

☒ **National Stock Exchange of India Limited**

Exchange Plaza,
Bandra Kurla Complex,
Bandra (East),
Mumbai 400 051

☒ **BSE Limited**

Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai 400 001

The Company Secretary

Summit Securities Limited,
213, Bezzola Complex, B Wing,
71, Sion-Trombay Road,
Chembur, Mumbai - 400071

Re: Security Code: 533306; Security ID/Symbol: SUMMITSEC

Sub: Disclosure under Regulation 30(2) and Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011.

Dear Sir / Madam,

Pursuant to provisions of Regulation 30(2) of the Securities and Exchange Board of India (SEBI) (Substantial Acquisition of Shares and Takeover) Regulations, 2011, I disclose herewith the number of shares and voting rights held by me as promoter along with persons acting in concert, in Summit Securities Limited as on March 31, 2020.

Disclosure under Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011:

PART-A – Details of Shareholding:

1.	Name of the Target Company (TC)	Summit Securities Limited
2.	Name(s) of the stock exchange(s) where the shares of the TC are listed	NSE- National Stock Exchange of India Limited; BSE- BSE Limited
3.	Particulars of the shareholder(s):	
a.	Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.	N.A
	Or	
b.	Name(s) of promoter(s), member of the promoter group and PAC with him.	As per Annexure A

4.	Particulars of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t total share/ voting capital wherever applicable	% of total diluted share/ voting capital of TC(*)
ii	As of March 31 st of the year, holding of:			
	a) Shares	As per Annexure A		
	b) Voting Rights (otherwise than by shares)	-	-	-
	c) Warrants,	-	-	-
	d) Convertible Securities	-	-	-
	e) Any other instrument that would entitle the holder to receive shares in the TC.	-	-	-
	TOTAL	81,37,866	74.65%	74.65%

PART-B (**)

Name of the Target Company:		Summit Securities Limited	
Sr. No.	Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/ Promoter group	PAN of the person and PAC's
1.	Late Shri Rama Prasad Goenka	YES	
2.	Swallow Associates LLP (#)***	YES	
3.	STEL Holdings Limited***	YES	
4.	Carniwal Investments Limited***	YES	
5.	Sofreal Mercantrade Pvt Ltd***	YES	
6.	Ektara Enterprises LLP***	YES	
7.	Chattarpati Apartments LLP***	YES	
8.	Vayu Udaan Aircraft LLP***	YES	
9.	Malabar Coastal Holdings LLP***	YES	
10.	Atlantus Dwellings And Infrastructure LLP***	YES	
11.	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)***	YES	
12.	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)***	YES	
13.	Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)***	YES	
14.	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)***	YES	
15.	Harsh Vardhan Goenka (Trustee of Secura India Trust)***	YES	
16.	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)***	YES	
17.	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)***	YES	

HARSH VARDHAN GOENKA

Unit No. 208, 2nd Floor,
Bezzola Complex, B
Wing, Sion Trombay
Road, Opp. Suman
Nagar, Chembur,
Mumbai – 400071

18.	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)***	YES	
19.	Harshvardhan Ramprasad Goenka (Karta of Harsh Anant Goenka HUF)***	YES	
20.	Anant Vardhan Goenka (Trustee of AVG Family Trust)***	YES	
21.	Anant Vardhan Goenka (Trustee of RG Family Trust)***	YES	
22.	Harsh Vardhan Goenka***	YES	
23.	Anant Vardhan Goenka***	YES	
24.	Mala Goenka***	YES	
25.	Radha Anant Goenka***	YES	

Notes:

1. In case of promoter(s) making disclosure under Regulation 30(2), no additional disclosure under Regulation 30(1) is required.

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

(**) Part B shall be disclosed to Stock Exchange but shall not be disseminated.

(***) Holding of the promoter group entity from serial nos. 2-25 is also being disclosed separately.

(#) Out of 76,22,815 shares 2,285 shares are held in the name of Jubilee Investments and Industries Limited ('JIIL'). JIIL merged with RPG Cellular Investments and Holdings Private Limited ('RCHIPL') pursuant to the scheme of amalgamation between RCHIPL, KTL Industrial Finance Company Limited, Kocilim Breweries Private Limited, Yield investments Private limited and JIIL with RCHIPL duly sanctioned by Honorable High Court of Calcutta on June 11, 2009. RCHIPL merged with Swallow Associates Limited (SAL) pursuant to the Scheme of Amalgamation and Arrangement between SAL and Blue Niles Holding Limited, South Asia Electricity Holdings Limited, Kestrel Investments Limited, Petrochem International Limited and RCHIPL duly sanctioned by the Honorable High Court of Judicature at Bombay w.e.f March 27, 2012. Further, SAL has been converted into a Limited Liability Partnership with effect from October 31, 2012 and now is known as Swallow Associates LLP.

