

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

04.04.2024

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 Audit Committee of the Board of Directors

Spencer's Retail Limited
Duncan House, 1st Floor
31, Netaji Subhas Road,
Kolkata-700001

Re: Target Company Security Code: SPENCER; Security ID/Symbol: 542337

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

Dear Sir,

Pursuant to Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011, we hereby confirm that none of promoter(s) along with 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,

For **STEL Holdings Limited**

Lakshmi P.S

Company Secretary

Place: Kochi

Date: 04.04.2024

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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, 2024

| Sr. No. | Name(s) and Detail(s) of the shareholding of person(s) mentioned above | Number of shares | % w.r.t total share/ voting capital wherever applicable | % of total diluted share/voting capital of Target Company (*) |
|---------|--|--------------------|---|---|
| 1 | SANJIV GOENKA | 91,659 | 0.10 | 0.10 |
| 2 | SHASHWAT GOENKA | 75,756 | 0.08 | 0.08 |
| 3 | PREETI GOENKA | 17,150 | 0.02 | 0.02 |
| 4 | SANJIV GOENKA HUF | 8,360 | 0.01 | 0.01 |
| 5 | AVARNA JAIN | 340 | 0.00 | 0.00 |
| 6 | RAINBOW INVESTMENTS LIMITED | 3,96,04,042 | 43.94 | 43.94 |
| 7 | STEL HOLDINGS LIMITED | 43,96,082 | 4.88 | 4.88 |
| 8 | PCBL LIMITED | 11,46,613 | 1.27 | 1.27 |
| 9 | INTEGRATED COAL MINING LIMITED | 24,56,247 | 2.73 | 2.73 |
| 10 | CASTOR INVESTMENTS LIMITED | 23,90,661 | 2.65 | 2.65 |
| 11 | DOTEX MERCHANDISE PRIVATE LIMITED | 28,107 | 0.03 | 0.03 |
| 12 | QUEST CAPITAL MARKETS LIMITED | 17,41,508 | 1.93 | 1.93 |
| 13 | LEBNITZE REAL ESTATES PRIVATE LIMITED | 1399 | 0.00 | 0.00 |
| 14 | DIGIDRIVE DISTRIBUTORS LIMITED | 10,50,590 | 1.17 | 1.17 |
| | Total | 5,30,08,514 | 58.81 | 58.81 |

(*) Diluted share/ voting capital mean the total number of shares in the Target Company assuming full conversion of the outstanding convertible securities/warrants into equity shares of the Target Company.