

August 18, 2021

To

Ms. Charmi Dharod
Manager
National Stock Exchange of India Ltd

Subject: Clarification on Quarterly Submission of Shareholding Pattern for March 31, 2021

Dear Madam,

This is with reference to Letter having Reference No. NSE/LIST/33445 dated May 27, 2021 issued by your good office. We would like to state that the difference of shareholding of promoter for the quarter ended March 31, 2021 in comparison of quarter ended December 31, 2020 was due to Buy Back Offer of equity shares announced by the Company vide Board Meeting held on January 06, 2021 and In-Principal Letter issued by SEBI dated January 29, 2021.

Kindly take note that in pursuant to Clause 6.1 of said Buy Back Offer, the Promoter of the Company i.e. Assam Timber Products Private Limited has duly disclosed its intention w.r.t. tender of shares held by them in said Buy Back Offer announced by the Company. The Company has duly disclosed the total shareholding of the Promoter post completion of Buy Back Offer (*Clause No. 9.4 of Offer Letter*). In Clause 13.7 of the Offer Letter, the Company has disclosed the Pre & Post shareholding pattern of the Company.

Kindly take note that in pursuant to Offer Letter, the Buyback Offer will not result in any benefit to any Director, Promoters/Promoter Companies except to the extent of the intention of the Directors and Promoters/Promoter Companies to participate in the Buyback.

Kindly take note that the Company has already received the disclosures from Assam Timber Products Private Limited as prescribed under the provisions of the SEBI (SAST) Regulations, 2011 and SEBI (PIT) Regulations, 2015 (*enclosed as Annexure 1*). Due to Covid 19 pandemic and lockdown imposed by the concerned state government, the said promoters has inadvertently forget to submit the copy of said disclosure with the National Stock Exchange Ltd (NSE).

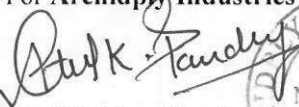
In view of aforesaid facts we would like to submit that non-submission of said disclosure will not prejudice the interest of any stakeholders of the Company as promoter has duly disclosed their intention in the said Offer Letter filed by the Company with the SEBI & stock exchanges. We request you to kindly waive off the fine, if any and take the disclosures on your records and oblige us.

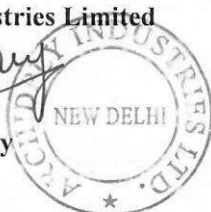
Our Company has always been compliant in respect of various provisions of SEBI Laws and other Corporate Governance provisions has always been a top priority of the management of the Company.

We would also like to submit & confirm that the Company will take care of such non-compliance and will be more vigilant in future.

Yours Faithfully

For Archidply Industries Limited


Atul Krishna Pandey
Company Secretary



ANNEXURE – 2**Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Name of the Target Company (TC)	Archidply Industries Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Assam Timber Products Pvt Ltd		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	1. National Stock Exchange Limited 2. BSE Ltd		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition under consideration, holding of :			
a) Shares carrying voting rights	4171750	18.91	18.91
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)			
c) Voting rights (VR) otherwise than by shares			
d) 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)			
e) Total (a+b+c+d)			
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold	2155964	9.77	9.77
b) VRs acquired /sold 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) acquired/sold			
d) Shares encumbered / invoked/released by the acquirer			
e) Total (a+b+c+/-d)			

ASSAM TIMBER PRODUCTS PVT. LTD.

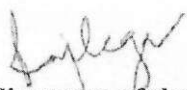
Regd. Office : 1, Makum Road, Tinsukia-786125 (Assam) CIN : U20211AS1979PTC001789

Ideal Plaza, North Wing, 3rd Floor, 11/1, Sarat Bose Road, Kolkata - 700 020

After the acquisition/sale, holding of:			
a) Shares carrying voting rights	2015786	9.14	9.14
b) Shares encumbered with the acquirer			
c) VRs otherwise than by shares			
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) after acquisition			
e) Total (a+b+c+d)			
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	BuyBack		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	04.03.2021		
Equity share capital / total voting capital of the TC before the said acquisition / sale	22065000		
Equity share capital/ total voting capital of the TC after the said acquisition / sale (Total Capital – total BuyBack of shares)	19865000		
Total diluted share/voting capital of the TC after the said acquisition	19865000		

(*) 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.



Signature of the acquirer / seller / Authorised Signatory

Place: Kolkata

Date: 05.03.2021
