

SECURA INDIA TRUST

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

March 6, 2023

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



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. 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. Saregama India 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	1,12,99,936	61.22	61.22
(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)	1,12,99,936	61.22	61.22
Details of acquisition / sale:			
(a) Shares carrying voting rights acquired/sold	3,70,574	2.02	2.02
(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)			
After the acquisition / sale, holding of:			
(a) Shares carrying voting rights	1,16,70,510	63.24	63.24
(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)	1,16,70,510	63.24	63.24
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



Authorised Signatory
Place: Mumbai
Date: March 6, 2023

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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 17, 2022 until March 3, 2023):

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
17.11.2022	Lebnitze Real Estates Pvt Ltd	1,536	2,01,452	0.01	BSE
18.11.2022	Lebnitze Real Estates Pvt Ltd	4,332	5,70,978	0.02	NSE
24.11.2022	Lebnitze Real Estates Pvt Ltd	3,269	4,38,856	0.02	NSE
25.11.2022	Lebnitze Real Estates Pvt Ltd	2,165	2,92,033	0.01	NSE
30.11.2022	Lebnitze Real Estates Pvt Ltd	6,295	8,83,356	0.03	NSE
01.12.2022	Lebnitze Real Estates Pvt Ltd	3,340	4,72,805	0.02	NSE
01.12.2022	Lebnitze Real Estates Pvt Ltd	1,431	2,03,531	0.01	BSE
06.12.2022	Lebnitze Real Estates Pvt Ltd	6,000	8,73,197	0.03	NSE
06.12.2022	Lebnitze Real Estates Pvt Ltd	2,500	3,62,461	0.01	BSE
07.12.2023	Lebnitze Real Estates Pvt Ltd	8,540	12,59,095	0.05	NSE
07.12.2022	Lebnitze Real Estates Pvt Ltd	1,599	2,32,700	0.01	BSE
08.12.2022	Lebnitze Real Estates Pvt Ltd	12,692	19,12,926	0.07	NSE
09.12.2022	Lebnitze Real Estates Pvt Ltd	22,000	33,77,714	0.12	NSE
09.12.2022	Lebnitze Real Estates Pvt Ltd	5,974	9,19,656	0.03	BSE
12.12.2022	Lebnitze Real Estates Pvt Ltd	18,327	28,45,565	0.10	NSE
27.12.2022	Lebnitze Real Estates Pvt Ltd	37,000	58,75,989	0.20	NSE
13.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	4,000	6,02,000	0.02	NSE
14.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	10,456	16,72,084	0.06	NSE & BSE
15.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,151	5,08,886	0.02	NSE
16.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	15,586	25,99,805	0.08	NSE

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19.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	13,002	22,34,300	0.07	NSE
20.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	15,000	25,52,522	0.08	NSE
21.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	19,702	32,40,231	0.11	NSE
22.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	10,677	16,25,170	0.06	NSE
23.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	17,000	24,13,282	0.09	NSE
26.12.2022	Harsh Vardhan Goenka, Trustee of Secura India Trust	20,000	30,09,404	0.11	NSE
23.02.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	564	74,697	0.00	NSE
24.02.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	3,247	4,38,207	0.02	NSE
27.02.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	10,181	13,66,687	0.06	NSE
28.02.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	1,659	2,25,963	0.01	NSE
01.03.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	26,952	38,54,902	0.15	NSE
02.03.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	44,609	69,07,169	0.24	NSE & BSE
03.03.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	17,788	29,07,141	0.1	NSE & BSE
TOTAL		3,70,574	5,69,54,764	2.02	

For Secura India Trust



Authorised Signatory

Place: Mumbai

Date: March 6, 2023