

016  
**Saldhar Investments and Trading Company Private Limited**

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

Telephone (022) 22838302 / 22838304 Email: [apmaniar@apcotex.com](mailto:apmaniar@apcotex.com)

CIN: U67120MH1979PTC021881 Fax (022) 22838291

Date: 13/12/2016

To,

|                                                                                                                |                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| BSE Limited<br>Scrip Code: 523694<br>Department of Listing,<br>P. J. Towers, Dalal Street,<br>Mumbai - 400 001 | National Stock Exchange of India<br>Limited<br>Symbol: APCOTEXIND<br>Exchange Plaza, Bandra-Kurla<br>Complex, Bandra (East), Mumbai - 400<br>051 |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|

Dear Sir/Madam,

Sub.: Disclosure under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Notice is hereby given under Regulation 29(1) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, that the Company being promoter, has acquired 38,100 shares of Apcotex Industries Limited.

Subsequent to the same, the Company holds 1,05,98,300 shares (i.e. 51.11%) shares in Apcotex Industries Limited.

Please find enclosed the information in the prescribed format. You are requested to take the same on record.

For Saldhar Investments and Trading Company Private Limited



*Atul Choksey*  
Director  
DIN: 00002102

Encl: as above

CC:-

Apcotex Industries Limited  
Plot No 3/1, MIDC Industrial Area,  
Taloja 410208, Maharashtra

# Saldhar Investments and Trading Company Private Limited

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

Telephone (022) 22838302 / 22838304 Email: [apmaniar@apcotex.com](mailto:apmaniar@apcotex.com)

CIN: U67120MH1979PTC021881 Fax (022) 22838291

Date: 13/12/2016

To,

|                                                                                                                |                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| BSE Limited<br>Scrip Code: 523694<br>Department of Listing,<br>P. J. Towers, Dalal Street,<br>Mumbai - 400 001 | National Stock Exchange of India<br>Limited<br>Symbol: APCOTEXIND<br>Exchange Plaza, Bandra-Kurla<br>Complex, Bandra (East), Mumbai - 400<br>051 |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|

Dear Sir/Madam,

**Sub.: Disclosure under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Notice is hereby given under Regulation 29(1) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, that the Company being promoter, has acquired 38,100 shares of Apcotex Industries Limited.

Subsequent to the same, the Company holds 1,05,98,300 shares (i.e. 51.11%) shares in Apcotex Industries Limited.

Please find enclosed the information in the prescribed format. You are requested to take the same on record.

For Saldhar Investments and Trading Company Private Limited



*Atul Choksey*  
Atul Choksey  
Director  
DIN: 00002102

Encl: as above

CC:-

Apcotex Industries Limited  
Plot No 3/1, MIDC Industrial Area,  
Taloja 410208, Maharashtra



**Format for Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares  
and  
Takeovers) Regulations, 2011**

**Part-A- Details of the Acquisition**

|                                                                                                                                                                          |                                                                                                                              |                                              |                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------------------------------------------------------------|
| Name of the Target Company (TC)                                                                                                                                          | Apcotex Industries Limited                                                                                                   |                                              |                                                            |
| Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer                                                                                            | Sudhar Investments and Trading Company Private Limited<br><br>(All the existing promoter/promoter group/ PAC remains as PAC) |                                              |                                                            |
| Whether the acquirer belongs to Promoter/Promoter group                                                                                                                  | Yes                                                                                                                          |                                              |                                                            |
| Name(s) of the Stock Exchange(s) where the shares of TC are Listed                                                                                                       | BSE Limited and National Stock Exchange of India Limited                                                                     |                                              |                                                            |
| Details of the acquisition as follows                                                                                                                                    | Number                                                                                                                       | % w.r.t. total share/voting capital wherever | % w.r.t. total diluted share/voting capital of the TC (**) |
| Before the acquisition under consideration, holding of acquirer along with PACs of:                                                                                      |                                                                                                                              |                                              |                                                            |
| a) Shares carrying voting rights                                                                                                                                         | 1,20,06,158                                                                                                                  | 57.89%                                       | 57.89%                                                     |
| b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)                                                                                  | -                                                                                                                            | -                                            | -                                                          |
| c) Voting rights (VR) otherwise than by equity 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) | -                                                                                                                            | -                                            | -                                                          |
| e) Total (a+b+c+d)                                                                                                                                                       | 1,20,06,158                                                                                                                  | 57.89%                                       | 57.89%                                                     |



