

# RAINBOW INVESTMENTS LIMITED

CIN: U65993WB1988PLC171011

REGISTERED OFFICE: DUNCAN HOUSE,31, NETAJI SUBHAS ROAD KOLKATA-700 001

PHONE: (033) 2230-8515; E-mail: [rpsg.secretarial@rpsg.in](mailto:rpsg.secretarial@rpsg.in)

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## 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  
Cochin - 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.**

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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, 2026. 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)

*Pradip Halder*

Pradip Halder  
Company Secretary  
Rainbow Investments Limited  
Place: Kolkata  
Date: 07.04.2026



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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, 2026

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*	9,17,683	4.97	4.97
2	Carnival Investments Limited *	13,79,698	7.48	7.48
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.*	201010	1.08	1.08
6	Vayu Associates 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)*	14,43,381	7.82	7.82
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 RamPrasad 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	Lt Rama Prasad Goenka*	10,000	0.05	0.05
23	Sanjiv Goenka	35,000	0.19	0.19
24	Rainbow Investments Limited	45,21,438	24.50	24.50
25	Castor Investments Limited	10,63,087	5.76	5.76
26	Digidrive Distributors Limited	3,36,881	1.83	1.83
27	Lebnitze Real Estates Private Limited	5,14,727	2.79	2.79
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
	<b>Total</b>	<b>132,24,346</b>	<b>71.66</b>	<b>71.66</b>

(\* ) 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.

