

**AKHILL AGGARWAL**

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

**ANISH AGARWAL**

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

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**The Securities and Exchange Board of India**

SEBI Bhavan BKC,  
Plot no. C4-A, 'G' Block  
Bandra-Kurla Complex, Bandra (East)  
Mumbai-400051, Maharashtra

**By NEAPS****National Stock Exchange of India Limited**

"Exchange Plaza",  
Bandra-Kurla Complex, Bandra (E)  
Mumbai-400051

**Scrip Code: STERTOOLS**

**The Compliance Officer****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: 07.04.2022**

**Sub: Submission of Report under Regulation 10(7) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/ Madam,

We Akhill Aggarwal and Anish Agarwal, sons of Mr. Anil Aggarwal hereby submit the disclosure as required under regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, with respect to the acquisition of 20,00,000 Equity Shares (10,00,000 Equity Shares each) of Sterling Tools Limited from Mr. Anil Aggarwal, by way of Inter-se transfer of shares between Immediate Relative through Gift, dated 23.03.2022

The necessary intimation under Regulation 10(5) and 10(6) of the Takeover Regulations for the said acquisition, in the prescribed format, has already been submitted vide letter dated 26.02.2022 and 24.03.2022

Please find enclosed under Regulation 10(7) read with regulation 10(1)(a)(i) of the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

**AKHILL AGGARWAL**

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New Delhi - 110025

**ANISH AGARWAL**

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New Delhi - 110025

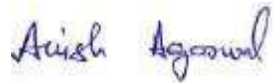
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The prescribed fee of Rs. 3,00,000/- (Rs. 1,50,000 each) paid through NEFT having Unique Transaction Reference numbers N096221905691380 and N096221905692995

Kindly take the same in your record.  
Thank You,



**AKHILL AGGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 07.04.2022**  
**Place: New Delhi**



**ANISH AGARWAL**  
**Promoter of Sterling Tools Limited**  
**Date: 07.04.2022**  
**Place: New Delhi**

**Format under Regulation 10(7) – Report to SEBI in respect of any acquisition made in reliance upon exemption provided for in regulation 10(1)(a)(i) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

<b>1</b>	<b>General Details</b>	
	a. Name, address, telephone no., e-mail of acquirer(s) {In case there are multiple acquirers, provide full contact details of any one acquirer (the correspondent acquirer) with whom SEBI shall correspond. }	<b>Name:</b> Akhill Aggarwal & Anish Agarwal <b>Address:</b> A-55, New Friends Colony, New Delhi-110025 <b>Contact No.:</b> 012922553 <b>Email:</b> <a href="mailto:vaishalis@stlfasteners.com">vaishalis@stlfasteners.com</a>
	b. Whether sender is the acquirer (Y/N)	Yes
	c. If not, whether the sender is duly authorized by the acquirer to act on his behalf in this regard (enclose copy of such authorization)	Not Applicable
	d. Name, address, Tel no. and e-mail of the sender, if sender is not the acquirer	Not Applicable
<b>2</b>	<b>Compliance of Regulation 10(7)</b>	
	a. Date of report	07/04/2022
	b. Whether report has been submitted to SEBI within 21 working days from the date of the acquisition	Yes
	c. Whether the report is accompanied with fees as required under Regulation 10(7)	Yes
<b>3</b>	<b>Compliance of Regulation 10(5)</b>	
	a. Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed, atleast 4 working days before the date of the proposed acquisition	Yes
	b. Date of Report	26/02/2022
<b>4</b>	<b>Compliance of Regulation 10(6)</b>	
	a. Whether the report has been filed with the Stock Exchanges where the shares of the Company are listed within 4 working days after the date of the proposed acquisition	Yes
	b. Date of Report	24/03/2022;
<b>5</b>	<b>Details of the Target Company (TC)</b>	
	a. Name & address of TC	STERLING TOOLS LIMITED

*The following abbreviations have been used all through the document: TC stands for 'Target Company', 'Takeover Regulations' stands for 'SEBI (Substantial Acquisition of Shares and Takeover Regulations) 2011*