|                                                                                                                                                                                                 |                                                                                       |        |        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|--------|--------|
| Details of acquisition                                                                                                                                                                          |                                                                                       |        |        |
| a) Shares carrying voting rights acquired                                                                                                                                                       | 38,100<br>(Open market)                                                               | 0.18%  | 0.18%  |
| b) VRs acquired otherwise than by equity 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               | -                                                                                     | -      | -      |
| d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)                                                                                                         | -                                                                                     | -      | -      |
| Total (a+b+c+d)                                                                                                                                                                                 | 38,100<br>(Open market)                                                               | 0.18%  | 0.18%  |
| After the acquisition, holding of acquirer along with PACs of:                                                                                                                                  |                                                                                       |        |        |
| a) Shares carrying voting right                                                                                                                                                                 | 1,20,06,258<br>(Refer Note 1)                                                         | 57.89% | 57.89% |
| b) VRs otherwise than by equity 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      | -                                                                                     | -      | -      |
| d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)                                                                                                         | -                                                                                     | -      | -      |
| e) Total (a+b+c+d)                                                                                                                                                                              | 1,20,06,258                                                                           | 57.89% | 57.89% |
| Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc.)                                                             | Open Market                                                                           |        |        |
| Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.                                                         | Not Applicable                                                                        |        |        |
| Date of acquisition of/ date of receipt of intimation of allotment of shares / VR/ warrants/convertible securities/any other instrument that entitles the acquirer to receive shares in the TC. | 9 <sup>th</sup> December, 2016                                                        |        |        |
| Equity share capital / total voting capital of the TC before the said acquisition                                                                                                               | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |        |        |



|                                                                                 |                                                                                       |
|---------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Equity share capital/ total voting capital of the TC after the said acquisition | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |
| Total diluted share/voting capital of the TC after the said acquisition         | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |



For Saldhar Investments and Trading Company Private Limited

Atul Choksey  
Director  
DIN 00002102

Place: Mumbai

Date: 12/12/2016

**Note:**

Note 1 : Saldhar Investments and Trading Company Private Limited (Saldhar) being promoter has acquired 38,100 shares (0.18%) of Apeotex Industries Limited. Separately, individual promoter have sold 38,000 shares of Apeotex Industries Limited (0.18%). Hence overall promoter shareholding has only changed by 100 shares of Apeotex Industries Limited.

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

(\*\*) 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.

# Saldhar Investments and Trading Company Private Limited

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

Telephone (022) 22838302 / 22838304 Email: [apmaniar@apcotex.com](mailto:apmaniar@apcotex.com)

CIN: U67120MH1979PTC021881 Fax (022) 22838291

Date: 13/11/2016

To,

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

Dear Sir/Madam,

Sub.: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Notice is hereby given under Regulation 29(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, that the Company being promoter, has acquired 38,100 shares of Apcotex Industries Limited.

Subsequent to the same, the Company holds 1,05,98,300 shares (i.e. 51.11%) shares in Apcotex Industries Limited.

Please find enclosed the information in the prescribed format. You are requested to take the same on record.

For Saldhar Investments and Trading Company Private Limited

  
Atul Choksey  
Director  
DIN: 00002102  
Encl: as above

CC:-  
Apcotex Industries Limited  
Plot No 3/1, MIDC Industrial Area,  
Taloja 410208, Maharashtra

13 DEC 2016

CONTENTS NOT VERIFIED

016  
**Saldhar Investments and Trading Company Private Limited**

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

Telephone (022) 22838302 / 22838304 Email: [apmaniar@apcotex.com](mailto:apmaniar@apcotex.com)

CIN: U67120MH1979PTC021881 Fax (022) 22838291

Date: 13/12/2016

To,

|                                                                                                                |                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| BSE Limited<br>Scrip Code: 523694<br>Department of Listing,<br>P. J. Towers, Dalal Street,<br>Mumbai - 400 001 | National Stock Exchange of India<br>Limited<br>Symbol: APCOTEXIND<br>Exchange Plaza, Bandra-Kurla<br>Complex, Bandra (East), Mumbai - 400<br>051 |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|

Dear Sir/Madam,

Sub.: Disclosure under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Notice is hereby given under Regulation 29(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, that the Company being promoter, has acquired 38,100 shares of Apcotex Industries Limited.

Subsequent to the same, the Company holds 1,05,98,300 shares (i.e. 51.11%) shares in Apcotex Industries Limited.

