

**STERLING TOOLS LIMITED**

CIN : L29222DL1979PLC009668

WORKS : 5-A DLF Industrial Estate  
Faridabad - 121 003 Haryana India  
Tel : 91-129-227 0621 to 25/225 5551 to 53  
Fax : 91-129-227 7359  
E-mail : sterling@stlfasteners.com  
website : stlfasteners.com

**By NEAPS**Email: [takeover@nse.co.in](mailto:takeover@nse.co.in)

**National Stock Exchange of India Limited**  
"Exchange Plaza",  
Bandra-Kurla Complex, Bandra (E)  
Mumbai-400051  
**Scrip Code: STERTOOLS**

Date: 26<sup>th</sup> June 2024**By Listing Centre**Email: [corp.relations@bseindia.com](mailto:corp.relations@bseindia.com)

General Manager  
**Corporate Relationship Department**  
**Bombay Stock Exchange Limited**  
1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai – 400001  
**Security Code No. 530759**

**Sub: Submission of disclosure under Regulation 10(6), 29(1) and 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

Dear Sir/ Madam,

This is in line with the requirement under Regulation 10(6), 29(1) and 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations 2011 (SEBI (SAST) Regulations, 2011), we have received the following disclosure from Promoter/Promoter Group of Sterling Tools Limited:

1. Disclosure under Regulation 10(6), 29(1) and 29(2) of SEBI (SAST) Regulations, 2011 received from Mrs. Promila Aggarwal, for acquisition of shares via inter se transfer (by way of gift).
2. Disclosure under Regulation 29(2) of SEBI (SAST) Regulations, 2011 received from Mr. Akhill Aggarwal and Mr. Anish Aggarwal, for disposal of shares via inter se transfer (by way of gift).

We request you to kindly take note of the same for compliance purposes and update the above disclosed information in your records.

Further, kindly note that there is no change in the total shareholding of Promoter and Promoter Group of the Company pre and post transfer of shares.

Thanking you,

**For Sterling Tools Limited**

A handwritten signature in blue ink that reads 'Abhishek Chawla'.

**Abhishek Chawla**

**Company Secretary & Compliance Officer**  
**M. No. A34399**

**ABHISHEK** Digitally signed by  
ABHISHEK CHAWLA  
Date: 2024.06.26  
15:28:00 +05'30'

**CHAWLA**

**AKHILL AGGARWAL**  
A-55, New Friends Colony,  
New Delhi - 110025

**ANISH AGARWAL**  
A-55, New Friends Colony,  
New Delhi - 110025

**Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Name of the Target Company (TC)	STERLING TOOLS LIMITED		
Name(s) of the Seller	Mr. Akhill Aggarwal Mr. Anish Agarwal		
Whether the Seller belongs to Promoter / Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited National Stock Exchange of India Ltd.		
<b>Details of the disposal as follows</b>	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever applicable (*)</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>
<b>Before the disposal under consideration, holding of:</b>			
a) Shares carrying voting rights	54,16,914	15.04	15.04
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
c) Voting rights (VR) otherwise than by shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the seller to receive shares carrying voting rights in the T C (specify holding in each category)	-	-	-
e) Total (a+b+c+d)	<b>54,16,914</b>	<b>15.04</b>	<b>15.04</b>
<b>Details of disposal:</b>			
a) Shares carrying voting rights sold	54000	0.15	0.15
b) VRs sold otherwise than by shares	-	-	-
c) Warrants/convertible securities/any other instrument that entitles the seller to receive shares carrying voting rights in the TC (specify holding in each category) sold	-	-	-
d) Shares encumbered / invoked / released by the seller	-	-	-
e) Total (a+b+c+d)	<b>54000</b>	<b>0.15</b>	<b>0.15</b>



Anish Agarwal

**AKHILL AGGARWAL**  
A-55, New Friends Colony,  
New Delhi - 110025

**ANISH AGARWAL**  
A-55, New Friends Colony,  
New Delhi – 110025

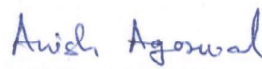
<b>After the disposal, holding of:</b>			
a) Shares carrying voting rights disposed off	53,62,914	14.89	14.89
b) Shares encumbered with the seller	-	-	-
c) VRs otherwise than by shares	-	-	-
d) Warrants / convertible securities / any other instrument that entitles the seller to receive shares carrying voting rights in the TC (specify holding in each category) after sale	-	-	-
e) Total (a+b+c+d)	<b>53,62,914</b>	<b>14.89</b>	<b>14.89</b>
Mode of sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Off Market trade i.e., inter-se transfer (by way of Gift)		
Date of sale / VR or date of receipt of intimation of allotment of shares, whichever is applicable	24-06-2024		
Equity share capital / total voting capital of the TC before the said sale	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		
Equity share capital/ total voting capital of the TC after the said sale	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		
Total diluted share/voting capital of the TC after the said Sale	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		

(\* Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(\*\*) 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.

