

SECURA INDIA TRUST

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

June 6, 2024

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 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	<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 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	1,20,54,011	65.32	65.32
(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)	1,20,54,011	65.32	65.32
Details of acquisition / sale: (***)	3,70,773	2.01	2.01
(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)	1,24,24,784	67.33	67.33
After the acquisition / sale, holding of:			
(a) Shares carrying voting rights	-	-	-
(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)	1,24,24,784	67.33	67.33
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: June 6, 2024



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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 November 22, 2023 until June 5, 2024):

Date of Purchase	Name of Promoter/ Promoter Group Entity	No. of Shares	% w.r.t. total share/voting capital wherever applicable	Mode of Acquisition
22.11.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	823	0.01	NSE
23.11.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	211	0.00	NSE
28.11.2023	Castor Investments Limited	4,476	0.02	NSE
29.11.2023	Castor Investments Limited	3,539	0.02	NSE & BSE
30.11.2023	Castor Investments Limited	8,500	0.05	NSE & BSE
01.12.2023	Castor Investments Limited	2,020	0.01	NSE & BSE
14.12.2023	Lebnitze Real Estates Private Limited	2,440	0.01	NSE
15.12.2023	Lebnitze Real Estates Private Limited	2,651	0.01	NSE & BSE
18.12.2023	Lebnitze Real Estates Private Limited	4,537	0.02	NSE
19.12.2023	Lebnitze Real Estates Private Limited	8,100	0.04	NSE & BSE
20.12.2023	Lebnitze Real Estates Private Limited	2,874	0.02	NSE & BSE
21.12.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	4,314	0.02	NSE & BSE
22.12.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	7,291	0.04	NSE & BSE
26.12.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	2,528	0.01	NSE & BSE
27.12.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	6,469	0.04	NSE & BSE
15.02.2024	Lebnitze Real Estates Private Limited	2,962	0.02	NSE & BSE
16.02.2024	Lebnitze Real Estates Private Limited	981	0.01	NSE & BSE
19.02.2024	Lebnitze Real Estates Private Limited	5,888	0.03	NSE & BSE
20.02.2024	Lebnitze Real Estates Private Limited	7,724	0.04	NSE & BSE

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21.02.2024	Lebnitze Real Estates Private Limited	7,445	0.04	NSE & BSE
22.02.2024	Lebnitze Real Estates Private Limited	3,085	0.02	NSE & BSE
23.02.2024	Lebnitze Real Estates Private Limited	5,000	0.03	NSE & BSE
26.02.2024	Castor Investments Limited	4,384	0.02	NSE & BSE
27.02.2024	Castor Investments Limited	12,098	0.07	NSE & BSE
28.02.2024	Castor Investments Limited	433	0.00	NSE
29.02.2024	Carniwal Investments Limited	3,629	0.02	NSE & BSE
04.03.2024	Carniwal Investments Limited	2,156	0.01	NSE & BSE
05.03.2024	Carniwal Investments Limited	10,333	0.06	NSE & BSE
06.03.2024	Swallow Associates LLP	3,586	0.02	NSE
14.03.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	17,534	0.10	NSE & BSE
15.03.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,899	0.02	NSE
18.03.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,088	0.02	NSE
19.03.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	5,775	0.03	NSE & BSE
14.05.2024	Rainbow Investments Limited	10,700	0.06	NSE & BSE
15.05.2024	Rainbow Investments Limited	25,505	0.13	NSE & BSE
16.05.2024	Rainbow Investments Limited	381	0.01	NSE
17.05.2024	Rainbow Investments Limited	13,414	0.07	NSE & BSE
21.05.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	18,877	0.10	NSE & BSE
22.05.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	28,097	0.15	NSE
23.05.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,026	0.02	NSE & BSE
24.05.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	10,000	0.05	NSE & BSE

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27.05.2024	Lebnitze Real Estates Private Limited	5,672	0.03	NSE & BSE
28.05.2024	Lebnitze Real Estates Private Limited	14,196	0.08	NSE & BSE
29.05.2024	Lebnitze Real Estates Private Limited	10,132	0.05	NSE & BSE
30.05.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	27,563	0.15	NSE
31.05.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	6,454	0.03	NSE
03.06.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	12,606	0.07	NSE & BSE
04.06.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	9,493	0.05	NSE & BSE
05.06.2024	Harsh Vardhan Goenka, Trustee of Secura India Trust	13,884	0.08	NSE & BSE
TOTAL		3,70,773	2.01	

For **Secura India Trust**



Paras Mal Rakhecha
Authorised Signatory

Place: Mumbai

Date: June 6, 2024