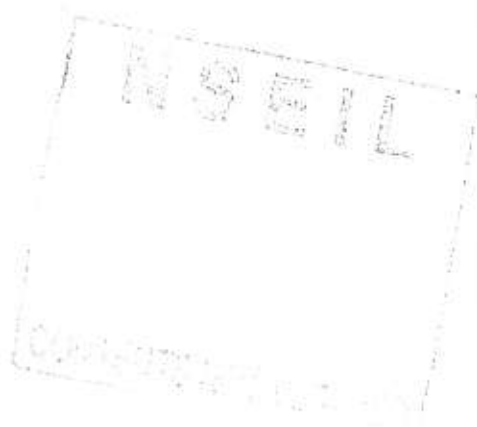
Please find enclosed the information in the prescribed format. You are requested to take the same on record.

For Saldhar Investments and Trading Company Private Limited



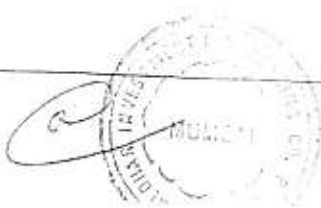
*Atul Choksey*  
Atul Choksey  
Director  
DIN: 00002102  
Encl: as above

CC:-  
Apcotex Industries Limited  
Plot No 3/1, MIDC Industrial Area,  
Taloja 410208, Maharashtra

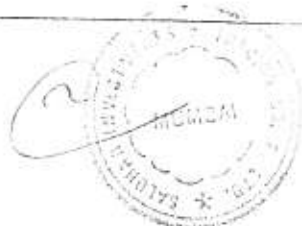


Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

|                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of the Target Company (TC)                                               | Apcotex Industries Limited                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer | <p>Saldhar Investments and Trading Company Private Limited*</p> <p>Person Acting in Concert</p> <ol style="list-style-type: none"> <li>1. Atul Champaklal Choksey (Promoter)</li> <li>2. Parul Atul Choksey (Promoter)</li> <li>3. Abhiraj Atul Choksey HUF (Promoter)</li> <li>4. Devanshi Anant Veer Jalan (Promoter)</li> <li>5. Abhiraj Atul Choksey (Promoter)</li> <li>6. Apco Entreprises Limited (Promoter)</li> <li>7. Rita Ashok Parekh (PAC)</li> <li>8. Amit Champaklal Choksey (PAC)</li> <li>9. Namrata Amit Choksey (PAC)</li> <li>10. Ankita Amit Choksey (PAC)</li> <li>11. Priti Amit Choksey (PAC)</li> <li>12. Amit Champaklal Choksey HUF (PAC)</li> <li>13. Biyash Abhiraj Choksey (PAC)</li> <li>14. Girish Champaklal Choksey (PAC)</li> <li>15. Ankur Girish Choksey (PAC)</li> <li>16. Prashant Girish Choksey (PAC)</li> <li>17. Sunita Girish Choksey (PAC)</li> <li>18. Devaki Ashok Parekh (PAC)</li> <li>19. Janaki Ashok Parekh (PAC)</li> <li>20. Abhiraj Trading And Investment Pvt Ltd (PAC)</li> <li>21. Bhuvantray Investments And Trading Company Private Limited (PAC)</li> <li>22. Aquamarine Trading &amp; Investments Private Limited (PAC)</li> <li>23. Gauriputra Investments And Trading Company Private Limited (PAC)</li> <li>24. Hmp Minerals Private Limited (PAC)</li> <li>25. Forest Hills Trading And Investment P Ltd (PAC)</li> <li>26. Haridwar Trading And Investments Pvt Ltd (PAC)</li> <li>27. Choksey Chemicals Private Ltd (PAC)</li> </ol> <p>* Scheme of Amalgamation between Titan Trading and Agencies Limited ("Titan") and Dhumraketu Investments and Trading Company Private Limited ("Dhumraketu") and Trivikram Investments and Trading Company Limited ("Trivikram") and Saldhar Investments and Trading Company Private Limited ("Saldhar") was approved by the Hon'ble High Court of Judicature at Bombay vide their order dated 12<sup>th</sup> August 2016 (which became effective on 6<sup>th</sup> September 2016). As a result, shares of Apcotex Industries Limited (which were earlier held by Trivikram and Dhumraketu) have been effectively transferred to and vested in Saldhar. Thus, Trivikram and Dhumraketu have ceased to exist and are effectively succeeded by Saldhar</p> |



