October 28, 2019

The Secretary
National Stock Exchange of India Limited
Exchange Plaza, Bandra- Kurla Complex
Bandra (E), Mumbai – 400051,
Maharashtra
Symbol: STEL

The Secretary
Bombay Stock Exchange Limited
Corporate Relationship Department
1st Floor, New Trading Ring, Rotunda building
P.J Towers, Dalal Street, Fort, Mumbai
Maharashtra- 400001
Scrip Code: 533316

Dear Sir,

Sub: Certificate under Regulation 40(9) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the half year ended September 30, 2019

We hereby submit the certificate under Regulation 40(10) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 issued by Mr. Sivakumar P., Practising Company Secretary (CP No. 2210) (SEP & Associates, Practising Company Secretaries) for the half year ended September 30, 2019.

Thanking you

Yours faithfully,

For STEL Holdings Limited

Lakshmi P.S
Company Secretary
CERTIFICATE UNDER REGULATION 40 (9) OF THE SECURITIES EXCHANGE BOARD OF INDIA (LISTING OBLIGATION AND DISCLOSURE REQUIREMENT) REGULATIONS, 2015
FOR THE HALF YEAR ENDED 30TH SEPTEMBER, 2019

I have examined all Share Transfer forms, Memorandum of Transfers, Registers, files and other documents relating to STEL HOLDINGS LIMITED, having its Registered office at 24/1624 Bristow Road, Willingdon Island Ernakulam - 682003 maintained by LINK INTIME INDIA PRIVATE LIMITED the Registrar and Share Transfer Agent (RTA) of the Company pertaining to transfer of equity shares of the company for the period from 1st April, 2019 to 30th September, 2019 for the purpose of issuing a Certificate as per Regulation 40(9)of the SEBI (LODR) Regulations 2015, by STEL HOLDINGS LIMITED and based on the information provided by the Company, hereby certify that the Company has delivered during the half year ended on 30th September, 2019.

A) Share Certificate(s) relating to the Share Transfer form(s) received during the period from 1st April, 2019 to 30th September, 2019 as entered in the Memorandum of Transfers have been issued within the prescribed format from the respective date of lodgement of each form excepting those rejected on technical grounds.

B) Share Certificate in respect of requests for exchange of Duplicate Certificates have been issued within the prescribed period from the date of lodgment and there is no request for split Certificate during the period from 01.04.2019 to 30.09.2019.

C) No request sub-division, consolidation, renewal, exchange, endorsement of calls/ allotment monies received by the company during the period from 01.04.2019 to 30.09.2019

D) Any other information, if applicable: Nil.

Date: 28.10.2019
Place: Kochi

Managing Partner
SEP & Associates
Membership No. 3050
CP No. 2210