

# 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](mailto: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**

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

**Re: Security Code: 500878; Security ID/Symbol: CEAT LTD**

**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, 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 CEAT Limited as on March 31, 2021.

Format for 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)                                                                                                                                                                                                                                                                  | <b>CEAT Limited</b>                                                |
| 2. | Name(s) of the stock exchange(s) where the shares of the TC are listed                                                                                                                                                                                                                           | NSE- National Stock Exchange of India Limited;<br>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.                                                                                                                                                                                                                           | <b>As per Annexure A</b>                                           |

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| 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(*) |
|----|------------------------------------------------------------------------------------|--------------------------|---------------------------------------------------------|--------------------------------------------------|
|    | As of March 31 <sup>st</sup> of the year, holding of :                             |                          |                                                         |                                                  |
|    | a) Shares                                                                          | <b>As per Annexure A</b> |                                                         |                                                  |
|    | 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. | -                        | -                                                       | -                                                |
|    | <b>TOTAL</b>                                                                       | <b>1,89,40,298</b>       | <b>46.82</b>                                            | <b>46.82</b>                                     |

## PART-B (\*\*)

| Name of the Target Company: |                                                                           | CEAT 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                           | Instant Holdings Limited                                                  | YES                                                    |                             |
| 3                           | Summit Securities Limited                                                 | YES                                                    |                             |
| 4                           | Sudarshan Electronics & T.V. Limited                                      | YES                                                    |                             |
| 5                           | Sofreal Mercantrade Pvt Ltd                                               | YES                                                    |                             |
| 6                           | STEL Holdings Limited                                                     | YES                                                    |                             |
| 7                           | Chattarpati Apartments LLP                                                | YES                                                    |                             |
| 8                           | Atlantus Dwellings and Infrastructure LLP                                 | YES                                                    |                             |
| 9                           | Ektara Enterprises LLP                                                    | YES                                                    |                             |
| 10                          | Malabar Coastal Holdings LLP                                              | YES                                                    |                             |
| 11                          | Vayu Udaan Aircraft LLP                                                   | YES                                                    |                             |
| 12                          | Harsh Vardhan Goenka (Trustee of Secura India Trust)                      | YES                                                    |                             |
| 13                          | Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)                      | YES                                                    |                             |
| 14                          | Harsh Vardhan Goenka (Trustee of Stellar Energy 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                                                    |                             |

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|    |                                                    |     |
|----|----------------------------------------------------|-----|
| 18 | Anant Vardhan Goenka (Trustee of AVG Family Trust) | YES |
| 19 | Anant Vardhan Goenka (Trustee of RG Family Trust)  | YES |
| 20 | Harsh Vardhan Goenka                               | YES |
| 21 | Anant Vardhan Goenka                               | YES |
| 22 | Mala Goenka                                        | YES |
| 23 | 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.

## 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 (as mentioned in Annexure A), have made any encumbrance directly or indirectly during the financial year ended March 31, 2021.

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: 07.04.2021**

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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                                                        | 44,84,624          | 11.09                                                   | 11.09                                                         |
| 2       | Instant Holdings Limited                                                      | 1,18,53,559        | 29.30                                                   | 29.30                                                         |
| 3       | Summit Securities Limited                                                     | 10,36,248          | 2.56                                                    | 2.56                                                          |
| 4       | Sudarshan Electronics & T.V. Limited                                          | 1                  | 0.00                                                    | 0.00                                                          |
| 5       | Sofreal Mercantrade Pvt Ltd                                                   | 10                 | 0.00                                                    | 0.00                                                          |
| 6       | STEL Holdings Limited                                                         | 14,16,757          | 3.50                                                    | 3.50                                                          |
| 7       | Chattarpati Apartments LLP                                                    | 876                | 0.00                                                    | 0.00                                                          |
| 8       | Atlantus Dwellings and Infrastructure LLP                                     | 10                 | 0.00                                                    | 0.00                                                          |
| 9       | Ektara Enterprises LLP                                                        | 10                 | 0.00                                                    | 0.00                                                          |
| 10      | Malabar Coastal Holdings LLP                                                  | 10                 | 0.00                                                    | 0.00                                                          |
| 11      | Vayu Udaan Aircraft LLP                                                       | 10                 | 0.00                                                    | 0.00                                                          |
| 12      | Harsh Vardhan Goenka (Trustee of Secura India Trust)                          | 1                  | 0.00                                                    | 0.00                                                          |
| 13      | Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)                          | 1                  | 0.00                                                    | 0.00                                                          |
| 14      | Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)                        | 1                  | 0.00                                                    | 0.00                                                          |
| 15      | Harsh Vardhan Goenka (Trustee of Prism Estates Trust)                         | 1                  | 0.00                                                    | 0.00                                                          |
| 16      | Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)                         | 10                 | 0.00                                                    | 0.00                                                          |
| 17      | Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)                          | 10                 | 0.00                                                    | 0.00                                                          |
| 18      | Anant Vardhan Goenka (Trustee of AVG Family Trust)                            | 10                 | 0.00                                                    | 0.00                                                          |
| 19      | Anant Vardhan Goenka (Trustee of RG Family Trust)                             | 10                 | 0.00                                                    | 0.00                                                          |
| 20      | Harsh Vardhan Goenka                                                          | 1,33,934           | 0.33                                                    | 0.33                                                          |
| 21      | Anant Vardhan Goenka                                                          | 14,185             | 0.04                                                    | 0.04                                                          |
| 22      | Mala Goenka                                                                   | 10                 | 0.00                                                    | 0.00                                                          |
| 23      | Radha Anant Goenka                                                            | 10                 | 0.00                                                    | 0.00                                                          |
|         | <b>Total</b>                                                                  | <b>1,89,40,298</b> | <b>46.82</b>                                            | <b>46.82</b>                                                  |