

REF: SEC: NS  
20<sup>th</sup> September, 2022

**BSE Limited**  
**Phiroze Jeejeebhoy Towers,**  
**Dalal Street, Fort,**  
**Mumbai 400001.**

**National Stock Exchange of India Ltd.,**  
**Exchange Plaza, 3rd Floor,**  
**Plot No.3-1, "G" Block, I.F.B.Centre,**  
**Bandra-Kurla-Complex, Bandra(East),**  
**Mumbai 400051.**

**Sub: Advance Intimation under Regulation 10(5) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 [“SEBI (SAST) Regulations”] for the proposed acquisition of Equity Shares of Swaraj Engines Limited (“SEL”)**

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Dear Sir,

Swaraj Engines Limited (“SEL”) is a Public Listed Company. Mahindra and Mahindra Limited (“Company”), a Promoter of SEL holds 42,16,792 equity shares of SEL representing 34.72% of its paid-up equity share capital. The Company proposes to acquire 21,14,349 Equity shares of SEL representing 17.41% of its paid-up equity share capital from Kirloskar Industries Limited (“KIL”), also a promoter of SEL.

In this regard, please find enclosed the requisite prior intimation in accordance with Regulation 10(5) of the SEBI (SAST) Regulations.

Kindly take the information on record.

Thanking you,

Yours faithfully,  
For Mahindra and Mahindra Limited

Narayan Shankar  
Company Secretary  
Encl.: a/a

**Disclosures under Regulation 10(5) - Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (“SAST Regulations”)**

1.	Name of the Target Company (TC)	Swaraj Engines Limited (“SEL”)
2.	Name of the acquirer(s)	Mahindra and Mahindra Limited (“M&M” or “Company”)
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes, M&M is a Promoter of SEL
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Kirloskar Industries Limited (“KIL”)
	b. Proposed date of acquisition	On or after 27 <sup>th</sup> September, 2022
	c. Number of shares to be acquired from each person mentioned in 4(a) above	21,14,349
	d. Total shares to be acquired as % of share capital of TC	17.41%
	e. Price at which shares are proposed to be acquired	Off Market (At a price of Rs.1,400 per share)
	f. Rationale, if any, for the proposed transfer	Inter se transfer of shares among Promoters of SEL to consolidate the Company’s holding in SEL
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer	Regulation 10(1)(a)(ii) of the SAST Regulations

6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.	The shares of SEL are frequently traded in terms of Regulation 2(1)(j) of the SAST Regulations.  The Volume Weighted Average Market Price for a period of 60 trading days preceding the date of issuance of this notice as traded on the stock exchange where the maximum volume of trading in the shares of SEL are recorded during such period (i.e. NSE) is Rs.1,615.30
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	N.A.
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	Attached
9.	i. Declaration by the acquirer, that the transferor and transferee have complied (during 3 years prior to the date of proposed acquisition) / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations, 1997)  The aforesaid disclosures made during previous 3 years prior to the date of proposed acquisition to be furnished.	Attached
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	Attached

11.	Shareholding details	Before the proposed transaction		After the proposed transaction	
		No. of shares /voting rights	% w.r.t total share capital of TC	No. of shares /voting rights	% w.r.t total share capital of TC
a	Acquirer(s) and PACs (other than sellers)(*) Mahindra and Mahindra Limited	42,16,792	34.72%	63,31,141	52.13%
b	Seller (s) Kirloskar Industries Limited	21,14,349	17.41%	-	-

**Note:**

- (\*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case, there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.

For Mahindra and Mahindra Limited

Narayan Shankar  
Company Secretary  
Date: 20<sup>th</sup> September, 2022  
Place: Mumbai

To,

**BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.**

**National Stock Exchange of India Ltd.,  
Exchange Plaza, 3rd Floor,  
Plot No.3-1, "G" Block, I.F.B.Centre,  
Bandra-Kurla-Complex, Bandra(East),  
Mumbai 400051.**

Sub: Declaration by acquirer in respect of acquisition under Regulation 10(1)(a) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("**SEBI (SAST) Regulations**")

I, Manoj Bhat, Group Chief Financial Officer on behalf of Mahindra & Mahindra Limited ("Transferee") hereby declare that:

1. The Transferee proposes to acquire 21,14,349 Equity Shares of Swaraj Engines Limited by way of inter se transfer from Kirloskar Industries Limited ("Transferor") in compliance with regulation 10(1)(a) (ii) of the SEBI (SAST) Regulations.
2. The acquisition price at which the aforesaid inter se transfer will be executed, shall not exceed twenty-five per cent of the volume-weighted average market price for a period of sixty trading days preceding the date of issuance of notice under regulation 10(5) of the SEBI (SAST) Regulations.
3. The Transferor and the Transferee have complied (during the 3 years preceding the date of the proposed acquisition) and will continue to comply with applicable disclosure requirements in Chapter V of the SEBI (SAST) Regulations. Details regarding the disclosures made during the 3 years preceding the date of proposed acquisition and copies thereof are enclosed as an annexure.
4. All the conditions as specified under regulation 10(1)(a) with respect to exemptions have been duly complied with.

For MAHINDRA & MAHINDRA LIMITED

MANOJ BHAT  
GROUP CFO

Date: 20<sup>th</sup> September, 2022  
Place: Mumbai

## LIST OF APPLICABLE DISCLOSURES

Entity making Disclosure	Due Date of Compliance	Actual Date of Compliance	Regulation No.	Submitted to	Reasons for delay, if any
Mahindra and Mahindra Limited	11/04/2022	06/04/2022	31(4)	National Stock Exchange of India Limited, BSE Limited and Swaraj Engines Limited	N. A.
	12/04/2021	07/04/2021	31(4)		
	12/04/2021	07/04/2021	30(2)		
	Extended upto 01/06/2020	06/05/2020	31(4)		
	Extended upto 01/06/2020	06/05/2020	30(2)		
	05/06/2019	03/06/2019	29(2)		
	09/04/2019	04/04/2019	30(2)		
Kirloskar Industries Limited	11/04/2022	08/04/2022	31(4)		
	12/04/2021	07/04/2021	31(4)		
	12/04/2021	07/04/2021	30(2)		
	Extended upto 01/06/2020	26/05/2020	31(4)		
	Extended upto 01/06/2020	13/05/2020	30(2)		
	09/04/2019	05/04/2019	30(2)		

Note:

1. Regulation 31(4) was introduced by the SEBI (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2019 w.e.f. 29-07-2019. Hence, this requirement was not applicable for the Financial Year ended 2019.
2. Regulation 30 was omitted by the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2021, w.e.f. 1-4-2022. Hence, this requirement was not applicable for the Financial Year ended 2022 and thereafter.

**From:** NARAYAN SHANKAR  
**Sent:** 06 April 2022 22:44  
**To:** dileep.choksi@ccchokshi.com; sudhirmankad@gmail.com; DURGASHANKAR S;  
Neerasaggi@outlook.com  
**Cc:** KAPILA RAJESH - SWARAJ  
**Subject:** Swaraj Engines Limited :- Declaration By Promoters under Regulation 31(4) of the  
SEBI (SAST) Regulations, 2011  
**Attachments:** M M disclosure under Reg 31(4) as Promoter for SEL April 2022 F.pdf

Members of the Audit Committee,  
Swaraj Engines Limited

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2021-2022 in respect of the shares of Swaraj Engines Limited held by us.

