Atul Choksey

8th April 2019

To,
The Manager
Listing Department
The National Stock Exchange of India Ltd,
Exchange Plaza, 5th Floor, Plot no. C/1, "G" Block,
Bandra-Kurla Complex,
Mumbai – 400 051

Company: Apcotex Industries Limited

Sir,

SUB.: DISCLOSURE UNDER REGULATION 30(2) OF SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATION 2011

Please find enclosed herewith the details of shareholding of promoter in control of the affairs of the Company along with member of the promoter group and Persons Acting in Concert (PAC) with them as on **31st March 2019** (as on Financial year end), as per the provisions of Regulation 30(3) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations 2011.

Kindly take note of the same and acknowledge.

Thanking you.

Yours faithfully

Atul C Choksey

Encl.: As Above

CC: Apcotex Industries Limited

4, Geetanjali, 9 N. Gamadia Road, Off Peddar Road, Mumbai - 400 026.
Tel : (022) 2351 9900 • Email : achoksey@apcotex.com

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

1. Name of the Target Company (TC)	**APCOTEX INDUSTRIES LIMITED**
2. Name(s) of the Stock Exchange(s) where the shares of the TC are listed	**BOMBAY STOCK EXCHANGE & NATIONAL STOCK EXHANGE**
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 b. Name(s) of promoter(s), member of the promoter group and Persons Acting in Concert (PAC) with him.	Not Applicable# 1. Atul C Choksey (Promoter) 2. Abhiraj A Choksey (Promoter) 3. Apco Enterprises LLP (Promoter) 4. Devanshi Anant Veer Jalan (Promoter) 5. Parul Atul Choksey (Promoter) 6. Saldhar Investments & Trading Co Pvt Limited (Promoter) 7. Biyash Abhiraj Choksey (Promoter) 8. Abhiraj Trading & Investment Pvt. Ltd Choksey (Member of promoter group and persons acting in concert (PAC)) 9. Amit Champaklal Choksey (Member of promoter group and persons acting in concert (PAC)) 10. Namrata Amit Choksey (Member of promoter group and persons acting in concert (PAC)) 11. Choksey Chemicals Pvt Ltd (Member of promoter group and persons acting in concert (PAC)) 12. Aquamarine Trading & Investments Pvt Ltd (Member of promoter group and persons acting in concert (PAC)) 13. Bhuvantray Investments & Trading Company Private Limited (Member of promoter group and persons acting in

	concert (PAC)) 14. Devaki Anand Trivedi (Member of promoter group and persons acting in concert (PAC)) 15. Forest Hills Trading And Investments Pvt Limited (Member of promoter group and persons acting in concert (PAC)) 16. Gauriputra Investments & Trading Company Private Ltd (Member of promoter group and persons acting in concert (PAC)) 17. Girish Champaklal Choksey (Member of promoter group and persons acting in concert (PAC)) 18. Haridwar Trading And Investments Pvt Limited (Member of promoter group and persons acting in concert (PAC)) 19. Janaki Ashok Parekh (Member of promoter group and persons acting in concert (PAC)) 20. Prashant Girish Choksey (Member of promoter group and persons acting in concert (PAC)) 21. Priti Amit Choksey (Member of promoter group and persons acting in concert (PAC)) 22. Rita Ashok Parekh (Member of promoter group and persons acting in concert (PAC)) 23. Sunita Girish Choksey (Member of promoter group and persons acting in concert (PAC)) 24. The Hindustan Mineral Products Company Private Limited (Member of promoter group and persons acting in concert (PAC) 25. Ankita Amit Choksey (Member Of Promoter Group And Persons Acting In Concert (PAC) 26. Ankur Girish Choksey (Member Of Promoter Group And Persons Acting In Concert (PAC) 27. Colortek India Limited (Member of promoter group and persons acting in concert (PAC)		
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 31st 2019 holding of Atul C Choksey (Promoter):			
a) Shares	31,10,700	15	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Abhiraj Atul Choksey (Promoter)			
a) Shares	27,10,287	13.06	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019 , holding of Apco Enterprises LLP (Promoter)			
a) Shares	1,12,352	0.54	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA

As of March 31st 2019, holding of Devanshi Anant Veer Jalan (Promoter)			
a) Shares	22,81,178	11	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Parul Atul Choksey (Promoter)			
a) Shares	29,11,761	14.04	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Biyash Abhiraj Choksey (Promoter)			
a) Shares	36,000	0.17	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA

As of March 31st 2019, holding of Abhiraj Trading & Investment Private Limited (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	1,16,468	0.56	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Ankur Choksey (Member of Promoter Group and Persons Acting in Concert (PAC)):			
a) Shares	13,600	0.07	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Amit Champaklal Choksey (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	1,10,050	0.53	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA

e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Namrata Amit Choksey (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	57,076	0.28	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Choksey Chemicals Pvt Ltd (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	276	0.00	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Aquamarine Trading & Investments Pvt Ltd (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	98,800	0.48	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA

As of March 31st 2019, holding of Bhuvantray Investments & Trading Company Private Limited (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	99,784	0.48	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Devaki Anand Trivedi (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	6400	0.03	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Forest Hills Trading And Investments Pvt Limited (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	8600	0.04	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA

e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Gauriputra Investments & Trading Company Private Ltd (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	52,400	0.25	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Girish Champaklal Choksey (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	17,800	0.08	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Haridwar Trading And Investments Pvt Limited (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	8600	0.04	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA

e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Janaki Ashok Parekh (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	4800	0.02	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Prashant Girish Choksey (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	13,200	0.06	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Priti Amit Choksey (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	47,134	0.23	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA

As of March 31st 2019, holding of Rita Ashok Parekh (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	1,06,380	0.52	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Sunita Girish Choksey (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	9200	0.04	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of The Hindustan Mineral Products Company Private Limited (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	19,324	0.09	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d) Convertible Securities	NA	NA	NA

e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Ankita Amit Choksey (Member of Promoter Group and Persons Acting in Concert (PAC):			
f) Shares	54,088	0.26	NA
g) Voting Rights (otherwise than by shares)	--	--	--
h) Warrants,	NA	NA	NA
i) Convertible Securities	NA	NA	NA
j) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
As of March 31st 2019, holding of Colortek India Limited (Member of Promoter Group and Persons Acting in Concert (PAC):			
a) Shares	7649	0.03	NA
b) Voting Rights (otherwise than by shares)	--	--	--
c) Warrants,	NA	NA	NA
d)Convertible Securities	NA	NA	NA
e) Any other instrument that would entitle the holder to receive shares in the TC.	NA	NA	NA
Total	**1,20,13,907**	**57.93**	

Apcotex industries Limited

Name (s) of the person and Persons acting in Concert (PAC) with the person	Whether the person belong to Promoter/Promoter Group
Apco Enterprises Limited	Promoter
Aquamaraine Trading &Investments Pvt Ltd	Promoter Group
Bhuvantray Investments & Trading Co Pvt Ltd	Promoter Group
Gauriputra Investments & Trading Co.Pvt Ltd	Promoter Group
Abhiraj Trading and Investment Pvt Ltd	Promoter Group
The Hindustan Mineral Products Limited	Promoter Group
Haridwar Trading and Investments Pvt Ltd	Promoter Group
Forest Hills Trading and Investments Pvt Limited	Promoter Group
Choksey Chemicals Pvt Ltd	Promoter Group
Atul Champaklal Choksey	Promoter
Abhiraj Atul Choksey	Promoter
Abhiraj Atul Choksey HUF	Promoter
Namrata Amit Choksey	Promoter Group
Ankita Amit Choksey	Promoter Group
Amit Champaklal Choksey	Promoter Group
Girish Champaklal Choksey HUF	Promoter Group
Ankur Girish Choksey	Promoter Group
Girish Champaklal Choksey	Promoter Group
Prashant Girish Choksey	Promoter Group
Sunita Girish Choksey	Promoter Group
Devanshi Anant Veer Jalan	Promoter

Parul Atul Choksey	Promoter
Rita Ashok Parekh	Promoter Group
Biyash Abhiraj Choksey	Promoter
Priti Amit Choksey	Promoter Group
Devaki Ashok Parekh	Promoter Group
Janaki Ashok Parekh	Promoter Group
Amit Champaklal Choksey HUF	Promoter Group
Rita Ashok Parekh	Promoter Group

(*) 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.

Note

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

Atul C Choksey

Promoter

Place: Mumbai

Date:08/04/2019