

# SWALLOW ASSOCIATES LLP

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

Tel No.: +91-22-49632787

Email: swallowassociatesllp@gmail.com

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**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 Audit Committee of the Board of Directors,**

CEAT Limited,  
463, Dr. Annie Besant Road,  
Worli, Mumbai 400 030

**Re: Security Code: 500878; Security ID/Symbol: CEATLTD**

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

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Dear Sir/Madam,

Pursuant to Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we hereby confirm that none of promoter(s) alongwith persons acting in concert (as mentioned in Annexure A), have made any encumbrance, directly or indirectly during the financial year ended March 31, 2024.

Kindly take the above information in your record(s).

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)

  
**Mahesh Narayanaswamy**  
**Authorised Signatory**  
**Swallow Associates LLP**

**Place: Mumbai**

**Date: 03.04.2024**

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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, 2024:

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	44,84,624	11.09	11.09
2	Instant Holdings Limited	1,19,35,260	29.51	29.51
3	Summit Securities Limited	10,46,248	2.59	2.59
4	Sofreal Mercantrade Private Ltd	10	0.00	0.00
5	STEL Holdings Limited	14,80,157	3.66	3.66
6	Chattarpati Apartments LLP	876	0.00	0.00
7	Atlantus Dwellings and Infrastructure LLP	10	0.00	0.00
8	Ektara Enterprises LLP	10	0.00	0.00
9	Malabar Coastal Holdings LLP	10	0.00	0.00
10	Vayu Udaan Aircraft LLP	10	0.00	0.00
11	Harsh Vardhan Goenka (Trustee of Secura India Trust)	2	0.00	0.00
12	Harsh Vardhan Goenka (Trustee of Nucleus Life 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	1,33,934	0.33	0.33
19	Anant Vardhan Goenka	14,185	0.04	0.04
20	Mala Goenka	10	0.00	0.00
21	Radha Anant Goenka	10	0.00	0.00
	<b>Total</b>	<b>1,90,95,398</b>	<b>47.21</b>	<b>47.21</b>