

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

SCEAT 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, 2020.

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)	CEAT 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

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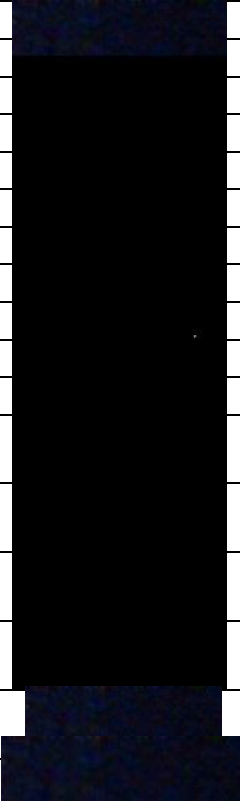
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4.	Particulars of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t total share/ voting capital wherever applicable	% of total diluted share/voting capital of TC(*)
	As of March 31 st of the year, holding of :			
	a) Shares	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	1,88,85,245	46.69	46.69

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 Crystal India Tech Trust)	YES	
14.	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	YES	
15.	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	YES	
16.	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	YES	
17.	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	YES	

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18.	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	YES	
19.	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	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.

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, 2020.

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)

S. Raguraman
Authorised Signatory
Swallow Associates LLP
Place: Mumbai
Date: 18.05.2020

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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	44,84,624	11.09	11.09
2	Instant Holdings Limited	1,18,20,524	29.22	29.22
3	Summit Securities Limited	10,14,230	2.51	2.51
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 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 Stellar Energy Trust)	1	0.00	0.00
16	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	1	0.00	0.00
17	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	1	0.00	0.00
18	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	10	0.00	0.00
19	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	10	0.00	0.00
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	1,33,932	0.33	0.33
23	Anant Vardhan Goenka	14,185	0.04	0.04
24	Mala Goenka	10	0.00	0.00
25	Radha Anant Goenka	10	0.00	0.00
	Total	1,88,85,245	46.69	46.69