

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

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

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 Summit Securities 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)	Summit Securities 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.	N.A.
	Or	
b.	Name(s) of promoter(s), member of the promoter group and PAC with him.	1. Swallow Associates LLP (#) 2. STEL Holdings Limited 3. Carniwal Investments Limited 4. Sofreal Mercantrade Pvt Ltd 5. Ektara Enterprises LLP 6. Chattarpati Apartments LLP

LLPIN: AAB 1953

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

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

		7. Vayu Udaan Aircraft LLP 8. Malabar Coastal Holdings LLP 9. Atlantis Dwellings and Infrastructure LLP 10. Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust) 11. Harsh Vardhan Goenka (Trustee of Stellar Energy Trust) 12. Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust) 13. Harsh Vardhan Goenka (Trustee of Nucleus Life Trust) 14. Harsh Vardhan Goenka (Trustee of Secura India Trust) 15. Harsh Vardhan Goenka (Trustee of Prism Estates Trust) 16. Rama Prasad Goenka 17. Harsh Vardhan Goenka 18. Anant Vardhan Goenka 19. Mala Goenka 20. Radha Anant Goenka		
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 (#)	76,22,815	69.92	69.92
	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. Atlantis Dwellings and Infrastructure LLP	10	0.00	0.00
	10. Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	16,157	0.15	0.15
	11. Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	1	0.00	0.00

LLPIN: AAB 1953

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

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

12. Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)	1	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)	1	0.00	0.00
15. Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	1	0.00	0.00
16. Rama Prasad Goenka	211	0.00	0.00
17. Harsh Vardhan Goenka	2,153	0.02	0.02
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
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	80,66,713	73.99	73.99

PART-B ()**

Name of the Target Company:		Summit Securities 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.	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

LLPIN: AAB 1953

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

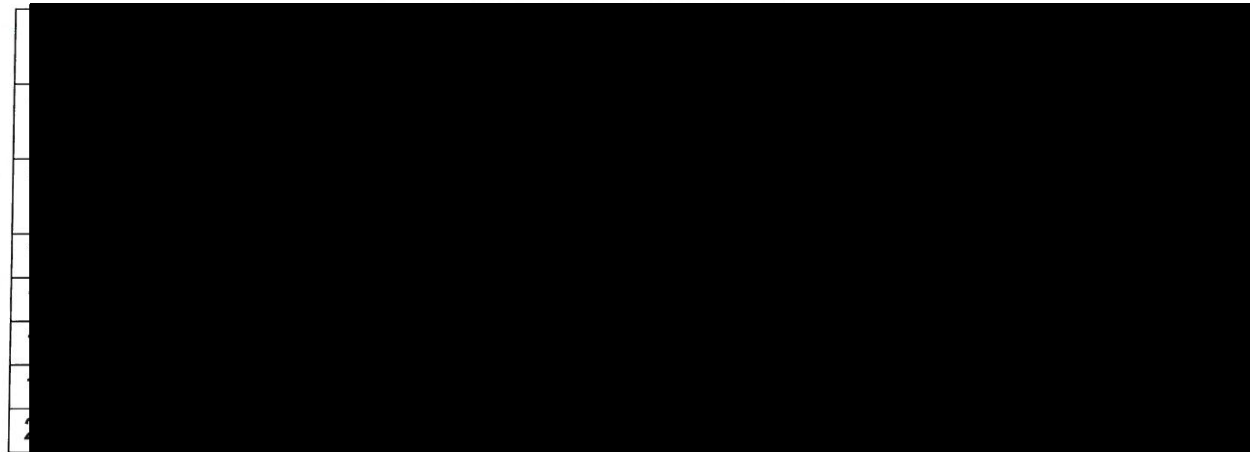
[Signature]

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



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.

(#) Out of 76,22,815 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 has been converted into a Limited Liability Partnership with effect from October 31, 2012 and now is known as Swallow Associates LLP.

Thanking you,

Yours faithfully,

For Swallow Associates LLP


.....
Authorised Signatory

Place: Mumbai

Date: 04.04.2019

LLPIN: AAB 1953

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