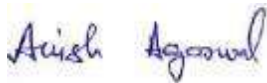
	b.	Name of the Stock Exchange(s) where the shares of the TC are listed	National Stock Exchange of India Ltd. BSE Ltd.			
<b>6</b>	<b>Details of the acquisition</b>					
	a.	Date of acquisition	23/03/2022			
	b.	Acquisition price per share (in Rs.)	N.A. (Since Shares were acquired through Gift)			
	c.	Regulation which would have been triggered an open offer, had the report not been filed under Regulation 10(7). ( <u>whether Regulation 3(1), 3(2), 4 or 5</u> )	N.A.			
	d.	Shareholding of acquirer(s) and PAC individually in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)(*)	Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital of TC	No. of Shares	% w.r.t total share capital of TC
			1. Akhill Aggarwal	660000	1.83	1660000
		2. Anish Aggarwal	701000	1.95	1701000	4.72
	e.	Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)	Before the acquisition		After the acquisition	
			No. of Shares	% w.r.t total share capital of TC	No. of Shares	% w.r.t total share capital of TC
			1. Anil Aggarwal	8110583	22.51	6110583
<b>7</b>	<b>Information specific to the exemption category to which the instant acquisition belongs- Regulation 10(1)(a)(i)</b>					
	a.	Provide the names of the seller(s)	Mr. Anil Aggarwal			
	b.	Specify the relationship between the acquirer(s) and the seller(s).	The Acquirers Akhill Aggarwal and Anish Agarwal are sons of Seller Mr. Anil Aggarwal			
	c.	Confirm whether the acquirer(s) and the seller(s) are 'immediate relatives' as defined in the Regulation 2(l).	This is to confirm that acquirer(s) and the seller are immediate relatives			
	d.	If shares of the TC are frequently traded, volume-weighted average market price (VWAP) of such shares for a period of sixty trading days preceding the date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	N.A. (since Shares were acquired through gift)			
	e.	If the shares of the TC are infrequently traded, the price of such shares as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	N.A. (since Shares were acquired through gift)			

f.	Confirm whether the acquisition price per share is not higher by more than twenty-five percent of the price as calculated in (d) or (e) above as applicable.	N.A. (since Shares were acquired through gift)
g.	Date of issuance of notice regarding the proposed acquisition to the stock exchanges where the TC is listed.	26/02/2022
h.	Whether the acquirers as well as sellers have complied with the provisions of Chapter V of the Takeover Regulations (corresponding provisions of the repealed Takeover Regulations 1997) (Y/N). If yes, specify applicable regulation(s) as well as date on which the requisite disclosures were made along with the copies of the same.	Yes; Regulation 30(2) - Yearly Continual disclosures for FY 2018-2019 on 05/04/2019 FY 2019-2020 on 02/04/2020 FY 2020-2021 on 03/04/2021 - Copies enclosed
i.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a)(i) with respect to exemptions has been duly complied with.	Acquirer(s) hereby declare that all the conditions specified under regulation 10(1)(a)(i) with respect to exemption has been duly complied with.

I/We hereby declare that the information provided in the instant report is true and nothing has been concealed there from.



**AKHILL AGGARWAL**  
Promoter of Sterling Tools Limited  
Date: 07.04.2022  
Place: New Delhi



**ANISH AGARWAL**  
Promoter of Sterling Tools Limited  
Date: 07.04.2022  
Place: New Delhi

## Details of Payment

Date of Payment	06.04.2022
Mode of Payment	NEFT
Amount	Rs. 3,00,000 (Rs. 1,50,000 Each)
Purpose of Payment	Payment under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011 for Inter-se transfer of shares between Immediate Relative through Gift (an Off Market Transaction), dated 23.03.2022
Unique Transaction Reference numbers	N096221905691380 And N096221905692995

**AKHILL AGGARWAL**A-55, New Friends Colony,  
New Delhi - 110025**ANISH AGARWAL**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: STERTOOLSSterling 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. 530759Date: 26<sup>th</sup> FEBRUARY, 2022**Sub: Prior Intimation under regulation 10(5) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for proposed acquisition of shares by way of gift**

Dear Sir/ Madam,

As due compliance of Regulation 10(5) of the SEBI (SAST) Regulations, 2011, the undersigned being part of the Promoter and Promoter Group of the Company and the Immediate Relative of one of the Promoter - Mr. Anil Aggarwal, hereby furnish the PRIOR INTIMATION in the specified format under regulation 10(5) in respect of proposed *inter-se* acquisition of 20,00,000 (5.55%) shares of Sterling Tools Limited being the Target Company ("TC") in the following manner:

Date of Proposed Transaction	Name of the person (belongs to the Promoter group) Transferor/Donor	Name of the person (belongs to the Promoter group) Transferee/Donee	Number of shares proposed to be transferred by way of Gift	% of Holding
On or after 7 <sup>th</sup> March, 2022	Mr. Anil Aggarwal	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>

**AKHILL AGGARWAL**

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New Delhi - 110025

**ANISH AGARWAL**

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New Delhi - 110025

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The shares are proposed to be acquired by way of "Gift" amongst the Promoter and Promoter Group pursuant to exemption provided in Regulation 10(l)(a)(i) of SEBI (Substantial Acquisition of Shares and takeovers) Regulations, 2011 (qualifying person being Immediate Relatives as the Acquirers are sons of Mr. Anil Aggarwal – Seller/Donor) and there will be no change in the Total Shareholding of the Promoters group after such inter-se transfer of the shares of the Target Company.

Thank You,

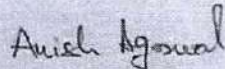
Yours Faithfully



**AKHILL AGGARWAL**  
Promoter of Sterling Tools Limited

Date: 26/02/2022

Place: DELHI



**ANISH AGARWAL**  
Promoter of Sterling Tools Limited

Date: 26/02/2022

Place: DELHI



**Format for Disclosures under Regulation 10(5) – Intimation to Stock Exchanges in respect of acquisition under Regulation 10(1)(a) 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)	The disclosure is pursuant to inter-se transfer of shares (by way of Gift) amongst Promoter and Promoter Group.  The Transferees/ Acquirers are Mr. Akhill Aggarwal and Mr. Anish Agarwal, sons of Mr. Anil Aggarwal
3.	Whether the acquirer(s) is/ are promoters of the TC prior to the transaction. If not, nature of relationship or association with the TC or its promoters	Yes  The disclosure pertains to inter-se transfer (by way of Gift) of shares between Immediate Relatives under Promoter and Promoter group.
4.	Details of the proposed acquisition	
	a. Name of the person(s) from whom shares are to be acquired	Mr. Anil Aggarwal
	b. Proposed date of acquisition	On or after 7 <sup>th</sup> March, 2022
	c. Number of shares to be acquired from person mentioned in 4(a) above	10,00,000 Shares to be acquired by Mr. Akhill Aggarwal and 10,00,000 Shares to be acquired by Mr. Anish Agarwal from Mr. Anil Aggarwal
	d. Total shares to be acquired as % of share capital of TC	Mr. Akhill Aggarwal along with Mr. Anish Agarwal will acquire 5.55% of the shares pursuant to gift from Mr. Anil Aggarwal
	e. Price at which shares are proposed to be acquired	NIL. Shares are proposed to be transferred by way of gift. Therefore no Consideration involved. Mr. Anil Aggarwal is the father of Mr. Akhill Aggarwal and Mr. Anish Agarwal
	f. Rationale, if any, for the proposed transfer	The proposed acquisition is only a private family arrangement for smooth succession planning of the Family and to streamline the Family's assets and businesses.
5.	Relevant sub-clause of regulation 10(1)(a) under which the acquirer is exempted from making open offer.	Sub clause (i): Immediate Relatives – Mr. Akhill Aggarwal & Mr. Anish Agarwal are sons of Mr. Anil Aggarwal
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance	Not applicable since the Shares are proposed to be transferred by the way of Gift. Therefore no consideration involved.

