

WELLINGTON MANAGEMENT GROUP LLP

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**WELLINGTON  
MANAGEMENT\***

**BY E-MAIL**

October 25, 2024

**BSE Limited**

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**National Stock Exchange of India Limited**

Exchange Plaza,  
Bandra-Kurla-Complex, Bandra (East)  
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E-mail: [takeover@nse.co.in](mailto:takeover@nse.co.in)

**Compliance Officer**

Amber Enterprises India Limited  
C-1, Phase - II, Focal Point, Rajpura Town  
Rajapura, Punjab, 140401  
E-mail: [info@ambergrouppindia.com](mailto:info@ambergrouppindia.com); [cs\\_corp@ambergrouppindia.com](mailto:cs_corp@ambergrouppindia.com)

Dear Sir/ Madam,

**Subject: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (“Takeover Regulations”).**

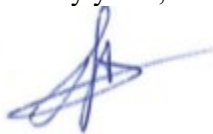
This is to inform you that certain clients of Wellington Management Group LLP have disposed of an aggregate of 184,961 equity shares of Amber Enterprises India Limited through open market transactions on October 24, 2024, which coupled with previous disposals of clients of Wellington Management Group LLP, has crossed the 2% threshold for the purpose of Regulation 29(2) of the Takeover Regulations.

Accordingly, please find enclosed a disclosure under Regulation 29(2) of the Takeover Regulations.

Kindly take the above on record.

Thanking you,

Sincerely yours,



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Taisia Lowe, Regulatory Analyst  
Wellington Management Group LLP  
Email: [beneficialownership@wellington.com](mailto:beneficialownership@wellington.com)



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

|                                                                                                                                                                             |                                                                                                                                |                                                             |                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------------------|
| Name of the Target Company (TC)                                                                                                                                             | Amber Enterprises India Limited<br>(ISIN: INE371P01015)                                                                        |                                                             |                                                            |
| Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer                                                                                               | The details of the acquirers and persons acting in concert with them (“PACs”) are set out in <b>Annexure A.</b> <sup>(*)</sup> |                                                             |                                                            |
| Whether the acquirer belongs to Promoter/Promoter group                                                                                                                     | No. Neither the acquirer nor any of the PACs belong to Promoter/ Promoter group.                                               |                                                             |                                                            |
| Name(s) of the Stock Exchange(s) where the shares of TC are Listed                                                                                                          | National Stock Exchange of India Limited and BSE Limited                                                                       |                                                             |                                                            |
| Details of the disposal as follows                                                                                                                                          | Number                                                                                                                         | % w.r.t. total share/voting capital wherever applicable (*) | % w.r.t. total diluted share/voting capital of the TC (**) |
| <b>Before the disposal under consideration, holding of:</b>                                                                                                                 |                                                                                                                                |                                                             |                                                            |
| a) Shares carrying voting rights                                                                                                                                            | 1,875,200                                                                                                                      | 5.55%                                                       | 5.55%                                                      |
| b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)                                                                                     | N/A                                                                                                                            | N/A                                                         | N/A                                                        |
| c) Voting rights (VR) otherwise than by shares                                                                                                                              | N/A                                                                                                                            | N/A                                                         | N/A                                                        |
| 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)    | N/A                                                                                                                            | N/A                                                         | N/A                                                        |
| <b>e) Total (a+b+c+d)</b>                                                                                                                                                   | <b>1,875,200<sup>(#)</sup></b>                                                                                                 | <b>5.55%<sup>(#)</sup></b>                                  | <b>5.55%<sup>(#)</sup></b>                                 |
| <b>Details of sale</b>                                                                                                                                                      |                                                                                                                                |                                                             |                                                            |
| a) Shares carrying voting rights sold                                                                                                                                       |                                                                                                                                |                                                             |                                                            |
| • Daiwa Asset Management Co. Ltd.                                                                                                                                           | 121                                                                                                                            | 0.00%                                                       | 0.00%                                                      |
| • Alberta Investment Management Corporation                                                                                                                                 | 1,599                                                                                                                          | 0.00%                                                       | 0.00%                                                      |
| • Sprugos Investments VIII, L.L.C.                                                                                                                                          | 3,374                                                                                                                          | 0.01%                                                       | 0.01%                                                      |
| • Wellington Trust Company, National Association Multiple Common Trust Funds Trust, Emerging Markets Opportunities Portfolio                                                | 4,604                                                                                                                          | 0.01%                                                       | 0.01%                                                      |
| • Wellington Emerging Markets Opportunities Fund                                                                                                                            | 9,297                                                                                                                          | 0.03%                                                       | 0.03%                                                      |
| • Desjardins Emerging Markets Opportunities Fund                                                                                                                            | 24,913                                                                                                                         | 0.07%                                                       | 0.07%                                                      |
| • Wellington Emerging Market Themes Fund                                                                                                                                    | 44,981                                                                                                                         | 0.13%                                                       | 0.13%                                                      |
| • Wellington Trust Company, National Association Multiple Common Trust Funds Trust, Emerging Market Development Portfolio                                                   | 96,072                                                                                                                         | 0.28%                                                       | 0.28%                                                      |
| b) VRs sold otherwise than by shares                                                                                                                                        | N/A                                                                                                                            | N/A                                                         | N/A                                                        |
| c) Warrants/convertible securities/any other instrument that entitles the seller to receive shares carrying voting rights in the TC (specify holding in each category) sold | N/A                                                                                                                            | N/A                                                         | N/A                                                        |