Declaration under Regulation 31(4)

Pursuant to Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011, I hereby confirm that I have not made any encumbrance, directly or indirectly during the financial year ended March 31, 2020. As regards other constituent(s) of the promoter group and person acting in concert (identified in serial nos. 2-25 of Annexure A), a separate declaration will be furnished by them.

Thanking you,

Yours faithfully,

(On behalf of Late Shri Rama Prasad Goenka without specifying ownership)

.....
Harsh Vardhan Goenka
Place: Mumbai
Date: 19.05.2020

Annexure A

Name(s) and Detail(s) of shareholding of Promoter(s), member of the promoter group and Persons Acting in Concert as at March 31, 2020.

Sr. No.	Name(s) and Detail(s) of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t total share/ voting capital wherever applicable	% of total diluted share/voting capital of Target Company (*)
1	Late Shri Rama Prasad Goenka	211	0.00	0.00
2	Swallow Associates LLP#***	76,93,928	70.57	70.57
3	STEL Holdings Limited***	69,815	0.64	0.64
4	Carniwal Investments Limited***	3,54,159	3.25	3.25
5	Sofreal Mercantrade Pvt Ltd***	10	0.00	0.00
6	Ektara Enterprises LLP***	10	0.00	0.00
7	Chattarpati Apartments LLP***	10	0.00	0.00
8	Vayu Udaan Aircraft LLP***	10	0.00	0.00
9	Malabar Coastal Holdings LLP***	10	0.00	0.00
10	Atlantus Dwellings And Infrastructure LLP***	10	0.00	0.00
11	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)***	16,157	0.15	0.15
12	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)***	1	0.00	0.00
13	Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)***	1	0.00	0.00
14	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)***	1	0.00	0.00
15	Harsh Vardhan Goenka (Trustee of Secura India Trust)***	1	0.00	0.00
16	Harsh Vardhan Goenka (Trustee of Prism Estates Trust) ***	1	0.00	0.00
17	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)***	10	0.00	0.00
18	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)***	10	0.00	0.00
19	Harshvardhan Ramprasad Goenka (Karta of Harsh Anant Goenka HUF)***	653	0.01	0.01
20	Anant Vardhan Goenka (Trustee of AVG Family Trust)***	10	0.00	0.00
21	Anant Vardhan Goenka (Trustee of RG Family Trust)***	10	0.00	0.00
22	Harsh Vardhan Goenka***	1,500	0.01	0.01
23	Anant Vardhan Goenka***	1,318	0.01	0.01
24	Mala Goenka***	10	0.00	0.00
25	Radha Anant Goenka***	10	0.00	0.00
Total		81,37,866	74.65	74.65

(***) Holding of the promoter group entity(ies) identified from serial nos. 2-25 will also be disclosed by them.

SWALLOW ASSOCIATES LLP

Regd. Office: 463, Dr. Annie Besant Road, Worli, Mumbai 400 030

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Email: swallowassociatesllp@gmail.com

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Dear Sir / Madam,

Pursuant to provisions of Regulation 30(2) of the Securities and Exchange Board of India (SEBI) (Substantial Acquisition of Shares and Takeover) Regulations, 2011, we disclose herewith the number of shares and voting rights held by persons forming part of the promoter group along with persons acting in concert, in Summit Securities Limited as on March 31, 2020.

Disclosure under Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011:

PART- A – Details of Shareholding:

1.	Name of the Target Company (TC)	Summit Securities Limited		
2.	Name(s) of the stock exchange(s) where the shares of the TC are listed	NSE- National Stock Exchange of India Limited; BSE- BSE Limited		
3.	Particulars of the shareholder(s):	N.A		
a.	Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.			
	Or	As per Annexure A		
b.	Name(s) of promoter(s), member of the promoter group and PAC with him.			
4.	Particulars of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t total share/ voting capital	% of total diluted share/voting

LLPIN: AAB 1953

(A limited liability partnership registered under the LLP Act, 2008.)