	of this notice as traded on the stock exchange where the maximum volume of trading in the shares of the TC are recorded during such period.				
7.	If in-frequently traded, the price as determined in terms of clause (e) of sub-regulation (2) of regulation 8.	Not applicable since the Shares are proposed to be transferred by the way of Gift. Therefore, no consideration involved.			
8.	Declaration by the acquirer, that the acquisition price would not be higher by more than 25% of the price computed in point 6 or point 7 as applicable.	Not applicable since the Shares are proposed to be transferred by the way of Gift. Therefore, no consideration involved.			
9.	Declaration by the acquirer, that the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)	Enclosed as "Annexure A"			
10.	Declaration by the acquirer that all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with.	Enclosed as "Annexure A"			
11.	Shareholding details	Before the proposed Transaction		After the proposed transaction	
		No. of shares /voting rights	% w.r.t total share capital of TC	No. of shares /voting rights	% w.r.t total share capital of TC
a	Acquirer(s) and PACs (other than sellers)(*):				
	1. Mr. Akhill Aggarwal	660000	1.83	1660000	4.61
	2. Mr. Anish Agarwal	701000	1.95	1701000	4.72
	<b>Total Acquirers and PACs</b>	<b>1361000</b>	<b>3.78</b>	<b>3361000</b>	<b>9.33</b>
b	Seller(s):				
	1. Anil Aggarwal	8110583	22.51	6110583	16.96
	<b>Total Sellers</b>	<b>8110583</b>	<b>22.51</b>	<b>6110583</b>	<b>16.96</b>

Note:

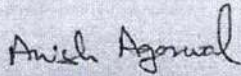
- (\*) Shareholding of each entity may be shown separately and then collectively in a group.
- The above disclosure shall be signed by the acquirer mentioning date & place. In case there is more than one acquirer, the report shall be signed either by all the persons or by a person duly authorized to do so on behalf of all the acquirers.



**AKHILL AGGARWAL**  
Promoter of Sterling Tools Limited

Date: 26/02/2022

Place: Delhi



**ANISH AGARWAL**  
Promoter of Sterling Tools Limited

Date: 26/02/2022

Place: Delhi

## Annexure-A


### DECLARATION BY ACQUIRER

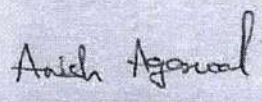
This is with respect to the following proposed acquisition of shares by way of "Gift," *inter-se*, within the Promoters and Promoter Group of the Company viz. Sterling Tools Limited (a company incorporated under the Companies Act, 1956, having its registered office at Unit no. 515, DLF Tower A, Jasola District Center, New Delhi - 110025

Date of Proposed Transaction	Name of the person (belongs to the Promoter group) Transferor/Donor	Name of the person (belongs to the Promoter group) Transferee/Donee	Number of shares proposed to be transferred by way of Gift	% of Holding
On or after 7 <sup>th</sup> March, 2022	Mr. Anil Aggarwal	Mr. Akhill Aggarwal	10,00,000	2.775
		Mr. Anish Agarwal	10,00,000	2.775
Total			20,00,000	5.550

In this regard, the undersigned being the proposed acquirer to the proposed "Gift", hereby declare that:

- the transferor and transferee have complied / will comply with applicable disclosure requirements in Chapter V of the Takeover Regulations, 2011 (corresponding provisions of the repealed Takeover Regulations 1997)
- all the conditions specified under regulation 10(1)(a) with respect to exemptions has been duly complied with

  
**AKHILL AGGARWAL**  
Promoter of Sterling Tools Limited  
Date: 26/02/2022  
Place: Delhi

  
**ANISH AGARWAL**  
Promoter of Sterling Tools Limited  
Date: 26/02/2022  
Place: Delhi

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

**ANISH AGARWAL**  
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: 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. 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- 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, - whether disclosure was made and whether it was made within the timeline specified under the regulations. - date of filing with the stock exchange.	Yes  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 % 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**

**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,

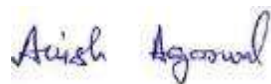
In terms of disclosure under Regulation 29(2) SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011. We, Akhill Aggarwal and Anish Agarwal, residents of A-55, New Friends Colony, New Delhi – 110025, hereby submitting the disclosure under Regulation 29(2) SEBI (Substantial Acquisition 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**

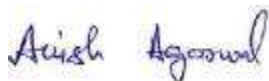
Name of the Target Company (TC)	STERLING TOOLS LIMITED		
Name(s) of the acquirer(s)	Akhil Aggarwal and Anish Agarwal		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	National Stock Exchange of India Ltd. BSE Ltd.		
Details 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 (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 (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 (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**

\*\*\*\*\*

## 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>

**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

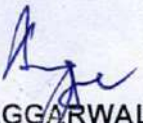
Sub: Disclosure under regulation 29(2) of Securities and Exchange Board of India  
(Substantial Acquisition of Shares and Takeovers) Regulations, 2011

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

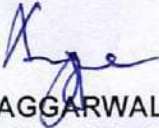
**Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

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. 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>-</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>-</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 / 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 (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 (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.

