

From: Maithili N. Desai
Gitanjali Gardens, 7th Floor,
68-E, Nepean Sea Road,
Rungta Lane,
Mumbai - 400 006.

1st April, 2021

To,

- 1. BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
- 2. National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
- 3. Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

I, the undersigned, being a Promoter of the Target Company, declare that I, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,

Maithili N Desai
(Maithili N. Desai)
Apar Industries Limited
Promoter

From: Kushal N. Desai
Gitanjali Gardens, 8th Floor,
68-E, Nepean Sea Road,
Rungta Lane,
Mumbai - 400 006.

1st April, 2021

To,

- 1. BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
- 2. National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
- 3. Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

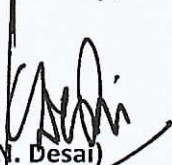
Dear Sirs,

I, the undersigned, being a Promoter – Chairman & Managing Director and KMP of the Target Company, declare that I, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,



(Kushal N. Desai)

(DIN : 00008084)

Apar Industries Limited

Promoter - Chairman & Managing Director and KMP

From : Chaitanya N. Desai
Gitanjali Gardens, 6th Floor,
68-E, Nepean Sea Road,
Rungta Lane,
Mumbai - 400 006.

1st April, 2021

To,

- 1. BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
- 2. National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
- 3. Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

I, the undersigned, being a Promoter – Managing Director and KMP of the Target Company, declare that I, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,



(C. N. Desai)
(DIN : 00008091)
Apar Industries Limited
Promoter - Managing Director and KMP

From: Noopur K. Desai
Gitanjali Gardens, 8th Floor,
68-E, Nepean Sea Road,
Rungta Lane,
Mumbai - 400 006.

1st April, 2021

To,

1. **BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
2. **National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
3. **Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

I, the undersigned, being a Promoter of the Target Company, declare that I, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,



(Noopur K. Desai)
Apar Industries Ltd.
Promoter

From: Jinisha C. Desai
Gitanjali Gardens, 6th Floor,
68-E, Nepean Sea Road,
Rungta Lane,
Mumbai - 400 006.

1st April, 2021

To,

- 1. BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
- 2. National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
- 3. Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

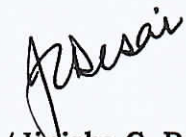
Dear Sirs,

I, the undersigned, being a Promoter of the Target Company, declare that I, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,



(Jinisha C. Desai)
Apar Industries Ltd.
Promoter

From : Rishabh K. Desai
Boulevard Point Tower, Flat No.3503,
Sheikh Mohammed Bin Rashid BLVD,
Downtown,
Dubai, UAE - 42180

1st April, 2021

To,

1. **BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
2. **National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
3. **Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

I, the undersigned, being a Promoter-Director (Non-Executive & Non Independent) of the Target Company, declare that I, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,



(Rishabh K. Desai)
(DIN : 08444660)
Apar Industries Ltd.
Promoter-Director
(Non-Executive & Non Independent)

From: Gaurangi K. Desai
Gitanjali Gardens, 8th Floor,
68-E, Nepean Sea Road,
Rungta Lane,
Mumbai - 400 006.

1st April, 2021

To,

- 1. BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
- 2. National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
- 3. Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

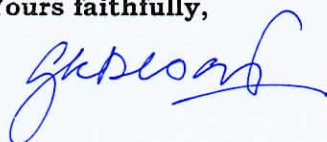
Dear Sirs,

I, the undersigned, being a Promoter of the Target Company, declare that I, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,



(Gaurangi K. Desai)
Apar Industries Ltd.
Promoter

From: Devharsh C. Desai
Gitanjali Gardens, 6th Floor,
68-E, Nepean Sea Road,
Rungta Lane,
Mumbai - 400 006.

1st April, 2021

To,

- 1. BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
- 2. National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
- 3. Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

I, the undersigned, being a Promoter of the Target Company, declare that I, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,

For & on behalf of Devharsh C. Desai
Promoter – Apar Industries Ltd.



