

SWALLOW ASSOCIATES LLP

Regd. Office: 463, Dr. Annie Besant Road, Worli, Mumbai 400 030

Tel No.: +91-22-25292152/54/55 Fax No: +91-22-25297423

Email: swallowassociatesllp@gmail.com

☒ National Stock Exchange of India Limited

Exchange Plaza,
Bandra Kurla Complex,
Bandra (East),
Mumbai 400 051

Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai 400 001

☐ The Company Secretary

STEL Holdings Limited,
24/1624 Bristow Road, Willingdon Island
Ernamkulam- 682003

Re: Security Code: 533316; Security ID/Symbol: STEL

Sub: Disclosure under Regulation 30(2) and Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011.

Dear Sir/Madam,

Pursuant to provisions of Regulation 30(2) of the Securities and Exchange Board of India (SEBI) (Substantial Acquisition of Shares and Takeover) Regulations, 2011, we disclose herewith the number of shares and voting rights held by persons forming part of the promoter group along with persons acting in concert, in STEL Holdings Limited as on March 31, 2020.

Disclosure under Regulation 30(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011:

PART-A – Details of Shareholding:

1.	Name of the Target Company (TC)	STEL Holdings Limited		
2.	Name(s) of the stock exchange(s) where the shares of the TC are listed	NSE- National Stock Exchange of India Limited; BSE- BSE Limited		
3.	Particulars of the shareholder(s): a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC. Or b. Name(s) of promoter(s), member of the promoter group and PAC with him.	N.A As per Annexure A		
4.	Particulars of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t total share/ voting capital	% of total diluted share/v

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			wherever applicable	oting capital of TC(*)
	As of March 31 st of the year, holding of :			
	a) Shares	As per Annexure A		
	b)Voting Rights (otherwise than by shares)	-	-	-
	c)Warrants,	-	-	-
	d)Convertible Securities	-	-	-
	e)Any other instrument that would entitle the holder to receive shares in the TC.	-	-	-
	TOTAL	98,86,086	53.57	53.57

PART-B (**)

Name of the Target Company:		STEL Holdings Limited
Sr. No.	Name(s) of the person and Persons Acting in Concert (PAC) with the person	Whether the person belongs to Promoter/ Promoter group
1.	Swallow Associates LLP	YES
2.	Carniwal Investments Limited	YES
3.	Summit Securities Limited	YES
4.	Instant Holdings Limited	YES
5.	Sofreal Mercantrade Pvt. Ltd.	YES
6.	Ektara Enterprises LLP	YES
7.	Chattarpati Apartments LLP	YES
8.	Vayu Udaan Aircraft LLP	YES
9.	Malabar Coastal Holdings LLP	YES
10.	Atlantus Dwellings and Infrastructure LLP	YES
11.	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	YES
12.	Harsh Vardhan Goenka (Trustee of Secura India Trust)	YES
13.	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	YES
14.	Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)	YES
15.	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	YES
16.	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	YES
17.	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	YES
18.	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	YES
19.	Harshvardhan Ramprasad Goenka (Karta of Harsh Anant Goenka HUF)	YES

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20.	Anant Vardhan Goenka (Trustee of AVG Family Trust)	YES
21.	Anant Vardhan Goenka (Trustee of RG Family Trust)	YES
22.	Mala Goenka	YES
23.	Anant Vardhan Goenka	YES
24.	Radha Anant Goenka	YES
25.	Rama Prasad Goenka	YES
26.	Sanjiv Goenka	YES
27.	Rainbow Investments Limited	YES
28.	Saregama India Limited	YES
29.	Castor Investments Limited	YES
30.	Trivikram Khaitan (Trustee of HML Trust No.I)	Yes
31.	Trivikram Khaitan (Trustee of HML Trust No.II)	Yes
32.	Trivikram Khaitan (Trustee of HML Trust No.III)	Yes
33.	Trivikram Khaitan (Trustee of HML Trust No.IV)	Yes
34.	Trivikram Khaitan (Trustee of HML Trust No.V)	Yes
35.	Trivikram Khaitan (Trustee of HML Trust No.VI)	Yes

Notes:

1. In case of promoter(s) making disclosure under Regulation 30(2), no additional disclosure under Regulation 30(1) is required.