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Email: swallowassociatesllp@gmail.com

			wherever applicable	capital of TC(*)
li	As of March 31 st of the year, holding of:			
	a) Shares	As per Annexure A		
	b) Voting Rights (otherwise than by shares)	-	-	-
	c) Warrants,	-	-	-
	d) Convertible Securities	-	-	-
	e) Any other instrument that would entitle the holder to receive shares in the TC.	-	-	-
	TOTAL	81,37,866	74.65%	74.65%

PART-B (**)

Name of the Target Company:		Summit Securities Limited	
Sr. No.	Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/ Promoter group	PAN of the person and PAC's
1.	Swallow Associates LLP (#)	YES	
2.	STEL Holdings Limited	YES	
3.	Carniwal Investments Limited	YES	
4.	Sofreal Mercantrade Pvt Ltd	YES	
5.	Ektara Enterprises LLP	YES	
6.	Chattarpati Apartments LLP	YES	
7.	Vayu Udaan Aircraft LLP	YES	
8.	Malabar Coastal Holdings LLP	YES	
9.	Atlantus Dwellings and Infrastructure LLP	YES	
10.	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	YES	
11.	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	YES	
12.	Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)	YES	
13.	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	YES	
14.	Harsh Vardhan Goenka (Trustee of Secura India Trust)	YES	
15.	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	YES	
16.	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	YES	
17.	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	YES	
18.	Harshvardhan Ramprasad Goenka (Karta of Harsh Anant Goenka HUF)	YES	
19.	Anant Vardhan Goenka (Trustee of AVG Family Trust)	YES	

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20.	Anant Vardhan Goenka (Trustee of RG Family Trust)	YES	
21.	Harsh Vardhan Goenka	YES	
22.	Anant Vardhan Goenka	YES	
23.	Mala Goenka	YES	
24.	Radha Anant Goenka	YES	
25.	Late Shri Rama Prasad Goenka***	YES	

Notes:

1. In case of promoter(s) making disclosure under Regulation 30(2), no additional disclosure under Regulation 30(1) is required.

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

(**) Part B shall be disclosed to Stock Exchange but shall not be disseminated.

(***) Holding of the promoter group entity from serial nos. 2-25 is also being disclosed separately.

(#) Out of 76,22,815 shares 2,285 shares are held in the name of Jubilee Investments and Industries Limited ('JIIL'). JIIL merged with RPG Cellular Investments and Holdings Private Limited ('RCHIPL') pursuant to the scheme of amalgamation between RCHIPL, KTL Industrial Finance Company Limited, Kocilim Breweries Private Limited, Yield investments Private limited and JIIL with RCIHPL duly sanctioned by Honorable High Court of Calcutta on June 11, 2009. RCIHPL merged with Swallow Associates Limited (SAL) pursuant to the Scheme of Amalgamation and Arrangement between SAL and Blue Niles Holding Limited, South Asia Electricity Holdings Limited, Kestrel Investments Limited, Petrochem International Limited and RCIHPL duly sanctioned by the Honorable High Court of Judicature at Bombay w.e.f March 27, 2012. Further, SAL has been converted into a Limited Liability Partnership with effect from October 31, 2012 and now is known as Swallow Associates LLP.

Declaration under Regulation 31(4)

Pursuant to Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011, we hereby confirm that none of promoter(s) alongwith persons acting in concert identified in serials nos. 1-24 (see above), have made any encumbrance, directly or indirectly during the financial year ended March 31, 2020. As regards other constituent of the promoter group and person acting in concert (identified as serial no. 25 of Annexure A), a separate declaration will be furnished.

Thanking you,

Yours faithfully,

On behalf of Promoter(s), member(s) of the promoter group and Persons Acting in Concert (as mentioned in Annexure A from serial no. 1 to 24)

S. Raguraman
Authorised Signatory
Swallow Associates LLP
Place: Mumbai
Date: 19.05.2020

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Annexure A

Name(s) and Detail(s) of shareholding of Promoter(s), member(s) of the promoter group and Persons Acting in Concert as at March 31, 2020.

Sr. No.	Name(s) and Detail(s) of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t total share/ voting capital wherever applicable	% of total diluted share/voting capital of Target Company (*)
1	Swallow Associates LLP	76,93,928	70.57	70.57
2	STEL Holdings Limited	69,815	0.64	0.64
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24	Radha Anant Goenka	10	0.00	0.00
25	Late Shri Rama Prasad Goenka***	211	0.00	0.00
Total		81,37,866	74.65	74.65

(***) Holding of the promoter group entity of serial no. 25 will also be disclosed separately.

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