

Saldhar Investments and Trading Company Private Limited

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

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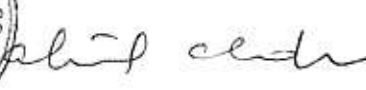
BSE Limited Scrip Code: 523694 Department of Listing, P. J. Towers, Dalal Street, Mumbai - 400 001	National Stock Exchange of India Limited Symbol: APCOTEXIND Exchange Plaza, Bandra-Kurla Complex, Bandra (East), Mumbai - 400 051
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Sub:- Submission of the report under regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Pursuant to inter se transfer of shares amongst promoters, Saldhar Investments and Trading Company Private Limited ('Saldhar') (Promoter) has acquired 1,26,000 shares of Apcotex Industries Limited from Devanshi Anant Veer Jalan (Promoter) on 1st December, 2017. Pursuant to the said transaction Saldhar's shareholding in Apcotex Industries Limited increased from 1,05,98,300 shares (51.11%) to 1,07,24,300 shares (51.72%).

As required under Regulation 10(7) read with Regulation 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we enclose herewith the requisite report in the prescribed format along with Demand Draft No. 475368 dated 15th December 2017 for INR 1,50,000 (Rupees One Lakhs Fifty Thousand Only) drawn in favour of Securities and Exchange Board of India payable at Mumbai. The same has been filed with SEBI as well.

For Saldhar Investments and Trading Company Private Limited



Atul Choksey

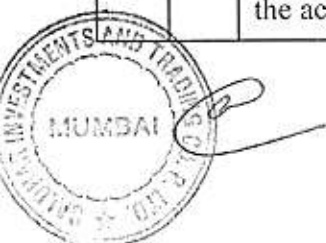
Director

DIN: 00002102

Date :19th December 2017

Format under Regulation 10(7) - Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(ii) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1	General Details	
a.	Name, address, telephone no., e-mail of acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond.}	Saldhar Investments and Trading Company Private Limited N K Mehta International House, 178 Backbay Reclamation, Babubhai M Chinnai Marg, Mumbai - 400 020 apmaniar@apcotex.com, Ph:- 022 22838302
b.	Whether sender is the acquirer (Y/N)	Yes
c.	If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	Not Applicable
d.	Name, address, Tel no. and e-mail of sender, if sender is not the acquirer	Not Applicable
2	Compliance of Regulation 10(7)	
a.	Date of Report	19 th December, 2017
b.	Whether report has been submitted to SEBI within 21 working days from the date of the acquisition	Yes
c.	Whether the report is accompanied with fees as required under Regulation 10(7)	Yes
3	Compliance of Regulation 10(5)	
a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed at least 4 working days before the date of the proposed acquisition.	Yes
b.	Date of Report	25 th November, 2017 for acquisition made on 1 st December, 2017
4	Compliance of Regulation 10(6)	
a.	Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days of the acquisition.	Yes



	b.	Date of Report	2 nd December, 2017 for the acquisition made on 1 st December, 2017			
5	Details of the Target Company					
	a.	Name & address of TC	Apcotex Industries Limited Plot No 3/1, MIDC Industrial Area, Taloja 410208, Maharashtra			
	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	BSE Limited National Stock Exchange of India Limited			
6	Details of the acquisition					
	a.	Date of acquisition	1 st December, 2017			
	b.	Acquisition price per share (in INR)	INR 471.05 per share for acquisition made on 1 st December, 2017 from Mrs Devanshi Anant Veer Jalan			
	c.	Regulation which would have triggered an open offer, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2), 4 or 5)	Regulation 3(2)			
	d.	Shareholding of acquirer(s) and PAC individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)(*)	Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital of TC	No. of Shares	% w.r.t total share capital of TC
		Name(s) of the acquirer(s) (**)	Refer Annexure I			
	e.	Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)(*)	Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital of TC	No. of Shares	% w.r.t total share capital of TC

	Name(s) of the seller(s) (**) <u>Sold on 1st December, 2017</u> Mrs Devanshi Anant Veer Jalan Total	 1,47,353 1,47,353	 0.71 0.71	 21,353 21,353	 0.10 0.10
7	Information specific to the exemption category to which the instant acquisition belongs - Regulation 10(1)(a)(ii)				
	a.	Provide the names of the seller(s)	Mrs. Devanshi Anant Veer Jalan		
	b.	Specify the relationship between the acquirer(s) and the seller(s).	Promoter		
	c.	Shareholding of the acquirer and the seller/s in the TC during the three years prior to the proposed acquisition	Year-1 (1 st Dec 2014 to 30 th Nov 2015)^	Year-2 (1 st Dec 2015 to 30 th Nov 2016)^	Year-3 (1 st Dec 2016 to 30 th Nov 2017)^
		Acquirer(s) (*) Saldhar Investments and Trading Company Private Limited	11,33,088 shares (5.46%)	1,05,60,200 shares (50.92%)	1,05,98,300 shares (51.11%)
		Sellers(s) (*) Mrs. Devanshi Anant Veer Jalan	1,46,000 shares (0.7%)	1,85,353 shares (0.89%)	1,47,353 shares (0.71%)
		^ Shares held as at end of quarter or specified date considered			
	d.	Confirm that the acquirer(s) and the seller/s have been named promoters in the shareholding pattern filed by the target company in terms of the listing agreement or the Takeover Regulations. Provide copies of such filings under the listing agreement or the Takeover Regulations.	We hereby confirm that acquirer and sellers have been named as promoters in the shareholding pattern filed by the target company Copies of filing under Listing Agreement has been attached as Annexure II		
	e.	If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	INR 459.91 per share as on 24 th November, 2017 (NSE) for acquisition made on 1 st December, 2017		