|                                                                                                                                                                                                                                |                                  |                         |                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-------------------------|-------------------------|
| d) Shares encumbered / invoked/released by the acquirer                                                                                                                                                                        |                                  |                         |                         |
| e) <b>Total (a+b+c+/-d)</b>                                                                                                                                                                                                    | N/A<br><b>184,961(*#)</b>        | N/A<br><b>0.55%(*#)</b> | N/A<br><b>0.55%(*#)</b> |
| <b>After the sale, holding of:</b>                                                                                                                                                                                             |                                  |                         |                         |
| a) Shares carrying voting rights                                                                                                                                                                                               | 1,690,239                        | 5.01%                   | 5.01%                   |
| b) Shares encumbered with the acquirer <del>/seller</del>                                                                                                                                                                      | N/A                              | N/A                     | N/A                     |
| c) VRs otherwise than by shares                                                                                                                                                                                                | N/A                              | N/A                     | N/A                     |
| d) Warrants/convertible securities/any other instrument that entitles the acquirer <del>/seller</del> to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition <del>/sale</del> | N/A                              | N/A                     | N/A                     |
| e) <b>Total (a+b+c+d)</b>                                                                                                                                                                                                      | <b>1,690,239(##)</b>             | <b>5.01%(##)</b>        | <b>5.01%(##)</b>        |
| Mode of sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).                                                                                                   | Net sale through open market     |                         |                         |
| Date of sale of shares / <del>VR or date of receipt of intimation of allotment of shares</del> , whichever is applicable                                                                                                       | October 24, 2024 <sup>(#*)</sup> |                         |                         |
| Equity share capital / total voting capital of the TC before the said sale                                                                                                                                                     | 33,762,506                       |                         |                         |
| Equity share capital/ total voting capital of the TC after the said sale                                                                                                                                                       | 33,762,506                       |                         |                         |
| Total diluted share/voting capital of the TC after the said sale                                                                                                                                                               | 33,762,506                       |                         |                         |

(\*) 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.

(\*\*) 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.

(#) Details of shareholding of the acquirer and PACs before the transaction on 24 October 2024 are set out in Annexure A.

(##) Details of shareholding of the acquirer and PACs after the transaction on 24 October 2024 are set out in Annexure A.

