

May 20, 2020

The Manager,
Listing Department,
National Stock Exchange of India Limited
Exchange Plaza, C-1,
Block G, Bandra – Kurla Complex,
Bandra (East),
Mumbai – 400 051

The Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001

Symbol: SAREGAMA EQ

Scrip Code : 532163

Dear Sir/ Madam,

Sub: Disclosure under Regulation 30(2) and Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 [‘SEBI (SAST) Regulations’]

Please find enclosed details of our shareholding in STEL Holdings Limited as on 31st March 2020 pursuant to Regulation 30(2) of SEBI (SAST) Regulations as **Annexure A** and declaration pursuant to Regulation 31(4) of SEBI (SAST) Regulations as **Annexure B**.

Please acknowledge receipt.

Thanking You,

Yours Faithfully,

For **SAREGAMA INDIA LIMITED**

Kamana
Sushil
Khetan

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Kamana Sushil
Khetan
Date: 2020.05.22
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Kamana Khetan

Company Secretary and Compliance Officer

Encl. As above

Cc: The Company Secretary
STEL Holdings Limited
24/ 1624 Bristow Road,
Willingdon Island,
Ernamkulam – 682003 (Kerela)

SAREGAMA India Limited, 33, Jessore Road, Dum Dum, Kolkata - 700 028, India.

Tel: +91 33 2551 2984, **Fax:** +91 33 2550 0817, **Web:** www.saregama.com

CIN: L22213W81946PLC014346 **Email ID:** saregama@rpsg.in

Annexure A

Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Part-A – Details of Shareholding

1. Name of Target Company (TC)	STEL Holdings Limited
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	BSE Ltd. and National Stock Exchange of India 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.	- <i>Individuals/ HUF</i> • Harsh Vardhan Ramprasad Goenka (HUF) • Sanjiv Goenka • Rama Prasad Goenka • Anant Vardhan Goenka • Mala Goenka • Radha Anant Goenka <i>Promoter Trust</i> • Trivikram Khaitan (on behalf of HML Trust I) • Trivikram Khaitan (on behalf of HML Trust II) • Trivikram Khaitan (on behalf of HML Trust III) • Trivikram Khaitan (on behalf of HML Trust IV) • Trivikram Khaitan (on behalf of HML Trust V) • Trivikram Khaitan (on behalf of HML Trust VI) • Harsh Vardhan Goenka (on behalf of CRYSTAL INDIA TECH TRUST) • Harsh Vardhan Goenka (on behalf of NUCLEUS LIFE TRUST) • Harsh Vardhan Goenka (on behalf of MONITOR PORTFOLIO TRUST) • Harsh Vardhan Goenka (on behalf of SECURA INDIA TRUST) • Harsh Vardhan Goenka (on behalf of STELLAR ENERGY TRUST) • Harsh Vardhan Goenka (on behalf of PRISM ESTATES TRUST) • Harsh Vardhan Goenka (on behalf of ISHAAN GOENKA TRUST) • Harsh Vardhan Goenka (on behalf of NAVYA GOENKA TRUST) • Anant Vardhan Goenka (on behalf of AVG Family Trust) • Anant Vardhan Goenka (on behalf of RG Family Trust) <i>Bodies Corporate</i> • Rainbow Investments Limited • Instant Holdings Limited • Carniwal Investments Ltd • Swallow Associates LLP • Summit Securities Limited • Castor Investments Limited • Saregama India Limited • Atlantus Dwellings and Infrastructure LLP • Chattarpati Apartments LLP

	• Ektara Enterprises LLP • Malabar Coastal Holdings LLP • Sofreal Mercantrade Pvt Ltd • Vayu Udaan Aircraft LLP		
4. Particulars of the shareholding of person(s) mentioned at (3) above	No. of shares	% w.r.t. total share/voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31, 2020, holding of :			
a) Shares			
• Harsh Vardhan Ramprasad Goenka (HUF)	45000	0.24	0.24
• Sanjiv Goenka	35000	0.19	0.19
• Rama Prasad Goenka	10000	0.05	0.05
• Anant Vardhan Goenka	10	0.00	0.00
• Mala Goenka	10	0.00	0.00
• Radha Anant Goenka	10	0.00	0.00
• Trivikram Khaitan (on behalf of HML Trust I)	43680	0.24	0.24
• Trivikram Khaitan (on behalf of HML Trust II)	43680	0.24	0.24
• Trivikram Khaitan (on behalf of HML Trust III)	43680	0.24	0.24
• Trivikram Khaitan (on behalf of HML Trust IV)	43680	0.24	0.24
• Trivikram Khaitan (on behalf of HML Trust V)	43680	0.24	0.24
• Trivikram Khaitan (on behalf of HML Trust VI)	43680	0.24	0.24
• Harsh Vardhan Goenka (on behalf of CRYSTAL INDIA TECH TRUST)	10	0.00	0.00
• Harsh Vardhan Goenka (on behalf of NUCLEUS LIFE TRUST)	10	0.00	0.00
• Harsh Vardhan Goenka (on behalf of MONITOR PORTFOLIO TRUST)	10	0.00	0.00
• Harsh Vardhan Goenka (on behalf of SECURA INDIA TRUST)	10	0.00	0.00
• Harsh Vardhan Goenka (on behalf of STELLAR ENERGY TRUST)	10	0.00	0.00
• Harsh Vardhan Goenka (on behalf of PRISM ESTATES TRUST)	10	0.00	0.00
• Harsh Vardhan Goenka (on behalf of ISHAAN GOENKA TRUST)	10	0.00	0.00
• Harsh Vardhan Goenka (on behalf of NAVYA GOENKA TRUST)	10	0.00	0.00
• Anant Vardhan Goenka (on behalf of AVG Family Trust)	10	0.00	0.00
• Anant Vardhan Goenka (on behalf of RG Family Trust)	10	0.00	0.00
• Rainbow Investments Limited	4471438	24.23	24.23
• Instant Holdings Limited	1605200	8.70	8.70
• Carniwal Investments Ltd	1363580	7.39	7.39
• Swallow Associates LLP	914097	4.95	4.95
• Summit Securities Limited	878501	4.76	4.76
• Castor Investments Limited	300900	1.63	1.63
• Saregama India Limited	100	0.00	0.00
• Atlantus Dwellings and Infrastructure LLP	10	0.00	0.00
• Chattarpati Apartments LLP	10	0.00	0.00
• Ektara Enterprises LLP	10	0.00	0.00
• Malabar Coastal Holdings LLP	10	0.00	0.00
• Sofreal Mercantrade Pvt Ltd	10	0.00	0.00