Please find enclosed scanned copy of the declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Request you to take the same on record.

Regards

Narayan Shankar

Company Secretary

**Mahindra & Mahindra Limited**

E-Mail: [Narayan.Shankar@mahindra.com](mailto:Narayan.Shankar@mahindra.com)

Mobile: +91 9892319642



**From:** NARAYAN SHANKAR  
**Sent:** 06 April 2022 22:42  
**To:** corp.relations@bseindia.com  
**Cc:** HALBE ANITA A; MASCARENHAS DIVYA; JUWATKAR GAURAV - Mumbai - Worli; SNEHIL NIKITA  
**Subject:** Swaraj Engines Limited :- Declaration By Promoters under Regulation 31(4) of the SEBI (SAST ) Regulations, 2011  
**Attachments:** M M disclosure under Reg 31(4) as Promoter for SEL April 2022 F.pdf

Dear Sir/Madam,

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2021-2022 in respect of the shares of Swaraj Engines Limited held by us.

Please find enclosed scanned copy of the declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Request you to take the same on record.

Regards

Narayan Shankar

Company Secretary

**Mahindra & Mahindra Limited**

E-Mail: [Narayan.Shankar@mahindra.com](mailto:Narayan.Shankar@mahindra.com)

Mobile: +91 9892319642





✔ **Success !**

Thank you for submitting disclosure pursuant to SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011  
A copy of the disclosure bearing the acknowledgement number 22040602849R0 has been sent to the following email id(s) -  
[baria.feroze@mahindra.com](mailto:baria.feroze@mahindra.com)

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Click on **START** to submit a new disclosure

**Disclosure**

Previously

**Start**



**Successfully saved**

Acknowledgement number is : 22040602849R0

**OK**

**Disclosure(s) pursuant to SEBI (Substantial Acquisition of Shares and Takeovers)  
Regulations, 2011**

**Request Type**

New Disclosure

**Disclosure Regulation**

Regulation 31(4) - Annual Declaration

**Declaration**

Pursuant to Regulation 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, a declaration is hereby being made that no other Encumbrance on shares of Swaraj Engines Limited has been made directly or indirectly, other than those already disclosed to the Stock Exchanges during the Financial Year ending 31-Mar-2022

**Name of Entity/Person submitting the Declaration**

Mahindra & Mahindra Limited

**Details of Entity/Person on who's behalf the declaration is being submitted**

Name of Entity/Person	Category
Mahindra & Mahindra Limited	Promoter

**Declaration**

I hereby declare that the disclosure being submitted is true and correct.

**Date** :

**Place** :

**Signature** :

REF: SEC: NS  
6<sup>th</sup> April, 2022

**The Secretary**  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.

**The Secretary**  
**National Stock Exchange of India Ltd.,**  
Exchange Plaza, 3rd Floor,  
Plot No.3-1, "G" Block, I.F.B.Centre,  
Bandra-Kurla-Complex, Bandra(East),  
Mumbai 400051.

**The Company Secretary**  
**Swaraj Engines Limited**  
Phase IV, Industrial Area,  
S.A.S.Nagar (Mohali),  
Punjab - 160055

**Sub: Declaration under Regulation 31(4) of the Securities and Exchange Board of India  
(Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

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Dear Sir,

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2021-2022 in respect of the shares of Swaraj Engines Limited held by us.

Kirloskar Industries Limited will file a separate declaration under the captioned Regulation.

Thanking you,

Yours faithfully,  
For Mahindra and Mahindra Limited



Narayan Shankar  
Company Secretary

**From:** NARAYAN SHANKAR  
**Sent:** 07 April 2021 22:42  
**To:** dileep.choksi@ccchokshi.com; sudhirmankad@gmail.com;  
neerasaggi@outlook.com; DURGASHANKAR S  
**Cc:** KAPILA RAJESH - SWARAJ; HALBE ANITA A; MASCARENHAS DIVYA; JUWATKAR  
GAURAV - Mumbai - Worli  
**Subject:** Swaraj Engines Limited :- Declaration By Promoters under Regulation 31(4) of the  
SEBI (SAST ) Regulations, 2011  
**Attachments:** M & M disclosure under Regu 31(4) as Promoter for SEL April 2021.pdf

Members of the Audit Committee,  
Swaraj Engines Limited.

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2020-2021 in respect of the shares of Swaraj Engines Limited held by us.

Kirloskar Industries Limited will file a separate declaration under the captioned Regulation.

Please find enclosed declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Request you to take the same on record.

Regards

Narayan Shankar  
Company Secretary  
**Mahindra & Mahindra Limited**  
E-Mail: [Narayan.Shankar@mahindra.com](mailto:Narayan.Shankar@mahindra.com)  
Mobile: +91 9892319642



**From:** NARAYAN SHANKAR  
**Sent:** 07 April 2021 22:40  
**To:** takeover@nse.co.in; corp.relations@bseindia.com  
**Cc:** KAPILA RAJESH - SWARAJ; HALBE ANITA A; MASCARENHAS DIVYA; JUWATKAR GAURAV - Mumbai - Worli  
**Subject:** Swaraj Engines Limited :- Declaration By Promoters under Regulation 31(4) of the SEBI (SAST ) Regulations, 2011  
**Attachments:** M & M disclosure under Regu 31(4) as Promoter for SEL April 2021.pdf

Dear Sir/ Madam,

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2020-2021 in respect of the shares of Swaraj Engines Limited held by us.

Kirloskar Industries Limited will file a separate declaration under the captioned Regulation.

Please find enclosed declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Request you to take the same on record.

Regards

Narayan Shankar

Company Secretary

**Mahindra & Mahindra Limited**

E-Mail: [Narayan.Shankar@mahindra.com](mailto:Narayan.Shankar@mahindra.com)

Mobile: +91 9892319642



REF: SEC: NS  
7<sup>th</sup> April, 2021

The Secretary  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.

The Secretary  
National Stock Exchange of India Ltd.,  
Exchange Plaza, 3rd Floor,  
Plot No.3-1, "G" Block, I.F.B.Centre,  
Bandra-Kurla-Complex, Bandra(East),  
Mumbai 400051.

The Company Secretary  
Swaraj Engines Limited  
Phase IV, Industrial Area,  
S.A.S.Nagar (Mohali),  
Punjab - 160055

**Sub: Declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

---

Dear Sir,

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2020-2021 in respect of the shares of Swaraj Engines Limited held by us.

Kirloskar Industries Limited will file a separate declaration under the captioned Regulation.

