

ALPS/500/SE10/2019-2020

October 1, 2019

|                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                               |
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| The General Manager<br>Market Operations Deptt.,<br><b>National Stock Exchange of India Ltd.,</b><br>Exchange Plaza, 5th Floor,<br>Plot No. C/1, G-Block, Bandra-Kurla Complex<br>Bandra (E), <b>Mumbai - 400 051</b><br>Ph - 91-22-2659 8101 - 8114<br>Fax : 022 - 26598237/38/ 2659 8100<br>Email - cmlist@nse.co.in | Ms. Erika D'Sa, (Relationship Manager)<br>Corporate Relationship Deptt.,<br><b>Bombay Stock Exchange Limited,</b><br>1 <sup>st</sup> Floor New Trading Ring,<br>Rotunda Building, P. J. Towers,<br>Dalal Street, Fort, <b>Mumbai-400 001.</b><br>Ph - 022-22728995<br>Fax: 022 - 22723121 /<br>3719/2037/2039/2041/2061<br>Email - intern.erika@bseindia.com ,<br>corp.relations@bseindia.com |
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**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE OF  
PROMOTER SHAREHOLDING RECEIVED FROM THE PROMOTERS OF THE  
COMPANY IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

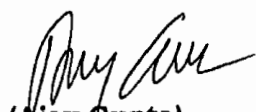
Dear Sir,

With reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019, we are submitting herewith the disclosure of reasons for encumbrance of promoter shareholding received from respective promoters of the company on October 1, 2019 in terms of the said circular.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

For **ALPS INDUSTRIES LIMITED**

(Ajay Gupta)  
Company Secretary  
& General Manager - Legal  
Encl. a/a.





October 1, 2019

The General Manager  
Market Operations Deptt.,  
**National Stock Exchange of India Ltd.,**  
Exchange Plaza, 5th Floor,  
Plot No. C/1, G-Block, Bandra-Kurla  
Complex Bandra (E), Mumbai - 400 051  
Ph - 91-22-2659 8101 - 8114  
Fax : 022 - 26598237/38/ 2659 8100  
Email - cmlist@nse.co.in

Ms. Erika D'Sa, (Relationship Manager)  
Corporate Relationship Deptt.,  
**Bombay Stock Exchange Limited,**  
1<sup>st</sup> Floor New Trading Ring,  
Rotunda Building, P. J. Towers,  
Dalal Street, Fort, Mumbai-400 001.  
Ph - 022-22728995  
Fax: 022 - 22723121 /  
3719/2037/2039/2041/2061  
Email - intern.erika@bseindia.com,  
corp.relations@bseindia.com

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

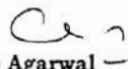
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I am submitting herewith the said disclosure being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

  
**Sandeep Agarwal -**  
**(Promoter)**

CC to:  
To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

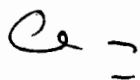
|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Sandeep Agarwal                                                                                                                                                  |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which his holding<br>No. of shares -651510<br>% of total share capital -1.67% |
| Encumbered shares as a % of promoter shareholding                                 | 3.793%                                                                                                                                                           |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|                                                                                                                                                                            |                                                                                                                                                                              | Date of creation of encumbrance: 26.06.2010                         |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) |                                                                                                                                                                              | Pledge                                                              |
| No. and % of shares encumbered by Mr. Sandeep Agarwal                                                                                                                      |                                                                                                                                                                              | No. of shares: 401510<br>% of total promoter shareholding :3.793%   |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     | State Bank of India being Lead Banker                               |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. | YES, State Bank of India is a Scheduled Commercial Bank             |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 | Listed company and its group companies (if any)<br>- Not Applicable |

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|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of _____ on the date of event / shares agreement (A)                                                                                                                                                                          | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(e) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (f) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

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October 1, 2019

|                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.</b>,<br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), Mumbai - 400 051<br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/>Email - cmlist@nse.co.in</p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited</b>,<br/>1<sup>st</sup> Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, Mumbai-400 001.<br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - intern.erika@bseindia.com,<br/>corp.relations@bseindia.com</p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Karta of Sandeep Agarwal & Sons, am submitting herewith the said disclosure being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
For Sandeep Agarwal & Sons (Promoter)

*Ce n*  
**Sandeep Agarwal**  
(Karta)

*CC to:*

To  
Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

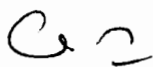
|                                                                                   |                                                                                                                                                                               |
|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                                       |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                                     |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Sandeep Agarwal & Sons (HUF)                                                                                                                                                  |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br><i>No. of shares -94380</i><br><i>% of total share capital -0.24%</i> |
| Encumbered shares as a % of promoter shareholding                                 | 0.419%                                                                                                                                                                        |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                                            |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                                           |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|                                                                                                                                                                            |                                                                                                                                                                              | Date of creation of encumbrance: 26.06.2010                         |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) |                                                                                                                                                                              | Pledge                                                              |
| No. and % of shares encumbered by M/s. Sandeep Agarwal & Sons (HUF)                                                                                                        |                                                                                                                                                                              | No. of shares: 44380<br>% of total promoter shareholding :0.419%    |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     | State Bank of India being Lead Banker                               |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. | YES, State Bank of India is a Scheduled Commercial Bank             |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 | Listed company and its group companies (if any)<br>- Not Applicable |

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|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of on the date of event / shares agreement (A)                                                                                                                                                                                | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(m) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (n) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
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| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
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| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
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| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
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| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
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| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

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October 1, 2019

|                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.,</b><br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), <b>Mumbai - 400 051</b><br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/><b>Email - cmllist@nse.co.in</b></p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited,</b><br/>1<sup>st</sup> Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, <b>Mumbai-400 001.</b><br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - intern.erika@bseindia.com,<br/>corp.relations@bseindia.com</p> |
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**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

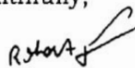
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I am submitting herewith the said disclosure being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

  
**Rohan Agarwal**  
(Promoter)

CC to:

To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

|                                                                                   |                                                                                                                                                                 |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                         |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                       |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Rohan Agarwal                                                                                                                                                   |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which his holding<br>No. of shares -430128<br>% of total share capital -1.1% |
| Encumbered shares as a % of promoter shareholding                                 | 2.174%                                                                                                                                                          |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                              |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                             |

#### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|                                                                                                                                                                            |                                                                                                                                                                              | Date of creation of encumbrance: 26.06.2010                         |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) |                                                                                                                                                                              | Pledge                                                              |
| No. and % of shares encumbered by Mr. Rohan Agarwal                                                                                                                        |                                                                                                                                                                              | No. of shares: 230128<br>% of total promoter shareholding :2.174%   |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     | State Bank of India being Lead Banker                               |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. | YES, State Bank of India is a Scheduled Commercial Bank             |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 | Listed company and its group companies (if any)<br>- Not Applicable |

R. Agarwal

|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of _____ on the date of event / shares agreement (A)                                                                                                                                                                          | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(i) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (j) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |

Signature of Authorised Signatory: 

R. H. A. J.

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |





October 1, 2019

|                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.,</b><br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), <b>Mumbai - 400 051</b><br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/>Email - cmlist@nse.co.in</p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited,</b><br/>1<sup>st</sup> Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, <b>Mumbai-400 001.</b><br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - intern.erika@bseindia.com,<br/>corp.relations@bseindia.com</p> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I am submitting herewith the said disclosure being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

*Sanyog Agarwal*

**Sanyog Agarwal**  
(Promoter)

CC to:

To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

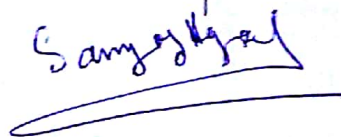
### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

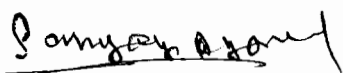
|                                                                                   |                                                                                                                                                                                |
|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                                        |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                                      |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Sanyog Agarwal                                                                                                                                                                 |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which her holding<br><i>No. of shares -248650</i><br><i>% of total share capital -0.64%</i> |
| Encumbered shares as a % of promoter shareholding                                 | 2.349%                                                                                                                                                                         |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                                             |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                                            |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|                                                                                                                                                                            |                                                                                                                                                                              | Date of creation of encumbrance: 26.06.2010                         |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) |                                                                                                                                                                              | Pledge                                                              |
| No. and % of shares encumbered by Mrs. Sanyog Agarwal                                                                                                                      |                                                                                                                                                                              | No. of shares: 248650<br>% of total promoter shareholding :2.349%   |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     | State Bank of India being Lead Banker                               |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. | YES, State Bank of India is a Scheduled Commercial Bank             |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 | Listed company and its group companies (if any)<br>- Not Applicable |



|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of shares on the date of event / agreement (A)                                                                                                                                                                                | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(g) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (h) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

*Sanyog Agarwal*



October 1, 2019

|                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.,</b><br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), Mumbai - 400 051<br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/>Email - cm1ist@nse.co.in</p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited,</b><br/>1<sup>st</sup> Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, Mumbai-400 001.<br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - intern.erika@bseindia.com,<br/>corp.relations@bseindia.com</p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

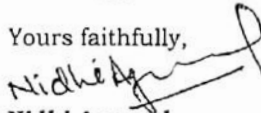
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I am submitting herewith the said disclosure being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

  
**Nidhi Agarwal**  
(Promoter)

CC to:

To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Nidhi Agarwal                                                                                                                                                    |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which her holding<br>No. of shares -216100<br>% of total share capital -0.55% |
| Encumbered shares as a % of promoter shareholding                                 | 0.152%                                                                                                                                                           |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                                                                             |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                                                                                  |
| No. and % of shares encumbered by Mrs. Nidhi Agarwal                                                                                                                       | No. of shares: 16100<br>% of total promoter shareholding :0.152%                                                                                                                                                                        |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)<br>State Bank of India being Lead Banker                                                                                                                                       |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.<br>YES, State Bank of India is a Scheduled Commercial Bank |
|                                                                                                                                                                            | Names of all other entities in the agreement<br>Listed company and its group companies (if any)<br>- Not Applicable                                                                                                                     |

*Nidhi Agarwal*

|                              |                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                                                                                                                                   | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                                                   |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                                                                                                                                  | NO                                                                                                                                                                                                                                                                                                                                                                                         |
| Security Cover / Asset Cover | Value of on the date of event / shares agreement (A)                                                                                                                                                                                                                                                                                              | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                                          |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                                                                                                                                   | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                                         |
|                              | Ratio of A / B                                                                                                                                                                                                                                                                                                                                    | 0.00065                                                                                                                                                                                                                                                                                                                                                                                    |
| End use of money             | <p>Borrowed amount to be utilized for what purpose –</p> <p>(c) Personal use by promoters and PACs</p> <p>(d) For the benefit of listed company</p> <p>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.</p> <p>(a) Any other reason (please specify)</p> | <p>NO</p> <p>Yes</p> <p>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.</p> <p>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring.</p> |

Signature of Authorised Signatory:

Place: Ghaziabad

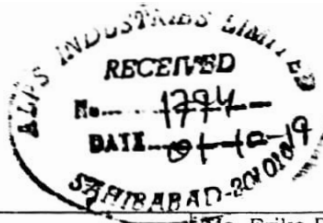
Date: October 1, 2019

*Midhi Ag*

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

*Nidhi Ag*



October 1, 2019

The General Manager  
Market Operations Deptt.,  
**National Stock Exchange of India Ltd.,**  
Exchange Plaza, 5th Floor,  
Plot No. C/1, G-Block, Bandra-Kurla  
Complex Bandra (E), Mumbai - 400 051  
Ph - 91-22-2659 8101 - 8114  
Fax : 022 - 26598237/38/ 2659 8100  
Email - cmlist@nse.co.in

Ms. Erika D'Sa, (Relationship Manager)  
Corporate Relationship Deptt.,  
**Bombay Stock Exchange Limited,**  
1<sup>st</sup> Floor New Trading Ring,  
Rotunda Building, P. J. Towers,  
Dalal Street, Fort, Mumbai-400 001.  
Ph - 022-22728995  
Fax: 022 - 22723121 /  
3719/2037/2039/2041/2061  
Email - intern.erika@bseindia.com,  
corp.relations@bseindia.com

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter. As required I am submitting herewith the said disclosure being under the promoter group.

