Format for disclosure by the Promoter(s) to the Stock Exchanges and to the Target Company for encumbrance of shares / invocation of encumbrance/ release of encumbrance, in terms of Regulation 31 (1) and 31 (2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target company(TC)	ACC Limited
Name of the stock Exchanges where the shares of the target	BSE Ltd. & National Stock Exchange of India Ltd.
Date of reporting	October 28, 2026
Name of the Promoter or PAC on whose shares encumbrance was created/ released/invoked	Holderind Investments Limited Endeavour Trade and Investment Limited

Details of the creation of encumbrance:

Name of Promoter(s) or PACs with him (*)	Promoter holding in the target company (1)		Promoter holding already encumbered (2)		Details of events pertaining to encumbrance (3)							Post event holding of encumbered shares { creation[(2)+(3) / release [(2)-(3)] /	
	No. of shares	% of total share capital	No. of shares	% of total share capital	Type of event(creation /release /invocation)	Date of creation /invocation/ release of encumbrance	Type of encumbrance (pledge /lien/non disposal undertaking/others)	Reason for encumbrance **	Number	% of total share capital	Name of the entity in whose favour shares encumbered ***	No. of shares	% of total share capital
Holderind Investments Limited	8,411,000	4.48	8,411,000	4.48	Creation	October 21, 2026	Others	Refer Notes below	8,411,000	4.48	Deutsche Bank AG, Hong Kong Branch acting as the security agent for the lenders.	8,411,000	4.48
Endeavour Trade and Investment Limited	4,061,807	2.16	4,061,807	2.16	Creation	October 21, 2026	Others	Refer Notes below	4,061,807	2.16	Deutsche Bank AG, Hong Kong Branch acting as the security agent for the lenders.	4,061,807	2.16

Note 1: No pledge has been created on the shares of ACC Limited ("ACCL").

Note 2: The shares of Holderind Investments Ltd. ("Holderind") and Endeavour Trade and Investment Ltd ("Endeavour") have been charged as a security for certain facilities availed by Endeavour which was previously disclosed under the disclosure made for ACCL on October 25, 2023, ("Original Facilities").

Note 3: Endeavor is availing a facility ("New Facility") to, inter alia, refinance one of the facilities availed under the Original Facilities. The lenders of the New Facility, the arrangers of the New Facility and Deutsche Bank AG, Hong Kong Branch as the agent of the New Facility have executed an intercreditor agreement accession undertaking dated October 21, 2026 pursuant to which the existing security as disclosed in Note 2 (above) is being extended for the New Facility also. Following the application of the proceeds of the New Facility towards part repayment of the Original Facilities such security shall continue to secure the remaining outstanding liabilities under the Original Facilities and the liabilities arising under the New Facility.

For Holderind Investments Limited

Authorised Signatory

Place: Mauritius
Date: October 28, 2026

For Endeavour Trade and Investment Limited

Authorised Signatory

Place: Mauritius
Date: October 28, 2026

Format for disclosure of reasons for encumbrance
(In addition to Annexure - I prescribed by way of circular dated August 05, 2015)

Name of listed Company		ACC Limited
Name of the recognised stock exchanges where the shares of the company are listed		BSE Ltd. & National Stock Exchange of India Ltd.
Name of the promoter(s) / PACs whose shares have been encumbered		Holderind Investments Limited Endeavour Trade and Investment Limited
Total promoter shareholding in the listed company	No. of shares -	106,456,927
	% of total share capital -	56.69
Encumbered shares as a % of promoter shareholding		11.72
Whether encumbered share is 50% or more of promoter shareholding		No
Whether encumbered share is 20% or more of total share capital		No

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 1 (Date of creation of encumbrance: October 21, 2026)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Other covenant in the nature of encumbrance
No. and % of shares encumbered	No. of shares:	12,472,807
	% of total share capital:	6.64
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Deutsche Bank AG, Hong Kong Branch acting as the security agent for the lenders*.
	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.	NO. Security Agent

Names of all other entities in the agreement	The original facility agreement has been signed by Endeavour with Endeavour including its successors in title, permitted assigns and permitted transferees as the Borrower, and the Mandated Lead Arrangers and Bookrunners and Underwriters as disclosed on October 25, 2023, the other Mandated Lead Arrangers and Bookrunners as disclosed on October 25, 2023 and those providing the additional amounts as set out below (and as may accede from time to time), Deutsche Bank AG, Hong Kong Branch as Agent and the Security Agent: (a) MUFG Bank, Ltd., GIFT Branch (b) Mizuho Bank, Ltd. (c) Standard Chartered Bank (Singapore) Limited (d) ING Bank N.V., Singapore Branch (e) Sumitomo Mitsui Banking Corporation Singapore Branch
	The new facility agreement has been signed wiht Endeavour including its successors in title, permitted assigns and permitted transferees as the Borrower, and the Mandated Lead Arrangers and Bookrunners and Underwriters, Deutsche Bank AG, Hong Kong Branch as Agent and the Security Agent: (a) MUFG Bank, Ltd., GIFT Branch (b) CTBC Bank Co. Ltd,. GIFT IFSC Banking Unit (c) First Abu Dhabi Bank PJSC, GIFT City Branch (d) ING Bank N.V., Singapore Branch (e) Mizuho Bank, Ltd., IFSC Banking Unit (f) Standard Chartered Bank (Singapore) Limited (g) Sumitomo Mitsui Banking Corporation Singapore Branch

	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)	14,391,124,717
	Amount involved (against which shares have been encumbered) (B)	up to USD 1.375 billion*
	Ratio of A / B	0.05
End use of money	Borrowed amount to be utilized for what purpose – (a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	The Original Facilities was availed by Endeavour including its successors in title, permitted assigns and permitted transferees for the purposes as disclosed on October 25, 2023. The new facility has been availed by Endeavour including its successors in title, permitted assigns and permitted transferees to partly refinance/ repay the Original Facilities. It may be noted that no pledge has been created over the shares of ACCL.

** This amount has been calculated taking into account the refinancing/ repayment of part of Original Facilities (availed by Endeavour which was previously disclosed under the disclosure made by ACCL on October 25, 2023 ("Original Facilities").*

Authorised Signatory

Place: Mauritius
Date: October 28, 2026