

REGISTERED OFFICE
31, Netaji Subhas Road
Kolkata 700 001
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Exchange Plaza,
Bandra Kurla Complex,
Bandra (East),
Mumbai 400 051

Rotunda Building, P.J. Towers,
Dalal Street, Fort,
Mumbai 400 001

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

Sub: Disclosure under Regulation 30(2) and Declaration under Regulation 31(4) of the 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 and Takeover) 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, 2021.

Format for Disclosure under Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011:

[illegible]

RAINBOW INVESTMENTS LIMITED

REGISTERED OFFICE

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Kolkata 700 001

E-mail: rpsg.secretarial@rpsg.in

CIN: U65993WB1988PLC171011

PHONE: : (033) 6625 1000/1500

: (033) 2230 8515/9281

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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 31 st of the year, holding of :			
	a) Shares	As per Annexure A		
	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	10,176,086	55.14	55.14

PART-B (**)

Name of the Target Company:		STEL Holdings Limited	
Sr. No.	Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/ Promoter group	PAN of the person and PAC's
1.	Swallow Associates LLP***	YES	
2.	Carnival Investments Limited ***	YES	
3.	Summit Securities Limited***	YES	
4.	Instant Holdings Limited ***	YES	
5.	Sofreal Mercantrade Pvt. Ltd. ***	YES	
6.	Ektara Enterprises LLP***	YES	
7.	Chattarpati Apartments LLP***	YES	
8.	Vayu Udaan Aircraft LLP***	YES	
9.	Malabar Coastal Holdings LLP***	YES	
10.	Atlantus Dwellings and Infrastructure LLP***	YES	
11.	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust) ***	YES	
12.	Harsh Vardhan Goenka (Trustee of Secura India Trust) ***	YES	
13.	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust) ***	YES	
14.	Harsh Vardhan Goenka (Trustee of Prism Estates Trust) ***	YES	
15.	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust) ***	YES	
16.	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust) ***	YES	

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17.	Anant Vardhan Goenka (Trustee of AVG Family Trust) ***	YES
18.	Anant Vardhan Goenka (Trustee of RG Family Trust) ***	YES
19.	Harsh Vardhan Goenka***	YES
20.	Mala Goenka***	YES
21.	Anant Vardhan Goenka ***	YES
22.	Radha Anant Goenka***	YES
23.	Rama Prasad Goenka***	YES
24.	Sanjiv Goenka	YES
25.	Rainbow Investments Limited	YES
26.	Saregama India Limited	YES
27.	Castor Investments Limited	YES
28.	Trivikram Khaitan (Trustee of HML Trust No.I) ***	Yes
29.	Trivikram Khaitan (Trustee of HML Trust No.II) ***	Yes
30.	Trivikram Khaitan (Trustee of HML Trust No.III) ***	Yes
31.	Trivikram Khaitan (Trustee of HML Trust No.IV) ***	Yes
32.	Trivikram Khaitan (Trustee of HML Trust No.V) ***	Yes
33.	Trivikram Khaitan (Trustee of HML Trust No.VI) ***	Yes

Notes:

1. In case of promoter(s) making disclosure under Regulation 30(2), no additional disclosure under Regulation 30(1) is required.

(*) Diluted share/ voting capital mean 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 Stock Exchange but shall not be disseminated.

(***) Holdings of the promoter group entities from serial nos. 01 to 23 and 28 to 33 is also being disclosed separately by the concerned entities.

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 Point 3 (b) from serial no 24 to 27)

.....
Authorised Signatory

Harish Toshniwal

Place: Kolkata

Date: 05.04.2021

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Declaration under Regulation 31(4)

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. 24-27 (see above), have made any encumbrance, directly or indirectly during the financial year ended March 31, 2021. As regards other constituents of the promoter group and persons acting in concert identified from serial nos. 01 to 23 and 28 to 33 (see above), a separate declaration would 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 Point 3 (b) from serial no 24 to 27)

.....
Authorised Signatory
Harish Toshniwal
Place: Kolkata
Date: 05.04.2021

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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, 2021

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	Carnival 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 Stellar Energy Trust) ***	10	0.00	0.00
12	Harsh Vardhan Goenka (Trustee of Secura India Trust) ***	1,40,010	0.75	0.75
13	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust) ***	10	0.00	0.00
14	Harsh Vardhan Goenka (Trustee of Prism Estates Trust) ***	10	0.00	0.00
15	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust) ***	10	0.00	0.00
16	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust) ***	10	0.00	0.00
17	Anant Vardhan Goenka (Trustee of AVG Family Trust) ***	10	0.00	0.00
18	Anant Vardhan Goenka (Trustee of RG Family Trust) ***	10	0.00	0.00
19	Harsh Vardhan Goenka***	55,020	0.30	0.30
20	Anant Vardhan Goenka***	10	0.00	0.00
21	Radha Anant Goenka***	10	0.00	0.00
22	Mala Goenka***	10	0.00	0.00
23	Rama Prasad Goenka***	10,000	0.05	0.05
24	Sanjiv Goenka	35,000	0.19	0.19
25	Rainbow Investments Limited	44,71,438	24.23	24.23
26	Saregama India Limited	100	0.00	0.00
27	Castor Investments Limited	4,40,900	2.39	2.39
28	Trivikram Khaitan (Trustee of HML Trust No.I)***	43,680	0.24	0.24

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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	10,176,086	55.14	55.14

(***) Holdings of the promoter group entities from serial nos. 01 to 23 and 28 to 33 is also being disclosed separately by the concerned entities.