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Thanking you,

Yours faithfully,

  
**K.K Agarwal**  
(Promoter)

CC to:

To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

|                                                                                   |                                                                                                                                                                   |
|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                           |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                         |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | K.K. Agarwal                                                                                                                                                      |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which his holding<br>No. of shares -1147460<br>% of total share capital -2.93% |
| Encumbered shares as a % of promoter shareholding                                 | 6.11%                                                                                                                                                             |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                                |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                               |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|                                                                                                                                                                            |                                                                                                                                                                              | Date of creation of encumbrance: 26.06.2010                         |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) |                                                                                                                                                                              | Pledge                                                              |
| No. and % of shares encumbered by Mr. K.K. Agarwal                                                                                                                         |                                                                                                                                                                              | No. of shares: 647460<br>% of total promoter shareholding :6.11%    |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     | State Bank of India being Lead Banker                               |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. | YES, State Bank of India is a Scheduled Commercial Bank             |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 | Listed company and its group companies (if any)<br>– Not Applicable |



|                              |                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                  | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                   |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating | NO                                                                                                                                                                                                                                                                                                                                                         |
| Security Cover / Asset Cover | Value of shares on the date of event / agreement (A)                                                                                                                                             | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                          |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                  | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                         |
|                              | Ratio of A / B                                                                                                                                                                                   | 0.00065                                                                                                                                                                                                                                                                                                                                                    |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(a) Personal use by promoters and PACs<br><br>(b) For the benefit of listed company                                                         | NO<br><br>Yes                                                                                                                                                                                                                                                                                                                                              |
|                              | Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify)           | The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |

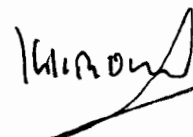
  
Signature of ~~Authorized~~ Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |



# PACIFIC TEXMARK PRIVATE LIMITED

REGD. OFFICE: F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110030

CIN: U67120DL1997PTC084608, EMAIL: [ajay\\_guptaj@yahoo.com](mailto:ajay_guptaj@yahoo.com)



October 1, 2019

|                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.,</b><br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), <b>Mumbai - 400 051</b><br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/>Email - <a href="mailto:cmlist@nse.co.in">cmlist@nse.co.in</a></p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited,</b><br/>1<sup>st</sup> Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, <b>Mumbai-400 001.</b><br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - <a href="mailto:intern.erika@bseindia.com">intern.erika@bseindia.com</a>,<br/><a href="mailto:corp.relations@bseindia.com">corp.relations@bseindia.com</a></p> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

Dear Sir,

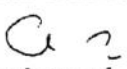
This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Pacific Texmark Private Limited (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

For **Pacific Texmark Private Limited (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:

To

Company Secretary

**ALPS INDUSTRIES LIMITED**

57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

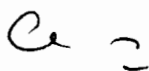
|                                                                                   |                                                                                                                                                                   |
|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                           |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                         |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Pacific Texmark Private Limited                                                                                                                                   |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -2835872<br>% of total share capital -7.25% |
| Encumbered shares as a % of promoter shareholding                                 | 3.17%                                                                                                                                                             |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                                |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                               |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|                                                                                                                                                                            |                                                                                                                                                                              | Date of creation of encumbrance: 26.06.2010                         |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) |                                                                                                                                                                              | Pledge                                                              |
| No. and % of shares encumbered by M/s. Pacific Texmark Private Limited                                                                                                     |                                                                                                                                                                              | No. of shares: 335872<br>% of total promoter shareholding :3.17%    |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     | State Bank of India being Lead Banker                               |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. | YES, State Bank of India is a Scheduled Commercial Bank             |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 | Listed company and its group companies (if any)<br>– Not Applicable |

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|                              |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                      | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                     | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of _____ on the date of event / shares agreement (A)                                                                                                                                                                           | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                      | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                       | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(cc) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (dd) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

G 2

**PEEK TEXTFAB LIMITED**

REGD. OFF.: F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110030  
 CIN: U74899DL1995PLC074557, Email: [ajay\\_guptaji@yahoo.com](mailto:ajay_guptaji@yahoo.com)



October 1, 2019

The General Manager  
 Market Operations Deptt.,  
**National Stock Exchange of India Ltd.,**  
 Exchange Plaza, 5th Floor,  
 Plot No. C/1, G-Block, Bandra-Kurla  
 Complex Bandra (E), Mumbai - 400 051  
 Ph - 91-22-2659 8101 - 8114  
 Fax : 022 - 26598237/38/ 2659 8100  
 Email - [cmlist@nse.co.in](mailto:cmlist@nse.co.in)

Ms. Erika D'Sa, (Relationship Manager)  
 Corporate Relationship Deptt.,  
**Bombay Stock Exchange Limited,**  
 1<sup>st</sup> Floor New Trading Ring,  
 Rotunda Building, P. J. Towers,  
 Dalal Street, Fort, Mumbai-400 001.  
 Ph - 022-22728995  
 Fax: 022 - 22723121 /  
 3719/2037/2039/2041/2061  
 Email - [intern.erika@bseindia.com](mailto:intern.erika@bseindia.com),  
[corp.relations@bseindia.com](mailto:corp.relations@bseindia.com)

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
 PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
 SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

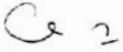
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Peek Textfab Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
 For Peek Textfab Ltd (Promoter)

  
**Sandeep Agarwal**  
 (Authorized Representative)

CC to:

