

# 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 the Directors,**

KEC International Limited,  
RPG House, 463  
Dr. Annie Besant Road,  
Worli, Mumbai-400030

**Re: Security Code: 532714; Security ID/Symbol: KEC**

**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**

LLPIN: AAB 1953

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

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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 shareholding of Promoter(s), member(s) of the promoter group and Persons Acting in Concert	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	6,77,56,616	26.36	26.36
2	Summit Securities Limited	2,81,71,543	10.96	10.96
3	Instant Holdings Limited	2,22,99,165	8.67	8.67
4	Sofreal Mercantrade Pvt Ltd	10	0.00	0.00
5	Stel Holdings Limited	50,11,891	1.95	1.95
6	Carniwal Investments Limited	29,70,981	1.16	1.16
7	RPG Ventures Limited	2,84,950	0.11	0.11
8	Chattarpati Apartments LLP	17,90,785	0.70	0.70
9	Atlantus Dwellings & Infrastructure 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	Ektara Enterprises LLP	10	0.00	0.00
13	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	1	0.00	0.00
14	Harsh Vardhan Goenka (Trustee of Secura India Trust)	101	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	50,42,917	1.96	1.96
21	Mala Goenka	50	0.00	0.00
22	Anant Vardhan Goenka	40,000	0.02	0.02
23	Radha Anant Goenka	10	0.00	0.00
	<b>Total</b>	<b>13,33,69,101</b>	<b>51.88</b>	<b>51.88</b>

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