Chaitanya N. Desai
(Constituted Attorney)

ACPL/Reg. 31(4)/2021

1st April, 2021

To,

1. **BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
2. **National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
3. **Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

We, the undersigned, being a Promoter of the Target Company, declare that we, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,
For Apar Corporation Private Limited (Promoter)



Chaitanya N. Desai
(Director)
DIN : 00008091

MAITHILI TRUSTEESHIP SERVICES PRIVATE LIMITED

(COMPANY LIMITED BY GUARANTEE AND NOT HAVING SHARE CAPITAL)

MTSPL/Reg. 31(4)/2021

1st April, 2021

To,

1. **BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
2. **National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
3. **Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

We, the undersigned, being a Promoter of the Target Company, declare that we, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,

For Maithili Trusteeship Services Private Limited (Promoter)

Chaitanya N. Desai
(Director)
DIN : 00008091

Kushal N. Desai Family Private Trust

**Primary Office Address : Flat no. 801, "Gitanjali Gardens", 68-E, Nepean Sea Road,
Rungta Lane, Mumbai – 400006, Maharashtra, India.**

KND Fly Pvt. Trust/Reg. 31(4)/2020

1st April, 2021

To,

- 1. BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
- 2. National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
"Exchange Plaza"
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
- 3. Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

**Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and
Takeovers) Regulations, 2011, as amended from time to time.**

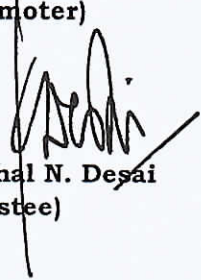
Dear Sirs,

We, the undersigned, being a Promoter of the Target Company, declare that we, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

**Yours faithfully,
For Kushal N. Desai Family Private Trust
(Promoter)**


**Kushal N. Desai
(Trustee)**

Chaitanya N. Desai Family Private Trust

**Primary Office Address : Flat no. 601, "Gitanjali Gardens", 68-E, Nepean Sea Road,
Rungta Lane, Mumbai – 400006, Maharashtra, India.**

CND Fly Pvt. Trust/Reg. 31(4)/2020

1st April, 2021

To,

- 1. BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
- 2. National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
"Exchange Plaza"
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
- 3. Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

**Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and
Takeovers) Regulations, 2011, as amended from time to time.**

Dear Sirs,

We, the undersigned, being a Promoter of the Target Company, declare that we, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,

**For Chaitanya N. Desai Family Private Trust
(Promoter)**



**Chaitanya N. Desai
(Trustee)**

Maithili N. Desai Family Private Trust

Primary Office Address : Apar House, Building No.5,
Corporate Park, Sion-Trombay Road,
Chembur, Mumbai – 400071, Maharashtra, India.

MND Fly Pvt. Trust/Reg. 31(4)/2020

1st April, 2021

To,

1. **BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
2. **National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
3. **Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

We, the undersigned, being a Promoter of the Target Company, declare that we, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,

For Maithili N. Desai Family Private Trust
(Promoter)



Chaitanya N. Desai
(Trustee)

Maithili N. Desai Family Private Trust No. 2

Primary Office Address : Apar House, Building No.5,
Corporate Park, Sion-Trombay Road,
Chembur, Mumbai – 400071, Maharashtra, India.

MND Fly Pvt. Trust No. 2/Reg. 31(4)/2020

1st April, 2021

To,

1. **BSE Limited (BSE)**
(Scrip Code : 532259)
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001.
2. **National Stock Exchange of India Limited (NSE)**
(Scrip Symbol : APARINDS)
“Exchange Plaza”
Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051.
3. **Apar Industries Limited (Target Company)**
Audit Committee of Board of Directors
301, Panorama Complex,
R. C. Dutt Road,
Vadodara – 390 007.

Sub. : Declaration under Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.

Dear Sirs,

We, the undersigned, being a Promoter of the Target Company, declare that we, along with persons acting in concert, have not made any encumbrance of shares of the Company, directly or indirectly, during the Financial Year ended on 31st March, 2021 (2020-2021).

Please take on record the above disclosure.

Thanking You,

Yours faithfully,
For Maithili N. Desai Family Private Trust No. 2
(Promoter)



(Trustee)
Maithili Trusteeship Services Private Limited