

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

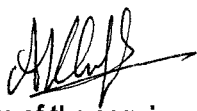
1. Name of the Target Company (TC)	APL APOLLO TUBES LTD		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Ashok Kumar Gupta (Acquirer) and PAC		
3. Whether the acquirer belongs to Promoter/Promoter group	Yes		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	Bombay Stock Exchange, National Stock Exchange of India Ltd, Delhi Stock Exchange Ltd, U.P. Stock Exchange Ltd, Ahmedabad Stock Exchange Ltd, Calcutta Stock Exchange Ltd		
5. Details of the acquisition/ ~~disposal/holding of shares/voting rights/holding of the Acquirer and PAC~~	Number	% w.r.t. total share/voting capital wherever applicable	% w.r.t. total diluted share/voting capital of the TC(*)
<u>Before the acquisition/disposal under consideration, holding of: (**)</u>			
a) Shares carrying voting rights			
(1) Acquirer	Nil	Nil	Nil
(2) PAC	83,00,000	40.89%	37.83%
b) Voting rights (VR) otherwise than by shares	Nil	Nil	Nil
c) 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)			
(1) Acquirer	Nil	Nil	Nil
(2) PAC	16,41,953 Warrants	8.09%	7.48%
Total (a+b+c)	99,41,953	40.98%	45.31%
<u>Details of acquisition/sale (***)</u>			
a) Shares carrying voting rights acquired/sold			
(1) Acquirer	5,00,000	2.46%	2.28%
(2) PAC	(5,00,000)	(2.46%)	(2.28%)
b) VRs acquired /sold otherwise than by shares	Nil	Nil	Nil
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/sold	Nil	Nil	Nil
Total (a+b+c)	-	-	-

<u>After the acquisition/sale, holding of:</u>			
a) Shares carrying voting rights			
(1) Acquirer	5,00,000	2.46%	2.28%
(2) PAC	78,00,000	38.43%	35.55%
	Nil	Nil	Nil
b) VRs otherwise than by shares			
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) after acquisition.			
(1) Acquirer	Nil	Nil	Nil
(2) PAC	16,41,953 Warrants	8.09%	7.48%
Total (a+b+c)	99,41,953	40.98%	45.31%
6. Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Open market / inter-se transfer		
7. Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	February 13, 2012		
8. Equity share capital / total voting capital of the TC before the said acquisition / sale.	Rs. 20,29,66,830/-		
9. Equity share capital/ total voting capital of the TC after the said acquisition / sale	Rs. 20,29,66,830/-		
10. Total diluted share/voting capital of the TC after the said acquisition/sale.	Rs. 21,93,86,360/-		

(*) 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.

(**) represents the aggregate shareholding of the promoters and the persons belonging to the promoter group of the target company.

(***) represents open market / inter-se transfer of 5,00,000 Equity Shares of the target company from a promoter group entity, namely, M/s APL Infrastructure Pvt. Ltd., in favour of the acquirer.



Signature of the acquirer / seller / Authorised Signatory

Place: Delhi

Date: February 13, 2012