

# SECURA INDIA TRUST

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

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November 22, 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**

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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**



Anand Rathi  
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"> <li>1. Late 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 Prism Estates Trust)</li> <li>9. Anant Vardhan Goenka (Trustee of AVG Family Trust)</li> <li>10. Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)</li> <li>11. Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)</li> <li>12. Anant Vardhan Goenka (Trustee of RG Family Trust)</li> <li>13. Carniwal Investments Limited</li> <li>14. Instant Holdings Limited</li> <li>15. Summit Securities Limited</li> <li>16. Sofreal Mercantrade Private Limited</li> <li>17. Swallow Associates LLP</li> <li>18. Ektara Enterprises LLP</li> <li>19. Chattarpati Apartments LLP</li> <li>20. Vayu Udaan Aircraft LLP</li> <li>21. Malabar Coastal Holdings LLP</li> <li>22. Atlantis Dwellings and Infrastructure LLP</li> <li>23. Trivikram Khaitan (Trustee of HML TRUST NO. I)</li> <li>24. Trivikram Khaitan (Trustee of HML TRUST NO. II)</li> <li>25. Trivikram Khaitan (Trustee of HML TRUST NO.III)</li> <li>26. Trivikram Khaitan (Trustee of HML TRUST NO. IV)</li> <li>27. Trivikram Khaitan (Trustee of HML TRUST NO. V)</li> <li>28. Trivikram Khaitan (Trustee of HML TRUST NO.VI)</li> <li>29. Rainbow Investments Limited</li> <li>30. Digidrive Distributors Limited</li> <li>31. Castor Investments Limited</li> <li>32. Lebnitze Real Estates Private 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)

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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 (**)
<b>Before the acquisition/disposal under consideration, holding of:</b>			
(b) Shares carrying voting rights	1,16,70,510	63.24	63.24
(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)	-	-	-
<b>(f) Total (a+b+c+d)</b>	<b>1,16,70,510</b>	<b>63.24</b>	<b>63.24</b>
<b>Details of acquisition / sale:</b>			
(a) Shares carrying voting rights acquired/sold	3,83,501	2.08	2.08
(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>1,20,54,011</b>	<b>65.32</b>	<b>65.32</b>
<b>After the acquisition / sale, holding of:</b>			
(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) <b>Total (a+b+c+d)</b>	<b>1,20,54,011</b>	<b>65.32</b>	<b>65.32</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 / 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**

  
Anand Rathi  
Authorised Signatory  
Place: Mumbai  
Date: November 22, 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 March 6, 2023 until November 21, 2023):**

Date of Purchase	Name of Promoter/ Promoter Group Entity	No. of Shares	% w.r.t. total share/voting capital wherever applicable	Mode of Acquisition
13.03.2023	Lebnitze Real Estates Private Limited	8,884	0.05	NSE & BSE
14.03.2023	Lebnitze Real Estates Private Limited	16,500	0.09	NSE & BSE
15.03.2023	Lebnitze Real Estates Private Limited	14,661	0.08	NSE & BSE
16.03.2023	Lebnitze Real Estates Private Limited	8,919	0.04	NSE & BSE
17.03.2023	Lebnitze Real Estates Private Limited	8,825	0.05	NSE & BSE
20.03.2023	Lebnitze Real Estates Private Limited	13,134	0.07	NSE & BSE
21.03.2023	Lebnitze Real Estates Private Limited	10,540	0.06	NSE
22.03.2023	Lebnitze Real Estates Private Limited	16,075	0.09	NSE & BSE
22.03.2023	Lebnitze Real Estates Private Limited	7,462	0.04	NSE & BSE
17.08.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	11,001	0.06	NSE & BSE
18.08.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	22,499	0.12	NSE & BSE
23.08.2023	Castor Investments Limited	10,000	0.05	NSE & BSE
24.08.2023	Castor Investments Limited	10,000	0.05	NSE & BSE
25.08.2023	Castor Investments Limited	17,500	0.09	NSE & BSE
31.08.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	2,735	0.01	NSE
01.09.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	1,265	0.01	NSE
14.09.2023	Castor Investments Limited	9,477	0.05	NSE

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15.09.2023	Castor Limited	Investments	24,354	0.13	NSE
18.09.2023	Castor Limited	Investments	5,294	0.03	NSE
20.09.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust		5,286	0.03	NSE
21.09.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust		16,090	0.09	NSE & BSE
22.09.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust		17,232	0.09	NSE & BSE
25.09.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust		4,382	0.02	NSE & BSE
26.09.2023	Castor Limited	Investments	2,222	0.01	NSE
27.09.2023	Castor Limited	Investments	1,653	0.01	NSE
23.10.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust		32,954	0.18	NSE & BSE
25.10.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust		17,056	0.09	NSE & BSE
25.10.2023	Castor Limited	Investments	3,359	0.02	NSE & BSE
26.10.2023	Castor Limited	Investments	3,580	0.02	NSE & BSE
27.10.2023	Castor Limited	Investments	6,726	0.04	NSE & BSE
02.11.2023	Castor Limited	Investments	4,590	0.02	NSE & BSE
03.11.2023	Castor Limited	Investments	2,849	0.02	NSE & BSE
06.11.2023	Castor Limited	Investments	6,970	0.04	NSE & BSE
07.11.2023	Castor Limited	Investments	8,314	0.05	NSE & BSE
08.11.2023	Castor Limited	Investments	5,695	0.03	NSE & BSE
09.11.2023	Castor Limited	Investments	3,532	0.02	NSE & BSE
10.11.2023	Castor Limited	Investments	4,385	0.02	NSE & BSE

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16.11.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	667	0.00	NSE
17.11.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	10	0.00	NSE
20.11.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	20	0.00	NSE
21.11.2023	Harsh Vardhan Goenka, Trustee of Secura India Trust	16,804	0.09	NSE & BSE
<b>TOTAL</b>		<b>3,83,501</b>	<b>2.08</b>	

For Secura India Trust



Anand Rathi  
Authorised Signatory  
Place: Mumbai  
Date: November 22, 2023