<u>Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares</u> <u>and Takeovers) Regulations, 2011</u>

Name of the Target Company (TC)	APL APOLLO TUBES limited		
Name(s) of the acquirer and Persons	Kitara PIIN 1101 (Acquirer)		
Acting in Concert (PAC) with the	Kitara PIIN 1001 (PAC)		
acquirer			
Whether the acquirer belongs to	No		
Promoter/Promoter group			
Name(s) of the Stock Exchange(s) where	National Stock Exchange and Bombay		
the shares of TC are Listed	Stock Exchange		
Details of the acquisition / disposal as	Number	% w.r.t.	% w.r.t.
follows		total share/voting capital wherever applicable	total diluted share/voting capital of the TC (**)
		(*)	,
Before the acquisition/disposal under			
consideration, holding of :	Anna Anna Anna Anna Anna Anna Anna Anna		
a) Shares carrying voting rights ¹	3,000,000	12.72%	12.72%
b) Shares in the nature of encumbrance			
(pledge/lien/non-disposal	-	<u>.</u>	-
undertaking / others)			
c) Voting rights (VR) otherwise than by	_	-	_
equity shares			
d) Warrants/convertible securities/any	_	_	-
other instrument that entitles the	As se reference de la constitución de la constituci	,	
acquirer to receive shares carrying			
voting rights in the TC (specify			
holding in each category)			

¹ Shares held by PAC

e) Total (a+b+c+d)	3,000,000	12.72%	12.72%
Details of acquisition/sale			
a) Shares carrying voting rights	8,52,000	3.61 %	3.61 %
acquired 2			
b) VRs acquired /sold otherwise than		.	••
by shares			Administrative Company
c) Warrants/convertible securities/any	-	-	-
other instrument that entitles the			1
acquirer to receive shares carrying			
voting rights in the TC (specify			
holding in each category)			
acquired/sold			The state of the s
d) Shares encumbered /	-	-	_
invoked/released by the acquirer.			
e) Total (a+b+c+d)	8,52,000	3.61 %	3.61 %
After the acquisition/sale, holding of:	,		
a) Shares carrying voting rights ³	3,852,000	16.33%	16.33%
b) Shares encumbered with the			
acquirer	-	-	-
c) VRs otherwise than by equity 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)	3,852,000	16.33%	16.33%
Mode of acquisition/sale (e.g. open			

² Shares acquired by the Acquirer.

 $^{^{3}}$ Shares held by the Acquirer and PAC post-acquisition.

market / off-market / public issue /	Open Market
rights issue /preferential allotment /	
inter-se transfer etc.)	
Date of acquisition / sale of shares / VR	28 December 2016
or date of receipt of intimation of	
allotment of shares, whichever is	
applicable	
Equity share capital / total voting	23,589,955 Equity Shares of Rs. 10 each
capital of the TC before the said	
acquisition/sale	
Equity share capital/ total voting	23,589,955 Equity Shares of Rs. 10 each
capital of the TC after the said	
acquisition/sale	
Total diluted share/voting capital of the	23,589,955 Equity Shares of Rs. 10 each
TC after the said acquisition/sale	

- (*) Total share capital/voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 31 of the SEBI Listing Regulations.
- (**) 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.

The Acquirer

Place: Mauritius

Date: 4 January 2017