|                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                          |                                                           |                                                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|-----------------------------------------------------------|-----------------------------------------------------------|
| Whether the acquirer belongs to Promoter/Promoter group                                                                                                                                                                                                                                                                                                                                                                                                                 | Yes                                                      |                                                           |                                                           |
| Name(s) of the Stock Exchange(s) where the shares of TC are Listed                                                                                                                                                                                                                                                                                                                                                                                                      | BSE Limited and National Stock Exchange of India Limited |                                                           |                                                           |
| 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 (**) |
| <p>Before the acquisition under consideration, holding of :</p> <p>a) Shares carrying voting rights</p> <p>b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)</p> <p>c) Voting rights (VR) otherwise than by shares</p> <p>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)</p> <p>e) Total (a+b+c+d)</p> | As per Annexure I                                        |                                                           |                                                           |
| <p>Details of acquisition/sale</p> <p>a) Shares carrying voting rights acquired/sold</p> <p>b) VRs acquired /sold otherwise than by shares</p> <p>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</p> <p>d) Shares encumbered / invoked/released by the acquirer</p> <p>e) Total (a+b+c+d)</p>                                   | As per Annexure II                                       |                                                           |                                                           |



|                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| <p>After the acquisition/sale, holding of:</p> <p>a) Shares carrying voting rights</p> <p>b) Shares encumbered with the acquirer</p> <p>c) VRs otherwise than by shares</p> <p>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</p> <p>e) Total (a+b+c+d)</p> | As per Annexure III                                                                   |
| Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).                                                                                                                                                                                                                                                              | Open Market                                                                           |
| Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable                                                                                                                                                                                                                                                                              | 9 <sup>th</sup> December, 2016                                                        |
| Equity share capital / total voting capital of the TC before the said acquisition / sale                                                                                                                                                                                                                                                                                                                | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |
| Equity share capital/ total voting capital of the TC after the said acquisition / sale                                                                                                                                                                                                                                                                                                                  | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |
| Total diluted share/voting capital of the TC after the said acquisition                                                                                                                                                                                                                                                                                                                                 | Rs. 10,40,80,175 (including 3,90,255 towards 78,051 shares forfeited at Rs. 5/- each) |

(\*) Total share capital/voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

(\*\*) 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.

For Saldhar Investments and Trading Company Private Limited

Atul Choksey  
Director  
DIN 00002102

Place: Mumbai  
Date: 12/12/2016

Annexure to disclosure under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and Takeover Regulations, 2011)

Annexure 1

Details of shareholding of promoters/promoter group and person acting in concert before acquisition

| Sr. No | Name of the Shareholders                        | Number of Shares | % w.r.t. total share/voting capital wherever applicable (*) | % w.r.t. total diluted share/voting capital of TC (**) |
|--------|-------------------------------------------------|------------------|-------------------------------------------------------------|--------------------------------------------------------|
| 1      | Saldhar Investments and Trading Company Pvt Ltd | 1,05,60,200      | 50.92                                                       | 50.92                                                  |
| 2      | Atul Champaklal Choksey                         | 71,398           | 0.34                                                        | 0.34                                                   |
| 3      | Parul Atul Choksey                              | 72,770           | 0.35                                                        | 0.35                                                   |
| 4      | Abhiraj Atul Choksey HUF                        | 14,217           | 0.07                                                        | 0.07                                                   |
| 5      | Devanshi Anant Veer Jalan                       | 1,85,353         | 0.89                                                        | 0.89                                                   |
| 6      | Abhiraj Atul Choksey                            | 1,09,888         | 0.53                                                        | 0.53                                                   |
| 7      | Rita Ashok Parekh                               | 1,06,380         | 0.51                                                        | 0.51                                                   |
| 8      | Amit Champaklal Choksey                         | 68,910           | 0.33                                                        | 0.33                                                   |
| 9      | Namrata Amit Choksey                            | 57,076           | 0.28                                                        | 0.28                                                   |
| 10     | Ankita Amit Choksey                             | 54,088           | 0.26                                                        | 0.26                                                   |
| 11     | Priti Amit Choksey                              | 47,134           | 0.23                                                        | 0.23                                                   |
| 12     | Amit Champaklal Choksey HUF                     | 41,140           | 0.2                                                         | 0.2                                                    |
| 13     | Biyash Abhiraj Choksey                          | 36,000           | 0.17                                                        | 0.17                                                   |
| 14     | Girish Champaklal Choksey                       | 17,800           | 0.09                                                        | 0.09                                                   |
| 15     | Ankur Girish Choksey                            | 13,600           | 0.07                                                        | 0.07                                                   |
| 16     | Prashant Girish Choksey                         | 13,200           | 0.06                                                        | 0.06                                                   |
| 17     | Sunita Girish Choksey                           | 9,200            | 0.04                                                        | 0.04                                                   |
| 18     | Devaki Ashok Parekh                             | 6,400            | 0.03                                                        | 0.03                                                   |
| 19     | Janaki Ashok Parekh                             | 4,800            | 0.02                                                        | 0.02                                                   |