Thanking you,

Yours faithfully,

For Mahindra and Mahindra Limited



Narayan Shankar  
Company Secretary

**From:** NARAYAN SHANKAR  
**Sent:** 07 April 2021 22:38  
**To:** takeover@nse.co.in; corp.relations@bseindia.com; KAPILA RAJESH - SWARAJ  
**Cc:** HALBE ANITA A; MASCARENHAS DIVYA; JUWATKAR GAURAV - Mumbai - Worli  
**Subject:** Disclosure under Regulation 30(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - Swaraj Engines Limited  
**Attachments:** M&M disclosure under Regu 30(2) as Promoter for SEL April 2021.pdf

Dear Sir/ Madam,

Please find enclosed disclosure under Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of shares held by Mahindra & Mahindra Limited in Swaraj Engines Limited.

Regards

Narayan Shankar

Company Secretary

**Mahindra & Mahindra Limited**

E-Mail: [Narayan.Shankar@mahindra.com](mailto:Narayan.Shankar@mahindra.com)

Mobile: +91 9892319642



REF: SEC: NS  
7<sup>th</sup> April, 2021

The Secretary  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.

The Secretary  
National Stock Exchange of India Ltd.,  
Exchange Plaza, 3rd Floor,  
Plot No.3-1, "G" Block, I.F.B.Centre,  
Bandra-Kurla-Complex, Bandra(East),  
Mumbai 400051.

The Company Secretary  
Swaraj Engines Limited  
Phase IV, Industrial Area,  
S.A.S.Nagar (Mohali),  
Punjab - 160055

**Sub: Disclosure of shareholding in terms of Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir,

Please find enclosed Disclosure, as required under Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of shares held by the Company in **Swaraj Engines Limited** as on 31<sup>st</sup> March, 2021.

Kindly acknowledge receipt.

Thanking you,

Yours faithfully,  
For Mahindra & Mahindra Limited



Narayan Shankar  
Company Secretary  
Encl: a/a



**Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A- Details of Shareholding**

1.	Name of the Target Company (TC)	Swaraj Engines Limited		
2.	Name(s) of the stock exchange(s) where the shares of the TC are listed	1. BSE Limited 2. National Stock Exchange of India 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.	Mahindra & Mahindra Limited #		
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 <sup>st</sup> , 2021 ( <del>of the year</del> ), holding of:			
	a) Shares	42,16,792	34.74	34.74
	b) Voting Rights (otherwise than by shares)	N.A.	N.A.	N.A.
	c) Warrants,	N.A.	N.A.	N.A.
	d) Convertible Securities	N.A.	N.A.	N.A.
	e) Any other instrument that would entitle the holder to receive shares in the TC.	N.A.	N.A.	N.A.
	<b>Total</b>	<b>42,16,792</b>	<b>34.74</b>	<b>34.74</b>

# Kirloskar Industries Limited holding, 21,14,349 shares representing 17.42% of the share capital of the target company will file a separate disclosure under Regulation 30(2).

**Part-B\*\***

**Name of the Target Company:** Swaraj Engines Limited

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 PACs
Mahindra & Mahindra Limited	Promoter	AAACM3025E

For Mahindra & Mahindra Limited



Narayan Shankar  
Company Secretary

Place: Mumbai  
Date: 7<sup>th</sup> April, 2021

**Note:**

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 means 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 the Stock Exchanges but shall not be disseminated.

**From:** NARAYAN SHANKAR  
**Sent:** 06 May 2020 01:37  
**To:** dileep.choksi@ccchokshi.com; sudhirmankad@gmail.com; DURGASHANKAR S;  
neera\_saggi@hotmail.com  
**Cc:** GREWAL MANINDER - SWARAJ; HALBE ANITA A  
**Subject:** Swaraj Engines Limited - Declaration By Promoters under Regulation 31(4) of the  
SEBI (SAST ) Regulations, 2011  
**Attachments:** SEL-31(4).pdf

Members of the Audit Committee,  
Swaraj Engines Limited

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2019-2020 in respect of the shares of Swaraj Engines Limited held by us.

Please find enclosed scanned copy of the declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kirloskar Industries Limited will file a separate declaration under the captioned Regulation.

Request you to take the same on record.

Regards,

Narayan Shankar  
Company Secretary  
Mahindra & Mahindra Limited  
Mahindra Towers,  
Dr. G. M. Bhosale Marg,  
Worli, Mumbai - 400 018  
Contact - 9892319642

**From:** NARAYAN SHANKAR  
**Sent:** 06 May 2020 01:34  
**To:** takeover@nse.co.in; corp.relations@bseindia.com  
**Cc:** GREWAL MANINDER - SWARAJ; HALBE ANITA A  
**Subject:** Swaraj Engines Limited - Declaration By Promoters under Regulation 31(4) of the SEBI (SAST ) Regulations, 2011  
**Attachments:** SEL-31(4).pdf

Dear Sir/Madam,

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2019-2020 in respect of the shares of Swaraj Engines Limited held by us.

Please find enclosed scanned copy of the declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kirloskar Industries Limited will file a separate declaration under the captioned Regulation.

Request you to take the same on record.

Regards,

Narayan Shankar  
Company Secretary  
Mahindra & Mahindra Limited  
Mahindra Towers,  
Dr. G. M. Bhosale Marg,  
Worli, Mumbai – 400 018  
Contact – 9892319642

**REF: SEC: NS**

**6<sup>th</sup> May, 2020**

**The Secretary  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.**

**The Secretary  
National Stock Exchange of India Ltd.,  
Exchange Plaza, 3rd Floor,  
Plot No.3-1, "G" Block, I.F.B.Centre,  
Bandra-Kurla-Complex, Bandra(East),  
Mumbai 400051.**

**The Audit Committee  
Swaraj Engines Limited  
Phase IV, Industrial Area,  
S.A.S.Nagar (Mohali),  
Punjab - 160055**

**Sub: Declaration under Regulation 31(4) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir,

We, Mahindra and Mahindra Limited, the Promoters of Swaraj Engines Limited, declare that we have not made any encumbrance, directly or indirectly, during the Financial Year 2019-2020 in respect of the shares of Swaraj Engines Limited held by us.

Kirloskar Industries Limited will file a separate declaration under the captioned Regulation.

Thanking you,

Yours faithfully,

For Mahindra and Mahindra Limited



Narayan Shankar  
Company Secretary

**From:** HALBE ANITA A  
**Sent:** 06 May 2020 11:40  
**To:** takeover@nse.co.in; corp.relations@bseindia.com; KAPILA RAJESH - SWARAJ  
**Cc:** NARAYAN SHANKAR; GREWAL MANINDER - SWARAJ  
**Subject:** Disclosure under Regulation 30(2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - SEL  
**Attachments:** SEL-30(2).pdf

Dear Sir/ Madam,

Please find enclosed scanned copy of the disclosure under Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of shares held by Mahindra & Mahindra Limited in **Swaraj Engines Limited**.

Kindly confirm the receipt.

Regards,

Anita Halbe  
Dy G. M. - Shares & Secretarial  
Mahindra & Mahindra Limited  
Contact - 9821696469

REF: SEC: NS  
6<sup>th</sup> May, 2020

The Secretary  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.

