey | 1,69,888 | 0.82 | 0.82 |
| 7 | Rita Ashok Parekh | 1,06,380 | 0.51 | 0.51 |
| 8 | Amit ChampaklalChoksey | 68,910 | 0.33 | 0.33 |
| 9 | Namrata Amit Choksey | 57,076 | 0.28 | 0.28 |
| 10 | Ankita Amit Choksey | 54,088 | 0.26 | 0.26 |
| 11 | Priti Amit Choksey | 47,134 | 0.23 | 0.23 |
| 12 | Amit ChampaklalChoksey HUF | 41,140 | 0.2 | 0.2 |
| 13 | BiyashAbhirajChoksey | 36,000 | 0.17 | 0.17 |
| 14 | Girish ChampaklalChoksey | 17,800 | 0.09 | 0.09 |
| 15 | Ankur Girish Choksey | 13,600 | 0.07 | 0.07 |
| 16 | Prashant Girish Choksey | 13,200 | 0.06 | 0.06 |
| 17 | Sunita Girish Choksey | 9,200 | 0.04 | 0.04 |
| 18 | Devaki Ashok Parekh | 6,400 | 0.03 | 0.03 |
| 19 | Janaki Ashok Parekh | 4,800 | 0.02 | 0.02 |

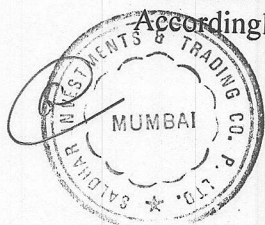


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|----|--|----------|------|------|
| 20 | Abhiraj Trading And Investment Pvt Ltd | | | |
| 21 | Apco Enterprises Limited | 1,16,468 | 0.56 | 0.56 |
| 22 | Bhuvantray Investments And Trading Company Private Limited | 1,12,352 | 0.54 | 0.54 |
| 23 | Aquamarine Trading & Investments Private Limited | 99,784 | 0.48 | 0.48 |
| 24 | Gauriputra Investments And Trading Company Private Limited | 98,800 | 0.48 | 0.48 |
| 25 | Hmp Minerals Private Limited | 52,400 | 0.25 | 0.25 |
| 26 | Forest Hills Trading And Investment P Ltd | 19,324 | 0.09 | 0.09 |
| 27 | Haridwar Trading And Investments Pvt Ltd | 8,600 | 0.04 | 0.04 |
| 28 | Choksey Chemicals Private Ltd | 8,600 | 0.04 | 0.04 |
| | | 276 | 0.00 | 0.00 |

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 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.

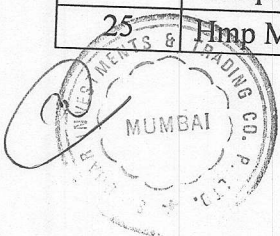
Note 1 Pursuant to a Scheme of Amalgamation between Titan Trading and Agencies Limited ("Titan") and Dhumraketu Investments and Trading Company Private Limited ("Dhumraketu") and Trivikram Investments and Trading Company Limited ("Trivikram") and Saldhar Investments and Trading Company Private Limited ("Saldhar"), as approved by the Hon'ble High Court of Judicature at Bombay vide their order dated 12th August 2016 (which became effective on 6th September 2016), 72,96,978 shares of Apcotex Industries Limited (which were earlier held by Trivikram and Dhumraketu) have been effectively transferred to and vested in Saldhar. Additionally, Saldhar also acquired 5,60,000 shares from AtulChampaklalChoksey and 1,98,000 shares from ParulAtulChoksey of Apcotex Industries Limited through an inter se transfer on 11th November, 2016 and 2,00,000 shares of Apcotex Industries Limited from AbhirajAtulChoksey HUF through an inter se transfer on 23rd November, 2016. Accordingly, Saldhar holds 1,04,40,000 (i.e. 50.34%) shares in Apcotex Industries Limited.



