



S GUPTA HOLDING PRIVATE LIMITED

(Formerly known as APL Infrastructure Private Limited)

April 3, 2026

National Stock Exchange of India Limited
"Exchange Plaza" Bandra-Kurla Complex,
Bandra (E),
Mumbai – 400051

NSE Symbol: APLAPOLLO

Department of Corporate Services/Listing
BSE Limited
Phiroze Jeejeebhoy Tower,
Dalal Street, Fort,
Mumbai – 400001

Scrip Code: 533758

Dear Sir/Madam,


Re: Disclosures under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("SEBI (SAST) Regulations")

In terms of provisions of Regulation 31(4) of the SEBI (SAST) Regulations, we, S Gupta Holding Private Limited (Formerly known as APL Infrastructure Private Limited), one of the members of the promoter group of the Company, declare that we and the other members of the Promoter/ Promoter Group and/or Person Acting in Concert, have not made any encumbrance over the shares of APL Apollo Tubes Limited, directly or indirectly during the Financial Year 2025-2026, other than those (if any) already disclosed.

In compliance with the provisions mentioned in Regulation 31(5) of the SEBI (SAST) Regulations, we request the Company to place this disclosure at the ensuing Audit Committee Meeting of the Company.

Thanking You

**For & on behalf of Promoters/ Promoter Group
/ Person Acting in Concert (PAC)
of APL Apollo Tubes Limited**


Vinay Gupta
Managing Director
DIN: 00005149



**S Gupta Holding Private Limited
(Formerly known as APL Infrastructure Private Limited)**

Note: List of Promoter and Promoter Group of members of APL Apollo Tubes Limited is enclosed herewith as Annexure

CC:

To
The Company Secretary
APL Apollo Tubes Limited
37, Hargobind Enclave, Vikas Marg
Delhi-110092

To
The Audit Committee
APL Apollo Tubes Limited
37, Hargobind Enclave, Vikas Marg
Delhi-110092

Annexure

List of Promoter and Promoter Group Members of APL Apollo Tubes Limited

Sr. No.	Name	Whether the person belong to Promoter/ Promoter Group
1.	Shri Sanjay Gupta	Promoter
2.	S Gupta Holding Private Limited (Formerly known as APL Infrastructure Private Limited)	Promoter Group
3.	Mrs. Veera Gupta	Promoter Group
4.	Shri Rahul Gupta	Promoter Group
5.	Shri Rohan Gupta	Promoter Group
6.	Shri Ashok Kumar Gupta	Promoter Group

**For & on behalf of Promoters/ Promoter Group
/ Person Acting in Concert (PAC)
of APL Apollo Tubes Limited**


Vinay Gupta
Managing Director
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