

**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**

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

Scrip Code: STERTOOLS

**By Listing Centre**

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

Date: 25<sup>th</sup> March, 2022

Sub: : Submission of Disclosures under Regulation 29(2) and regulation 10(6) of SEBI  
(Substantial Acquisition of Shares and Takeovers ) Regulations, 2011

Dear Sir/ Madam,

This is in continuation to earlier disclosure made under Regulation 10 (5) of SAST Regulations, 2011,  
on 26th Feb, 2022 intimating inter-se promoters transfer through off-line mode.

Please find enclosed the required disclosures as received from the Promoters as mentioned below:-

1. Under Regulation 29 (2) of SAST Regulations .
2. Under Regulation 10 (6) of SAST regulations.

Kindly acknowledge the receipt and take the same on your record.

Thanking you,

Yours faithfully  
for **Sterling Tools Limited**

  
**Vaishali Singh**  
Company Secretary

**ANIL AGGARWAL**

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

**By NEAPS**

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

**Sterling Tools Limited**  
Unit No. 515, DLF Tower A, Jasola District  
Centre, New Delhi - 110025

**By Listing Centre**

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**

Date: 24.03.2022

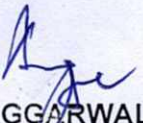
**Sub: Disclosure under regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/ Madam,

In terms of disclosure under Regulation 29(2) SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011. I, Anil Aggarwal resident of A-55, New Friends Colony, New Delhi – 110025, hereby submitting the Disclosure under Regulation 29(2) SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011 with regards to the disposal of 20,00,000 Equity shares of the Company of Sterling Tools Limited on 23<sup>rd</sup> March, 2022 through Off-Market (by way of Gift).

Kindly take the same in your record.

Thank You,

  
**ANIL AGGARWAL**  
Promoter of Sterling Tools Limited  
Date: 24.03.2022  
Place: New Delhi



**Format for 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  | Anil Aggarwal                                     |  |   |
| Whether the Seller 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.<br>BSE 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 Sale under consideration, holding of :</b>   |   |  |   |
| a) Shares carrying voting rights   | 8110583   | 22.51  | -   |
| 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)              | -   | -  | -   |
| <b>e) Total (a+b+c+d)</b>  | <b>8110583</b>                                    | <b>22.51</b>   | -   |
| <b>Details of Sale (Gift) made:</b>  |   |  |   |
| a) Shares carrying voting rights sold  | 2000000   | 5.55   | -   |
| 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>2000000</b>                                    | <b>5.55</b>  | -   |



|  |   |              |          |
|--|---|--------------|----------|
| <b>After the Sale, holding of:</b>   |   |              |          |
| a) Shares carrying voting rights   | 6110583   | 16.96        | -        |
| 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 | -   | -            | -        |
| <b>e) Total (a+b+c+d)</b>  | <b>6110583</b>  | <b>16.96</b> | <b>-</b> |
| Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).   | Off Market (by way of Gift)   |              |          |
| Date of acquisition / sale of shares / <del>VR or date of receipt of intimation of allotment of shares, whichever is applicable</del>  | 23/03/2022  |              |          |
| Equity share capital / total voting capital of the TC before the said acquisition / sale   | Paid Up Capital of Rs. 7,20,48,422<br>(3,60,24,211 Share of Rs. 2/- each) |              |          |
| Equity share capital/ total voting capital of the TC after the said acquisition / sale   | Paid Up Capital of Rs. 7,20,48,422<br>(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<br>(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.

  
**ANIL AGGARWAL**  
Promoter of Sterling Tools Limited  
Date: 24.03.2022  
Place: New Delhi

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

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

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**By NEAPS**

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

**Sterling Tools Limited**  
Unit No. 515, DLF Tower A, Jasola District  
Centre, New Delhi - 110025

**By Listing Centre**

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**

**Date: 24.03.2022**

**Sub: Disclosure under regulation 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/ Madam,

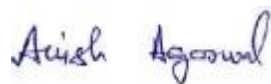
In terms of disclosure under Regulation 29(2) SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011. We, Akhill Aggarwal and Anish Agarwal, residents of A-55, New Friends Colony, New Delhi – 110025, hereby submitting the disclosure under Regulation 29(2) SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011 with regards to the Acquisition of 20,00,000 Equity shares (10,00,000 Equity Share each) of the Company of Sterling Tools Limited on 23<sup>rd</sup> March, 2022 through Off-Market (by way of Gift).

Kindly take the same in your record.

Thank You,



**AKHILL AGGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 24.03.2022**  
**Place: New Delhi**



**ANISH AGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 24.03.2022**  
**Place: New Delhi**

**Format for 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(s)   | Akhil Aggarwal and Anish Agarwal                  |  |   |
| 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.<br>BSE 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   | 1361000   | 3.78   | -   |
| 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)              | -   | -  | -   |
| <b>e) Total (a+b+c+d)</b>  | <b>1361000</b>                                    | <b>3.78</b>  | -   |
| <b>Details of acquisition:</b>   |   |  |   |
| a) Shares carrying voting rights acquired  | 2000000   | 5.55   | -   |
| 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>2000000</b>                                    | <b>5.55</b>  | -   |