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

\*\*\*\*\*

**AKHILL AGGARWAL**

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

**ANISH AGARWAL**

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

---

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

**Date: 24.03.2022**

**Sub: Disclosures under Regulation 7(2)(a) of Securities and Exchange Board of India (Prohibition of Insider trading) Regulation, 2015.**

Dear Sir/ Madam,

Please find enclosed herewith disclosure in Form C under Regulation 7(2)(a) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 regarding Acquisition of 20,00,000 equity shares (10,00,000 Equity Shares each) of M/s. Sterling Tools Ltd., on 23/03/2022 by way of gift from our father Shri Anil Aggarwal, member of Promoter Group, out of natural love and affection. We also belong to Promoters Group. Hence the aforesaid transfer may be considered as inter-se transfer between Immediate relatives in Promoters' Group.

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**

## FORM C

### SEBI (Prohibition of Insider Trading) Regulations, 2015

#### [Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]

Name of the company: STERLING TOOLS LIMITED

ISIN of the company: INE 334A01023

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter /member of the promoter group/designated person/ Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ disposal of shares, specify		Date of intimation to company	Mode of acquisition /disposal (on market/ public/ rights/ preferential offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
Akhil Aggarwal  PAN: AGRPA9376N  DIN: 01681666	Promoter	Equity Share	6,60,000 Equity Shares and 1.83 % of Share holding	Equity Share	1000000	Nil	Purchase through Gift	Equity Share	1660000 Equity Share and 4.61 % of Share holding	23/03/2022	23/03/2022	24/03/2022	Inter-se transfer (by way of Gift)	Not Applicable





Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)					Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell	
		Notional Value	Number of units (contracts * lot size)	Notional Value	
NOT APPLICABLE					NOT APPLICABLE

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

## FORM C

### SEBI (Prohibition of Insider Trading) Regulations, 2015

#### [Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]

Name of the company: STERLING TOOLS LIMITED

ISIN of the company: INE 334A01023

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ disposal of shares, specify		Date of intimation to company	Mode of acquisition /disposal (on market/public/rights/preferential offer/off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
Anish Agarwal  PAN: ALXPA8676L  DIN: 07056465	Promoter	Equity Share	7,01,000 Equity Shares and 1.95 % of Share holding	Equity Share	1000000	Nil	Purchase through Gift	Equity Share	1701000 Equity Share and 4.72 % of Share holding	23/03/2022	23/03/2022	24/03/2022	Inter-se transfer (by way of Gift)	Not Applicable



Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)					Exchange on which the trade was executed	
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value		Number of units (contracts * lot size)
NOT APPLICABLE					NOT APPLICABLE	

*Anish Agarwal*

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

**ANIL AGGARWAL**

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

---

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

Date: 24.03.2022

Sub: Disclosures under Regulation 7(2)(a) of Securities and Exchange Board of India  
(Prohibition of Insider trading) Regulation, 2015.

Dear Sir/ Madam,

Please find enclosed herewith disclosure in Form C under Regulation 7(2)(a) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 regarding Disposal of 20,00,000 Equity shares of M/s. Sterling Tools Ltd. by me, on 23/03/2022 by way of gift to my sons Mr. Akhill Aggarwal and Mr. Anish Agarwal, member of Promoter Group, out of natural love and affection. Hence the aforesaid transfer may be considered as inter-se transfer between Immediate relatives in Promoters' Group.

Kindly take the same in your record.

