



To,

Date: 21<sup>st</sup> November 2011**Bombay Stock Exchange Ltd.**

Phiroze Jeejeebhoy Towers

Dalal Street

Mumbai -400001

Annexure-A

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

1. Name of the Target Company (TC)	<b>APL Apollo Tubes Limited</b>		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	<b>Religare Finvest Ltd</b>		
3. Whether the acquirer belongs To Promoter/Promoter group	NO		
4. Name(s) of the Stock exchange(s) where the shares of TC are Listed	BOMBAY STOCK EXCHANGE		
5. Details of the acquisition of shares/voting rights/holding of the Acquirer and PAC	Number	% w.r.t. total share/voting Capital wherever applicable	% w.r.t. total diluted share / voting capital of the TC (*)
Before the acquisition under consideration, holding of :			
a) Shares carrying voting rights	NIL	NIL	NIL
b) Voting rights (VR) otherwise than by equity shares	NIL	NIL	NIL
c) Warrants/convertible securities / any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	NIL	NIL	NIL
Total (a + b + c)	-	-	-
Details of acquisition			
a) Shares carrying voting rights acquired	17,00,000	8.38%	8.38%
b) VRs acquired otherwise than by equity shares	NIL	NIL	NIL
c) Warrants/convertible securities / any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired	NIL	NIL	NIL
Total (a + b + c)	17,00,000	8.38%	8.38%

After the acquisition, holding of: a) Shares carrying voting rights	17,00,000	8.38%	8.38%
b) VRs otherwise than by equity shares	NIL NIL	NIL NIL	NIL NIL
c) Warrants / convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition			
<b>Total (a + b + c)</b>	<b>17,00,000</b>	<b>8.38%</b>	<b>8.38%</b>
6. Mode of acquisition (e.g. Open market / public issue / rights issue / preferential allotment / inter - se transfer, etc.)	Shares offered as part of collateral/ encumbrances created in consideration of borrowings by various clients.		
7. Date of acquisition of/ date of receipt of intimation of allotment of shares / VR / warrants / convertible securities / any instrument that entitles the acquirer to receive shares in the TC.	19 <sup>th</sup> November 2011		
8. Equity share capital / total voting capital of the TC before the said acquisition	<b>20,296,683</b> Equity shares of Rs.10 each		
9. Equity share capital/ total voting capital of the TC after the said acquisition	<b>20,296,683</b> Equity shares of Rs.10 each		
10. Total diluted share/voting capital of the TC after the said acquisition	<b>20,296,683</b> Equity shares of Rs.10 each		

Note:

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

**For Religare Finvest Limited**

  
 Ankur Gupta  
 (Authorized Signatory)

Place: Noida  
 Date: 21<sup>st</sup> November 2011