Annexure II

Details of acquisition of promoters/promoter group and person acting in concert

| Sr. No | Name of the Shareholders | Number of Shares | % w.r.t. total share/voting capital wherever applicable (*) | % w.r.t. total diluted share/voting capital of TC (**) |
|--------|---|------------------|---|--|
| 1 | Saldhar Investments and Trading Company Pvt Ltd(Refer Note 1) | 1,20,200 | 0.58 | 0.58 |
| 2 | AtulChampaklalChoksey(Refer Note 1) | (60,000) | (0.29) | (0.29) |
| 3 | ParulAtulChoksey | - | - | - |
| 4 | AbhirajAtulChoksey HUF | - | - | - |
| 5 | DevanshiAnant Veer Jalan | - | - | - |
| 6 | AbhirajAtulChoksey(Refer Note 1) | (60,000) | (0.29) | (0.29) |
| 7 | Rita Ashok Parekh | - | - | - |
| 8 | Amit ChampaklalChoksey | - | - | - |
| 9 | Namrata Amit Choksey | - | - | - |
| 10 | Ankita Amit Choksey | - | - | - |
| 11 | Priti Amit Choksey | - | - | - |
| 12 | Amit ChampaklalChoksey HUF | - | - | - |
| 13 | BiyashAbhirajChoksey | - | - | - |
| 14 | Girish ChampaklalChoksey | - | - | - |
| 15 | Ankur Girish Choksey | - | - | - |
| 16 | Prashant Girish Choksey | - | - | - |
| 17 | Sunita Girish Choksey | - | - | - |
| 18 | Devaki Ashok Parekh | - | - | - |
| 19 | Janaki Ashok Parekh | - | - | - |
| 20 | Abhiraj Trading And Investment Pvt Ltd | - | - | - |
| 21 | Apco Enterprises Limited | - | - | - |
| 22 | Bhuvantray Investments And Trading Company Private Limited | - | - | - |
| 23 | Aquamarine Trading & Investments Private Limited | - | - | - |
| 24 | Gauriputra Investments And Trading Company Private Limited | - | - | - |
| 25 | Hmp Minerals Private Limited | - | - | - |



| | | | | |
|----|---|---|---|---|
| 26 | Forest Hills Trading And Investment P Ltd | - | - | - |
| 27 | Haridwar Trading And Investments Pvt Ltd | - | - | - |
| 28 | Choksey Chemicals Private Ltd | - | - | - |

Note 1 : Saldhar Investments and Trading Company Private Limited (Saldhar) has acquired 1,20,200 shares (0.58%) of Apcotex Industries Limited. Separately, individual promoters have sold 1,20,000 shares of Apcotex Industries Limited (0.58%) for which separate disclosure is being made under Regulation 29(2) of SEBI(Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 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.



Annexure III

Details of shareholding of promoters/promoter group and person acting in concert after acquisition

| Sr. No | Name of the Shareholders | Number of Shares | % w.r.t. total share/voting capital wherever applicable (*) | % w.r.t. total diluted share/voting capital of TC (**) |
|--------|---|------------------|---|--|
| 1 | Saldhar Investments and Trading Company Pvt Ltd | 1,05,60,200 | 50.92 | 50.92 |
| 2 | AtulChampaklalChoksey | 71,398 | 0.34 | 0.34 |
| 3 | ParulAtulChoksey | 72,770 | 0.35 | 0.35 |
| 4 | AbhirajAtulChoksey HUF | 14,217 | 0.07 | 0.07 |
| 5 | DevanshiAnant Veer Jalan | 1,85,353 | 0.89 | 0.89 |
| 6 | AbhirajAtulChoksey | 1,09,888 | 0.53 | 0.53 |
| 7 | Rita Ashok Parekh | 1,06,380 | 0.51 | 0.51 |
| 8 | Amit ChampaklalChoksey | 68,910 | 0.33 | 0.33 |
| 9 | Namrata Amit Choksey | 57,076 | 0.28 | 0.28 |
| 10 | Ankita Amit Choksey | 54,088 | 0.26 | 0.26 |
| 11 | Priti Amit Choksey | 47,134 | 0.23 | 0.23 |
| 12 | Amit ChampaklalChoksey HUF | 41,140 | 0.2 | 0.2 |
| 13 | BiyashAbhirajChoksey | 36,000 | 0.17 | 0.17 |
| 14 | Girish ChampaklalChoksey | 17,800 | 0.09 | 0.09 |
| 15 | Ankur Girish Choksey | 13,600 | 0.07 | 0.07 |
| 16 | Prashant Girish Choksey | 13,200 | 0.06 | 0.06 |
| 17 | Sunita Girish Choksey | 9,200 | 0.04 | 0.04 |
| 18 | Devaki Ashok Parekh | 6,400 | 0.03 | 0.03 |
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| 20 | Abhiraj Trading And Investment Pvt Ltd | | | |
| 21 | Apco Enterprises Limited | 1,16,468 | 0.56 | 0.56 |
| 22 | Bhuvantray Investments And Trading Company Private Limited | 1,12,352 | 0.54 | 0.54 |
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| 24 | Gauriputra Investments And Trading Company Private Limited | 98,800 | 0.48 | 0.48 |
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| 26 | Forest Hills Trading And Investment P Ltd | 19,324 | 0.09 | 0.09 |
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| 28 | Choksey Chemicals Private Ltd | 8,600 | 0.04 | 0.04 |
| | | 276 | 0.00 | 0.00 |

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 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.

