

SWALLOW ASSOCIATES LLP

Regd. Office: 463, Dr. Annie Besant Road, Worli, Mumbai 400 030

Tel No.: +91-22-49632787

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

The Audit Committee of the Board of Directors,

STEL Holdings Limited,
24/1624 Bristow Road, Willingdon Island
Ernamkulam- 682003

Re: Security Code: 533316; Security ID/Symbol: STEL

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

Dear Sir/Madam,

Pursuant to Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, we hereby confirm that none of promoter(s) alongwith persons acting in concert identified in serials nos. 1-22 (As mentioned in Annexure A), have made any encumbrance, directly or indirectly during the financial year ended March 31, 2024. As regards other constituents of the promoter group and persons acting in concert identified from serial nos. 23 to 34 (As mentioned in Annexure A) a separate declaration will be furnished by them.

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

Thanking you,
Yours faithfully,

On behalf of Promoter(s), member of the promoter group and Persons Acting in Concert
(as mentioned in Annexure A from serial no.1 to 22).



Authorised Signatory
Swallow Associates LLP

Place: Mumbai
Date: 03.04.2024

LLPIN: AAB 1953

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

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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 shareholding of Promoter(s), member(s) of the promoter group and Persons Acting in Concert	Number of shares	% w.r.t total share/ voting capital wherever applicable	% of total diluted share/voting capital of Target Company
1	Swallow Associates LLP	9,17,683	4.97	4.97
2	Carniwal Investments Limited	13,79,698	7.48	7.48
3	Summit Securities Limited	8,78,501	4.76	4.76
4	Instant Holdings Limited	16,05,200	8.70	8.70
5	Sofreal Mercantrade Pvt. Ltd.	10	0.00	0.00
6	Vayu Udaan Aircraft LLP	10	0.00	0.00
7	Ektara Enterprises LLP	10	0.00	0.00
8	Chattarpati Apartments LLP	10	0.00	0.00
9	Malabar Coastal Holdings LLP	10	0.00	0.00
10	Atlantus Dwellings and Infrastructure LLP	10	0.00	0.00
11	Harsh Vardhan Goenka (Trustee of Secura India Trust)	11,40,100	6.18	6.18
12	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	10	0.00	0.00
13	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	10	0.00	0.00
14	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	10	0.00	0.00
15	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	10	0.00	0.00
16	Anant Vardhan Goenka (Trustee of AVG Family Trust)	10	0.00	0.00
17	Anant Vardhan Goenka (Trustee of RG Family Trust)	10	0.00	0.00
18	Harsh Vardhan Goenka	55,020	0.30	0.30
19	Anant Vardhan Goenka	10	0.00	0.00
20	Radha Anant Goenka	10	0.00	0.00
21	Mala Goenka	10	0.00	0.00
22	Late Rama Prasad Goenka	10,000	0.05	0.05
23	Sanjiv Goenka*	35,000	0.19	0.19
24	Rainbow Investments Limited*	44,71,438	24.23	24.23
25	Saregama India Limited*	0	0.00	0.00
26	Digidrive Distributors Limited*	100	0.00	0.00
27	Castor Investments Limited*	10,63,087	5.76	5.76

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28	Lebnitze Real Estates Private Limited*	3,96,727	2.15	2.15
29	Trivikram Khaitan (Trustee of HML Trust No.I)*	43,680	0.24	0.24
30	Trivikram Khaitan (Trustee of HML Trust No.II) *	43,680	0.24	0.24
31	Trivikram Khaitan (Trustee of HML Trust No.III) *	43,680	0.24	0.24
32	Trivikram Khaitan (Trustee of HML Trust No.IV) *	43,680	0.24	0.24
32	Trivikram Khaitan (Trustee of HML Trust No.V) *	43,680	0.24	0.24
34	Trivikram Khaitan (Trustee of HML Trust No.VI) *	43,680	0.24	0.24
	Total	1,22,14,784	66.19%	66.19%

(*) Holdings of the promoter group entities from serial nos. 23 to 34 is also being disclosed separately by the concerned entities.