

SECURA INDIA TRUST

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

November 17, 2022

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 Sellers:</u></p> <ol style="list-style-type: none"> 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>			
(b) Shares carrying voting rights	1,09,30,411	59.22	59.22
(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)	1,09,30,411	59.22	59.22
<u>Details of acquisition / sale:</u>			
(a) Shares carrying voting rights acquired/sold	3,69,525	2.00	2.00
(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)	3,69,525	2.00	2.00
<u>After the acquisition / sale, holding of:</u>			
(a) Shares carrying voting rights	1,12,99,936	61.22	61.22
(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)	1,12,99,936	61.22	61.22
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**.

For Secura India Trust



Paras Mal Rakhecha
Authorised Signatory
Place: Mumbai

Date: November 17, 2022



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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 December 1, 2021 until November 16, 2022):

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
02.12.2021	Castor Investments Ltd	50,000	80,28,062	0.27	NSE
03.12.2021	Castor Investments Ltd	84,000	1,40,23,697	0.46	NSE
08.12.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	5,381	8,84,020	0.03	NSE
09.12.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	5,706	9,38,875	0.03	NSE / BSE
10.12.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	14,332	24,05,356	0.08	NSE / BSE
29.08.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	9,364	10,51,703	0.05	NSE
30.08.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	40,444	48,78,910	0.22	NSE
02.09.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	32,296	45,12,249	0.17	NSE
05.09.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	1,012	1,40,162	0.01	NSE
06.09.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,591	5,03,282	0.02	NSE
08.09.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	4,919	6,94,813	0.03	NSE
09.09.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	5,329	7,53,926	0.03	NSE
12.09.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,885	5,48,929	0.02	NSE
01.09.2022	Lebnitze Real Estates Pvt Ltd	61,271	82,17,709	0.33	NSE
02.09.2022	Lebnitze Real Estates Pvt Ltd	6,377	8,60,886	0.03	NSE
13.09.2022	Lebnitze Real Estates Pvt Ltd	5,142	7,31,341	0.03	NSE
14.09.2022	Lebnitze Real Estates Pvt Ltd	2,104	3,03,252	0.01	NSE
16.09.2022	Lebnitze Real Estates Pvt Ltd	16,324	24,77,989	0.09	NSE
19.09.2022	Lebnitze Real Estates Pvt Ltd	9,622	14,30,085	0.05	NSE
14.11.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	483	61,824	0.00	NSE
15.11.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	2,494	3,23,634	0.01	NSE
16.11.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	5,449	7,15,355	0.03	NSE
TOTAL		3,69,525	5,44,86,059	2.00	

For Secura India Trust



Paras Mal Rakecha
Authorised Signatory
Place: Mumbai
Date: 17.11.2022

