

# SWALLOW ASSOCIATES LIMITED

Regd. Office: 463, Dr. Annie Besant Road, Worli, Mumbai 400 030

---

March 29, 2012

National Stock Exchange of India Limited  
Exchange Plaza,  
Bandra Kurla Complex,  
Bandra (East),  
Mumbai 400 051

Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai 400 001

## **Sub: Disclosure under Regulation 13(4A) of Securities and Exchange Board of India (prohibition of Insider Trading) Regulations 1992**

Dear Sir,

Please find enclosed herewith the disclosure in respect of the purchase of the securities of STEL Holdings Limited by the Company under Regulation 13(4A) of Securities and Exchange Board of India (prohibition of Insider Trading) Regulations 1992.

Request you to kindly take the same on record and acknowledge receipt.

Thanking you,

Yours faithfully,  
For Swallow Associates Limited



Director



**FORM D**

Securities And Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992  
[Regulation 13(4A)]

| Name of the Company                                        | No. & % of shares / voting rights held by the Promoter / Director / officer | Date of acquisition / sale of shares / voting rights | Date of Intimation to company | Mode of acquisition (market purchase / public rights / preferential offer etc.) / sale | No. of shares / voting rights post acquisition / sale | Trading member through whom the trade was executed with SEBI Registration No. of the TM | Exchange on which the trade was executed | Buy Quantity      | Buy Value (Rs. in lakhs) | Sale Quantity | Sale Value |
|------------------------------------------------------------|-----------------------------------------------------------------------------|------------------------------------------------------|-------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------|-----------------------------------------------------------------------------------------|------------------------------------------|-------------------|--------------------------|---------------|------------|
| Swallow Associates Limited                                 | 263,197                                                                     |                                                      |                               |                                                                                        | 6,13,197                                              | BNK Securities Private Limited                                                          |                                          |                   |                          |               |            |
| PAN : AADCS3329Q                                           | 1.43%                                                                       |                                                      |                               |                                                                                        | 3.32%                                                 | SEBI Regn No.: INB230653536                                                             |                                          |                   |                          |               |            |
| Address : 463, Dr. Amie Besant Road, Worli, Mumbai 400 030 |                                                                             | As per Annexure A                                    | 29.03.2012                    | Market Purchase                                                                        |                                                       |                                                                                         | As per Annexure A                        | As per Annexure A | As per Annexure A        |               |            |

Note: The said acquisition was made by RPG Cellular Investments & Holdings Private Limited now merged with Swallow Associates Limited.

For SWALLOW ASSOCIATES LTD.



**Director**

**Annexure - A****Statement of shares purchased**

Rs. in lakhs

| Sr. No | Date       | Buy Quantity | Buy Amount | Exchange on which trade was executed |
|--------|------------|--------------|------------|--------------------------------------|
| 1      | 28/03/2012 | 350,000      | 46.63      | NSE                                  |
| TOTAL  |            | 350,000      | 46.63      |                                      |

For SWALLOW ASSOCIATES LTD.

**Director**