

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

04.04.2023

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

**Ref: Target Company - Security Code: 533316; Security ID/Symbol: STEL**

**Sub: Declaration under Regulation 31(4)**

Dear Sir/Madam,

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 identified in serials nos. 28-33 (As per attachment), have made any encumbrance, directly or indirectly during the financial year ended March 31, 2023. As regards other constituents of the promoter group and persons acting in concert identified from serial nos. 1 to 23 and 24 to 27 (As per attachment), a separate declaration will be furnished by them.

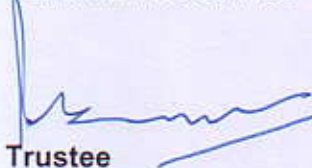
Kindly take the above information in your records.

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 nos. 28 to 33.**

For HML TRUST NO.I

  
Trustee



Place: Kochi  
Date: 04.04.2023

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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, 2023

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	Swallow Associates LLP	914097	4.95	4.95
2	Carniwal Investments Limited	1363580	7.39	7.39
3	Summit Securities Limited	878501	4.76	4.76
4	Instant Holdings Limited	1605200	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)	940167	5.09	5.09
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	55020	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	Rama Prasad Goenka	10000	0.05	0.05
23	Sanjiv Goenka	35000	0.19	0.19
24	Rainbow Investments Limited	4471438	24.23	24.23
25	Saregama India Limited	100	0.00	0.00
26	Castor Investments Limited	897137	4.86	4.86



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27	Lebnitze Real Estates Pvt. Ltd.	343040	1.86	1.86
28	Trivikram Khaitan (Trustee of HML Trust No.I)	43680	0.24	0.24
29	Trivikram Khaitan (Trustee of HML Trust No.II)	43680	0.24	0.24
30	Trivikram Khaitan (Trustee of HML Trust No.III)	43680	0.24	0.24
31	Trivikram Khaitan (Trustee of HML Trust No.IV)	43680	0.24	0.24
32	Trivikram Khaitan (Trustee of HML Trust No.V)	43680	0.24	0.24
33	Trivikram Khaitan (Trustee of HML Trust No.VI)	43680	0.24	0.24
<b>Total</b>		<b>11775510</b>	<b>63.81</b>	<b>63.81</b>

(\*) Diluted share/ voting capital means 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.

Holdings of the promoter group entities from serial nos. 1 to 23 and 24 to 27 is also being disclosed separately by the concerned entities.