✓ To  
 Company Secretary  
**ALPS INDUSTRIES LIMITED**  
 57/2, Site-IV, Industrial Area, Sahibabad,  
 Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Peek Texfab Ltd                                                                                                                                                  |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -100120<br>% of total share capital -0.26% |
| Encumbered shares as a % of promoter shareholding                                 | 0.00%*                                                                                                                                                           |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                                                                             |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                                                                                  |
| No. and % of shares encumbered by M/s. Peek Texfab Ltd                                                                                                                     | No. of shares: 120<br>% of total promoter shareholding :0.00%*                                                                                                                                                                          |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)<br>State Bank of India being Lead Banker                                                                                                                                       |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.<br>YES, State Bank of India is a Scheduled Commercial Bank |
|                                                                                                                                                                            | Names of all other entities in the agreement<br>Listed company and its group companies (if any)<br>- Not Applicable                                                                                                                     |

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|                              |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                      | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                     | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of _____ on the date of event / shares agreement (A)                                                                                                                                                                           | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                      | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                       | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(aa) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (bb) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |

\*Negligible



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processors Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

C 2

**ROSEATE FINVEST PRIVATE LIMITED**

F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110 030  
CIN:- U74899DL1995PTC067348, Email: roc.rkgovil@gmail.com



October 1, 2019

|                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>The General Manager</b><br>Market Operations Deptt.,<br><b>National Stock Exchange of India Ltd.,</b><br>Exchange Plaza, 5th Floor,<br>Plot No. C/1, G-Block, Bandra-Kurla<br>Complex Bandra (E), Mumbai - 400 051<br>Ph - 91-22-2659 8101 - 8114<br>Fax : 022 - 26598237/38/ 2659 8100<br>Email - cmlist@nse.co.in | <b>Ms. Erika D'Sa, (Relationship Manager)</b><br>Corporate Relationship Deptt.,<br><b>Bombay Stock Exchange Limited,</b><br>1 <sup>ST</sup> Floor New Trading Ring,<br>Rotunda Building, P. J. Towers,<br>Dalal Street, Fort, Mumbai-400 001.<br>Ph - 022-22728995<br>Fax: 022 - 22723121 /<br>3719/2037/2039/2041/2061<br>Email - intern.erika@bseindia.com,<br>corp.relations@bseindia.com |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Roseate Finvest (P) Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
For **Roseate Finvest (P) Ltd (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:  
To:  
Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

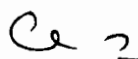
|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Roseate Finvest (P) Ltd                                                                                                                                          |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -382000<br>% of total share capital -0.98% |
| Encumbered shares as a % of promoter shareholding                                 | 3.61%                                                                                                                                                            |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|                                                                                                                                                                            |                                                                                                                                                                              | Date of creation of encumbrance: 26.06.2010                         |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) |                                                                                                                                                                              | Pledge                                                              |
| No. and % of shares encumbered by M/s. Roseate Finvest (P) Ltd                                                                                                             |                                                                                                                                                                              | No. of shares: 382000<br>% of total promoter shareholding :3.61%    |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     | State Bank of India being Lead Banker                               |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. | YES, State Bank of India is a Scheduled Commercial Bank             |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 | Listed company and its group companies (if any)<br>- Not Applicable |

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|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of on the date of event / shares agreement (A)                                                                                                                                                                                | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(y) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (z) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

C 2

# PEEK FINVEST PRIVATE LIMITED

F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110 030

CIN:- U74899DL1995PTC067339



October 1, 2019

|                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The General Manager<br>Market Operations Deptt.,<br><b>National Stock Exchange of India Ltd.,</b><br>Exchange Plaza, 5th Floor,<br>Plot No. C/1, G-Block, Bandra-Kurla<br>Complex Bandra (E), <b>Mumbai - 400 051</b><br>Ph - 91-22-2659 8101 - 8114<br>Fax : 022 - 26598237/38/ 2659 8100<br><b>Email - cmlist@nse.co.in</b> | Ms. Erika D'Sa, (Relationship Manager)<br>Corporate Relationship Deptt.,<br><b>Bombay Stock Exchange Limited,</b><br>1st Floor New Trading Ring,<br>Rotunda Building, P. J. Towers,<br>Dalal Street, Fort, <b>Mumbai-400 001.</b><br>Ph - 022-22728995<br>Fax: 022 - 22723121 /<br>3719/2037/2039/2041/2061<br>Email - intern.erika@bseindia.com,<br>corp.relations@bseindia.com |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Peek Finvest (P) Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
For **Peek Finvest (P) Ltd (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:

To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Peek Finvest (P) Ltd                                                                                                                                             |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -342082<br>% of total share capital -0.87% |
| Encumbered shares as a % of promoter shareholding                                 | 3.23%                                                                                                                                                            |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                  |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                       |
| No. and % of shares encumbered by M/s. Peek Finvest (P) Ltd                                                                                                                | No. of shares: 342082<br>% of total promoter shareholding :3.23%                                                                                                             |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 |
|                                                                                                                                                                            | State Bank of India being Lead Banker                                                                                                                                        |
|                                                                                                                                                                            | YES, State Bank of India is a Scheduled Commercial Bank                                                                                                                      |
|                                                                                                                                                                            | Listed company and its group companies (if any)<br>- Not Applicable                                                                                                          |

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|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of on the date of event / shares agreement (A)                                                                                                                                                                                | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(w) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (x) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prelect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

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## PREFECT FINMEN SERVICES PVT LTD

F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110 030  
CIN:- U74899DL1995PTC067340, Email: ajay\_guptaji@yahoo.com



October 1, 2019

|                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The General Manager<br>Market Operations Deptt.,<br><b>National Stock Exchange of India Ltd.,</b><br>Exchange Plaza, 5th Floor,<br>Plot No. C/1, G-Block, Bandra-Kurla<br>Complex Bandra (E), <b>Mumbai - 400 051</b><br>Ph - 91-22-2659 8101 - 8114<br>Fax : 022 - 26598237/38/ 2659 8100<br><b>Email - cmlist@nse.co.in</b> | Ms. Erika D'Sa, (Relationship Manager)<br>Corporate Relationship Deptt.,<br><b>Bombay Stock Exchange Limited,</b><br>1 <sup>ST</sup> Floor New Trading Ring,<br>Rotunda Building, P. J. Towers,<br>Dalal Street, Fort, <b>Mumbai-400 001.</b><br>Ph - 022-22728995<br>Fax: 022 - 22723121 /<br>3719/2037/2039/2041/2061<br>Email - intern.erika@bseindia.com,<br>corp.relations@bseindia.com |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

