

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

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

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

Dear Sir/Madam,

Sub: Disclosures under Regulation 30(2) and Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011.

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 KEC International Limited as on March 31, 2020.

Disclosure under Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011:

1.	Name of the Target Company (TC)	KEC International 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. Or b. Name(s) of promoter(s), member of the promoter group and PAC with him.	N.A As per Annexure A		
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

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				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	13,28,23,907	51.66	51.66

PART-B (**)

Name of the Target Company:		KEC International 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	AOC505011B
2.	Summit Securities Limited	YES	
3.	Instant Holdings Limited	YES	
4.	Sudarshan Electronics & T.V. Limited	YES	
5.	Sofreal Mercantrade Pvt Ltd	YES	
6.	Stel Holdings Limited	YES	
7.	Carniwal Investments Limited	YES	
8.	RPG Ventures Limited	YES	
9.	Chattarpati Apartments LLP	YES	
10.	Atlantus Dwellings & Infrastructure LLP	YES	
11.	Malabar Coastal Holdings LLP	YES	
12.	Vayu Udaan Aircraft LLP	YES	
13.	Ektara Enterprises LLP	YES	
14.	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	YES	
15.	Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)	YES	
16.	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	YES	
17.	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	YES	
18.	Harsh Vardhan Goenka (Trustee of Secura India Trust)	YES	
19.	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	YES	
20.	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	YES	
21.	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	YES	
22.	Harsh Anant Goenka HUF (#)	YES	
23.	Anant Vardhan Goenka (Trustee of AVG Family Trust)	YES	

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24.	Anant Vardhan Goenka (Trustee of RG Family Trust)	YES	
25.	Harsh Vardhan Goenka	YES	
26.	Mala Goenka	YES	
27.	Anant Vardhan Goenka	YES	
28.	Radha 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.

(#) 1,69,500 equity shares are held by Mr. Harsh Vardhan Goenka as the Karta of Harsh Anant Goenka HUF

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, 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	6,77,56,616	26.36	26.36
2	Summit Securities Limited	2,79,10,754	10.86	10.86
3	Instant Holdings Limited	2,20,14,759	8.56	8.56
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	50,11,891	1.95	1.95
7	Carnival Investments Limited	29,70,981	1.16	1.16
8	RPG Ventures Limited	2,84,950	0.11	0.11
9	Chattarpati Apartments LLP	17,90,785	0.70	0.7
10	Atlantus Dwellings & Infrastructure LLP	10	0.00	0.00
11	Malabar Coastal Holdings LLP	10	0.00	0.00
12	Vayu Udaan Aircraft LLP	10	0.00	0.00
13	Ektara Enterprises LLP	10	0.00	0.00
14	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	100	0.00	0.00
15	Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)	24,991	0.01	0.01
16	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	1	0.00	0.00
17	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	1	0.00	0.00
18	Harsh Vardhan Goenka (Trustee of Secura India Trust)	1	0.00	0.00
19	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	1	0.00	0.00
20	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	10	0.00	0.00
21	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	10	0.00	0.00
22	Harsh Anant Goenka HUF (#)	1,69,500	0.07	0.07
23	Anant Vardhan Goenka (Trustee of AVG Family Trust)	10	0.00	0.00
24	Anant Vardhan Goenka (Trustee of RG Family Trust)	10	0.00	0.00
25	Harsh Vardhan Goenka	48,48,425	1.89	1.89
26	Mala Goenka	50	0.00	0.00
27	Anant Vardhan Goenka	40,000	0.02	0.02
28	Radha Goenka	10	0.00	0.00
	Total	13,28,23,907	51.66	51.66

(#) 1,69,500 equity shares are held by Mr. Harsh Vardhan Goenka as the Karta of Harsh Anant Goenka HUF

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