f.	If shares of the TC are infrequently traded, the price of such shares as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not Applicable.
g.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (e) or (f) above as applicable	We hereby confirm that the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (e)
h.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed	25 th November, 2017 for acquisition made on 1 st December, 2017
i.	<p>1) Whether the acquirers as well as sellers have complied (during 3 years prior to the date of acquisition) with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N).</p> <p>2) If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made and furnish copies of the same.</p>	<p>Yes</p> <p>Disclosure under Regulation 29(2) made via email dated 2nd December, 2017. The disclosure were filed in hard copy on 4th December, 2017 by Mrs Devanshi Anant Veer Jalan</p> <p>Disclosures under Regulation 29(1) and 29(2) made via email dated 2nd December, 2017. The disclosure were filed in hard copy on 4th December, 2017 by Saldhar Investments and Trading Company Private Limited</p> <p>Disclosure under Regulation 29(2) made on 13th December, 2016 by Mrs Devanshi Anant Veer Jalan</p> <p>Disclosures under Regulation 29(1) and 29(2) made on 13th December, 2016 by Saldhar Investments and Trading Company Private Limited</p> <p>Disclosures under Regulation 29(1) and 29(2) made on 29th November, 2016 by Saldhar Investments and Trading Company Private Limited</p>

		<p>Disclosures under Regulation 29(1) and 29(2) made on 24th November, 2016 by Saldhar Investments and Trading Company Private Limited</p> <p>Disclosures under Regulation 29(1) and 29(2) made via email dated 14th November, 2016. The disclosure were filed in hard copy on 15th November, 2016 by Saldhar Investments and Trading Company Private Limited</p> <p>Disclosures under Regulation 29(1) and 29(2) made on 29th September, 2016 by Saldhar Investments and Trading Company Private Limited</p> <p>Disclosures under Regulation 29(1) and 29(2) made on 20th September, 2016 by Saldhar Investments and Trading Company Private Limited</p> <p>Disclosures under Regulation 29(1) and 29(2) made on 7th September, 2016 by Saldhar Investments and Trading Company Private Limited</p> <p>Disclosure under Regulation 30 made on 10th April, 2017 for FY 2016-17, 7th April, 2016 for FY 2015-16 and 10th April 2015 for FY 2014-15</p> <p>Copies enclosed herewith as Annexure III</p>
j.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a)(ii) with respect to exemptions has been duly complied with.	It is hereby confirmed that we have complied with all the conditions specified with respect to the exemption under Regulation 10(1)(a)(ii) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

I/We hereby declare that the information provided in the instant report is true and nothing has been concealed there from.



For Saldhar Investments and Trading Company Private Limited

Director

DIN 00002102

Date: 19th December 2017

Place: Mumbai

NOTE:

(*) In case, percentage of shareholding to the total capital is different from percentage of voting rights, indicate percentage of shareholding and voting rights separately.

(**) Shareholding of each entity shall be shown separately as well as collectively.

The following abbreviations have been used all through the document: TC stands for Target Company, Takeover Regulations stands for EBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Annexure I

Shareholding of acquirer/s and PACs individually in TC (in terms of no: & as a percentage of the total share capital of the TC)	Before the acquisition		After the acquisition	
	No. of Shares	% w.r.t total share capital of TC	No. of Shares	% w.r.t total share capital of TC
Saldhar Investments and Trading Company Pvt Ltd	1,05,98,300	51.11	1,07,24,300	51.72
Devanshi Anant Veer Jalan	1,47,353	0.71	21,353	0.10
Abhiraj Atul Choksey	1,09,888	0.53	1,09,888	0.53
Rita Ashok Parekh	1,06,380	0.51	1,06,380	0.51
Parul Atul Choksey	72,770	0.35	72,770	0.35
Atul Champaklal Choksey	71,398	0.34	71,398	0.34
Amit Champaklal Choksey	68,910	0.33	68,910	0.33
Namrata Amit Choksey	57,076	0.28	57,076	0.28
Ankita Amit Choksey	54,088	0.26	54,088	0.26
Priti Amit Choksey	47,134	0.23	47,134	0.23
Amit Champaklal Choksey HUF	41,140	0.2	41,140	0.2
Biyash Abhiraj Choksey	36,000	0.17	36,000	0.17
Girish Champaklal Choksey	17,800	0.09	17,800	0.09
Abhiraj Atul Choksey HUF	14,217	0.07	14,217	0.07
Ankur Girish Choksey	13,600	0.07	13,600	0.07
Prashant Girish Choksey	13,200	0.06	13,200	0.06
Sunita Girish Choksey	9,200	0.04	9,200	0.04
Devaki Ashok Parekh	6,400	0.03	6,400	0.03
Janaki Ashok Parekh	4,800	0.02	4,800	0.02
Abhiraj Trading And Investment Pvt Ltd	1,16,468	0.56	1,16,468	0.56

Apco Enterprises Limited	1,12,352	0.54	1,12,352	0.54
Bhuvantray Investments And Trading Company Private Limited	99,784	0.48	99,784	0.48
Aquamarine Trading & Investments Private Limited	98,800	0.48	98,800	0.48
Gauriputra Investments And Trading Company Private Limited	52,400	0.25	52,400	0.25
Hmp Minerals Private Limited	19,324	0.09	19,324	0.09
Forest Hills Trading And Investment P Ltd	8,600	0.04	8,600	0.04
Haridwar Trading And Investments Pvt Ltd	8,600	0.04	8,600	0.04
Colortek India Limited	4,150	0.02	4,150	0.02
Choksey Chemicals Private Ltd	276	0.00	276	0.00
Total	1,20,10,408	57.89	1,20,10,408	57.89

