

SECURA INDIA TRUST

Registered Office: CEAT Mahal, Dr. Annie Besant Road, Worli, Mumbai, Maharashtra

December 01, 2021

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 Compliance Officer

STEL Holdings Limited

24/1624, Bristow Road,
Willingdon Island,
Cochin – 682003
Kerala

Sub: Disclosure under Regulation 29(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Dear Sir/Madam,

Please find enclosed herewith the disclosure under Regulation 29(2) of the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 in respect of the purchases of equity shares of STEL Holdings Limited.

Kindly take the same on record and acknowledge receipt.

Thanking you,

Yours faithfully,

For Secura India Trust



Paras Mal Rakhecha
Authorised Signatory

Encl.: As above

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Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	STEL Holdings Limited
Name(s) of the acquirer-and Persons Acting in Concert (PAC) with the Sellers	Harsh Vardhan Goenka, Trustee of Secura India Trust ('Secura') alongwith <u>Persons acting in concert with the Sellers:</u> 1. Rama Prasad Goenka 2. Harsh Vardhan Goenka 3. Anant Vardhan Goenka 4. Mala Goenka 5. Radha Anant Goenka 6. Sanjiv Goenka 7. Harsh Vardhan Goenka (Trustee of Nucleus Life Trust) 8. Harsh Vardhan Goenka (Trustee of Stellar Energy Trust) 9. Harsh Vardhan Goenka (Trustee of Prism Estates Trust) 10. Anant Vardhan Goenka (Trustee of AVG Family Trust) 11. Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust) 12. Harsh Vardhan Goenka (Trustee of Navya Goenka Trust) 13. Anant Vardhan Goenka (Trustee of RG Family Trust) 14. Carniwal Investments Limited 15. Instant Holdings Limited 16. Summit Securities Limited 17. Sofreal Mercantrade Private Limited 18. Swallow Associates LLP 19. Ektara Enterprises LLP 20. Chattarpati Apartments LLP 21. Vayu Udaan Aircraft LLP 22. Malabar Coastal Holdings LLP 23. Atlantus Dwellings and Infrastructure LLP 24. Trivikram Khaitan (Trustee of HML TRUST NO. I) 25. Trivikram Khaitan (Trustee of HML TRUST NO. II) 26. Trivikram Khaitan (Trustee of HML TRUST NO.III) 27. Trivikram Khaitan (Trustee of HML TRUST NO. IV) 28. Trivikram Khaitan (Trustee of HML TRUST NO. V) 29. Trivikram Khaitan (Trustee of HML TRUST NO.VI) 30. Rainbow Investments Limited 31. Saregama India Limited 32. Castor Investments Limited 33. Lebnitze Real Estates Private Limited
Whether the acquirer belongs to Promoter/Promoter group	Yes
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Ltd. (NSE) and BSE Limited (BSE)

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Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC (**)
<u>Before the acquisition/ disposal under consideration, holding of:</u>			
(a) Shares carrying voting rights	1,05,37,557(****)	57.09	57.09
(b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	-	-	-
(c) Voting rights (VR) otherwise than by equity shares	-	-	-
(d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	-	-	-
(e) Total (a+b+c+d)	1,05,37,557	57.09	57.09
<u>Details of acquisition / sale:</u>	3,92,854	2.13	2.13
(a) Shares carrying voting rights acquired/sold			
(b) VRs acquired/sold otherwise than by shares	-	-	-
(c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold	-	-	-
(d) Shares encumbered/ invoked/ released by the acquirer	-	-	-
(e) Total (a+b+c+/-d)	3,92,854	2.13^(***)	2.13
<u>After the acquisition / sale, holding of:</u>			
(a) Shares carrying voting rights	1,09,30,411	59.22	59.22
(b) Shares encumbered with the acquirer	-	-	-
(c) VRs otherwise than by shares	-	-	-

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(d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	-	-	-
(e) Total (a+b+c+d)	1,09,30,411	59.22	59.22
Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Open market purchase of shares as per Annexure-A		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	As per Annexure-A		
Equity share capital / total voting capital of the TC before the said acquisition / sale	No. of shares: 1,84,55,405 of face value Rs. 10/- each Amount: Rs. 18,45,54,050/-		
Equity share capital/ total voting capital of the TC after the said acquisition / sale	No. of shares: 1,84,55,405 of face value Rs. 10/- each Amount: Rs. 18,45,54,050/-		
Total diluted share/voting capital of the TC after the said acquisition	There is no dilution of the share capital/voting capital of the TC as a result of the transaction.		

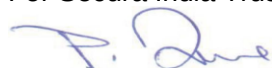
(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Regulation 31 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

(**) 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.

(***) This represents the aggregate shares carrying voting rights acquired by the acquirer together with person acting in concert with him, as per the details provided in **Annexure-A**.

(****) This includes acquisition of 200 shares by Lebnitze Real Estates Private Limited pursuant to a scheme of arrangement approved by the Hon'ble National Company Law Tribunal, Kolkata Bench.

For Secura India Trust



Paras Mal Rakhecha
Authorised Signatory
Place: Mumbai
Date: 01.12.2021

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Statement of acquisition of equity shares of STEL Holdings Limited by Secura India Trust along with PAC's (since last disclosure dated August 27, 2021 until November 30, 2021):

Date of Purchase	Name of Promoter/ Promoter Group Entity	No. of Shares	Value (in Rs.)	% w.r.t. total share/voting capital wherever applicable	Mode of Acquisition
31.08.2021	Castor Investments Ltd.	50,000	67,87,809	0.27	Market Purchase
01.09.2021	Castor Investments Ltd.	25,000	34,31,744	0.14	Market Purchase
02.09.2021	Castor Investments Ltd	25,000	35,38,370	0.14	Market Purchase
06.09.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	25,966	43,08,626	0.14	Market Purchase
07.09.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	7,000	11,61,167	0.04	Market Purchase
15.09.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	10,000	17,76,524	0.05	Market Purchase
16.09.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	29,000	52,61,275	0.16	Market Purchase
17.09.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	25,000	45,41,464	0.14	Market Purchase
22.09.2021	Castor Investments Ltd	8,237	14,79,731	0.04	Market Purchase
11.11.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	50,028	83,51,630	0.27	Market Purchase
12.11.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	15,623	26,16,529	0.08	Market Purchase
15.11.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	35,349	60,24,640	0.19	Market Purchase
16.11.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	22,651	38,13,730	0.12	Market Purchase
22.11.2021	Castor Investments Ltd.	39,000	62,03,709	0.21	Market Purchase
30.11.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	25,000	37,22,349	0.14	Market Purchase
TOTAL		3,92,854	6,30,19,297	2.13	

For Secura India Trust

Paras Mal Rakecha
Authorised Signatory
Place: Mumbai
Date: 01.12.2021