The Secretary  
National Stock Exchange of India Ltd.,  
Exchange Plaza, 3rd Floor,  
Plot No.3-1, "G" Block, I.F.B.Centre,  
Bandra-Kurla-Complex, Bandra(East),  
Mumbai 400051.

The Company Secretary  
Swaraj Engines Limited  
Phase IV, Industrial Area,  
S.A.S.Nagar (Mohali),  
Punjab - 160055

**Sub: Disclosure of shareholding in terms of Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

---

Dear Sir,

Please find enclosed Disclosure, as required under Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of shares held by the Company in **Swaraj Engines Limited** as on 31<sup>st</sup> March, 2020.

Kindly acknowledge receipt.

Thanking you,

Yours faithfully,  
For Mahindra & Mahindra Limited



Narayan Shankar  
Company Secretary

Encl: a/a

**Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A- Details of Shareholding**

1. Name of the Target Company (TC)	Swaraj Engines Limited		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	1. BSE Limited 2. National Stock Exchange of India 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.	Mahindra & Mahindra Limited #		
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 <sup>st</sup> , 2020 ( <del>of the year</del> ), holding of:			
a) Shares	42,16,792	34.76	34.76
b) Voting Rights (otherwise than by shares)	N.A.	N.A.	N.A.
c) Warrants,	N.A.	N.A.	N.A.
d) Convertible Securities	N.A.	N.A.	N.A.
e) Any other instrument that would entitle the holder to receive shares in the TC.	N.A.	N.A.	N.A.
<b>Total</b>	<b>42,16,792</b>	<b>34.76</b>	<b>34.76</b>

# Kirloskar Industries Limited holding, 21,14,349 shares representing 17.43% of the share capital of the target company will file a separate disclosure under Regulation 30(2).





**Part-B\*\***

**Name of the Target Company:** Swaraj Engines Limited

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 PACs
Mahindra & Mahindra Limited	Promoter	AAACM3025E

For Mahindra & Mahindra Limited



Narayan Shankar  
Company Secretary

Place: Mumbai  
Date: 6<sup>th</sup> May, 2020

**Note:**

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 means 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 the Stock Exchanges but shall not be disseminated.

**From:** HALBE ANITA A  
**Sent:** 03 June 2019 20:18  
**To:** takeover@nse.co.in; corp.relations@bseindia.com; GREWAL MANINDER - SWARAJ  
**Cc:** NARAYAN SHANKAR; PATIL HEMANGI; JUWATKAR GAURAV - Mumbai - Worli;  
NEELAM SAI JPS; KAPILA RAJESH - SWARAJ  
**Subject:** Disclosure under Regulation 29(2) of the SEBI (Substantial Acquisition of Shares and  
Takeovers) Regulations, 2011 - Swaraj Engines Limited  
**Attachments:** Reg. 29(2) - Swaraj Engines Transfer.pdf

Dear Sir/Madam,

We wish to inform you that the Company has today purchased 1,77,586 Equity Shares of Rs.10 each of Swaraj Engines Limited ('SEL') representing 1.46% of the paid-up share capital of SEL.

The aforesaid purchase of shares by the Company does not require any disclosure under Regulation 29(2) of the Regulations as this transaction does not exceed two per cent of total shareholding or voting rights in SEL. However, the Company out of abundant caution, is submitting herewith the disclosure under the said Regulations.

The disclosure as required under the Regulation 29(2) of the Regulations in this respect is attached herewith.

Kindly acknowledge receipt.

Regards,  
Anita Halbe  
Dy. General Manager - Shares & Secretarial  
Mahindra & Mahindra Limited  
Contact - 9821696469 / 24905968

REF: NS: SEC:

3<sup>rd</sup> June, 2019

**The Secretary**  
**BSE Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.

**The Secretary**  
**National Stock Exchange of India Ltd.,**  
Exchange Plaza, 3<sup>rd</sup> Floor,  
Plot No.3-1, "G" Block, I.F.B.Centre,  
Bandra-Kurla-Complex, Bandra(East),  
Mumbai 400051.

**The Company Secretary**  
**Swaraj Engines Limited**  
Phase IV, Industrial Area,  
S.A.S Nagar (Mohali),  
Punjab- 160055

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

Dear Sir,

We wish to inform you that the Company has today purchased 1,77,586 Equity Shares of Rs.10 each of Swaraj Engines Limited ('SEL') representing 1.46% of the paid-up share capital of SEL.

The aforesaid purchase of shares by the Company does not require any disclosure under Regulation 29(2) of the Regulations as this transaction does not exceed two per cent of total shareholding or voting rights in SEL. However, the Company out of abundant caution, is submitting herewith the disclosure under the said Regulations.

The disclosure as required under the Regulation 29(2) of the Regulations in this respect is enclosed herewith.

Kindly acknowledge receipt.

Yours faithfully,  
For MAHINDRA & MAHINDRA LIMITED



 NARAYAN SHANKAR  
COMPANY SECRETARY

Encl: a/a

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

Name of the Target Company (TC)	Swaraj Engines Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Promoter: Mahindra & Mahindra Limited		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited National Stock Exchange of India Limited		
Details of the acquisition/ <del>disposal</del> as follows	Number	% w.r.t. total share/voting capital wherever applicable(*)	% w.r.t. total diluted share /voting capital of the TC(**)
<b>Before the acquisition under consideration, holding of:</b>			
a) Shares carrying voting rights	40,39,206	33.30	33.30
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
c) Voting rights (VR) 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)	-	-	-
e) Total (a+b+c+d)	40,39,206	33.30	33.30



<b>Details of acquisition/sale</b>				
a)	Shares carrying voting rights acquired /sold	1,77,586	1.46	1.46
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)	1,77,586	1.46	1.46
<b>After the acquisition/sale, holding of:</b>				
a)	Shares carrying voting rights	42,16,792	34.76	34.76
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)	42,16,792	34.76	34.76
Mode of acquisition / sale (e.g. open market / off-market / public issue /rights issue/ preferential allotment / inter-se transfer etc).		Open Market		



Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	3 <sup>rd</sup> June, 2019
Equity share capital /total voting capital of the TC before the said acquisition /sale	1,21,28,886 Equity Shares of Rs.10 each
Equity share capital/total voting capital of the TC after the said acquisition/ <del>sale</del>	1,21,28,886 Equity shares of Rs.10 each
Total diluted share/voting capital of the TC after the said acquisition.	1,21,28,886 Equity shares of Rs.10 each

(\*) Total share capital/voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the Listing Agreement.

(\*\*) 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.

(\*\*) Diluted share/voting capital does not include ESOPs granted and outstanding.

For MAHINDRA & MAHINDRA LIMITED



NARAYAN SHANKAR  
COMPANY SECRETARY



Place: Mumbai

Date: 3<sup>rd</sup> June, 2019

**From:** PATIL HEMANGI  
**Sent:** 04 April 2019 21:08  
**To:** takeover@nse.co.in; corp.relations@bseindia.com; GREWAL MANINDER - SWARAJ;  
KAPILA RAJESH - SWARAJ  
**Cc:** NARAYAN SHANKAR; HALBE ANITA A; JUWATKAR GAURAV - Mumbai - Worli  
**Subject:** Disclosure under Regulation 30(2) of the SEBI (Substantial Acquisition of Shares and  
Takeovers) Regulations, 2011 - SEL  
**Attachments:** SEL.pdf

Dear Sir/ Madam,

Please find enclosed scanned copy of the disclosure under Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of shares held by Mahindra & Mahindra Limited in **Swaraj Engines Limited**.