  
**AKHILL AGGARWAL**  
WHOLE TIME DIRECTOR & PROMOTER  
OF STERLING TOOLS LTD

Place: New Delhi  
Date: 26.06.2024

  
**ANISH AGARWAL**  
DIRECTOR & PROMOTER  
OF STERLING TOOLS LTD

**AKHILL AGGARWAL**  
A-55, New Friends Colony,  
New Delhi - 110025

**ANISH AGARWAL**  
A-55, New Friends Colony,  
New Delhi – 110025

**APPENDIX -A**

**Name of Target Company: Sterling Tools Limited**

**1. Pre- disposal Shareholding:**

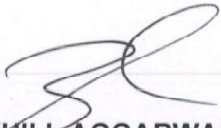
<b>Name of the Seller</b>	<b>Number of shares</b>	<b>% of Total shareholding</b>
Mr. Akhill Aggarwal	26,87,957	7.46
Mr. Anish Agarwal	27,28,957	7.58
<b>Total</b>	<b>54,16,914</b>	<b>15.04</b>

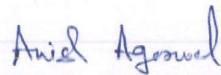
**2. Details of Sale:**

<b>Name of the Seller</b>	<b>Number of shares</b>	<b>% of Total shareholding</b>
Mr. Akhill Aggarwal	27000	0.07
Mr. Anish Agarwal	27000	0.07
<b>Total</b>	<b>54000</b>	<b>0.15</b>

**3. Post disposal Shareholding:**

<b>Name of the Seller</b>	<b>Number of shares</b>	<b>% of Total shareholding</b>
Mr. Akhill Aggarwal	26,60,957	7.39
Mr. Anish Agarwal	27,01,957	7.50
<b>Total</b>	<b>53,62,914</b>	<b>14.89</b>

  
**AKHILL AGGARWAL**  
WHOLE TIME DIRECTOR & PROMOTER  
OF STERLING TOOLS LTD

  
**ANISH AGARWAL**  
DIRECTOR & PROMOTER  
OF STERLING TOOLS LTD

Place: New Delhi  
Date: 26.06.2024

**PROMILA AGGARWAL**A-55, New Friends Colony,  
New Delhi - 110025**Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011****Part-A - Details of the Acquisition**

Name of the Target Company (TC)	STERLING TOOLS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	PROMILA AGGARWAL (Part of Promoter/Promoter Group)		
Whether the acquirer belongs to Promoter / Promoter group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE LIMITED National Stock Exchange of India Ltd.		
<b>Details of the acquisition as follows</b>	<b>Number</b>	<b>% w.r.t. total share/voting capital wherever applicable (*)</b>	<b>% w.r.t. total diluted share/voting capital of the TC (**)</b>
<b>Before the acquisition under consideration, holding of acquirer along with PACs of:</b>			
a) Shares carrying voting rights	701000	1.95	1.95
b) Shares in the nature of encumbrance (pledge/ lien/ non- disposal undertaking/ others)	-	-	-
c) Voting rights (VR) 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)	-	-	-
e) Total (a+b+c+d)	<b>701000</b>	<b>1.95</b>	<b>1.95</b>
<b>Details of acquisition</b>			
a) Shares carrying voting rights acquired	54000	0.15	0.15
b) VRs acquired otherwise than by equity 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	-	-	-

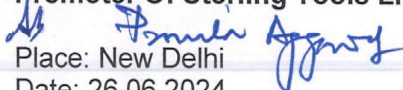
**PROMILA AGGARWAL**

A-55, New Friends Colony,  
New Delhi - 110025

d) Shares in the nature of encumbrance (pledge/ lien/ non- disposal undertaking/ others)	-	-	-
e) Total (a+b+c+/-d)	<b>54000</b>	<b>0.15</b>	<b>0.15</b>
<b>After the acquisition, holding of acquirer along with PACs of:</b>			
a) Shares carrying voting rights	7,55,000	2.10	2.10
b) VRs otherwise than by equity 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) after acquisition	-	-	-
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)	-	-	-
e) Total (a+b+c+d)	<b>7,55,000</b>	<b>2.10</b>	<b>2.10</b>
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer / encumbrance, etc.)	Off Market Trade i.e., Inter-se transfer (by way of Gift)		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	N.A.		
Date of acquisition of / date of receipt of intimation of allotment of shares / VR/ warrants/convertible securities/any other instrument that entitles the acquirer to receive shares in the TC.	24 <sup>th</sup> June 2024		
Equity share capital / total voting capital of the TC before the said acquisition	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		
Equity share capital/ total voting capital of the TC after the said acquisition	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		
Total diluted share/voting capital of the TC after the said acquisition	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		

