

SWALLOW ASSOCIATES LLP

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

Tel No.: +91-22-25292152/54/55 Fax No: +91-22-25297423

Email: swallowassociatesllp@gmail.com

☒ **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: Disclosures 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, 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, 2021.

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 wherever applicable	% of total diluted share/voting capital of TC(*)
ii	As of March 31 st of the year, holding of:			

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		As per Annexure A		
a) Shares				
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
1.	Swallow Associates LLP (#)	YES
2.	STEL Holdings Limited	YES
3.	Carnival 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 Stellar Energy Trust)	YES
11.	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	YES
12.	Harsh Vardhan Goenka (Trustee of Secura India Trust)	YES
13.	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	YES
14.	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	YES
15.	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	YES
16.	Anant Vardhan Goenka (Trustee of AVG Family Trust)	YES
17.	Anant Vardhan Goenka (Trustee of RG Family Trust)	YES
18.	Harsh Vardhan Goenka	YES
19.	Anant Vardhan Goenka	YES
20.	Mala Goenka	YES
21.	Radha Anant Goenka	YES
22.	Rama Prasad Goenka***	YES

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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 of serial no. 22 is also being disclosed separately.

(#) Out of 76,93,928 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, 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, 2021. As regards other constituent of the promoter group and person acting in concert (identified as serial no. 22 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 21)



Mahesh Narayanaswamy

Authorised Signatory

Swallow Associates LLP

Place: Mumbai

Date: 06.04.2021

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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, 2021.

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
3	Carniwal Investments Limited	3,54,159	3.25	3.25
4	Sofreal Mercantrade Pvt Ltd	10	0.00	0.00
5	Ektara Enterprises LLP	10	0.00	0.00
6	Chattarpati Apartments LLP	10	0.00	0.00
7	Vayu Udaan Aircraft LLP	10	0.00	0.00
8	Malabar Coastal Holdings LLP	10	0.00	0.00
9	Atlantus Dwellings And Infrastructure LLP	10	0.00	0.00
10	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	1	0.00	0.00
11	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	1	0.00	0.00
12	Harsh Vardhan Goenka (Trustee of Secura India Trust)	1	0.00	0.00
13	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	1	0.00	0.00
14	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	10	0.00	0.00
15	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	10	0.00	0.00
16	Anant Vardhan Goenka (Trustee of AVG Family Trust)	10	0.00	0.00
17	Anant Vardhan Goenka (Trustee of RG Family Trust)	10	0.00	0.00
18	Harsh Vardhan Goenka	18,311	0.17	0.17
19	Anant Vardhan Goenka	1,318	0.01	0.01
20	Mala Goenka	10	0.00	0.00
21	Radha Anant Goenka	10	0.00	0.00
22	Rama Prasad Goenka***	211	0.00	0.00
Total		81,37,866	74.65	74.65

(#) Out of 76,93,928 shares 2,285 shares are held in the name of Jubilee Investments and Industries Limited ('JIIIL'). JIIIL 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 JIIIL 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.

(***) Holding of the promoter group entity of serial no. 22 is also being disclosed separately.