Kindly confirm the receipt.

Regards,  
Hemangi Shailesh Patil  
Corporate Secretarial Department  
Mahindra & Mahindra Ltd.

Contact No.: +91 22 24905957/ 9821298336

**Mahindra**  
Rise

REF: SEC: NS

4<sup>th</sup> April, 2019

**The Secretary  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001.**

**The Secretary  
National Stock Exchange of India Ltd.,  
Exchange Plaza, 3rd Floor,  
Plot No.3-1, "G" Block, I.F.B.Centre,  
Bandra-Kurla-Complex, Bandra(East),  
Mumbai 400051.**

**The Company Secretary  
Swaraj Engines Limited  
Phase IV, Industrial Area,  
S.A.S.Nagar (Mohali),  
Punjab - 160055**

**Sub: Disclosure of shareholding in terms of Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

---

Dear Sir,

A disclosure, as required under Regulation 30(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of shares held by the Company in **Swaraj Engines Limited** as on 31<sup>st</sup> March, 2019 is enclosed herewith.

Kindly acknowledge receipt.

Thanking you,

Yours faithfully,  
For MAHINDRA & MAHINDRA LIMITED



 **NARAYAN SHANKAR  
COMPANY SECRETARY**

Encl: a/a



**Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A- Details of Shareholding**

1. Name of the Target Company (TC)	Swaraj Engines Limited		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	1. BSE Limited 2. National Stock Exchange of India 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.	Mahindra & Mahindra Limited #		
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 <sup>st</sup> , 2018 (of the year), holding of:			
a) Shares	40,39,206	33.30	33.30
b) Voting Rights (otherwise than by shares)	N.A.	N.A.	N.A.
c) Warrants,	N.A.	N.A.	N.A.
d) Convertible Securities	N.A.	N.A.	N.A.
e) Any other instrument that would entitle the holder to receive shares in the TC.	N.A.	N.A.	N.A.
<b>Total</b>	<b>40,39,206</b>	<b>33.30</b>	<b>33.30</b>

# Kirloskar Industries Limited holding, 21,14,349 shares representing 17.43% of the share capital of the target company will file a separate disclosure under Regulation 30(2).



**Part-B\*\***

**Name of the Target Company:** Swaraj Engines Limited

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 PACs
Mahindra & Mahindra Limited	Promoter	AAACM3025E

For MAHINDRA & MAHINDRA LIMITED



*Dr. YS*  
NARAYAN SHANKAR  
COMPANY SECRETARY

Place: Mumbai

Date: 4<sup>th</sup> April, 2019

**Note:**

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 means 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 the Stock Exchanges but shall not be disseminated.

**From:** Ashwini Mali (KIL) <ashwini.mali@kirloskar.com>  
**Sent:** 08 April 2022 16:45  
**To:** KAPILA RAJESH - SWARAJ  
**Cc:** Gayatree Karandikar (KIL); Soniya Taware (KIL)  
**Subject:** Declarations under SEBI Takeover, 2011  
**Attachments:** 31(4) - SEL - BSE.pdf; 31(4) - SEL - Company.pdf; 31(4).pdf

Sir / Madam,

Please find enclosed Declarations under SEBI Takeover Code, 2011, for your necessary actions, please.

The same has been filed with the BSE Limited.

The copy of NSE along with acknowledgement will be sent to you soon.

Thanking you.

Best regards,  
Ashwini Mali  
Company Secretary &  
Compliance Officer  
Kirloskar Industries Limited

8 April 2022

✓ Corporate Relationship Department  
BSE Limited  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai 400001

The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (East), Mumbai 400051

The Company Secretary  
Swaraj Engines Limited  
Phase IV, S A S Nagar,  
Dist Mohali, Industrial Area,  
Ropar, Chandigarh 160055

Sir / Madam,

Sub.: Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2019

Kirloskar Industries Limited (the Company / KIL), promoter of Swaraj Engines Limited (SEL), hereby declare that the Company has not created any encumbrance, directly or indirectly on the shares (21,14,349 representing 17.41%) of SEL held by the Company.

Furthermore, as per Regulation 31 (5) of the aforesaid Regulations. the Company requests SEL to please suitably communicate at the next Audit Committee Meeting of SEL.

You are requested to take note of the same.

Thanking you.

For Kirloskar Industries Limited

  
Ashwini Mali  
Company Secretary &  
Compliance Officer



Kirloskar Industries Limited  
A Kirloskar Group Company

Regd. Office: Cello Platina, Office Number 801,  
Fergusson College Road, Shivajinagar, Pune- 411005  
Tel: +91 (20) 29704374  
Fax: +91 (20) 29704374  
Email: investorrelations@kirloskar.com  
Website: www.kil.net.in  
CIN: L70100PN1978PLC088972

8 April 2022

Corporate Relationship Department  
BSE Limited  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai 400001

✓ The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (East), Mumbai 400051

The Company Secretary  
Swaraj Engines Limited  
Phase IV, S A S Nagar,  
Dist Mohali, Industrial Area,  
Ropar, Chandigarh 160055

Sir / Madam,

Sub.: Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2019

Kirloskar Industries Limited (the Company / KIL), promoter of Swaraj Engines Limited (SEL), hereby declare that the Company has not created any encumbrance, directly or indirectly on the shares (21,14,349 representing 17.41%) of SEL held by the Company.

Furthermore, as per Regulation 31 (5) of the aforesaid Regulations. the Company requests SEL to please suitably communicate at the next Audit Committee Meeting of SEL.

You are requested to take note of the same.

Thanking you.

For Kirloskar Industries Limited

  
Ashwini Mali  
Company Secretary &  
Compliance Officer



Kirloskar Industries Limited  
A Kirloskar Group Company

Regd. Office: Cello Platina, Office Number 801,  
Fergusson College Road, Shivajinagar, Pune- 411005  
Tel: +91 (20) 29704374  
Fax: +91 (20) 29704374  
Email: investorrelations@kirloskar.com  
Website: www.kil.net.in  
CIN: L70100PN1978PLC088972

8 April 2022

Corporate Relationship Department  
BSE Limited  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai 400001

The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (East), Mumbai 400051

✓ The Company Secretary  
Swaraj Engines Limited  
Phase IV, S A S Nagar,  
Dist Mohali, Industrial Area,  
Ropar, Chandigarh 160055

Sir / Madam,

Sub.: Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2019

Kirloskar Industries Limited (the Company / KIL), promoter of Swaraj Engines Limited (SEL), hereby declare that the Company has not created any encumbrance, directly or indirectly on the shares (21,14,349 representing 17.41%) of SEL held by the Company.