Vayu Udaan Aircraft LLP	10	0.00	0.00
b) Voting rights (otherwise than by shares)			
c) Warrants			
d) Convertible Securities			
Any other instrument that would entitle the holder to receive shares in the TC			
Total	9886086	53.57	53.57

For SAREGAMA INDIA LIMITED

Signature of the Authorised Signatory

Kamana
Sushil
Khetan

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Kamana Sushil
Khetan
Date: 2020.05.22
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(Kamana Khetan)
Company Secretary

Place: Mumbai

Date: May 20, 2020

Part-B**

Name of the Target Company: STEL Holdings Limited

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 PACs
Harsh Vardhan Ramprasad Goenka (HUF)	Yes	
Sanjiv Goenka	Yes	
Rama Prasad Goenka	Yes	
Anant Vardhan Goenka	Yes	
Mala Goenka	Yes	
Radha Anant Goenka	Yes	
Trivikram Khaitan (on behalf of HML Trust I)	Yes	
Trivikram Khaitan (on behalf of HML Trust II)	Yes	
Trivikram Khaitan (on behalf of HML Trust III)	Yes	
Trivikram Khaitan (on behalf of HML Trust IV)	Yes	
Trivikram Khaitan (on behalf of HML Trust V)	Yes	
Trivikram Khaitan (on behalf of HML Trust VI)	Yes	
Harsh Vardhan Goenka (on behalf of CRYSTAL INDIA TECH TRUST)	Yes	
Harsh Vardhan Goenka (on behalf of NUCLEUS LIFE TRUST)	Yes	
Harsh Vardhan Goenka (on behalf of MONITOR PORTFOLIO TRUST)	Yes	
Harsh Vardhan Goenka (on behalf of SECURA INDIA TRUST)	Yes	
Harsh Vardhan Goenka (on behalf of STELLAR ENERGY TRUST)	Yes	
Harsh Vardhan Goenka (on behalf of PRISM ESTATES TRUST)	Yes	
Harsh Vardhan Goenka (on behalf of ISHAAN GOENKA TRUST)	Yes	
Harsh Vardhan Goenka (on behalf of NAVYA GOENKA TRUST)	Yes	
Anant Vardhan Goenka (on behalf of AVG Family Trust)	Yes	
Anant Vardhan Goenka (on behalf of RG Family Trust)	Yes	
Rainbow Investments Limited	Yes	

Instant Holdings Limited	Yes	
Carniwal Investments Ltd	Yes	
Swallow Associates LLP	Yes	
Summit Securities Limited	Yes	
Castor Investments Limited	Yes	
Saregama India Limited	Yes	
Atlantus Dwellings and Infrastructure LLP	Yes	
Chattarpati Apartments LLP	Yes	
Ektara Enterprises LLP	Yes	
Malabar Coastal Holdings LLP	Yes	
Sofreal Mercantrade Pvt Ltd	Yes	
Vayu Udaan Aircraft LLP	Yes	

For SAREGAMA INDIA LIMITED

Signature of the Authorised Signatory

Kamana
Sushil
Khetan

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Kamana Sushil
Khetan
Date: 2020.05.22
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(Kamana Khetan)
Company Secretary

Place: Mumbai

Date: May 20, 2020

Note:

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 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.

Annexure B

Declaration under Regulation 31(4)

In terms of Regulation 31(4) of the Securities Exchange Board of India (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 this is to confirm that Saregama India Limited had not made any encumbrance on its shareholding in STEL Holdings Limited either directly or indirectly during the Financial Year-2019-20.

For SAREGAMA INDIA LIMITED

Signature of the Authorised Signatory

Kamana
Sushil
Khetan

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Kamana Sushil
Khetan
Date: 2020.05.22
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(Kamana Khetan)
Company Secretary

Place: Mumbai

Date: May 20, 2020