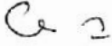
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Prefect Finmen Services (P) Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
For **Prefect Finmen Services (P) Ltd (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:

To  
Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

|                                                                                   |                                                                                                                                                                                |
|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                                        |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                                      |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Prefect Finmen Services (P) Ltd                                                                                                                                                |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br><i>No. of shares -412800</i><br><i>% of total share capital -1.06%</i> |
| Encumbered shares as a % of promoter shareholding                                 | 2.48%                                                                                                                                                                          |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                                             |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                                            |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
|                                                                                                                                                                            |                                                                                                                                                                              | Date of creation of encumbrance: 26.06.2010                         |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) |                                                                                                                                                                              | Pledge                                                              |
| No. and % of shares encumbered by M/s. Prefect Finmen Services (P) Ltd                                                                                                     |                                                                                                                                                                              | No. of shares: 262800<br>% of total promoter shareholding :2.48%    |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     | State Bank of India being Lead Banker                               |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. | YES, State Bank of India is a Scheduled Commercial Bank             |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 | Listed company and its group companies (if any)<br>- Not Applicable |

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|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of _____ on the date of event / shares agreement (A)                                                                                                                                                                          | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(u) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (v) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

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**CAREEN FINTEC PRIVATE LIMITED**  
F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110 030  
CIN: U67120DL1996PTC076021, Email: roc.rkgovil@gmail.com



October 1, 2019

|                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The General Manager<br>Market Operations Deptt.,<br><b>National Stock Exchange of India Ltd.,</b><br>Exchange Plaza, 5th Floor,<br>Plot No. C/1, G-Block, Bandra-Kurla<br>Complex Bandra (E), <b>Mumbai - 400 051</b><br>Ph - 91-22-2659 8101 - 8114<br>Fax : 022 - 26598237/38/ 2659 8100<br>Email - cmlist@nse.co.in | Ms. Erika D'Sa, (Relationship Manager)<br>Corporate Relationship Deptt.,<br><b>Bombay Stock Exchange Limited,</b><br>1st Floor New Trading Ring,<br>Rotunda Building, P. J. Towers,<br>Dalal Street, Fort, <b>Mumbai-400 001.</b><br>Ph - 022-22728995<br>Fax: 022 - 22723121 /<br>3719/2037/2039/2041/2061<br>Email - intern.erika@bseindia.com,<br>corp.relations@bseindia.com |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

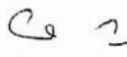
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Careen Fintec (P) Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
For **Careen Fintec (P) Ltd (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:  
To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

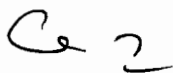
|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Careen Fintec (P) Ltd                                                                                                                                            |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -295000<br>% of total share capital -0.75% |
| Encumbered shares as a % of promoter shareholding                                 | 0.43%                                                                                                                                                            |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                                                                             |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                                                                                  |
| No. and % of shares encumbered by M/s. Careen Fintec (P) Ltd                                                                                                               | No. of shares: 45000<br>% of total promoter shareholding :0.43%                                                                                                                                                                         |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)<br>State Bank of India being Lead Banker                                                                                                                                       |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.<br>YES, State Bank of India is a Scheduled Commercial Bank |
|                                                                                                                                                                            | Names of all other entities in the agreement<br>Listed company and its group companies (if any)<br>- Not Applicable                                                                                                                     |

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|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of _____ on the date of event / shares agreement (A)                                                                                                                                                                          | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(q) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (r) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

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**PADAM PRECISION DIES AND COMPONENTS PRIVATE LIMITED**

F-228, Ground Floor, Lado Sarai, New Delhi-110 030  
CIN: U74899DL1991PTC045849, Email: roc.rkgovil@gmail.com



October 1, 2019

|                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The General Manager<br>Market Operations Deptt.,<br><b>National Stock Exchange of India Ltd.,</b><br>Exchange Plaza, 5th Floor,<br>Plot No. C/1, G-Block, Bandra-Kurla<br>Complex Bandra (E), <b>Mumbai - 400 051</b><br>Ph - 91-22-2659 8101 - 8114<br>Fax : 022 - 26598237/38/ 2659 8100<br>Email - cm1ist@nse.co.in | Ms. Erika D'Sa, (Relationship Manager)<br>Corporate Relationship Deptt.,<br><b>Bombay Stock Exchange Limited,</b><br>1 <sup>st</sup> Floor New Trading Ring,<br>Rotunda Building, P. J. Towers,<br>Dalal Street, Fort, <b>Mumbai-400 001.</b><br>Ph - 022-22728995<br>Fax: 022 - 22723121 /<br>3719/2037/2039/2041/2061<br>Email - intern.erika@bseindia.com,<br>corp.relations@bseindia.com |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

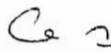
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Padam Precision Dies And Components Pvt Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
For **Padam Precision Dies And Components Pvt Ltd (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:  
To  
Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

|                                                                                   |                                                                                                                                                                   |
|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                           |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                         |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Padam Precision Dies And Components Pvt Ltd                                                                                                                       |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -1688200<br>% of total share capital -4.32% |
| Encumbered shares as a % of promoter shareholding                                 | 1.78%                                                                                                                                                             |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                                |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                               |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                                                                             |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                                                                                  |
| No. and % of shares encumbered by M/s. Padam Precision Dies And Components Pvt Ltd                                                                                         | No. of shares: 188200<br>% of total promoter shareholding :1.78%                                                                                                                                                                        |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)<br>State Bank of India being Lead Banker                                                                                                                                       |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.<br>YES, State Bank of India is a Scheduled Commercial Bank |
|                                                                                                                                                                            | Names of all other entities in the agreement<br>Listed company and its group companies (if any)<br>- Not Applicable                                                                                                                     |

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|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of shares on the date of event / agreement (A)                                                                                                                                                                                | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(s) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (t) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |

  
Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

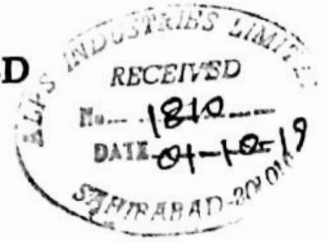
| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

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# CORONATION SPINNING (I) PRIVATE LIMITED

F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110 030

CIN NO:- U74899DL1982PTC013569



October 1, 2019

|                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.</b>,<br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), <b>Mumbai - 400 051</b><br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/>Email - cmlist@nse.co.in</p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited</b>,<br/>1st Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, <b>Mumbai-400 001</b>.<br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - intern.erika@bseindia.com,<br/>corp.relations@bseindia.com</p> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Coronation Spinning India Pvt Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

For **Coronation Spinning India Pvt Ltd (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:

To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

|                                                                                   |                                                                                                                                                                 |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                         |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                       |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Coronation Spinning India Pvt Ltd                                                                                                                               |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -900000<br>% of total share capital -2.3% |
| Encumbered shares as a % of promoter shareholding                                 | 2.83%                                                                                                                                                           |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                              |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                             |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                  |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                       |
| No. and % of shares encumbered by M/s. Coronation Spinning India Pvt Ltd                                                                                                   | No. of shares: 300000<br>% of total promoter shareholding :2.83%                                                                                                             |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     |
|                                                                                                                                                                            | State Bank of India being Lead Banker                                                                                                                                        |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. |
|                                                                                                                                                                            | YES, State Bank of India is a Scheduled Commercial Bank                                                                                                                      |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 |
|                                                                                                                                                                            | Listed company and its group companies (if any)<br>- Not Applicable                                                                                                          |

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|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of shares on the date of event / agreement (A)                                                                                                                                                                                | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(o) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (p) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |

C 2

Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN         | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|-------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AAEHHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AAADH89672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J  | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B  | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G  | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K  | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F  | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R  | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R  | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N  | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H  | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R  | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q  | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G  | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F  | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N  | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processors Private Limited             | AABCA7512R  | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N  | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R  | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |             | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

C 2

## SAURABH FLORICULTURE PRIVATE LIMITED

F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110 030  
CIN NO:- U74899DL1995PTC067348, Email: roc.rkgovil@gmail.com



October 1, 2019

|                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.,</b><br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), <b>Mumbai - 400 051</b><br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/>Email - cmlist@nse.co.in</p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited,</b><br/>1st Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, <b>Mumbai-400 001.</b><br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - intern.erika@bseindia.com,<br/>corp.relations@bseindia.com</p> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

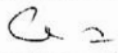
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Saurabh Floriculture (P) Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
For **Saurabh Floriculture (P) Ltd (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:  
✓ To  
Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular  
dated August 05, 2015)

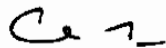
|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Saurabh Floriculture (P) Ltd                                                                                                                                     |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -183800<br>% of total share capital -0.47% |
| Encumbered shares as a % of promoter shareholding                                 | 1.74%                                                                                                                                                            |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                                                                             |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                                                                                  |
| No. and % of shares encumbered by M/s. Saurabh Floriculture (P) Ltd                                                                                                        | No. of shares: 183800<br>% of total promoter shareholding :1.74%                                                                                                                                                                        |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)<br>State Bank of India being Lead Banker                                                                                                                                       |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.<br>YES, State Bank of India is a Scheduled Commercial Bank |
|                                                                                                                                                                            | Names of all other entities in the agreement<br>Listed company and its group companies (if any)<br>- Not Applicable                                                                                                                     |

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|                              |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                      | Other entities (if any) - Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                     | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of shares on the date of event / agreement (A)                                                                                                                                                                                 | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                      | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                       | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose -<br>(ii) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (ij) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |



Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

C 2

# SUPREME FINVEST PRIVATE LIMITED

F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110 030  
CIN NO:- U74899DL1995PTC067351, Email: roc.rkgovil@gmail.com



October 1, 2019

|                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The General Manager<br>Market Operations Deptt.,<br><b>National Stock Exchange of India Ltd.</b> ,<br>Exchange Plaza, 5th Floor,<br>Plot No. C/1, G-Block, Bandra-Kurla<br>Complex Bandra (E), Mumbai - 400 051<br>Ph - 91-22-2659 8101 - 8114<br>Fax : 022 - 26598237/38/ 2659 8100<br>Email - cmlist@nse.co.in | Ms. Erika D'Sa, (Relationship Manager)<br>Corporate Relationship Deptt.,<br><b>Bombay Stock Exchange Limited</b> ,<br>1 <sup>st</sup> Floor New Trading Ring,<br>Rotunda Building, P. J. Towers,<br>Dalal Street, Fort, Mumbai-400 001.<br>Ph - 022-22728995<br>Fax: 022 - 22723121 /<br>3719/2037/2039/2041/2061<br>Email - intern.erika@bseindia.com,<br>corp.relations@bseindia.com |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

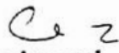
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Supreme Finvest (P) Ltd (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,  
For **Supreme Finvest (P) Ltd (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to:  
To  
Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Supreme Finvest (P) Ltd                                                                                                                                          |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -290000<br>% of total share capital -0.74% |
| Encumbered shares as a % of promoter shareholding                                 | 1.32%                                                                                                                                                            |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                  |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                       |
| No. and % of shares encumbered by M/s. Supreme Finvest (P) Ltd                                                                                                             | No. of shares: 140000<br>% of total promoter shareholding :1.32%                                                                                                             |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     |
|                                                                                                                                                                            | State Bank of India being Lead Banker                                                                                                                                        |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. |
|                                                                                                                                                                            | YES, State Bank of India is a Scheduled Commercial Bank                                                                                                                      |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 |
|                                                                                                                                                                            | Listed company and its group companies (if any)<br>- Not Applicable                                                                                                          |

