

**Dr. Kailash S. Choudhari**

**C-65, First Floor,  
Anand Niketan, Chanakya puri,  
New Delhi-110021**

January 25, 2021

To  
The Compliance Team  
**Aksh Optifibre Limited**  
F-1080, RIICO Industrial Area,  
Phase-III, Bhiwadi,  
Rajasthan-301019

**Sub: Disclosure in terms of Regulation 31(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011**

Dear Sir,

I, hereby inform you that SEBI has issued a Notice of Demand to Aksh Optifibre Limited ("Company") bearing Certificate No. RC 3148/2020 dated November 11, 2020 to deposit the amount of penalty of INR 10.15 Crores (Rupees Ten Crore Fifteen Lacs) along with interest in pursuant to the order of SEBI passed on February 28, 2020.

With respect to the said Demand Notice, I, Kailash S. Choudhari, being a Promoter of the Company submitted an undertaking with SEBI offering my 1,77,09,218 shares as a security lying in below mentioned Demat account with Alankit Assignments Limited till the appeal with respect to the above said SEBI order dated February 28, 2020 is pending.

<b>Name of Demat Holder</b>	Kailash Shantilal Choudhari
<b>Client ID</b>	11532573
<b>Quantity</b>	1,77,09,218
<b>Scrip Name</b>	Aksh Optifibre Limited
<b>DP ID</b>	IN300118
<b>ISIN</b>	INE523B01011

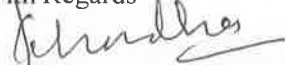
M/s Alankit Assignment Limited has sent an email dated January 22, 2021 to me for confirmation of freeze of Demat account.

I further inform that the SEBI SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated Aug 07, 2019 is not applicable on the above mentioned transaction.

In consideration of the above said transaction please find enclosed herewith the disclosure in terms of Regulation 31(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 2011, in the requisite format for your records and reference.

Thanking You

With Regards



**(Dr. Kailash S. Choudhari)**

Encl: As above

CC:

<b>National Stock Exchange of India Limited</b> Exchange Plaza, 5th Floor, Plot no. C/1, 'G' Block, Bandra- Kurla Complex, Bandra (E), Mumbai- 51.	<b>BSE Limited</b> Phiroze Jeejeebhoy Towers, Dalal Street Mumbai – 400 001.
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ANNEXURE - 1

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(IC) : Aksh Optifibre Limited

Names of the Stock Exchanges where the shares of the target Company are listed : NSE & BSE

Date of reporting : 25-Jan-21

Name of the Promoter or PAC on whose shares encumbrance has been created/released/invoked : Dr. Kailash S Choudhari

Details of the creation of encumbrance:

Name of the promoter (s) or PACs with him*	Promoter holding in the target company (1)		Promoter holding already encumbered (2)		(3) Details of events pertaining to encumbrance							Post event holding of encumbered shares	
	Number	% of Total Share Capital	Number	% of Total Share Capital	Type of event (creation/ release/ invocation)	Date of creation/ release/ invocation of encumbrance	Type of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	Reason for encumbrance **	Number	% of Total Capital	Name of the entity in whose favor shares encumbered ***	Number	% of Total Share Capital
Dr. Kailash S. Choudhari	20,205,678	12.42	-	-	Creation	20-Jan-21	Non-disposal Undertaking and Security towards SEBI penalty	Security towards SEBI penalty on Company till finalisation of appeal(s)	17,709,218	10.88	Securities and Exchange Board of India	17,709,218	10.88
PAC's													
Seema Choudhari	7,000,000	4.30	-	-	-	-	-	-	-	-	-	-	-
Rohan Choudhari	150,500	0.09	-	-	-	-	-	-	-	-	-	-	-
Rashi Choudhari	150,500	0.09	-	-	-	-	-	-	-	-	-	-	-
Shailesh Popatlal	6,901,723	4.24	-	-	-	-	-	-	-	-	-	-	-
Bha-ti Shailesh Sundesha	4,092,372	2.52	-	-	-	-	-	-	-	-	-	-	-
Sharda Popatlal Sundesha	6,969,562	4.28	-	-	-	-	-	-	-	-	-	-	-
Popatlal Fulchand	-	0.00	-	-	-	-	-	-	-	-	-	-	-

*Kailash S Choudhari*

Signature of Authorised Signatory

Dr. Kailash S Choudhari

Date:

Place:

\*The names of all the promoters, their shareholding in the target company and their pledged shareholding as on the reporting date should appear in the table irrespective of whether they are reporting on the date of event or not.

\*\* For example, for the purpose of collateral for loans taken by the company, personal borrowing, third party pledge, etc.

\*\*\* This would include name of both the lender and the trustee who may hold shares directly or on behalf of the lender