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

| | 3 | | |
|---|---------------------------------------|---|--|
| Name of the Target Company (TC) | Action Construction Equipment Limited | | |
| Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer | Vijay Agarwal | | |
| Whether the acquirer belongs to Promoter/Promoter group | Promoter | | |
| Name(s) of the Stock Exchange(s) where the shares of TC are Listed | NSE and BSE | | |
| 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 (**) |
| Before the acquisition under consideration, holding of: | | | |
| a) Shares carrying voting rights.b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ | 41426907 | 35.31 | 35.31 |
| others) c) Voting rights (VR) otherwise than by | _ | - . | <u>-</u> |
| shares 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) e) Total (a+b+c+d) | 41426907 | 35.31 | 35.31 |
| Details of acquisition : | | | · |
| a) Shares carrying voting rights acquired b) VRs acquired otherwise than by shares c) Warrents (convertible securities (conv | 1824 | 0.00 | 0.00 |
| 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 | - | - | |
| d) Shares encumbered / invoked/released by the acquirer | - | - | - · · · · · · · · · · · · · · · · · · · |
| e) Total (a+b+c+/-d) | 1824 | 0.00 | 0.00 |

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| After the acquisition, holding of: | | | <i>;</i> | |
|---|---|-------|-----------------|--|
| 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 | 41428731 - - - | 35.31 | 35.31 - - | |
| e) Total (a+b+c+d) | 41428731 | 35.31 | 35.31 | |
| Mode of acquisition (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. | 06.06.2018 | | | |
| Equity share capital / total voting capital of the TC before the said acquisition. | Number 11,73,23,000 Equity Shares of Rs. 2/- each Amount Rs. 23,46,46,000 | | | |
| Equity share capital/ total voting capital of the TC after the said acquisition. | Number 11,73,23,000 Equity Shares of Rs. 2/- each Amount Rs. 23,46,46,000 | | | |
| Total diluted share/voting capital of the TC after the said acquisition. | Number 11,73,23,000 Equity Shares of Rs. 2/- each Amount Rs. 23,46,46,000 | | | |

Signature of the acquirer

Place: Faridabad Date: 07.06.2018