

SECURA INDIA TRUST

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

March 7, 2025

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G
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 Mai 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	<p>Harsh Vardhan Goenka, Trustee of Secura India Trust ('Secura') alongwith</p> <p><u>Persons acting in concert with the Buyer:</u></p> <ol style="list-style-type: none"> 1. Late 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 Prism Estates Trust) 9. Anant Vardhan Goenka (Trustee of AVG Family Trust) 10. Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust) 11. Harsh Vardhan Goenka (Trustee of Navya Goenka Trust) 12. Anant Vardhan Goenka (Trustee of RG Family Trust) 13. Carniwal Investments Limited 14. Instant Holdings Limited 15. Summit Securities Limited 16. Sofreal Mercantrade Private Limited 17. Swallow Associates LLP 18. Ektara Enterprises LLP 19. Chattarpati Apartments LLP 20. Vayu Associates LLP(Formerly known as Vayu Udaan Aircraft LLP) 21. Malabar Coastal Holdings LLP 22. Atlantus Dwellings and Infrastructure LLP 23. Trivikram Khaitan (Trustee of HML TRUST NO. I) 24. Trivikram Khaitan (Trustee of HML TRUST NO. II) 25. Trivikram Khaitan (Trustee of HML TRUST NO.III) 26. Trivikram Khaitan (Trustee of HML TRUST NO. IV) 27. Trivikram Khaitan (Trustee of HML TRUST NO. V) 28. Trivikram Khaitan (Trustee of HML TRUST NO.VI) 29. Rainbow Investments Limited 30. Digidrive Distributors Limited 31. Castor Investments Limited 32. 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 (**)
Before the acquisition/ disposal under consideration, holding of:			
(b) Shares carrying voting rights	1,24,24,784	67.33	67.33
(c) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	-	-	-
(d) Voting rights (VR) otherwise than by equity shares	-	-	-
(e) Warrants / convertible securities / any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	-	-	-
(f) Total (a+b+c+d)	1,24,24,784	67.33	67.33
Details of acquisition / sale: (***)	3,69,211	2.00	2.00
(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)	3,69,211	2.00	2.00
After the acquisition / sale, holding of:			
(a) Shares carrying voting rights	1,27,93,995	69.33	69.33
(b) Shares encumbered with the acquirer	-	-	-

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(c) VRs otherwise than by 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) after acquisition	-	-	-
(e) Total (a+b+c+d)	1,27,93,995	69.33	69.33
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**.

For **Secura India Trust**

Paras Mal Rakhecha
Authorised Signatory

Place: Mumbai
Date: March 7, 2025

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Annexure A

Statement of acquisition of equity shares of STEL Holdings Limited by Secura India Trust along with PAC's (since last disclosure dated June 6, 2024, until March 6, 2025):

Date of Purchase	Name of Promoter/ Promoter Group Entity	No. of Shares	% w.r.t. total share/voting capital wherever applicable	Mode of Acquisition
19.06.2024	Lebnitze Real Estates Private Limited	3,671	0.02	NSE
		2,136	0.01	BSE
20.06.2024	Lebnitze Real Estates Private Limited	3,528	0.02	NSE
		1,200	0.01	BSE
21.06.2024	Lebnitze Real Estates Private Limited	965	0.01	NSE
21.06.2024	Digidrive Distributors Limited	1,999	0.01	NSE
25.06.2024		4,434	0.02	
26.06.2024	Digidrive Distributors Limited	1,335	0.01	NSE
		250	0.00	BSE
27.06.2024	Digidrive Distributors Limited	6,989	0.04	NSE
		944	0.01	BSE
06.08.2024	Digidrive Distributors Limited	22,300	0.12	NSE
07.08.2024		44,534	0.24	
08.08.2024	Digidrive Distributors Limited	23,170	0.13	NSE
09.08.2024		54,222	0.29	
12.08.2024	Digidrive Distributors Limited	21,323	0.12	NSE
20.08.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	444	0.00	NSE
21.08.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	2,041	0.01	NSE
22.08.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	24,957	0.14	NSE
23.08.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	22,057	0.12	NSE
26.08.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	24,945	0.14	NSE
27.08.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	683	0.00	NSE
29.08.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	886	0.00	NSE
30.08.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	1,372	0.01	NSE
02.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	20,027	0.11	NSE & BSE
03.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	5,201	0.03	NSE & BSE
04.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	7,056	0.04	NSE
05.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	102	0.00	NSE
13.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,250	0.02	NSE

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16.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	4,681	0.03	NSE
17.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	504	0.00	NSE
18.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	111	0.00	NSE
19.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,916	0.02	NSE
		72	0.00	BSE
20.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	519	0.00	NSE
		670	0.00	BSE
23.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	1,941	0.01	NSE
		1,000	0.01	BSE
24.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	3500	0.02	NSE
		599	0.00	BSE
25.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	2,535	0.01	NSE
26.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,439	0.02	NSE
		518	0.00	BSE
27.09.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	6,000	0.03	NSE
		255	0.00	BSE
30.10.2024	Digidrive Distributors Limited	281	0.00	NSE
19.02.2025	Digidrive Distributors Limited	758	0.00	NSE
20.02.2025	Digidrive Distributors Limited	741	0.00	NSE
21.02.2025	Digidrive Distributors Limited	320	0.00	NSE
24.02.2025	Digidrive Distributors Limited	1362	0.01	NSE
25.02.2025	Digidrive Distributors Limited	1101	0.01	NSE
		372	0.00	BSE
27.02.2025	Digidrive Distributors Limited	3125	0.02	NSE
		589	0.00	BSE
28.02.2025	Digidrive Distributors Limited	4160	0.02	NSE
		1014	0.01	BSE
03.03.2025	Digidrive Distributors Limited	13390	0.07	NSE
		68	0.00	BSE
04.03.2025	Digidrive Distributors Limited	1000	0.01	NSE
05.03.2025	Digidrive Distributors Limited	2000	0.01	NSE
06.03.2025	Harsh Vardhan Goenka, Trustee of Secura India Trust	2649	0.01	NSE
TOTAL		3,69,211	2.00	

For Secura India Trust



Paras Mal Rakecha
Authorised Signatory

Place: Mumbai
Date: March 7, 2025