Furthermore, as per Regulation 31 (5) of the aforesaid Regulations. the Company requests SEL to please suitably communicate at the next Audit Committee Meeting of SEL.

You are requested to take note of the same.

Thanking you.

For Kirloskar Industries Limited

  
Ashwini Mali  
Company Secretary &  
Compliance Officer



Kirloskar Industries Limited  
A Kirloskar Group Company

Regd. Office: Cello Platina, Office Number 801,  
Fergusson College Road, Shivajinagar, Pune- 411005  
Tel: +91 (20) 29704374  
Fax: +91 (20) 29704374  
Email: investorrelations@kirloskar.com  
Website: www.kil.net.in  
CIN: L70100PN1978PLC088972

**From:** Ashwini Mali (KIL) <ashwini.mali@kirloskar.com>  
**Sent:** 07 April 2021 18:23  
**To:** KAPILA RAJESH - SWARAJ; GREWAL MANINDER - SWARAJ  
**Cc:** Gayatree Karandikar (KIL); Soniya Taware (KIL)  
**Subject:** Declarations under Regulation 31(4)  
**Attachments:** SwarajDeclarations.pdf; Swaraj Declarations.pdf; Swaraj Declarations.pdf

Sir / Madam,

Please find enclosed Declarations under SEBI Takeover Code, 2011, for your necessary actions, please.

The same has been filed with the Stock Exchanges.

Thanking you.

Best regards,  
Ashwini Mali  
Company Secretary &  
Compliance Officer  
Kirloskar Industries Limited



**KIRLOSKAR INDUSTRIES LIMITED**  
A Kirloskar Group Company

Enriching Lives

7 April 2021

✓ Corporate Relationship Department  
BSE Limited,  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai - 400 001

The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051

The Company Secretary  
Swaraj Engines Limited  
Phase -IV, S.A.S.Nagar,  
Dist. Ropar - 160059  
(Panjab)

Dear Sir,

**Sub.: Declaration under Regulation 31(4) SEBI (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2019**

Kirloskar Industries Limited (the Company / KIL), promoter of Swaraj Engines Limited (SEL), hereby declare that the Company has not created any encumbrance, directly or indirectly on the shares (21,14,349 representing 17.42%) of SEL held by the Company.

Furthermore, as per Regulation 31(5) of the aforesaid Regulations, the Company requests SEL to please suitably communicate at the next Audit Committee Meeting of SEL.

You are requested to take note of the same.

Thanking you,

Yours Sincerely

Yours faithfully,  
For Kirloskar Industries Limited

A.V.Mali

Ashwini Mali  
Company Secretary &  
Compliance Officer







Enriching Lives

**KIRLOSKAR INDUSTRIES LIMITED**

A Kirloskar Group Company

7 April 2021

Corporate Relationship Department  
BSE Limited,  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai - 400 001

✓ The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051

The Company Secretary  
Swaraj Engines Limited  
Phase -IV, S.A.S.Nagar,  
Dist. Ropar - 160059  
(Panjab)

Dear Sir,

**Sub.: Declaration under Regulation 31(4) SEBI (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2019**

Kirloskar Industries Limited (the Company / KIL), promoter of Swaraj Engines Limited (SEL), hereby declare that the Company has not created any encumbrance, directly or indirectly on the shares (21,14,349 representing 17.42%) of SEL held by the Company.

Furthermore, as per Regulation 31(5) of the aforesaid Regulations, the Company requests SEL to please suitably communicate at the next Audit Committee Meeting of SEL.

You are requested to take note of the same.

Thanking you,

Yours Sincerely

Yours faithfully,  
For Kirloskar Industries Limited

  
Ashwini Mali  
Company Secretary &  
Compliance Officer





Enriching Lives

**KIRLOSKAR INDUSTRIES LIMITED**  
A Kirloskar Group Company

7 April 2021

Corporate Relationship Department  
BSE Limited,  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai - 400 001

The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051

✓ The Company Secretary  
Swaraj Engines Limited  
Phase -IV, S.A.S.Nagar,  
Dist. Ropar - 160059  
(Panjab)

Dear Sir,

**Sub.: Declaration under Regulation 31(4) SEBI (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2019**

Kirloskar Industries Limited (the Company / KIL), promoter of Swaraj Engines Limited (SEL), hereby declare that the Company has not created any encumbrance, directly or indirectly on the shares (21,14,349 representing 17.42%) of SEL held by the Company.

Furthermore, as per Regulation 31(5) of the aforesaid Regulations, the Company requests SEL to please suitably communicate at the next Audit Committee Meeting of SEL.

You are requested to take note of the same.

Thanking you,

Yours Sincerely

Yours faithfully,  
For Kirloskar Industries Limited

*A.V. Mali*  
**Ashwini Mali**  
Company Secretary &  
Compliance Officer



Forwarded message

From: **Ashwini Mali (KIL)** <[ashwini.mali@kirloskar.com](mailto:ashwini.mali@kirloskar.com)>

Date: Wed, Apr 7, 2021 at 6:10 PM

Subject: Fwd: Kirloskar Industries Limited - Declarations under Regulation 30(1) and (2) of SEBI Takeover Code, 2011

To: <[GREWAL.MANINDER@mahindraswaraj.com](mailto:GREWAL.MANINDER@mahindraswaraj.com)>, <[KAPILA.RAJESH@mahindraswaraj.com](mailto:KAPILA.RAJESH@mahindraswaraj.com)>

Cc: Gayatree Karandikar (KIL) <[gayatree.karandikar@kirloskar.com](mailto:gayatree.karandikar@kirloskar.com)>, Soniya Taware (KIL) <[soniya.taware@kirloskar.com](mailto:soniya.taware@kirloskar.com)>

Dear Sir,

Please find enclosed herewith declarations under Regulation 30(1) and (2) of SEBI Takeover Code, 2011 along with declarations that are filed with the Stock Exchanges.

Thanking you.

Best regards,  
Ashwini

This e-mail and any files transmitted with it are for the sole or exclusive use of the intended recipient(s) and may contain confidential, proprietary and privileged information. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies and the original message. Any unauthorized review, use, disclosure, dissemination, forwarding, printing or copying of this email or any action taken in reliance on this e-mail is strictly prohibited and may be unlawful. The recipient acknowledges that Kirloskar Industries Ltd. or its subsidiaries and associated companies are unable to exercise control or ensure or guarantee the integrity of/over the contents of the information contained in e-mail transmissions and further acknowledges that any views expressed in this message are those of the individual sender and no binding nature of the message shall be implied or assumed unless the sender does so expressly with due authority of Kirloskar Industries Ltd. Before opening any attachments please check them for viruses and defects.



Enriching Lives

**KIRLOSKAR INDUSTRIES LIMITED**

A Kirloskar Group Company

7 April 2021

✓ Corporate Relationship Department  
BSE Limited,  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai - 400 001

The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051

Dear Sir,

**Declaration under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Please find enclosed declaration pursuant to Regulation 30 (1) and (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, of Swaraj Engines Limited.

Kindly take the same on your records.

