

SWALLOW ASSOCIATES LLP

Regd. Office: 463, Dr. Annie Besant Road, Worli, Mumbai 400 030
Tel No.: +91-22-25292152/53/54 Fax No: +91-22-25297423

Ref: RPG/CORPSEC/ /2015-16

March 31, 2016

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
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Sub: Disclosure under Regulation 29(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Dear Sir,

Please find enclosed herewith the disclosure by Swallow Associates LLP ('Swallow') under Regulation 29(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of the shares transferred off-market as an inter-se transfer from Mr. Suresh Mathew, Trustee of RIFL Benefit Trust ('RIFL') to Swallow, the beneficiary of RIFL upon its dissolution.

Kindly take the same on record and acknowledge receipt.

Thanking you,

Yours faithfully,
For Swallow Associates LLP


Suresh Mathew
Designated Partner
Encl: As above

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Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	Summit Securities Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Swallow Associates LLP Persons acting in concert with the Acquirer: 1. Rama Prasad Goenka 2. Anant Vardhan Goenka 3. Harsh Vardhan Goenka 4. Harsh Vardhan Goenka, Trustee of Monitor Portfolio Trust 5. Harsh Vardhan Goenka, Trustee of Crystal India Tech Trust 6. Harsh Vardhan Goenka, Trustee of Nucleus Life Trust 7. Harsh Vardhan Goenka, Trustee of Stellar Energy Trust 8. Suresh Mathew, Trustee of RIFL Benefit Trust 9. Carniwal Investments Limited 10. Jubilee Investments Industries Ltd # 11. RPG Cellular Investments and Holdings Pvt. Ltd. ## 12. STEL Holdings Limited		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Ltd. (NSE) and BSE Limited (BSE)		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share/voting capital of the TC (**)
<u>Before the acquisition under consideration, holding of :</u>			
(a) Shares carrying voting rights	73,58,085	67.49	67.49
(b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	-	-	-
(c) Voting rights (VR) otherwise than by equity shares	-	-	-
(d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	-	-	-
(e) Total (a+b+c+d)	73,58,085	67.49	67.49

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<u>Details of acquisition /sale:</u>			
(a) Shares carrying voting rights acquired/sold	2,45,455	2.25	2.25
(b) VRs acquired/sold otherwise than by shares	-	-	-
(c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold	-	-	-
(d) Shares encumbered/ invoked/ released by the acquirer	-	-	-
(e) Total (a+b+c+/-d)	2,45,455	2.25	2.25
<u>After the acquisition /sale, holding of:</u>			
(a) Shares carrying voting rights	76,03,540	69.75	69.75
(b) Shares encumbered with the acquirer	-	-	-
(c) VRs otherwise than by shares	-	-	-
(d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	-	-	-
(e) Total (a+b+c+d)	76,03,540	69.75	69.75
Mode of acquisition /sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Off Market <i>inter-se</i> transfer of shares from trustee to the beneficiary, who are both constituents of the promoter group of the Target Company, upon dissolution of the Trust.		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	March 30, 2016		
Equity share capital / total voting capital of the TC before the said acquisition /sale	No. of shares: 10901781 of face value Rs. 10/- each Amount: Rs. 10,90,17,810/-		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	No. of shares: 10901781 of face value Rs. 10/- each Amount: Rs. 10,90,17,810/-		
Total diluted share/voting capital of the TC after the said acquisition	There is no dilution of the share capital/voting capital of the TC as a result of the transaction.		

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(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Regulation 31 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

(#) Jubilee Investments & Industries Limited merged with RPG Cellular Investments and Holdings Private Limited (RCIHPL) pursuant to the Scheme of Amalgamation between RPG Communication & Holdings Private Limited, KTL Industrial Finance Company Limited, Kocilim Breweries Private Limited, Yield Investments Private Limited and Jubilee Investments & Industries Limited with RCIHPL duly sanctioned by the Honorable High Court of Calcutta on June 11, 2009. RCIHPL merged with Swallow Associates Limited (SAL) pursuant to the Scheme of Amalgamation and Arrangement between SAL and Blue Niles Holdings Limited, South Asia Electricity Holdings Limited, Kestrel Investments Limited, Petrochem International Limited and RCIHPL duly sanctioned by the Honorable High Court of Judicature at Bombay w.e.f. March 27, 2012. Further, SAL has been converted into a Limited Liability Partnership with effect from October 31, 2012 and is known as Swallow Associates LLP.

(# #) RPG Cellular Investments & Holdings Pvt. Ltd. merged with Swallow Associates Limited (SAL) pursuant to the Scheme of Amalgamation and Arrangement between SAL and Blue Niles Holdings Limited, South Asia Electricity Holdings Limited, Kestrel Investments Limited, Petrochem International Limited and RCIHPL duly sanctioned by the Honorable High Court of Judicature at Bombay w.e.f. March 27, 2012. Further, SAL has been converted into a Limited Liability Partnership with effect from October 31, 2012 and is known as Swallow Associates LLP.

For Swallow Associates LLP



Suresh Mathew

Designated Partner

Place: Mumbai

Date: 31.03.2016