

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

Dear Sir,

Sub: Disclosure under Regulation 30(2) 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 held by us as promoters along with persons acting in concert with us in KEC International Limited as on March 31, 2019.

Format of disclosures 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)	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 Ltd. 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.	<ol style="list-style-type: none"> 1. Swallow Associates LLP 2. Summit Securities Limited 3. Instant Holdings Limited 4. Sudarshan Electronics & T.V. Limited 5. Sofreal Mercantrade Pvt Ltd 6. Stel Holdings Limited 7. Carniwal Investments Limited 8. Chattarpati Apartments LLP

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		9. Atlantus Dwellings & Infrastructure LLP 10. Malabar Coastal Holdings LLP 11. Vayu Udaan Aircraft LLP 12. Ektara Enterprises LLP 13. Harsh Vardhan Goenka (Trustee of Stellar Energy Trust) 14. Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust) 15. Harsh Vardhan Goenka (Trustee of Nucleus Life Trust) 16. Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust) 17. Harsh Vardhan Goenka (Trustee of Secura India Trust) 18. Harsh Vardhan Goenka (Trustee of Prism Estates Trust) 19. Harsh Vardhan Goenka 20. Mala Goenka 21. Anant Vardhan Goenka 22. Radha Goenka 23. Harsh Anant Goenka HUF (#)		
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:			
	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	2,16,47,691	8.42	8.42
	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	48,48,891	1.89	1.89
	7. Carniwal Investments Limited	29,70,981	1.16	1.16
	8. Chattarpati Apartments LLP	17,90,785	0.70	0.70
	9. Atlantus Dwellings & Infrastructure LLP	25,000	0.01	0.01
	10. Malabar Coastal Holdings LLP	10	0.00	0.00
	11. Vayu Udaan Aircraft LLP	10	0.00	0.00

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12. Ektara Enterprises LLP	10	0.00	0.00
13. Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	100	0.00	0.00
14. Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)	1	0.00	0.00
15. Harsh Vardhan Goenka (Trustee of Nucleus Life 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 Secura India Trust)	1	0.00	0.00
18. Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	1	0.00	0.00
19. Harsh Vardhan Goenka	48,48,425	1.89	1.89
20. Mala Goenka	50	0.00	0.00
21. Anant Vardhan Goenka	40,000	0.02	0.02
22. Radha Goenka	10	0.00	0.00
23. Harsh Anant Goenka HUF (#)	1,69,500	0.07	0.07
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	13,20,08,849	51.38	51.38

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	I
1.	Swallow Associates LLP	YES	
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.	Chattarpati Apartments LLP	YES	
9.	Atlantus Dwellings & Infrastructure LLP	YES	
10.	Malabar Coastal Holdings LLP	YES	
11.	Vayu Udaan Aircraft LLP	YES	

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12.	Ektara Enterprises LLP	YES
13.	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	YES
14.	Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)	YES
15.	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	YES
16.	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	YES
17.	Harsh Vardhan Goenka (Trustee of Secura India Trust)	YES
18.	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	YES
19.	Harsh Vardhan Goenka	YES
20.	Mala Goenka	YES
21.	Anant Vardhan Goenka	YES
22.	Radha Goenka	YES
23.	Harsh Anant Goenka HUF (#)	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.

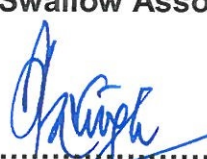
(**) Part B shall be disclosed to Stock Exchange but shall not be disseminated.

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

Thanking you,

Yours faithfully,

For Swallow Associates LLP


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Authorised Signatory

Place: Mumbai

Date: 04.04.2019

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