|    |                                                            |          |      |      |
|----|------------------------------------------------------------|----------|------|------|
| 20 | Abhiraj Trading And Investment Pvt Ltd                     |          |      |      |
| 21 | Apco Enterprises Limited                                   | 1,16,468 | 0.56 | 0.56 |
| 22 | Bhuvantray Investments And Trading Company Private Limited | 1,12,352 | 0.54 | 0.54 |
| 23 | Aquamarine Trading & Investments Private Limited           | 99,784   | 0.48 | 0.48 |
| 24 | Gauriputra Investments And Trading Company Private Limited | 98,800   | 0.48 | 0.48 |
| 25 | Hmp Minerals Private Limited                               | 52,400   | 0.25 | 0.25 |
| 26 | Forest Hills Trading And Investment P Ltd                  | 19,324   | 0.09 | 0.09 |
| 27 | Haridwar Trading And Investments Pvt Ltd                   | 8,600    | 0.04 | 0.04 |
| 28 | Choksey Chemicals Private Ltd                              | 8,600    | 0.04 | 0.04 |
|    |                                                            | 276      | 0.00 | 0.00 |

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

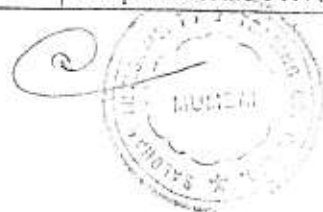
(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.



Annexure II

Details of acquisition of promoters/promoter group and person acting in concert

| Sr. No | Name of the Shareholders                                      | Number of Shares | % w.r.t. total share/voting capital wherever applicable (*) | % w.r.t. total diluted share/voting capital of TC (**) |
|--------|---------------------------------------------------------------|------------------|-------------------------------------------------------------|--------------------------------------------------------|
| 1      | Saldhar Investments and Trading Company Pvt Ltd(Refer Note 1) | 38,100           | 0.18                                                        | 0.18                                                   |
| 2      | AtulChampaklalChoksey                                         | -                | -                                                           | -                                                      |
| 3      | ParulAtulChoksey                                              | -                | -                                                           | -                                                      |
| 4      | AbhirajAtulChoksey HUF                                        | -                | -                                                           | -                                                      |
| 5      | DevanshiAnant Veer Jalan(Refer Note 1)                        | (38,000)         | (0.18)                                                      | (0.18)                                                 |
| 6      | AbhirajAtulChoksey                                            | -                | -                                                           | -                                                      |
| 7      | Rita Ashok Parekh                                             | -                | -                                                           | -                                                      |
| 8      | Amit ChampaklalChoksey                                        | -                | -                                                           | -                                                      |
| 9      | Namrata Amit Choksey                                          | -                | -                                                           | -                                                      |
| 10     | Ankita Amit Choksey                                           | -                | -                                                           | -                                                      |
| 11     | Priti Amit Choksey                                            | -                | -                                                           | -                                                      |
| 12     | Amit ChampaklalChoksey HUF                                    | -                | -                                                           | -                                                      |
| 13     | BiyashAbhirajChoksey                                          | -                | -                                                           | -                                                      |
| 14     | GirishChampaklalChoksey                                       | -                | -                                                           | -                                                      |
| 15     | AnkurGirishChoksey                                            | -                | -                                                           | -                                                      |
| 16     | Prashant GirishChoksey                                        | -                | -                                                           | -                                                      |
| 17     | SunitaGirishChoksey                                           | -                | -                                                           | -                                                      |
| 18     | Devaki Ashok Parekh                                           | -                | -                                                           | -                                                      |
| 19     | Janaki Ashok Parekh                                           | -                | -                                                           | -                                                      |
| 20     | Abhiraj Trading And Investment Pvt Ltd                        | -                | -                                                           | -                                                      |
| 21     | Apco Enterprises Limited                                      | -                | -                                                           | -                                                      |
| 22     | Bhuvantray Investments And Trading Company Private Limited    | -                | -                                                           | -                                                      |
| 23     | Aquamarine Trading & Investments Private Limited              | -                | -                                                           | -                                                      |
| 24     | Gauriputra Investments And Trading Company Private Limited    | -                | -                                                           | -                                                      |
| 25     | Hmp Minerals Private Limited                                  | -                | -                                                           | -                                                      |



|    |                                           |   |   |   |
|----|-------------------------------------------|---|---|---|
| 26 | Forest Hills Trading And Investment P Ltd | - | - | - |
| 27 | Haridwar Trading And Investments Pvt Ltd  | - | - | - |
| 28 | Choksey Chemicals Private Ltd             | - | - | - |

