

RAINBOW INVESTMENTS LIMITED

Registered Office: DUNCAN HOUSE, 31, Netaji Subhas Road, Kolkata 700 001
PHONE: (033) 6625-1461/1464, (033) 2230-8515/9281, TELEFAX: (033) 2230-6844/2248-0140

E-mail: rpsg.secretarial@rpsg.in

CIN: U65993WB1988PLC171011

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 Board

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. 23-27 (As mentioned in Annexure A), 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 22 and 28 to 33 (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. 23 to 27)



Authorised Signatory
Rainbow Investments Limited
Place: Kolkata
Date: 05.04.2023

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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***	9,14,097	4.95	4.95
2	Carniwal Investments Limited ***	13,63,580	7.39	7.39
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) ***	9,40,167	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***	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	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	100	0.00	0.00
26	Castor Investments Limited	8,97,137	4.86	4.86

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27	Lebnitze Real Estates Private Limited	3,43,040	1.86	1.86
28	Trivikram Khaitan (Trustee of HML Trust No.I) ***	43,680	0.24	0.24
29	Trivikram Khaitan (Trustee of HML Trust No.II) ***	43,680	0.24	0.24
30	Trivikram Khaitan (Trustee of HML Trust No.III) ***	43,680	0.24	0.24
31	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
33	Trivikram Khaitan (Trustee of HML Trust No.VI) ***	43,680	0.24	0.24
	Total	1,17,75,510	63.81	63.81

(***) Holdings of the promoter group entities from serial nos 1 to 22 and 28 to 33 is also being disclosed separately by the concerned entities.