



April 5, 2024

To:

National Stock Exchange of India Limited
Exchange Plaza, BKC, Bandra (East)
Mumbai – 400 051

BSE Limited

Floor 25, P J Towers, Dalal Street,
Mumbai – 400001

Audit Committee / Board of Directors
Adani Ports and Special Economic Zone Limited
"Adani Corporate House",
Shantigram, Near Vaishno Devi Circle,
S.G. Highway, Khodiyar,
Ahmedabad-382421

Dear Sir,

Subject: **Declaration by Promoter / Promoter Group of Adani Ports and Special Economic Zone Limited under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (as amended) for the financial year ended March 31, 2024**

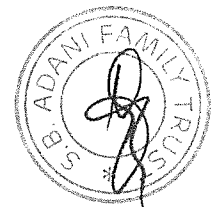
1. *Shareholding of Promoter / Promoter Group of Adani Ports and Special Economic Zone Limited as on 31st March, 2024.*

The shareholding of Promoter / Promoter Group of Adani Ports and Special Economic Zone Limited as on 31-03-2024 is given below:

Sr. No.	Details of Promoter / Promoter Group of Adani Ports and Special Economic Zone Limited	Details of shares held as on 31-03-2024		
		Number of shares	% w.r.t. Total share / voting capital wherever applicable	% w.r.t. Total diluted share/ voting capital wherever applicable
1.	Gautam S Adani & Rajesh S Adani (on behalf of S B Adani Family Trust)	71,07,53,935	32.90	32.90
2.	Adani Tradeline Pvt. Ltd.* (formerly Adani Tradeline LLP)	13,81,93,549*	6.40	6.40
3.	Shri Gautam S. Adani	1	0.00	0.00

S. B. Adani Family Trust
9th Floor, Shikhar, Near Adani House,
Mithakhali Six Roads, Navrangpura
Ahmedabad-380 009
Gujarat, India

Tel +91 79 2656 5555
Fax +91 79 2656 5500
info@adani.com
www.adani.com



adani

4.	Shri Rajesh S. Adani	30,001	0.00	0.00
5.	Worldwide Emerging Market Holding Ltd.	8,60,92,798	3.99	3.99
6.	Afro Asia Trade and Investments Ltd.	8,99,45,212	4.16	4.16
7.	Emerging Market Investment DMCC	13,62,35,995	6.31	6.31
8.	Flourishing Trade and Investment Ltd.	12,44,54,607	5.76	5.76
9.	Adani Properties Private Limited	16,85,000	0.08	0.08
10.	Adani Rail Infra Private Limited	7,06,21,469	3.27	3.27
11.	Gelt Bery Trade and Investment Ltd.	100	0.00	0.00
12.	Spitze Trade and Investment Ltd.	1,23,58,700	0.57	0.57
13.	Resurgent Trade and Investment Ltd.	5,30,04,718	2.45	2.45
	Total	142,33,76,085	65.89	65.89

**Includes 2,86,167 equity shares of APSEZL held in the demat account of Adani Tradeline LLP which are in the process of transfer to the demat account of Adani Tradeline Private Limited pursuant to conversion of Adani Tradeline LLP into Private Limited Company.*

2. *Declaration in terms of Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (as amended)*

Based on the information received from other members of the promoter and promoter group of Adani Ports and Special Economic Zone Limited, S.B. Adani Family Trust, one of the promoter group entity, does hereby confirm and declare on behalf of promoter and promoter group of Adani Ports and Special Economic Zone Limited that the members of the promoter and promoter group of Adani Ports and Special Economic Zone Limited have not created any encumbrance over the shares of Adani Ports and Special Economic Zone Limited, directly or indirectly, during the financial year ended on March 31, 2024, other than those encumbrances for which disclosures have already been made during the financial year ended on March 31, 2024 under the relevant provisions of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (as amended).

Kindly take the same on record.

Thanking You,

For **S.B. Adani Family Trust**

Authorised Signatory

S. B. Adani Family Trust
9th Floor, Shikhar, Near Adani House,
Mithakhali Six Roads, Navrangpura
Ahmedabad-380 009
Gujarat, India



Tel +91 79 2656 5555
Fax +91 79 2656 5500
info@adani.com
www.adani.com