

<p>BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai- 400001</p>	<p>National Stock Exchange of India Limited – Corporate Office Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra(E), Mumbai – 400 051</p>	<p>Refex Holding Private Limited 2nd Floor, No.313, Refex Towers, Sterling Road, Valluvar Kottam High Road, Nungambakkam, Chennai, Tamil Nadu – 600034 E-mail: investor.relations@refex.co.in /cscompliance@refex.co.in</p>
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Dear Sir/Madam,

Sub: Disclosure pursuant to Regulation 29 (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Pursuant to the disclosure required to be made under Regulation 29 (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, please find attached the disclosure in respect of the Pledged shares of “**REFEX HOLDING PRIVATE LIMITED**” in favor of “**Catalyst Trusteeship Limited**” in the capacity of Debenture Trustee for the benefit of Debenture Holders.

**For Catalyst Trusteeship Limited
(Formerly known as GDA Trusteeship Ltd)**

Authorised Signatory

Name: Deesha Srikanth

Designation: Senior Vice President

Place: Mumbai

Part A
Annexure

Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Part- A – Details of Acquisition

1. Name of the Target Company (TC)	Reflex Industries Limited		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Pledge of Equity shares of Reflex Industries Limited with Catalyst Trusteeship Ltd acting as Debenture Trustee on behalf of Debenture Holders.		
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	BSE Limited National Stock Exchange of India Limited		
5. Details of the acquisition as follows	Number	% w.r.t. total share/voting capital wherever applicable	% w.r.t. total diluted share/voting capital of the TC(*)
<u>Before the acquisition under consideration, holding of acquirer along with PACs of:</u>			
a) Shares carrying voting rights			
b) Shares in nature of encumbrance (pledge/ lien/non-disposal undertaking/others)	1,29,28,061	9.43	8.58%
c) Voting rights (VR) otherwise than by shares			
d) Warrants/convertible securities/ any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)			
e) Total (a+b+c+d)	1,29,28,061	9.43	8.58%
<u>Details of acquisition:</u>			
a) Shares carrying voting rights acquired/ sold			
b) VRs acquired/sold otherwise than by shares			
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/sold			
d) Shares in nature of encumbrance (pledge/ lien/non-disposal undertaking/others)	45,19,856	3.30	3.00
e) Total (a+b+c+d)	45,19,856	3.30	3.00
<u>After the acquisition, holding of acquirer along with PACs of :</u>			
a) Shares carrying voting rights			
b) Shares encumbered with the acquirer (pledge/ lien/non-disposal undertaking/others)	1,74,47,917	12.73	11.58
c) VRs otherwise than by shares			
d) 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.			
e) Total (a+b+c+d)	1,74,47,917	12.73	11.58

CATALYST TRUSTEESHIP LIMITED

Registered Office : GDA House, Plot No. 85, Bhusari Colony (Right), Paud Road, Pune - 411 038 Tel : +91 (20) 6680 7200
Delhi Office : 910-911, 9th Floor, Kailash Building, 26 Kasturba Gandhi Marg, New Delhi - 110 001 Tel : +91 (11) 4302 9101/02
Corporate Office : 901, 9th Floor, Tower-B, Peninsula Business Park, Senapati Bapat Marg, Lower Parel (W), Mumbai - 400013
Tel : +91 (22) 4922 0555 Fax : +91 (22) 4922 0505
CIN No. U74999PN1997PLC110262 Email : dt@ctitrustee.com Website : www.catalysttrustee.com

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6. Mode of acquisition (e.g. open market / public Shares in nature of encumbrance issue / rights issue / preferential allotment / inter se transfer etc.)	By way of pledge of equity shares
7. Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	16 th January, 2026
8. Equity share capital /total voting capital of the TC before the said acquisition/ sale	INR 27,42,59,064 divided into 13,71,29,532 equity shares of INR 2 each
9. Equity share capital/ total voting capital of the TC after the said acquisition/ sale	INR 27,42,59,064 divided into 13,71,29,532 equity shares of INR 2 each
10. Total diluted share/voting capital of the TC after the said acquisition/sale.	INR 30,11,59,136 divided into #15,05,79,568 equity shares of INR 2 each

Calculated including the outstanding ESOP Grants.

Signature of the acquirer:
For Catalyst Trusteeship Limited
(Formerly known as GDA Trusteeship Ltd)

Authorised Signatory
Name: Deesha Srikanth
Designation: Senior Vice President
Place: Mumbai

Date: 20th January 2026

Note:

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the

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