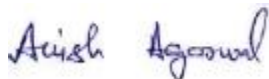


|  |  |             |   |
|--|--|-------------|---|
| <b>After the acquisition/sale, holding of:</b>   |  |             |   |
| a) Shares carrying voting rights   | 3361000  | 9.33        | - |
| b) Shares encumbered with the acquirer   | -  | -           | - |
| c) VRs otherwise than by shares  | -  | -           | - |
| 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 | -  | -           | - |
| <b>e) Total (a+b+c+d)</b>  | <b>3361000</b>   | <b>9.33</b> | - |
| Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).   | Off Market (by way of Gift)  |             |   |
| Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable   | 23/03/2022   |             |   |
| Equity share capital / total voting capital of the TC before the said acquisition / sale   | Paid Up Capital of Rs. 7,20,48,422<br>(3,60,24,211 Share of Rs. 10/- each) |             |   |
| Equity share capital/ total voting capital of the TC after the said acquisition / sale   | Paid Up Capital of Rs. 7,20,48,422<br>(3,60,24,211 Share of Rs. 10/- each) |             |   |
| Total diluted share/voting capital of the TC after the said acquisition  | Paid Up Capital of Rs. 7,20,48,422<br>(3,60,24,211 Share of Rs. 10/- each) |             |   |

(\* ) Details of acquisition with Pre & Post acquisition shareholding attached as Annexure-A



**AKHILL AGGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 24.03.2022**  
**Place: New Delhi**



**ANISH AGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 24.03.2022**  
**Place: New Delhi**

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## Annexure-A

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

### 1. Details of Acquisition:

| <b>Name of the Acquirer</b> | <b>Number of shares Acquired by way of Gift</b> | <b>% of Total Share Holding</b> |
|-----------------------------|---|---------------------------------|
| Mr. Akhill Aggarwal         | 10,00,000                                       | 2.775                           |
| Mr. Anish Agarwal           | 10,00,000                                       | 2.775                           |
| <b>Total</b>                | <b>20,00,000</b>                                | <b>5.550</b>                    |

### 2. Pre-acquisition Shareholding

| <b>Name of the Acquirer</b> | <b>Number of shares Holding</b> | <b>% of Total Share Holding</b> |
|-----------------------------|---------------------------------|---------------------------------|
| Mr. Akhill Aggarwal         | 6,60,000                        | 1.83                            |
| Mr. Anish Agarwal           | 7,01,000                        | 1.95                            |
| <b>Total</b>                | <b>13,61,000</b>                | <b>3.78</b>                     |

### 3. Post-acquisition Shareholding

| <b>Name of the Acquirer</b> | <b>Number of shares Holding</b> | <b>% of Total Share Holding</b> |
|-----------------------------|---------------------------------|---------------------------------|
| Mr. Akhill Aggarwal         | 16,60,000                       | 4.61                            |
| Mr. Anish Agarwal           | 17,01,000                       | 4.72                            |
| <b>Total</b>                | <b>33,61,000</b>                | <b>9.33</b>                     |



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

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

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**By NEAPS**

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

**Sterling Tools Limited**  
Unit No. 515, DLF Tower A, Jasola District  
Centre, New Delhi - 110025

**Date: 24.03.2022**

**Sub: Post Intimation under Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for acquisition of Shares**

Dear Sir/ Madam,

As due compliance of Regulation 10(6) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations 2011, the undersigned being the Promoter of the Company, disclosing the Post intimation after acquisition in the specified format in respect of inter-se transfer of 20,00,000 Equity shares (10,00,000 Equity shares each), (5.55%) of Sterling Tools Limited as detailed in the disclosure as attached

We request you to kindly update the above disclosed information in your records.

Thank You,



**AKHILL AGGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 24.03.2022**  
**Place: New Delhi**



**ANISH AGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 24.03.2022**  
**Place: New Delhi**

**Format for 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)  | AKHILL AGGARWAL and ANISH AGARWAL   |  |  |
| 3. | Name of the stock exchange where shares of the TC are listed   | National Stock Exchange of India Ltd.<br>BSE Ltd.   |  |  |
| 4. | Details of the transaction including rationale, if any, for the transfer/ acquisition of shares.   | Inter-se transfer of shares between immediate relatives and Promoters (by way of Gift) as follows-<br>20,00,000 Equity shares (10,00,000 Equity shares each) from Mr. ANIL AGGARWAL |  |  |
| 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,<br>- whether disclosure was made and whether it was made within the timeline specified under the regulations.<br>- date of filing with the stock exchange. | Yes<br><br>26 <sup>th</sup> February 2022   |  |  |
| 7. | Details of acquisition   | Disclosures required to be made under regulation 10(5)  | Whether the disclosures under regulation 10(5) are actually made |  |
|    | a. Name of the transferor / seller   | Mr. ANIL AGGARWAL   | Yes  |  |
|    | b. Date of acquisition   | 23/03/2022  | Yes  |  |
|    | c. Number of shares/ voting rights in respect of the acquisitions from each person mentioned in 7(a) above   | 20,00,000 Equity Shares   | Yes  |  |
|    | d. Total shares proposed to be acquired / actually acquired as a % of diluted share capital of TC  | 5.55 %  | 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. | Shareholding details   | Pre-Transaction   |  | Post-Transaction                                       |
|    |  | No. of shares held  | % w.r.t total share capital ofTC                                 | No. of shares held<br>% w.r.t total share capital ofTC |



|  |   |                               |         |       |         |       |
|--|---|-------------------------------|---------|-------|---------|-------|
|  | a | Each Acquirer / Transferee(*) |         |       |         |       |
|  |   | 1. Akhill Aggarwal            | 660000  | 1.83  | 1660000 | 4.61  |
|  |   | 2. Anish Aggarwal             | 701000  | 1.95  | 1701000 | 4.72  |
|  | b | Each Seller / Transferor      |         |       |         |       |
|  |   | 1. Anil Aggarwal              | 8110583 | 22.51 | 6110583 | 16.96 |

**AKHILL AGGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 24.03.2022**  
**Place: New Delhi**

**ANISH AGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 24.03.2022**  
**Place: New Delhi**