Thank You,



**ANIL AGGARWAL**  
Promoter of Sterling Tools Limited

Date: 24.03.2022

Place: New Delhi

**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]**

Name of the company: STERLING TOOLS LIMITED

ISIN of the company: INE 334A01023

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

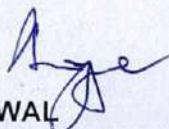
Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Director/s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ disposal of shares, specify		Date of intimation to company	Mode of acquisition/disposal (on market/public/rights/preferential offer/off market/Inter-se transfer, ESOPs, etc.)	Exchange on which the trades were executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
Mr. Anil Aggarwal  PAN: AAUPA6313L  DIN: 00027214	Promoter	Equity Share	8110583 Equity Shares and 22.51 % of Share holding	Equity Share	2000000	NIL	Sale/Gift	Equity Share	6110583 Equity Share and 16.96 % of Share holding	23/03/2022	23/03/2022	24/03/2022	Inter-se transfer (by way of Gift)	Not Applicable





Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)					Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell	
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)
NOT APPLICABLE					NOT APPLICABLE

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

Date: 3<sup>rd</sup> April, 2019

The Compliance Officer  
**Sterling Tools Limited**  
Office No. 243 C-10  
Regus Elegance,  
2F, Elegance  
Jasola District Centre  
Old Mathura Road  
New Delhi-110025

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

General Manager  
**Corporate Relationship Department  
Bombay Stock Exchange Limited**  
1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai – 400001

**Scrip Code: STERTOOLS**

**Security Code No. 530759**

**Sub: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for Financial Year Ending 31<sup>st</sup> March, 2019.**

Dear Sir,

Please find enclosed herewith a disclosure of aggregate shareholding and voting rights in M/s Sterling Tools Limited as on 31<sup>st</sup> March, 2019 under Regulation 30(1) and/or 30(2) of SEBI (Substantial Acquisition of Shares and Take-overs) Regulations, 2011 in a prescribed format.

You are requested to kindly take note of the same.

Thanking you.

Sincerely

  
**Akhil Aggarwal**

Encl.: as above.

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	STERLING TOOLS LIMITED		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	BOMBAY STOCK EXCHANGE NATIONAL STOCK EXCHANGE		
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.  <b>PROMOTERS &amp; PAC:</b> 1. Shri Manohar Lal Aggarwal 2. Shri Anil Aggarwal 3. Shri Atul Aggarwal 4. Akhill Aggarwal 5. Promila Aggarwal 6. Anish Agarwal		
4. Particulars 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 TC (*)
As of March 31st of the year, holding of: (a) Shares (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.	23523675	65.30%	65.30%
<b>Total</b>	<b>23523675</b>	<b>65.30%</b>	<b>65.30%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

Name(s) of person and Persons Acting in Concert (PAC) with the Person	Whether the person belongs to Promoter / Promoter group	PAN of the person and PACs
Shri Manohar Lal Aggarwal	Promoter	AAUPA6258N
Shri Anil Aggarwal	Promoter	AAUPA6313L
Shri Atul Aggarwal	Promoter	AAUPA6243R
Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Agarwal	Promoter Group	ALXPA8676L

Signature of the Authorized Signatory:

Place: New Delhi

Date: 03-04-2019

**Note**

- In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.
- (\*) 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.
- (\*\*) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

Date: 1<sup>st</sup> April, 2020

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

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

General Manager  
**Corporate Relationship Department  
Bombay Stock Exchange Limited**  
1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai – 400001

**Scrip Code: STERTOOLS**

**Security Code No. 530759**

**Sub: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for Financial Year Ending 31<sup>st</sup> March, 2020.**

Dear Sir,

Please find enclosed herewith a disclosure of aggregate shareholding and voting rights, in M/s Sterling Tools Limited having its Registered Office at Unit No. 515, DLF Tower A, Jasola District Centre, New Delhi-110025, as on 31<sup>st</sup> March, 2020 under Regulation 30(1) and/or 30(2) of SEBI (Substantial Acquisition of Shares and Take-overs) Regulations, 2011 in a prescribed format.

You are requested to kindly take note of the same.

Thanking you.

Sincerely

--Sd--

**Akhil Aggarwal**

Encl.: as above.

