

9th April 2021

Through E-Mail

National Stock Exchange of India Limited
"Exchange Plaza" Bandra-Kurla Complex,
Bandra (E),
Mumbai-400051

Email: takeover@nse.co.in

Department of Corporate Services/Listing
BSE Limited
Phiroze Jeejeebhoy Tower,
Dalal Street, Fort,
Mumbai-400001
Email: corp.relations@bseindia.com

Dear Sir/Madam,

Re: **Disclosures under Regulation 30(1), 30(2) & 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as on 31.03.2021**

1. Please find enclosed herewith the annual disclosure under Regulation 30(1), 30(2) & 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, regarding shareholding details of 'Promoter(s), member of the promoter group and Persons Acting in Concert in APL Apollo Tubes Ltd. as on 31st March 2021.
2. Please take note of the above disclosure and do the needful.

Thanking You

**For & on behalf of Promoters/ Promoter Group
/ Person Acting in Concert(PAC)
of APL Apollo Tubes Limited**


Vinay Gupta
Director



APL Infrastructure Private Limited

Encl: a/a

CC:

To
The Company Secretary
APL Apollo Tubes Limited
37, Hargobind Enclave, Vikas Marg
Delhi-110092



Sudesh Group

APL INFRASTRUCTURE PRIVATE LIMITED

CIN : U27310UP2006PTC076230

Regd. Office : 36, Kaushambi, Near Anand Vihar Terminal, Behind Wave Cinema
Ghaziabad - 201010 (U. P.) India, Tel. : 0120-4041400 Fax : 0120-4041444

Disclosures under Regulation 30(1) & 30(2) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

Part –A- Details of Shareholding

1. Name of the Target Company (TC)	APL Apollo Tubes Limited		
2. Name(s) of the Stock Exchange(s) where the shares of the TC are listed	BSE Limited (BSE) National Stock Exchange of India Limited (NSE)		
3. Particulars of the shareholder(s) : a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the target company) is more than 25% of the voting rights of the TC. Or	NIL (There are no persons acting in concert other than the members of the promoters' group disclosed below)		
b. Name(s) of promoter(s), member of the promoter group and Persons Acting in Concert (PAC) with him.	1. APL Infrastructure Private Limited 2. Veera Gupta 3. Rahul Gupta 4. Rohan Gupta 5. Sanjay Gupta 6. Ashok Kumar Gupta		
4. Particulars of the Shareholding of persons mentioned at (3) above	Number of Shares	% w.r.t .total share /voting capital wherever applicable	% of total diluted share/voting capital of TC*
As of March 31, 2021, holding of:			
a) Shares			
- APL Infrastructure Private Limited	4,05,00,935	32.43	32.43
- Veera Gupta	29,10,000	2.33	2.33
- Rahul Gupta	15,01,000	1.20	1.20
- Rohan Gupta	11,25,000	0.90	0.90
- Sanjay Gupta	1,75,000	0.14	0.14
- Ashok Kumar Gupta	NIL	NIL	NIL
b) Voting Rights (otherwise than shares)	NIL	NIL	NIL
c) Warrants,	NIL	NIL	NIL
d) Convertible Securities	NIL	NIL	NIL
e) Any other instrument that would entitle the holder to receive shares in TC	NIL	NIL	NIL
TOTAL	4,62,11,935	37.00	37.00



Part- B**

Name of the Target Company: APL Apollo Tubes Limited

Name(s) of the Person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/Promoter group	PAN of the person and PACs
APL Infrastructure Private Limited	Promoter	
Veera Gupta	Promoter	
Rahul Gupta	Promoter	
Rohan Gupta	Promoter	
Sanjay Gupta	Promoter	
Ashok Kumar Gupta	Promoter	

**For & on behalf of Promoters/ Promoter Group
/ Person Acting in Concert(PAC)
of APL Apollo Tubes Limited**


Vinay Gupta
Director



APL Infrastructure Private Limited

Place: New Delhi
Date: April 9, 2021

Notes:

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

(*) 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.

(**) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

Declaration in accordance with Regulation 31(4) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011

We, APL Infrastructure Private Limited, one of the promoters of the Company, declare that we, other members of the Promoter Group and/or Person Acting in Concert as disclosed above, have not made any encumbrance over the shares of APL Apollo Tubes Limited, directly or indirectly, other than those already disclosed during the Financial Year 2020-2021.

**For & on behalf of Promoters/ Promoter Group
/ Person Acting in Concert (PAC)
of APL Apollo Tubes Limited**


Vinay Gupta
Director
APL Infrastructure Private Limited



Place: New Delhi
Date: April 9, 2021