(*) Diluted share/ voting capital mean the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

(**) Part B shall be disclosed to Stock Exchange but shall not be disseminated.

Declaration under Regulation 31(4)

Pursuant to Regulation 31(4) of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011, we hereby confirm that none of promoter(s) alongwith persons acting in concert, have made any encumbrance, directly or indirectly during the financial year ended March 31, 2020.

Kindly take the above information in your record(s).

Thanking you,
Yours faithfully,

S. Raguraman
Authorised Signatory
Swallow Associates LLP
Place: Mumbai
Date: 22.05.2020

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Annexure A

Name(s) and Detail(s) of shareholding of Promoter(s), member of the promoter group and Persons Acting in Concert as at March 31, 2020

Sr. No.	Name(s) and Detail(s) of the shareholding of person(s) mentioned at (3) above	Number of shares	% w.r.t total share/ voting capital wherever applicable	% of total diluted share/voting capital of Target Company (*)
1	Swallow Associates LLP	9,14,097	4.95	4.95
2	Carniwal Investments Limited	13,63,580	7.39	7.39
3	Summit Securities Limited	8,78,501	4.76	4.76
4	Instant Holdings Limited	16,05,200	8.70	8.70
5	Sofreal Mercantrade Pvt. Ltd.	10	0.00	0.00
	Vayu Udaan Aircraft LLP	10	0.00	0.00
7	Ektara Enterprises LLP	10	0.00	0.00
8	Chattarpati Apartments LLP	10	0.00	0.00
9	Malabar Coastal Holdings LLP	10	0.00	0.00
10	Atlantus Dwellings and Infrastructure LLP	10	0.00	0.00
11	Harsh Vardhan Goenka (Trustee of Stellar Energy Trust)	10	0.00	0.00
12	Harsh Vardhan Goenka (Trustee of Secura India Trust)	10	0.00	0.00
13	Harsh Vardhan Goenka (Trustee of Monitor Portfolio Trust)	10	0.00	0.00
14	Harsh Vardhan Goenka (Trustee of Crystal India Tech Trust)	10	0.00	0.00
15	Harsh Vardhan Goenka (Trustee of Nucleus Life Trust)	10	0.00	0.00
16	Harsh Vardhan Goenka (Trustee of Prism Estates Trust)	10	0.00	0.00
17	Harsh Vardhan Goenka (Trustee of Ishaan Goenka Trust)	10	0.00	0.00
18	Harsh Vardhan Goenka (Trustee of Navya Goenka Trust)	10	0.00	0.00
19	Harshvardhan Ramprasad Goenka (Karta of Harsh Anant Goenka HUF)	45,000	0.24	0.24
20	Anant Vardhan Goenka (Trustee of AVG Family Trust)	10	0.00	0.00
21	Anant Vardhan Goenka (Trustee of RG Family Trust)	10	0.00	0.00
22	Anant Vardhan Goenka	10	0.00	0.00
23	Radha Anant Goenka	10	0.00	0.00
24	Mala Goenka	10	0.00	0.00
25	Rama Prasad Goenka	10,000	0.05	0.05
26	Sanjiv Goenka	35,000	0.19	0.19
27	Rainbow Investments Limited	44,71,438	24.22	24.22
28	Saregama India Limited	100	0.00	0.00
29	Castor Investments Limited	3,00,900	1.63	1.63
30	Trivikram Khaitan (Trustee of HML Trust No.I)	43,680	0.24	0.24
31	Trivikram Khaitan (Trustee of HML Trust No.II)	43,680	0.24	0.24
32	Trivikram Khaitan (Trustee of HML Trust No.III)	43,680	0.24	0.24
33	Trivikram Khaitan (Trustee of HML Trust No.IV)	43,680	0.24	0.24
34	Trivikram Khaitan (Trustee of HML Trust No.V)	43,680	0.24	0.24
35	Trivikram Khaitan (Trustee of HML Trust No.VI)	43,680	0.24	0.24
	Total	98,86,086	53.57	53.57