

STEL Holdings Limited

(CIN: L65993KL1990PLC005811)

Regd. Office: 24/1624, Bristow Road, Willingdon Island, Cochin - 682003, Kerala

Ph: 0484 6624335 **Fax:** 0484 - 2668024

Email: secretarial@stelholdings.com **Website:** www.stelholdings.com

05.04.2021

National Stock Exchange of India Limited

Exchange Plaza,
Bandra Kurla Complex,
Bandra (East),
Mumbai 400 051

BSE Limited

Rotunda Building, P.J. Towers,
Dalal Street, Fort,
Mumbai 400 001

The Company Secretary

SAREGAMA India Limited
33 Jessore Road, Dum Dum
Kolkata, West Bengal, 700028

Re: Security Code: 532163; Security ID/Symbol: SAREGAMA

Sub: Disclosure under Regulation 30(2) and Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011.

Dear Madam,

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 and voting rights held by persons forming part of the promoter group along with persons acting in concert, in SAREGAMA India Limited as on March 31, 2021

Format for Disclosure 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)	SAREGAMA India 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

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3.	Particulars of the shareholder(s):	N.A		
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.			
b.	Or Name(s) of promoter(s), member of the promoter group and PAC with him.	As per Annexure A		
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	As per Annexure A		
	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	1,02,91,759	59.05	59.05

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PART-B (**)

Name of the Target Company:		SAREGAMA INDIA 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.	Composure Services Private Limited	YES	
2.	STEL Holdings Limited	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.

Declaration under Regulation 31(4)

Pursuant to Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011, we hereby confirm that none of promoter(s) alongwith persons acting in concert have made any encumbrance, directly or indirectly during the financial year ended March 31, 2021.

Kindly take the above information in your record(s).

Thanking you,

Yours faithfully,

PALLAVUR
SIVA
SUBRAMAN
AN LAKSHMI

Digitally signed by
PALLAVUR SIVA
SUBRAMANAN
AN LAKSHMI
Date: 2021.04.05
11:34:33 +05'30'

Lakshmi P.S
Company Secretary

Place: Kochi
Date: 05.04.2021

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Annexure A

Name(s) and Detail(s) of shareholding of Promoter(s), member of the promoter group and Persons Acting in Concert as at March 31, 2021

Sr. No.	Name(s) and Detail(s) 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 Target Company (*)
1	Composure Services Private Limited	10291599	59.05	59.05
2	STEL Holdings Limited	160	0.00	0.00
	Total	1,02,91,759	59.05	59.05