Thanking you,

Yours Sincerely

Yours faithfully,  
For Kirloskar Industries Limited

A.V.Mali

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**



Encl.: As above



**Format for disclosures under regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1. Name of the Target Company (TC)	Swaraj Engines Limited		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	1. BSE Limited 2. National Stock Exchange of India Limited		
3. Particular of the Shareholder(s):  a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the forms 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) if promoter(s), member of the promoter group and PAC with him	N.A.           Kirloskar Industries Limited		
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, 2021, holding of:			
a) Shares	21,14,349	17.42	17.42
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC	Nil	Nil	Nil
<b>Total</b>	<b>21,14,349</b>	<b>17.42</b>	<b>17.42</b>





**KIRLOSKAR INDUSTRIES LIMITED**  
A Kirloskar Group Company

Enriching Lives

**Part – B\*\***

**Name of the Target Company: Swaraj Engines Limited**

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 PACs
Kirloskar Industries Limited	Promoter	AAACP3590P

Signature of the Authorised Signatory:

For **Kirloskar Industries Limited**

  
**Ashwini Mali**  
Company Secretary &  
Compliance Officer



Place: Pune  
Date: 7 April 2021

**Note:**

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 means 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 the Stock Exchanges but shall not be disseminated.



Enriching Lives

**KIRLOSKAR INDUSTRIES LIMITED**  
A Kirloskar Group Company

7 April 2021

Corporate Relationship Department  
BSE Limited,  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai - 400 001

✓ The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051

Dear Sir,

**Declaration under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Please find enclosed declaration pursuant to Regulation 30 (1) and (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, of Swaraj Engines Limited.

Kindly take the same on your records.

Thanking you,

Yours Sincerely

Yours faithfully,  
For **Kirloskar Industries Limited**

*A.V. Mali*

**Ashwini Mali**  
Company Secretary &  
Compliance Officer



Encl.: As above



**Format for disclosures under regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1. Name of the Target Company (TC)	Swaraj Engines Limited		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	1. BSE Limited 2. National Stock Exchange of India Limited		
3. Particular of the Shareholder(s):  a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the forms 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) if promoter(s), member of the promoter group and PAC with him	N.A.           Kirloskar Industries Limited		
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, 2021, holding of:			
a) Shares	21,14,349	17.42	17.42
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC	Nil	Nil	Nil
<b>Total</b>	<b>21,14,349</b>	<b>17.42</b>	<b>17.42</b>







**KIRLOSKAR INDUSTRIES LIMITED**  
A Kirloskar Group Company

Enriching Lives

**Part – B\*\***

**Name of the Target Company: Swaraj Engines Limited**

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 PACs
Kirloskar Industries Limited	Promoter	AAACP3590P

Signature of the Authorised Signatory:

For **Kirloskar Industries Limited**

  
**Ashwini Mali**  
Company Secretary &  
Compliance Officer



Place: Pune  
Date: 7 April 2021

**Note:**

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 means 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 the Stock Exchanges but shall not be disseminated.



Enriching Lives

**KIRLOSKAR INDUSTRIES LIMITED**

A Kirloskar Group Company

7 April 2021

The Company Secretary  
Swaraj Engines Limited  
Phase -IV, S.A.S.Nagar,  
Dist. Ropar - 160059  
(Panjab)

Dear Sir,

**Declaration under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Please find enclosed declaration pursuant to Regulation 30 (1) and (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly take the same on your records.

Thanking you,

Yours Sincerely

Yours faithfully,  
For Kirloskar Industries Limited

*A.V.Mali*

**Ashwini Mali**  
Company Secretary &  
Compliance Officer



Encl.: As above



**Format for disclosures under regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1. Name of the Target Company (TC)	Swaraj Engines Limited		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	1. BSE Limited 2. National Stock Exchange of India Limited		
3. Particular of the Shareholder(s):  a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the forms 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) if promoter(s), member of the promoter group and PAC with him	N.A.           Kirloskar Industries Limited		
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, 2021, holding of:			
a) Shares	21,14,349	17.42	17.42
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC	Nil	Nil	Nil
<b>Total</b>	<b>21,14,349</b>	<b>17.42</b>	<b>17.42</b>





**KIRLOSKAR INDUSTRIES LIMITED**  
A Kirloskar Group Company

Enriching Lives

**Part – B\*\***

**Name of the Target Company: Swaraj Engines Limited**

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 PACs
Kirloskar Industries Limited	Promoter	AAACP3590P

Signature of the Authorised Signatory:

For **Kirloskar Industries Limited**

  
**Ashwini Mali**  
Company Secretary &  
Compliance Officer



Place: Pune  
Date: 7 April 2021

**Note:**

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 means 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 the Stock Exchanges but shall not be disseminated.

**From:** Mali Ashwini (KIL)  
**Sent:** 26 May 2020 20:18  
**To:** 'KAPILA.RAJESH@mahindraswaraj.com'  
**Cc:** Gayatree Karandikar (KIL)  
**Subject:** Declarations under Regulation 31(4)  
**Attachments:** SwarajDeclarations.pdf

Sir / Madam,

Please find enclosed Declarations under SEBI Takeover Code, 2011, for your necessary actions please.

The same has been filed with the Stock Exchanges.

Thanking you.

Best regards,  
Ashwini Mali  
Company Secretary &  
Compliance Officer  
Kirloskar Industries Limited

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## KIRLOSKAR INDUSTRIES LIMITED

A Kirloskar Group Company

26 May 2020

Corporate Relationship Department  
BSE Limited,  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai - 400 001

The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051

The Company Secretary  
Swaraj Engines Limited  
Phase -IV, S.A.S.Nagar,  
Dist. Ropar - 160059  
(Panjab)

Dear Sir,

### **Sub.: Declaration under Regulation 31(4) SEBI (Substantial Acquisition of Shares and Takeovers) (Second Amendment) Regulations, 2019**

Kirloskar Industries Limited (the Company / KIL), promoter of Swaraj Engines Limited (SEL), hereby declare that the Company has not created any encumbrance, directly or indirectly on the shares (21,14,349 representing 17.43%) of SEL held by the Company.

Furthermore, as per Regulation 31(5) of the aforesaid Regulations, the Company requests SEL to please suitably communicate at the next Audit Committee Meeting of SEL.

You are requested to take note of the same.

Thanking you,

Yours Sincerely

Yours faithfully,  
For **Kirloskar Industries Limited**

ASHWINI Digitally signed by  
ASHWINI VIJAY MALI  
VIJAY MALI Date: 2020.05.26  
19:41:59 +05'30'

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**

**From:** Mali Ashwini (KIL)  
**Sent:** 13 May 2020 17:58  
**To:** 'KAPILA.RAJESH@mahindraswaraj.com'; 'GREWAL MANINDER - SWARAJ'  
**Cc:** Gayatree Karandikar (KIL); Shevade Vedang (KIL)  
**Subject:** 30(1)(2) declarations - Swaraj  
**Attachments:** Swaraj Engines-Disclosure to the Stock Exchanges.pdf; Swaraj - Disclosure under Regulation 30(1) and 30(2) of SEBI SAST Regulations.pdf

Dear Sir,

Please find enclosed herewith declarations which are filed with the Stock Exchanges also.

