

# SECURA INDIA TRUST

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

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August 27, 2021

**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	Harsh Vardhan Goenka, Trustee of Secura India Trust ('Secura') alongwith <u>Persons acting in concert with the Sellers:</u> <ol style="list-style-type: none"> <li>1. Rama Prasad Goenka</li> <li>2. Harsh Vardhan Goenka</li> <li>3. Anant Vardhan Goenka</li> <li>4. Mala Goenka</li> <li>5. Radha Anant Goenka</li> <li>6. Sanjiv Goenka</li> <li>7. Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)</li> <li>8. Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)</li> <li>9. Harsh Vardhan Goenka (Trustee of Prism Estates Trust)</li> <li>10. Anant Vardhan Goenka (Trustee of AVG Family Trust)</li> <li>11. Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)</li> <li>12. Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)</li> <li>13. Anant Vardhan Goenka (Trustee of RG Family Trust)</li> <li>14. Carniwal Investments Limited</li> <li>15. Instant Holdings Limited</li> <li>16. Summit Securities Limited</li> <li>17. Sofreal Mercantrade Private Limited</li> <li>18. Swallow Associates LLP</li> <li>19. Ektara Enterprises LLP</li> <li>20. Chattarpati Apartments LLP</li> <li>21. Vayu Udaan Aircraft LLP</li> <li>22. Malabar Coastal Holdings LLP</li> <li>23. Atlantus Dwellings and Infrastructure LLP</li> <li>24. Trivikram Khaitan (Trustee of HML Trust No.I)</li> <li>25. Trivikram Khaitan (Trustee of HML Trust No.II)</li> <li>26. Trivikram Khaitan (Trustee of HML Trust No.III)</li> <li>27. Trivikram Khaitan (Trustee of HML Trust No.IV)</li> <li>28. Trivikram Khaitan (Trustee of HML Trust No.V)</li> <li>29. Trivikram Khaitan (Trustee of HML Trust No.VI)</li> <li>30. Rainbow Investments Limited</li> <li>31. Saregama India Limited</li> <li>32. Castor Investments Limited</li> </ol>		
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)		
<b>Details of the acquisition / disposal as follows</b>	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>

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<b><u>Before the acquisition/ disposal under consideration, holding of:</u></b>			
(a) Shares carrying voting rights	1,01,66,086	55.08	55.08
(b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/others)	-	-	-
(c) Voting rights (VR) otherwise than by equity 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)	-	-	-
<b>(e) Total (a+b+c+d)</b>	<b>1,01,66,086</b>	<b>55.08</b>	<b>55.08</b>
<b><u>Details of acquisition / sale:</u></b>	3,71,271	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	-	-	-
<b>(e) Total (a+b+c+/-d)</b>	<b>3,71,271</b>	<b>2.01<sup>(***)</sup></b>	<b>2.01</b>
<b><u>After the acquisition / sale, holding of:</u></b>			
(a) Shares carrying voting rights	1,05,37,357	57.09	57.09
(b) Shares encumbered with the acquirer	-	-	-
(c) VRs otherwise than by shares	-	-	-

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(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	-	-	-
(e) <b>Total (a+b+c+d)</b>	<b>1,05,37,357</b>	<b>57.09</b>	<b>57.09</b>
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 <b>Annexure-A</b>		
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 /	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: 27.08.2021

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## Annexure A

### Statement of acquisition of equity shares of STEL Holdings Limited by Secura India Trust along with PAC's (from August 28,2020 to August 26, 2021):

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
29.09.2020	Harsh Vardhan Goenka	10,000	5,75,600	0.05	Market Purchase
17.08.2021	Castor Investments Ltd.	75,000	87,19,635	0.41	Market Purchase
20.08.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	50,000	58,46,155	0.27	Market Purchase
23.08.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	40,966	47,87,394	0.22	Market Purchase
23.08.2021	Castor Investments Ltd	27,969	32,99,620	0.15	Market Purchase
24.08.2021	Castor Investments Ltd	25,000	30,95,087	0.13	Market Purchase
25.08.2021	Castor Investments Ltd	47,031	60,17,839	0.26	Market Purchase
26.08.2021	Harsh Vardhan Goenka, Trustee of Secura India Trust	95,305	1,31,43,974	0.52	Market Purchase
<b>TOTAL</b>		<b>3,71,271</b>	<b>2,22,56,900</b>	<b>2.01</b>	

For Secura India Trust

Paras Mal Rakecha  
Authorised Signatory  
Place: Mumbai