**Promila Aggarwal**  
**Promoter Of Sterling Tools Limited**

Place: New Delhi  
Date: 26.06.2024



**PROMILA AGGARWAL**A-55, New Friends Colony,  
New Delhi - 110025**Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Name of the Target Company (TC)	STERLING TOOLS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	PROMILA AGGARWAL (Part of Promoter/Promoter Group)		
Whether the acquirer belongs to Promoter / Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE LIMITED National Stock Exchange of India Ltd.		
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 under consideration, holding of:</b>			
a) Shares carrying voting rights	701000	1.95	1.95
b) Shares in the nature of encumbrance (pledge/ lien/ non- disposal undertaking/ others)	-	-	-
c) Voting rights (VR) otherwise than by shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	-	-	-
e) Total (a+b+c+d)	<b>701000</b>	<b>1.95</b>	<b>1.95</b>
<b>Details of acquisition</b>			
a) Shares carrying voting rights acquired	54000	0.15	0.15
b) VRs acquired 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)	<b>54000</b>	<b>0.15</b>	<b>0.15</b>




**PROMILA AGGARWAL**

A-55, New Friends Colony,  
New Delhi - 110025

<b>After the acquisition, holding of:</b>			
a) Shares carrying voting rights acquired	7,55,000	2.10	2.10
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 holding in each category) after acquisition	-	-	-
e) Total (a+b+c+d)	<b>7,55,000</b>	<b>2.10</b>	<b>2.10</b>
Mode of acquisition (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Off Market trade i.e., inter-se transfer (by way of Gift)		
Date of acquisition / VR or date of receipt of intimation of allotment of shares, whichever is applicable	24 <sup>th</sup> June 2024		
Equity share capital / total voting capital of the TC before the said acquisition	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		
Equity share capital/ total voting capital of the TC after the said acquisition	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		
Total diluted share/voting capital of the TC after the said acquisition	Paid Up Capital of Rs. 7,20,48,422/- (3,60,24,211 Share of Rs. 2/- each)		

(\*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under Clause 35 of the listing Agreement.

(\*\*) 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.

  
**Promila Aggarwal**  
**Promoter of Sterling Tools Limited**

Place: New Delhi  
Date: 26.06.2024



**PROMILA AGGARWAL**A-55, New Friends Colony,  
New Delhi - 110025**Disclosures under Regulation 10(6) –Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

1.	Name of the Target Company (TC)	STERLING TOOLS LIMITED			
2.	Name of the acquirer(s)	Promila Aggarwal Part of Promoter/Promoter group			
3.	Name of the stock exchange where shares of the TC are listed	National Stock Exchange of India Ltd Bombay Stock Exchange Ltd			
4.	Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.	Off market trade i.e., <i>inter se</i> transfer (by way of Gift)			
5.	Relevant regulation under which the acquirer is exempted from making open offer.	Regulation 10(1) (a) (i) of SEBI (SAST) Regulation, 2011			
6.	Whether disclosure of proposed acquisition was required to be made under regulation 10 (5) and if so, - whether disclosure was made and whether it was made within the timeline specified under theregulations. - date of filing with the stockexchange.	Yes  19 <sup>th</sup> June 2024			
7.	<b>Details of acquisition</b>	<b>Disclosures required to be made under regulation 10(5)</b>	<b>Whether the disclosures under regulation 10(5) are actually made</b>		
a.	Name of the transferor / seller	Mr. Akhill Aggarwal Mr. Anish Agarwal	Yes		
b.	Date of acquisition	24 <sup>th</sup> June 2024	Yes		
c.	Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above	27000 Equity Shares from Mr. Akhill Aggarwal 27000 Equity Shares from Mr. Anish Agarwal	Yes		
d.	Total shares proposed to be acquired / acquired as a % of diluted share capital of TC	0.15%	Yes		
e.	Price at which shares are proposed to be acquired / actually acquired	Nil (being inter-se transfer of shares without consideration between immediate relatives)	Yes		
8.	<b>Shareholding details</b>	<b>Pre-Transaction</b>		<b>Post-Transaction</b>	
		<b>No. of shares held</b>	<b>% w.r.t total share capital of TC</b>	<b>No. of shares held</b>	<b>% w.r.t total share capital of TC</b>
a	Each Acquirer / Transferee(*) 1. Mrs. Promila Aggarwal	701,000	1.95	7,55,000	2.10
	<b>Total</b>	<b>701,000</b>	<b>1.95</b>	<b>7,55,000</b>	<b>2.10</b>
b	Each Seller / Transferor 1. Mr. Akhill Aggarwal 2. Mr. Anish Agarwal	26,87,957 27,28,957	7.46 7.58	26,60,957 27,01,957	7.39 7.50
	<b>Total</b>	<b>54,16,914</b>	<b>15.04</b>	<b>53,62,914</b>	<b>14.89</b>



**PROMILA AGGARWAL**  
**PROMOTER OF STERLING TOOLS LIMITED**

Place : New Delhi  
Date : 26.06.2024