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|                              |                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                                                   |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                                                                                                                                    | NO                                                                                                                                                                                                                                                                                                                                                                                         |
| Security Cover / Asset Cover | Value of shares on the date of event / agreement (A)                                                                                                                                                                                                                                                                                                | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                                          |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                                         |
|                              | Ratio of A / B                                                                                                                                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                                                    |
| End use of money             | <p>Borrowed amount to be utilized for what purpose –</p> <p>(gg) Personal use by promoters and PACs</p> <p>(hh) For the benefit of listed company</p> <p>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.</p> <p>(a) Any other reason (please specify)</p> | <p>NO</p> <p>Yes</p> <p>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.</p> <p>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring.</p> |

Q 2

Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processors Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

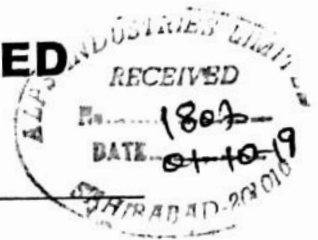
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# ALPS PROCESSERS PRIVATE LIMITED

REGD. OFFICE: -F-228, GROUND FLOOR, LADO SARAI, NEW DELHI-110 030

CIN: U22219DL1996PTC080342

Email: [ajay\\_guptajl@yahoo.co.in](mailto:ajay_guptajl@yahoo.co.in), Phone: 01129523097



October 1, 2019

|                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.,</b><br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), <b>Mumbai - 400 051</b><br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/>Email - <a href="mailto:cm1ist@nse.co.in">cm1ist@nse.co.in</a></p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited,</b><br/>1<sup>ST</sup> Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, <b>Mumbai-400 001.</b><br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - <a href="mailto:intern.erika@bseindia.com">intern.erika@bseindia.com</a>,<br/><a href="mailto:corp.relations@bseindia.com">corp.relations@bseindia.com</a></p> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

Dear Sir,

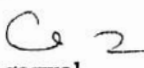
This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I, Authorized Representative of Alps Processers Private Limited (the "company") am submitting herewith the said disclosure on behalf of the company, being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

For **Alps Processers Private Limited (Promoter)**

  
**Sandeep Agarwal**  
(Authorized Representative)

CC to  
To

Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

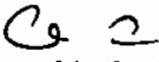
|                                                                                   |                                                                                                                                                                  |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                          |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                        |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Alps Processers Private Limited                                                                                                                                  |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which its holding<br>No. of shares -250116<br>% of total share capital -0.64% |
| Encumbered shares as a % of promoter shareholding                                 | 2.36%                                                                                                                                                            |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                               |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                              |

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                  |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                       |
| No. and % of shares encumbered by M/s. Alps Processers Private Limited                                                                                                     | No. of shares: 250116<br>% of total promoter shareholding :2.36%                                                                                                             |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     |
|                                                                                                                                                                            | State Bank of India being Lead Banker                                                                                                                                        |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. |
|                                                                                                                                                                            | YES, State Bank of India is a Scheduled Commercial Bank                                                                                                                      |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 |
|                                                                                                                                                                            | Listed company and its group companies (if any)<br>- Not Applicable                                                                                                          |

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|                              |                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                      | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                     | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of on the date of event / shares agreement (A)                                                                                                                                                                                 | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                      | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                       | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(ee) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (ff) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |

  
Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

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October 1, 2019

|                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <p>The General Manager<br/>Market Operations Deptt.,<br/><b>National Stock Exchange of India Ltd.</b>,<br/>Exchange Plaza, 5th Floor,<br/>Plot No. C/1, G-Block, Bandra-Kurla<br/>Complex Bandra (E), <b>Mumbai - 400 051</b><br/>Ph - 91-22-2659 8101 - 8114<br/>Fax : 022 - 26598237/38/ 2659 8100<br/>Email - <a href="mailto:cm1ist@nse.co.in">cm1ist@nse.co.in</a></p> | <p>Ms. Erika D'Sa, (Relationship Manager)<br/>Corporate Relationship Deptt.,<br/><b>Bombay Stock Exchange Limited</b>,<br/>1<sup>st</sup> Floor New Trading Ring,<br/>Rotunda Building, P. J. Towers,<br/>Dalal Street, Fort, <b>Mumbai-400 001</b>.<br/>Ph - 022-22728995<br/>Fax: 022 - 22723121 /<br/>3719/2037/2039/2041/2061<br/>Email - <a href="mailto:intern.erika@bseindia.com">intern.erika@bseindia.com</a>,<br/><a href="mailto:corp.relations@bseindia.com">corp.relations@bseindia.com</a></p> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**SUB: SUBMISSION OF DISCLOSURE OF REASONS FOR ENCUMBRANCE BY  
PROMOTER IN TERMS OF SEBI CIRCULAR NO.  
SEBI/HO/CFD/DCR1/CIR/P/2019/90 DATED AUGUST 07, 2019**

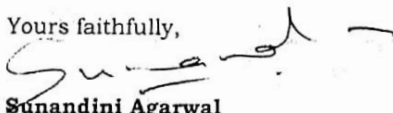
Dear Sir,

This has in reference to the SEBI Circular No. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated August 07, 2019 for submission of Disclosure of reasons for encumbrance by Promoter, as required I am submitting herewith the said disclosure being under the promoter group.

This is for your kind information and record please.

Thanking you,

Yours faithfully,

  
**Sunandini Agarwal**  
(Promoter)

CC to:

To  
Company Secretary  
**ALPS INDUSTRIES LIMITED**  
57/2, Site-IV, Industrial Area, Sahibabad,  
Ghaziabad-201010 (U.P)

Encl. a/a.

