

SECURA INDIA TRUST

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

August 29, 2020

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">1. Rama Prasad Goenka2. Anant Vardhan Goenka3. Radha Anant Goenka4. Mala Goenka5. Sanjiv Goenka6. Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)7. Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)8. Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)9. Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)10. Harsh Vardhan Goenka (Trustee of Prism Estates Trust)11. Anant Vardhan Goenka (Trustee of AVG Family Trust)12. Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)13. Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)14. Anant Vardhan Goenka (Trustee of RG Family Trust)15. Harshvardhan Ramprasad Goenka (Karta of Harsh Anant Goenka HUF)16. Carniwal Investments Limited17. Instant Holdings Limited18. Summit Securities Limited19. Sofreal Mercantrade Private Limited20. Swallow Associates LLP21. Ektara Enterprises LLP22. Chattarpati Apartments LLP23. Vayu Udaan Aircraft LLP24. Malabar Coastal Holdings LLP25. Atlantus Dwellings and Infrastructure LLP26. Trivikram Khaitan (Trustee of HML Trust No.I)27. Trivikram Khaitan (Trustee of HML Trust No.II)

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	28. Trivikram Khaitan (Trustee of HML Trust No.III) 29. Trivikram Khaitan (Trustee of HML Trust No.IV) 30. Trivikram Khaitan (Trustee of HML Trust No.V) 31. Trivikram Khaitan (Trustee of HML Trust No.VI) 32. Rainbow Investments Limited 33. Saregama India Limited 34. Castor Investments 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)		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever	% w.r.t. total diluted share/voting capital of the
<u>Before the acquisition/ disposal under consideration, holding of:</u>			
(a) Shares carrying voting rights	96,63,252	52.36	52.36
(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)	-	-	-
(e) Total (a+b+c+d)	96,63,252	52.36	52.36
<u>Details of acquisition / sale:</u>	5,02,834	2.72	2.72
(a) Shares carrying voting rights acquired/sold			

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(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)	5,02,834	2.72(***)	2.72
<u>After the acquisition / sale, holding of:</u>			
(a) Shares carrying voting rights	1,01,66,086	55.08	55.08
(b) Shares encumbered with the acquirer	-	-	-
(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	-	-	-
(e) <u>Total (a+b+c+d)</u>	1,01,66,086	55.08	55.08
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 /	No. of shares: 1,84,55,405 of face value Rs. 10/- each Amount: Rs. 18,45,54,050/-		

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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: 29.08.2020

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Statement of acquisition of equity shares of STEL Holdings Limited by Secura India Trust along with PAC's (from January 15,2019 to August 27, 2020):

Date	Name of Promoter/ Promoter Group Entity	No. of Shares	Value (in Rs.)	% w.r.t. total share/voting capital wherever applicable	Mode of Acquisition
15.01.2019	Castor Investments Ltd.	11,621	12,34,113	0.07	Market Purchase
16.01.2019	Castor Investments Ltd.	9,597	10,19,978	0.05	Market Purchase
17.01.2019	Castor Investments Ltd	7,325	7,78,530	0.04	Market Purchase
18.01.2019	Castor Investments Ltd	11,982	12,73,132	0.06	Market Purchase
21.01.2019	Castor Investments Ltd	1,575	1,67,420	0.01	Market Purchase
22.01.2019	Castor Investments Ltd	8,701	9,23,761	0.04	Market Purchase
23.01.2019	Castor Investments Ltd	1,886	2,00,169	0.01	Market Purchase
25.01.2019	Castor Investments Ltd	28,665	30,58,330	0.16	Market Purchase
28.01.2019	Castor Investments Ltd	96,985	1,02,92,157	0.52	Market Purchase
29.01.2019	Swallow Associates LLP	11,135	11,85,704	0.06	Market Purchase
30.01.2019	Swallow Associates LLP	2,051	2,18,197	0.01	Market Purchase
06.03.2019	Swallow Associates LLP	1,185	1,10,334	0.01	Market Purchase
07.03.2019	Swallow Associates LLP	13,388	12,77,401	0.07	Market Purchase
08.03.2019	Swallow Associates LLP	3,840	3,63,943	0.02	Market Purchase
11.03.2019	Swallow Associates LLP	52	5,144	0.00	Market Purchase
12.03.2019	Swallow Associates LLP	1,750	1,72,101	0.01	Market Purchase
13.03.2019	Swallow Associates LLP	2,536	2,53,631	0.01	Market Purchase
15.03.2019	Swallow Associates LLP	8,520	9,92,803	0.05	Market Purchase
20.06.2019	Anant Vardhan Goenka, Trustee of AVG Family Trust	10	904	0.00	Market Purchase
20.11.2019	Harsh Vardhan Goenka, Trustee of Ishaan Goenka Trust	10	721	0.00	Market Purchase

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20.11.2019	Harsh Vardhan Goenka, Trustee of Navya Goenka Trust	10	728	0.00	Market Purchase
20.11.2019	Anant Vardhan Goenka, Trustee of RG Family Trust	10	712	0.00	Market Purchase
27.08.2020	Castor Investments Limited	1,40,000	85,83,192	0.76	Market Purchase
27.08.2020	Harsh Vardhan Goenka, Trustee of Secura India Trust	1,40,000	85,84,373	0.76	Market Purchase
TOTAL		5,02,834	4,06,97,478	2.72	

For Secura India Trust



Paras Mal Rakecha
Authorised Signatory
Place: Mumbai