(#\*) As Wellington Management Group LLP is the common manager to the entities specified in Annexure A, they have been accordingly categorized as persons acting in concert for the purposes of the transaction. It is clarified that various entities managed by Wellington Management Group LLP have sold and/or acquired shares of the TC, and the disclosure obligation under Regulation 29(2) of the Takeover Regulations was triggered pursuant to disposal of 184,961 equity shares of the TC on October 24, 2024, which coupled with previous transactions, breached the 2% threshold.

Signature of the acquirer / Authorised Signatory

**For Wellington Management Group LLP**



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Taisia Lowe, Regulatory Analyst  
Wellington Management Group LLP  
Place: Boston, USA  
Date: October 25, 2024

## ANNEXURE A

| Sr No     | Name of the Acquirer/ PACs                                                                                                 | Before the transaction |                                               |                                                       | After the transaction |                                               |                                                       |       |
|-----------|----------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------------------------------|-------------------------------------------------------|-----------------------|-----------------------------------------------|-------------------------------------------------------|-------|
|           |                                                                                                                            | No. of shares          | % w.r.t. total share/voting capital of the TC | % w.r.t. total diluted share/voting capital of the TC | No. of shares         | % w.r.t. total share/voting capital of the TC | % w.r.t. total diluted share/voting capital of the TC |       |
| Acquirers |                                                                                                                            |                        |                                               |                                                       |                       |                                               |                                                       |       |
| 1         | Daiwa Asset Management Co. Ltd.                                                                                            | 7,603                  | 0.02%                                         | 0.02%                                                 | 6,479                 | 0.02%                                         | 0.02%                                                 |       |
| 2         | Alberta Investment Management Corporation                                                                                  | 114,597                | 0.34%                                         | 0.34%                                                 | 97,667                | 0.29%                                         | 0.29%                                                 |       |
| 3         | Sprugos Investments VIII, L.L.C.                                                                                           | 72,659                 | 0.22%                                         | 0.22%                                                 | 47,847                | 0.14%                                         | 0.14%                                                 |       |
| 4         | Wellington Trust Company, National Association Multiple Common Trust Funds Trust, Emerging Markets Opportunities Portfolio | 221,277                | 0.66%                                         | 0.66%                                                 | 140,937               | 0.42%                                         | 0.42%                                                 |       |
| 5         | Wellington Emerging Markets Opportunities Fund                                                                             | 88,599                 | 0.26%                                         | 0.26%                                                 | 56,431                | 0.17%                                         | 0.17%                                                 |       |
| 6         | Desjardins Emerging Markets Opportunities Fund                                                                             | 58,541                 | 0.17%                                         | 0.17%                                                 | 37,281                | 0.11%                                         | 0.11%                                                 |       |
| 7         | Wellington Emerging Market Themes Fund                                                                                     | 45,129                 | 0.13%                                         | 0.13%                                                 | 38,472                | 0.11%                                         | 0.11%                                                 |       |
| 8         | Wellington Trust Company, National Association Multiple Common Trust Funds Trust, Emerging Market Development Portfolio    | 11,295                 | 0.03%                                         | 0.03%                                                 | 9,625                 | 0.03%                                         | 0.03%                                                 |       |
| PACs      |                                                                                                                            |                        |                                               |                                                       |                       |                                               |                                                       |       |
| 9         | BAYVK A2-FONDS - BAYVK A2 WMC                                                                                              | 152,213                |                                               | 0.45%                                                 | 0.45%                 | 152,213                                       | 0.45%                                                 | 0.45% |

