
Onkar S. Kanwar

3/3, Shanti Niketan,
New Delhi- 110021

26th March' 2012

Cochin Stock Exchange Ltd.,
MES Building,
36/1565, 4th Floor,
Judges Avenue, Kaloor,
Kochi – 682017.

Bombay Stock Exchange Ltd.,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400001.

National Stock Exchange of India Ltd.,
Exchange Plaza,
Bandra-Kurla Complex,
Bandra (E),
Mumbai - 400 051

Dear Sir,

Sub : **Disclosure under Regulation 31(1), 31(2) and 31(3) of the Securities & Exchange Board of India (Substantial Acquisition of Shares & Takeovers) Regulations 2011**

Pursuant to Regulation 31(1), 31(2) and 31(3) of SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011, please find enclosed herewith the required disclosures, in the prescribed format, relating to encumbrance of shares of Apollo Tyres Ltd. received from Group Companies forming part of the Promoter Group (Refer Annexure A).

Thanking you,

Yours sincerely,


Onkar S. Kanwar

Encl. : a/a

Format for disclosure by the Promoter(s) to the stock exchanges and to the Target Company for encumbrance of shares/ invocation of encumbrance / release of encumbrance, in terms of Regulation 31(1) and 31(2) of SEBI (Substantial Acquisition of Shares and

Name of the Target company (TC) : APOLLO TYRES LIMITED

Name of the Promoter(s) on whom shares encumbrance was created /invoked/released(tick the relevant one) : SUNRAYS PROPERTIES & INVESTMENT CO. PVT. LTD

Date of reporting : 26th March ' 2012

Names of the stock exchanges where the shares of the target company are listed : National Stock Exchange Ltd
Cochin Stock Exchange Ltd
Bombay Stock Exchange Ltd

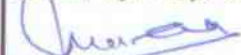
Details of the promoters'holding:

(The term 'event' indicates creation/ invocation/release of encumbrance, as the case may be)

Promoter (s)or PACs with him	Pre-event holding (Including pledge)	holding earlier	Details of events pertaining to encumbrance		Post event holding (encumbered shares to be excluded)	(*)Details of encumbrance (pledge/lien or others- give details	
Names	Number	% of total share capital	Type - creation/ invocation/ release	Date (s)	Number	% of total share capital	
SUNRAYS PROPERTIES & INVESTMENT CO. PRIVATE LIMITED	44719198	8.87%	Release 6400000	21/03/2012	18769198	3.72%	Kotak Mahindra Prime Ltd

(*) Details shall include the detils regarding the person(s) on whose favour the encumbrance has been created and other important features of such encumbrance.

For Sunrays Properties & Investment Co. Pvt. Ltd



(Authorised Signatory)

Place : Gurgaon

Date : 26.03.2012