

HML TRUST NO.III**24/1624, Bristow Road, Willingdon Island, Cochin – 682003**

May 26, 2020

The Secretary
Bombay Stock Exchange Ltd.
Corporate Relationship Dept.
1st Floor, New Trading Ring
Rotunda Building, PJ Towers
Dalal Street, Fort
Mumbai - 400 001

The Secretary
National Stock Exchange of India Ltd.
"Exchange Plaza", Bandra-Kurla
Complex
Bandra (E)
Mumbai – 400 051

Dear Sir,

**Sub: Disclosure under Regulation 30(2) and Declaration under Regulation 31(4) of
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 & Takeovers) 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 STEL Holdings Limited as on March 31, 2020.

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)	STEL Holdings Limited
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	a. National Stock Exchange of India Ltd. b. BSE Ltd.

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.

N.A.

1. Rama Prasad Goenka
2. Sanjiv Goenka
3. Harshvardhan Ramprasad Goenka
4. Anant Vardhan Goenka
5. Mala Goenka
6. Radha Anant Goenka
7. Saregama India Ltd
8. Rainbow Investments Limited
9. Vayu Udaan Aircraft LLP
10. Instant Holdings Limited
11. Summit Securities Limited
12. Castor Investments Ltd.
13. Trivikram Khaitan, on behalf of HML Trust No. I
14. Trivikram Khaitan, on behalf of HML Trust No. II
15. Trivikram Khaitan, on behalf of HML Trust No. III
16. Trivikram Khaitan, on behalf of HML Trust No. IV
17. Trivikram Khaitan, on behalf of HML Trust No. V
18. Trivikram Khaitan, on behalf of HML Trust No. VI
19. Swallow Associates LLP
20. Carniwal Investments Limited
21. Harsh Vardhan Goenka Trustee of Crystal India Tech Trust
22. Harsh Vardhan Goenka Trustee of Nucleus Life Trust
23. Harsh Vardhan Goenka Trustee of Monitor Portfolio Trust
24. Harsh Vardhan Goenka Trustee of Secura India Trust
25. Harsh Vardhan Goenka Trustee of Stellar Energy Trust
26. Harsh Vardhan Goenka Trustee of Prism Estates Trust
27. Harsh Vardhan Goenka Trustee of Navya Goenka Trust
28. Harsh Vardhan Goenka Trustee of Ishaan Goenka Trust
29. Anant Vardhan Goenka Trustee of RG Goenka Trust
30. Anant Vardhan Goenka Trustee of AVG Family Trust
31. Atlantus Dwellings and Infrastructure Llp
32. Chattarpati Apartments Llp
33. Ektara Enterprises Llp
34. Malabar Coastal Holdings Llp
35. Sofreal Mercantrade Pvt. Ltd.

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 31st of the year, holding of:

a) Shares

1. Rama Prasad Goenka	10000	0.05	0.05
2. Sanjiv Goenka	35000	0.19	0.19
3. Harshvardhan Ramprasad Goenka	45000	0.24	0.24
4. Anant Vardhan Goenka	10	0.00	0.00
5. Mala Goenka	10	0.00	0.00
6. Radha Anant Goenka	10	0.00	0.00
7. Saregama India Ltd	100	0.00	0.00

8. Rainbow Investments Limited	4471438	24.23	24.23
9. Vayu Udaan Aircraft LLP	10	0.00	0.00
10. Instant Holdings Limited	1605200	8.69	8.69
11. Summit Securities Limited	878501	4.76	4.76
12. Castor Investments Limited	300900	1.63	1.63
13. Trivikram Khaitan, on behalf of HML Trust No. I	43680	0.24	0.24
14. Trivikram Khaitan, on behalf of HML Trust No. II	43680	0.24	0.24
15. Trivikram Khaitan, on behalf of HML Trust No. III	43680	0.24	0.24
16. Trivikram Khaitan, on behalf of HML Trust No. IV	43680	0.24	0.24
17. Trivikram Khaitan, on behalf of HML Trust No. V	43680	0.24	0.24
18. Trivikram Khaitan, on behalf of HML Trust No. VI	43680	0.24	0.24
19. Swallow Associates LLP	914097	4.95	4.95
20. Carniwal Investments Limited	1363580	7.39	7.39
21. Harsh Vardhan Goenka Trustee of Crystal India Tech Trust	10	0.00	0.00
22. Harsh Vardhan Goenka Trustee of Nucleus Life Trust	10	0.00	0.00
23. Harsh Vardhan Goenka Trustee of Monitor Portfolio Trust	10	0.00	0.00
24. Harsh Vardhan Goenka Trustee of Secura India Trust	10	0.00	0.00
25. Harsh Vardhan Goenka Trustee of Stellar Energy Trust	10	0.00	0.00
26. Harsh Vardhan Goenka Trustee of Prism Estates Trust	10	0.00	0.00
27. Harsh Vardhan Goenka Trustee of Navya Goenka Trust	10	0.00	0.00
28. Harsh Vardhan Goenka Trustee of Ishaan Goenka Trust	10	0.00	0.00
29. Anant Vardhan Goenka Trustee of RG Goenka Trust	10	0.00	0.00
30. Anant Vardhan Goenka Trustee of AVG Family Trust	10	0.00	0.00
31. Atlantus Dwellings and Infrastructure Llp	10	0.00	0.00
32. Chattarpati Apartments Llp	10	0.00	0.00
33. Ektara Enterprises Llp	10	0.00	0.00
34. Malabar Coastal Holdings Llp	10	0.00	0.00
35. Sofreal mercantrade Pvt. Ltd.	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	9886086	53.57	53.57

Note:

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.

Declaration under Regulation 31(4)

Pursuant to Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeover Regulations, 2011, we hereby confirm that none of Promoter(s) along with persons acting in concert, have made any encumbrance, directly or indirectly during the financial year ended March 31, 2020.

Kindly take the above information in your records.

Thanking you,

Yours faithfully,

For HML TRUST NO.III


TRUSTEE

Date: 26.05.2020

Copy to: Harrisons Malayalam Ltd., Cochin - 682003
Stel Holdings Ltd., Cochin - 682003

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