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	<b>STERLING TOOLS LIMITED</b>		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	<b>BOMBAY STOCK EXCHANGE NATIONAL STOCK EXCHANGE</b>		
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.	<b>N.A.</b>  <b>PROMOTERS &amp; PAC:</b> <b>1. Shri Manohar Lal Aggarwal</b> <b>2. Shri Anil Aggarwal</b> <b>3. Shri Atul Aggarwal</b> <b>4. Akhill Aggarwal</b> <b>5. Promila Aggarwal</b> <b>6. Anish Agarwal</b>		
4. Particulars 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 TC (*)
As of March 31st of the year, holding of:			
(a) Shares	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>
(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.			
<b>Total</b>	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

<b>Name(s) of person and Persons Acting in Concert (PAC) with the Person</b>	<b>Whether the person belongs to Promoter / Promoter group</b>	<b>PAN of the person and PACs</b>
Shri Manohar Lal Aggarwal	Promoter	AAUPA6258N
Shri Anil Aggarwal	Promoter	AAUPA6313L
Shri Atul Aggarwal	Promoter	AAUPA6243R
Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Agarwal	Promoter Group	ALXPA8676L

--Sd--

Signature of the Authorized Signatory:

**Place: New Delhi**

**Date: 01-04-2020**

**Note**

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 means 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 the Stock Exchanges but shall not be disseminated.

Date: 1<sup>st</sup> April, 2021

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

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

General Manager  
**Corporate Relationship Department  
Bombay Stock Exchange Limited**  
1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai – 400001

**Scrip Code: STERTOOLS**

**Security Code No. 530759**

**Sub: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for Financial Year Ending 31<sup>st</sup> March, 2021.**

Dear Sir,

Please find enclosed herewith a disclosure of aggregate shareholding and voting rights, in M/s Sterling Tools Limited having its Registered Office at Unit No. 515, DLF Tower A, Jasola District Centre, New Delhi-110025, as on 31<sup>st</sup> March, 2021 under Regulation 30(1) and/or 30(2) of SEBI (Substantial Acquisition of Shares and Take-overs) Regulations, 2011 in a prescribed format.

You are requested to kindly take note of the same.

Thanking you.

Sincerely

  
**Akhil Aggarwal**

Encl.: as above.

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**


**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	STERLING TOOLS LIMITED		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	BOMBAY STOCK EXCHANGE NATIONAL STOCK EXCHANGE		
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.  <b>PROMOTERS &amp; PAC:</b> 1. Shri Manohar Lal Aggarwal 2. Shri Anil Aggarwal 3. Shri Atul Aggarwal 4. Shri Akhill Aggarwal 5. Mrs. Promila Aggarwal 6. Shri Anish Aggarwal		
4. Particulars 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 TC (*)
As of March 31st of the year, holding of: (a) Shares (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.	23693030	65.77%	65.77%
<b>Total</b>	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

Name(s) of person and Persons Acting in Concert (PAC) with the Person	Whether the person belongs to Promoter / Promoter group	PAN of the person and PACs
Shri Manohar Lal Aggarwal	Promoter	AAUPA6258N
Shri Anil Aggarwal	Promoter	AAUPA6313L
Shri Atul Aggarwal	Promoter	AAUPA6243R
Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Aggarwal	Promoter Group	ALXPA8676L

X   
Signature of the Authorized Signatory:

Place: New Delhi

Date: 01-04-2021

**Note**

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 means 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 the Stock Exchanges but shall not be disseminated.

Date: 3<sup>rd</sup> April, 2019

The Compliance Officer  
**Sterling Tools Limited**  
Office No. 243 C-10  
Regus Elegance,  
2F, Elegance  
Jasola District Centre  
Old Mathura Road  
New Delhi-110025

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

General Manager  
**Corporate Relationship Department  
Bombay Stock Exchange Limited**  
1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai – 400001

**Scrip Code: STERTOOLS**

**Security Code No. 530759**

**Sub: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for Financial Year Ending 31<sup>st</sup> March, 2019.**

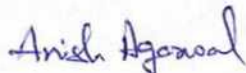
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Please find enclosed herewith a disclosure of aggregate shareholding and voting rights in M/s Sterling Tools Limited as on 31<sup>st</sup> March, 2019 under Regulation 30(1) and/or 30(2) of SEBI (Substantial Acquisition of Shares and Take-overs) Regulations, 2011 in a prescribed format.

You are requested to kindly take note of the same.

Thanking you.

Sincerely



**Anish Agarwal**

Encl.: as above.