|    |                                                                                    |         |       |       |         |       |       |
|----|------------------------------------------------------------------------------------|---------|-------|-------|---------|-------|-------|
| 10 | Brown Advisory<br>Emerging Markets<br>Select Fund                                  | 64,862  | 0.19% | 0.19% | 64,862  | 0.19% | 0.19% |
| 11 | Brunei Pension<br>Partnership Limited                                              | 18,824  | 0.06% | 0.06% | 18,824  | 0.06% | 0.06% |
| 12 | Saudi Central<br>Bank                                                              | 249,673 | 0.74% | 0.74% | 249,673 | 0.74% | 0.74% |
| 13 | GIC Private<br>Limited                                                             | 116,876 | 0.35% | 0.35% | 116,876 | 0.35% | 0.35% |
| 14 | People's Bank of<br>China                                                          | 40,233  | 0.12% | 0.12% | 40,233  | 0.12% | 0.12% |
| 15 | GAM Investment<br>Management<br>(Switzerland) Ltd.                                 | 13,012  | 0.04% | 0.04% | 13,012  | 0.04% | 0.04% |
| 16 | Lansforsakringar<br>Asienfond                                                      | 27,065  | 0.08% | 0.08% | 27,065  | 0.08% | 0.08% |
| 17 | Mercer UCITS<br>Common<br>Contractual Fund                                         | 9,401   | 0.03% | 0.03% | 9,401   | 0.03% | 0.03% |
| 18 | MYPAC Pty Ltd                                                                      | 9,412   | 0.03% | 0.03% | 9,412   | 0.03% | 0.03% |
| 19 | Ontario Teachers'<br>Pension Plan Board                                            | 50,320  | 0.15% | 0.15% | 50,320  | 0.15% | 0.15% |
| 20 | Permodalan<br>Nasional Berhad                                                      | 4,585   | 0.01% | 0.01% | 4,585   | 0.01% | 0.01% |
| 21 | RP FONDS<br>INSTITUTIONNEL<br>- Actions marchés<br>émergents - New<br>India Select | 107,863 | 0.32% | 0.32% | 107,863 | 0.32% | 0.32% |
| 22 | Skandia Asien                                                                      | 55,100  | 0.16% | 0.16% | 55,100  | 0.16% | 0.16% |
| 23 | The Incubation<br>Fund, Ltd.                                                       | 908     | 0.00% | 0.00% | 908     | 0.00% | 0.00% |
| 24 | Vanguard<br>Emerging Markets<br>Select Stock Fund                                  | 18,260  | 0.05% | 0.05% | 18,260  | 0.05% | 0.05% |
| 25 | Wellington Asian<br>Opportunities Fund                                             | 58,991  | 0.17% | 0.17% | 58,991  | 0.17% | 0.17% |
| 26 | Wellington<br>Emerging Markets<br>Research Equity<br>Fund                          | 34,103  | 0.10% | 0.10% | 34,103  | 0.10% | 0.10% |
| 27 | Wellington India<br>Focus Equity Fund                                              | 3,972   | 0.01% | 0.01% | 3,972   | 0.01% | 0.01% |
| 28 | Wellington India<br>Select Fund, Ltd.                                              | 46,430  | 0.14% | 0.14% | 46,430  | 0.14% | 0.14% |

|    |                                                                                                                                          |         |       |       |         |       |       |
|----|------------------------------------------------------------------------------------------------------------------------------------------|---------|-------|-------|---------|-------|-------|
| 29 | Wellington Trust Company, National Association Multiple Collective Investment Funds Trust II, Emerging Markets Research Equity Portfolio | 11,793  | 0.03% | 0.03% | 11,793  | 0.03% | 0.03% |
| 30 | Wellington Trust Company, National Association Multiple Collective Investment Funds Trust, Opportunistic Equity Portfolio                | 6,794   | 0.02% | 0.02% | 6,794   | 0.02% | 0.02% |
| 31 | Wellington Trust Company, National Association Multiple Common Trust Funds Trust, Asian Opportunities Portfolio                          | 121,853 | 0.36% | 0.36% | 121,853 | 0.36% | 0.36% |
| 32 | Wellington Trust Company, National Association Multiple Common Trust Funds Trust, Emerging Markets Research Equity Portfolio             | 31,195  | 0.09% | 0.09% | 31,195  | 0.09% | 0.09% |
| 33 | Wellington Trust Company, National Association Multiple Common Trust Funds Trust, Opportunistic Equity Portfolio                         | 1,762   | 0.01% | 0.01% | 1,762   | 0.01% | 0.01% |