### Disclosure of reasons for encumbrance

(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

|                                                                                   |                                                                                                                                                                |
|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of listed company                                                            | ALPS INDUSTRIES LIMITED                                                                                                                                        |
| Name of the recognised stock exchanges where the shares of the company are listed | 1. National Stock Exchange of India Limited(NSE)<br>2. Bombay Stock Exchange Limited(BSE)                                                                      |
| Name of the promoter(s) / PACs whose shares have been encumbered                  | Sunandini Agarwal                                                                                                                                              |
| Total promoter shareholding in the listed company                                 | Total Promoter Shareholding-10586018<br>% of total share capital- 27.06%<br>out of which her holding<br>No. of shares -800<br>% of total share capital -0.00%* |
| Encumbered shares as a % of promoter shareholding                                 | 0.008%                                                                                                                                                         |
| Whether encumbered share is 50% or more of promoter shareholding                  | NO                                                                                                                                                             |
| Whether encumbered share is 20% or more of total share capital                    | YES                                                                                                                                                            |

\*Negligible

### Details of all the existing events/ agreements pertaining to encumbrance

|                                                                                                                                                                            |                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                            | Date of creation of encumbrance: 26.06.2010                                                                                                                                  |
| Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance) | Pledge                                                                                                                                                                       |
| No. and % of shares encumbered by Ms. Sunandini Agarwal                                                                                                                    | No. of shares: 800<br>% of total promoter shareholding :0.008%                                                                                                               |
| Specific details about the encumbrance                                                                                                                                     | Name of the entity in whose favour shares encumbered (X)                                                                                                                     |
|                                                                                                                                                                            | Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity. |
|                                                                                                                                                                            | Names of all other entities in the agreement                                                                                                                                 |
|                                                                                                                                                                            | State Bank of India being Lead Banker                                                                                                                                        |
|                                                                                                                                                                            | YES, State Bank of India is a Scheduled Commercial Bank                                                                                                                      |
|                                                                                                                                                                            | Listed company and its group companies (if any)<br>- Not Applicable                                                                                                          |

*Sunandini*

|                              |                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                                                                                                                                                                                                                     | Other entities (if any) – Not Applicable                                                                                                                                                                                                                                                                                                                              |
|                              | Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating                                    | NO                                                                                                                                                                                                                                                                                                                                                                    |
| Security Cover / Asset Cover | Value of on the date of event / shares agreement (A)                                                                                                                                                                                | Rs. 0.64 /- Crore                                                                                                                                                                                                                                                                                                                                                     |
|                              | Amount involved (against which shares have been encumbered) (B)                                                                                                                                                                     | Rs. 989.17/- crore                                                                                                                                                                                                                                                                                                                                                    |
|                              | Ratio of A / B                                                                                                                                                                                                                      | 0.00065                                                                                                                                                                                                                                                                                                                                                               |
| End use of money             | Borrowed amount to be utilized for what purpose –<br>(k) Personal use by promoters and PACs                                                                                                                                         | NO                                                                                                                                                                                                                                                                                                                                                                    |
|                              | (l) For the benefit of listed company<br><br>Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc.<br><br>(a) Any other reason (please specify) | Yes<br><br>The loan has been taken for the business purpose of the company. The pledge of shares are in terms of the CDR scheme sanctioned vide Letter of Approval (LOA) dated 11.09.2009 of the outstanding as on the cut off dated i.e. 31.01.2009.<br>Due to withdrawal of CDR/Re-work of CDR on 16.11.2012, the company is under financial overall restructuring. |

*Sunand*  
Signature of Authorised Signatory:

Place: Ghaziabad

Date: October 1, 2019

**Details of Promoter shareholding along with % of total shares encumbered as on date**

| S.No.        | Name of Promoter                            | PAN        | Total nos. shares held | % of total share capital | Number of Shares pledged or otherwise encumbered | % of shares encumbered |
|--------------|---------------------------------------------|------------|------------------------|--------------------------|--------------------------------------------------|------------------------|
| 1            | K. K. Agarwal (Huf)                         | AABHK7991K | 117000                 | 0.30                     | 0                                                | 0                      |
| 2            | Sandeep Agarwal(Huf)                        | AADHS9672P | 94380                  | 0.24                     | 44380                                            | 0.419                  |
| 3            | Nidhi Agarwal                               | AAKPA2949J | 216100                 | 0.55                     | 16100                                            | 0.152                  |
| 4            | K. K. Agarwal                               | AAPPA5044B | 1147460                | 2.93                     | 647460                                           | 6.116                  |
| 5            | Sandeep Agarwal                             | ACEPA4737G | 651510                 | 1.67                     | 401510                                           | 3.793                  |
| 6            | Sanyog Agarwal                              | ACGPA7178K | 248650                 | 0.64                     | 248650                                           | 2.349                  |
| 7            | Rohan Agarwal                               | AIUPA3170F | 430128                 | 1.1                      | 230128                                           | 2.174                  |
| 8            | Sunandini Agarwal                           | AIUPA3196R | 800                    | 0.00*                    | 800                                              | 0.008                  |
| 9            | Coronation Spinning India Pvt Ltd           | AAACC8311R | 900000                 | 2.3                      | 300000                                           | 2.83                   |
| 10           | Careen Fintec (P) Ltd                       | AAACC8312N | 295000                 | 0.75                     | 45000                                            | 0.43                   |
| 11           | Padam Precision Dies And Components Pvt Ltd | AAACP4217H | 1688200                | 4.32                     | 188200                                           | 1.78                   |
| 12           | Prefect Finmen Services (P) Ltd             | AAACP8958R | 412800                 | 1.06                     | 262800                                           | 2.48                   |
| 13           | Peek Finvest (P) Ltd                        | AAACP8959Q | 342082                 | 0.87                     | 342082                                           | 3.23                   |
| 14           | Roseat Finvest (P) Ltd                      | AAACR7175G | 382000                 | 0.98                     | 382000                                           | 3.61                   |
| 15           | Peek Texfab Ltd                             | AABCA6857F | 100120                 | 0.26                     | 120                                              | 0.00                   |
| 16           | Pacific Texmark Private Limited             | AABCA7511N | 2835872                | 7.25                     | 335872                                           | 3.17                   |
| 17           | Alps Processers Private Limited             | AABCA7512R | 250116                 | 0.64                     | 250116                                           | 2.36                   |
| 18           | Supreme Finvest (P) Ltd                     | AACCS0471N | 290000                 | 0.74                     | 140000                                           | 1.32                   |
| 19           | Saurabh Floriculture (P) Ltd                | AACCS6111R | 183800                 | 0.47                     | 183800                                           | 1.74                   |
| <b>TOTAL</b> |                                             |            | <b>10586018</b>        | <b>27.06</b>             | <b>4019018</b>                                   | <b>37.97</b>           |

*Sunand*