

SWALLOW ASSOCIATES LLP

Regd. Office: 463, Dr. Annie Besant Road, Worli, Mumbai 400 030

Tel No.: +91-22-49632787

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 Audit Committee of the Board of Directors,

Summit Securities Limited,
213, Bezzola Complex, B Wing,
71, Sion-Trombay Road,
Chembur, Mumbai – 400071

Re: Security Code: 533306; Security ID/Symbol: SUMMITSEC

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

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

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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 (#)	76,93,928	70.57	70.57
2	STEL Holdings Limited	69,815	0.64	0.64
3	Carniwal Investments Limited	3,54,159	3.25	3.25
4	Sofreal Mercantrade Pvt Ltd	10	0.00	0.00
5	Ektara Enterprises LLP	10	0.00	0.00
6	Chattarpati Apartments LLP	10	0.00	0.00
7	Vayu Udaan Aircraft LLP	10	0.00	0.00
8	Malabar Coastal Holdings LLP	10	0.00	0.00
9	Atlantus Dwellings And Infrastructure LLP	10	0.00	0.00
10	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	1	0.00	0.00
11	Harsh Vardhan Goenka (Trustee of Secura India Trust)	2	0.00	0.00
12	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	1	0.00	0.00
13	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	10	0.00	0.00
14	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	10	0.00	0.00
15	Anant Vardhan Goenka (Trustee of AVG Family Trust)	10	0.00	0.00
16	Anant Vardhan Goenka (Trustee of RG Family Trust)	10	0.00	0.00
17	Harsh Vardhan Goenka	18,311	0.17	0.17
18	Anant Vardhan Goenka	1,318	0.01	0.01
19	Mala Goenka	10	0.00	0.00
20	Radha Anant Goenka	10	0.00	0.00
21	Late Rama Prasad Goenka	211	0.00	0.00
	Total	81,37,866	74.65	74.65

(#) Out of 76,93,928 shares 2,285 shares are held in the name of Jubilee Investments and Industries Limited ('JIIL'). JIIL merged with RPG Cellular Investments and Holdings Private Limited ('RCHIPL') pursuant to the scheme of amalgamation between RCHIPL, KTL Industrial Finance Company Limited, Kocilim Breweries Private Limited, Yield investments Private limited and JIIL with RCIHPL duly sanctioned by 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 Holding 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 had been converted into a Limited Liability Partnership with effect from October 31, 2012 and known as Swallow Associates LLP.