Thanking you.

Best regards,  
Ashwini



Enriching Lives

**KIRLOSKAR INDUSTRIES LIMITED**

A Kirloskar Group Company

13 May 2020

The Company Secretary  
Swaraj Engines Limited  
Phase –IV, S.A.S.Nagar,  
Dist. Ropar – 160059  
(Panjab)

Dear Sir,

**Declaration under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Please find enclosed declaration pursuant to Regulation 30 (1) and (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly take the same on your records.

Thanking you,

Yours Sincerely

Yours faithfully,  
For **Kirloskar Industries Limited**

ASHWINI  
VIJAY MALI

Digitally signed by  
ASHWINI VIJAY MALI  
Date: 2020.05.13  
16:18:11 +05'30'

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**

Encl.: As above







## KIRLOSKAR INDUSTRIES LIMITED

A Kirloskar Group Company

Enriching Lives

### Part – B\*\*

#### Name of the Target Company: Swaraj Engines Limited

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 PACs
Kirloskar Industries Limited	Promoter	AAACP3590P

Signature of the Authorised Signatory:

For **Kirloskar Industries Limited**

ASHWINI  
VIJAY MALI

Digitally signed by  
ASHWINI VIJAY MALI  
Date: 2020.05.13  
16:18:45 +05'30'

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**

Place: Pune

Date: 13 May 2020

#### Note:

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 means 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 the Stock Exchanges but shall not be disseminated.



Enriching Lives

**KIRLOSKAR INDUSTRIES LIMITED**

A Kirloskar Group Company

13 May 2020

Corporate Relationship Department  
BSE Limited,  
1<sup>st</sup> Floor, P. J. Towers,  
Dalal Street, Fort,  
Mumbai - 400 001

The Manager  
The Listing Department  
National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block G,  
Bandra-Kurla Complex,  
Bandra (East), Mumbai 400 051

Dear Sir,

**Declaration under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Please find enclosed declaration pursuant to Regulation 30 (1) and (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, of Swaraj Engines Limited.

Kindly take the same on your records.

Thanking you,

Yours Sincerely

Yours faithfully,  
For **Kirloskar Industries Limited**

ASHWINI  Digitally signed by  
ASHWINI VIJAY MALI  
Date: 2020.05.13  
16:18:30 +05'30'

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**

Encl.: As above





## KIRLOSKAR INDUSTRIES LIMITED

A Kirloskar Group Company

Enriching Lives

### Part – B\*\*

#### Name of the Target Company: Swaraj Engines Limited

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 PACs
Kirloskar Industries Limited	Promoter	AAACP3590P

Signature of the Authorised Signatory:

For **Kirloskar Industries Limited**

ASHWINI  
VIJAY MALI

Digitally signed by  
ASHWINI VIJAY MALI  
Date: 2020.05.13  
16:18:45 +05'30'

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**

Place: Pune

Date: 13 May 2020

#### Note:

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 means 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 the Stock Exchanges but shall not be disseminated.

**From:** Mali Ashwini (KIL)  
**Sent:** 05 April 2019 19:42  
**To:** 'KAPILA.RAJESH@mahindraswaraj.com'; GREWAL MANINDER - SWARAJ  
**Cc:** Gayatree Karandikar (KIL); Shevade Vedang (KIL); Taware Soniya (KIL)  
**Subject:** FW: 30(1)(2) declarations - Swaraj  
**Attachments:** Swaraj\_BSE.PDF; Swaraj\_Company.PDF; SwarajNSE.PDF

Dear Sir,

Please find enclosed herewith declarations which are filed with the Stock Exchanges also.

Thanking you.

Best regards,  
Ashwini



Enriching Lives

**KIRLOSKAR INDUSTRIES LIMITED**

A Kirloskar Group Company

5 April 2019

BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai 400 001.

Dear Sir,

**Declaration under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Please find enclosed declaration pursuant to Regulation 30 (1) and (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, of Swaraj Engines Limited.

Kindly take the same on your records.

Thanking you,

Yours Sincerely

Yours faithfully,  
For **Kirloskar Industries Limited**

*A.V. Mali*

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**



Encl: As above







Enriching Lives

## KIRLOSKAR INDUSTRIES LIMITED

A Kirloskar Group Company

### Part – B\*\*

#### Name of the Target Company: Swaraj Engines Limited

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 PACs
Kirloskar Industries Limited	Promoter	AAACP3590P

Signature of the Authorised Signatory:

For **Kirloskar Industries Limited**

*A.V.Mali*

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**



Place: Pune

Date: 5 April 2019

#### Note:

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 means 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 the Stock Exchanges but shall not be disseminated.



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## KIRLOSKAR INDUSTRIES LIMITED

A Kirloskar Group Company

5 April 2019

National Stock Exchange of India Limited  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No. C / 1, G Block,  
Bandra Kurla Complex,  
Bandra (East),  
Mumbai 400 051.

Dear Sir,

**Declaration under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Please find enclosed declaration pursuant to Regulation 30 (1) and (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, of Swaraj Engines Limited.

Kindly take the same on your records.

Thanking you,

Yours Sincerely

Yours faithfully,  
For **Kirloskar Industries Limited**

*A.V.Mali*

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**



Encl: As above





Enriching Lives

## KIRLOSKAR INDUSTRIES LIMITED

A Kirloskar Group Company

### Part – B\*\*

#### Name of the Target Company: Swaraj Engines Limited

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 PACs
Kirloskar Industries Limited	Promoter	AAACP3590P

Signature of the Authorised Signatory:

For Kirloskar Industries Limited

*A.V. Mali*

Ashwini Mali  
Company Secretary &  
Compliance Officer



Place: Pune

Date: 5 April 2019

#### Note:

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 means 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 the Stock Exchanges but shall not be disseminated.



Enriching Lives

## KIRLOSKAR INDUSTRIES LIMITED

A Kirloskar Group Company

5 April 2019

The Company Secretary  
Swaraj Engines Limited  
Phase -IV, S.A.S.Nagar,  
Dist. Ropar – 160059  
(Panjab)

Dear Sir,

**Declaration under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Please find enclosed declaration pursuant to Regulation 30 (1) and (2) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly take the same on your records.

Thanking you,

Yours Sincerely

Yours faithfully,  
For **Kirloskar Industries Limited**

*A.v.Mali*

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**



Encl: As above





Enriching Lives

## KIRLOSKAR INDUSTRIES LIMITED

A Kirloskar Group Company

### Part – B\*\*

#### Name of the Target Company: Swaraj Engines Limited

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 PACs
Kirloskar Industries Limited	Promoter	AAACP3590P

Signature of the Authorised Signatory:

For **Kirloskar Industries Limited**

**Ashwini Mali**  
**Company Secretary &**  
**Compliance Officer**



Place: Pune

Date: 5 April 2019

#### Note:

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 means 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 the Stock Exchanges but shall not be disseminated.