**Note 1 :** Saldhar Investments and Trading Company Private Limited (Saldhar) has acquired 38,100 shares (0.18%) of Apcotex Industries Limited. Separately, individual promoter have sold 38,000 shares of Apcotex Industries Limited (0.18%) for which separate disclosure is being made under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

(\*\*) 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.



Annexure III

Details of shareholding of promoters/promoter group and person acting in concert after acquisition

| Sr. No | Name of the Shareholders                        | Number of Shares | % w.r.t. total share/voting capital wherever applicable (*) | % w.r.t. total diluted share/voting capital of TC (**) |
|--------|-------------------------------------------------|------------------|-------------------------------------------------------------|--------------------------------------------------------|
| 1      | Saldhar Investments and Trading Company Pvt Ltd | 1,05,98,300      | 51.11                                                       | 51.11                                                  |
| 2      | AtulChampaklalChoksey                           | 71,398           | 0.34                                                        | 0.34                                                   |
| 3      | ParulAtulChoksey                                | 72,770           | 0.35                                                        | 0.35                                                   |
| 4      | AbhirajAtulChoksey HUF                          | 14,217           | 0.07                                                        | 0.07                                                   |
| 5      | DevanshiAnant Veer Jalan                        | 1,47,353         | 0.71                                                        | 0.71                                                   |
| 6      | AbhirajAtulChoksey                              | 1,09,888         | 0.53                                                        | 0.53                                                   |
| 7      | Rita Ashok Parekh                               | 1,06,380         | 0.51                                                        | 0.51                                                   |
| 8      | Amit ChampaklalChoksey                          | 68,910           | 0.33                                                        | 0.33                                                   |
| 9      | Namrata Amit Choksey                            | 57,076           | 0.28                                                        | 0.28                                                   |
| 10     | Ankita Amit Choksey                             | 54,088           | 0.26                                                        | 0.26                                                   |
| 11     | Priti Amit Choksey                              | 47,134           | 0.23                                                        | 0.23                                                   |
| 12     | Amit ChampaklalChoksey HUF                      | 41,140           | 0.2                                                         | 0.2                                                    |
| 13     | BiyashAbhirajChoksey                            | 36,000           | 0.17                                                        | 0.17                                                   |
| 14     | GirishChampaklalChoksey                         | 17,800           | 0.09                                                        | 0.09                                                   |
| 15     | AnkurGirishChoksey                              | 13,600           | 0.07                                                        | 0.07                                                   |
| 16     | Prashant GirishChoksey                          | 13,200           | 0.06                                                        | 0.06                                                   |
| 17     | SunitaGirishChoksey                             | 9,200            | 0.04                                                        | 0.04                                                   |
| 18     | Devaki Ashok Parekh                             | 6,400            | 0.03                                                        | 0.03                                                   |
| 19     | Janaki Ashok Parekh                             | 4,800            | 0.02                                                        | 0.02                                                   |



|    |                                                            |          |      |      |
|----|------------------------------------------------------------|----------|------|------|
| 20 | Abhiraj Trading And Investment Pvt Ltd                     | 1,16,468 | 0.56 | 0.56 |
| 21 | Apco Enterprises Limited                                   | 1,12,352 | 0.54 | 0.54 |
| 22 | Bhuvanray Investments And Trading Company Private Limited  | 99,784   | 0.48 | 0.48 |
| 23 | Aquamarine Trading & Investments Private Limited           | 98,800   | 0.48 | 0.48 |
| 24 | Gauriputra Investments And Trading Company Private Limited | 52,400   | 0.25 | 0.25 |
| 25 | Hmp Minerals Private Limited                               | 19,324   | 0.09 | 0.09 |
| 26 | Forest Hills Trading And Investment P Ltd                  | 8,600    | 0.04 | 0.04 |
| 27 | Haridwar Trading And Investments Pvt Ltd                   | 8,600    | 0.04 | 0.04 |
| 28 | Choksey Chemicals Private Ltd                              | 276      | 0.00 | 0.00 |

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

(\*\*) 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.