**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	STERLING TOOLS LIMITED		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	BOMBAY STOCK EXCHANGE NATIONAL STOCK EXCHANGE		
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.  <b>PROMOTERS &amp; PAC:</b> 1. Shri Manohar Lal Aggarwal 2. Shri Anil Aggarwal 3. Shri Atul Aggarwal 4. Akhill Aggarwal 5. Promila Aggarwal 6. Anish Agarwal		
4. Particulars 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 TC (*)
As of March 31st of the year, holding of: (a) Shares (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.	23523675	65.30%	65.30%
<b>Total</b>	<b>23523675</b>	<b>65.30%</b>	<b>65.30%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

Name(s) of person and Persons Acting in Concert (PAC) with the Person	Whether the person belongs to Promoter / Promoter group	PAN of the person and PACs
Shri Manohar Lal Aggarwal	Promoter	AAUPA6258N
Shri Anil Aggarwal	Promoter	AAUPA6313L
Shri Atul Aggarwal	Promoter	AAUPA6243R
Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Agarwal	Promoter Group	ALXPA8676L

*Anish Agarwal*

Signature of the Authorized Signatory:

Place: New Delhi

Date: 03-04-2019

**Note**

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 means 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 the Stock Exchanges but shall not be disseminated.

Date: 1<sup>st</sup> April, 2020

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

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

General Manager  
**Corporate Relationship Department  
Bombay Stock Exchange Limited**  
1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai – 400001

**Scrip Code: STERTOOLS**

**Security Code No. 530759**

**Sub: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for Financial Year Ending 31<sup>st</sup> March, 2020.**

Dear Sir,

Please find enclosed herewith a disclosure of aggregate shareholding and voting rights, in M/s Sterling Tools Limited having its Registered Office at Unit No. 515, DLF Tower A, Jasola District Centre, New Delhi-110025, as on 31<sup>st</sup> March, 2020 under Regulation 30(1) and/or 30(2) of SEBI (Substantial Acquisition of Shares and Take-overs) Regulations, 2011 in a prescribed format.

You are requested to kindly take note of the same.

Thanking you.

Sincerely

--Sd--

**Anish Agarwal**

Encl.: as above.

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	<b>STERLING TOOLS LIMITED</b>		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	<b>BOMBAY STOCK EXCHANGE NATIONAL STOCK EXCHANGE</b>		
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.	<p><b>N.A.</b></p> <p><b>PROMOTERS &amp; PAC:</b></p> <p>1. <b>Shri Manohar Lal Aggarwal</b> 2. <b>Shri Anil Aggarwal</b> 3. <b>Shri Atul Aggarwal</b> 4. <b>Akhill Aggarwal</b> 5. <b>Promila Aggarwal</b> 6. <b>Anish Agarwal</b></p>		
4. Particulars 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 TC (*)
As of March 31st of the year, holding of:			
(a) Shares	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>
(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.			
<b>Total</b>	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

<b>Name(s) of person and Persons Acting in Concert (PAC) with the Person</b>	<b>Whether the person belongs to Promoter / Promoter group</b>	<b>PAN of the person and PACs</b>
Shri Manohar Lal Aggarwal	Promoter	AAUPA6258N
Shri Anil Aggarwal	Promoter	AAUPA6313L
Shri Atul Aggarwal	Promoter	AAUPA6243R
Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Agarwal	Promoter Group	ALXPA8676L

--Sd--

Signature of the Authorized Signatory:

**Place: New Delhi**

**Date: 01-04-2020**

**Note**

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 means 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 the Stock Exchanges but shall not be disseminated.

Date: 1<sup>st</sup> April, 2021

The Compliance Officer  
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Unit No. 515, DLF Tower A  
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New Delhi-110025

**National Stock Exchange  
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General Manager  
**Corporate Relationship Department  
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1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai – 400001

**Scrip Code: STERTOOLS**

**Security Code No. 530759**

**Sub: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for Financial Year Ending 31<sup>st</sup> March, 2021.**

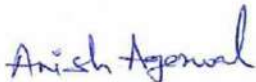
Dear Sir,

Please find enclosed herewith a disclosure of aggregate shareholding and voting rights, in M/s Sterling Tools Limited having its Registered Office at Unit No. 515, DLF Tower A, Jasola District Centre, New Delhi-110025, as on 31<sup>st</sup> March, 2021 under Regulation 30(1) and/or 30(2) of SEBI (Substantial Acquisition of Shares and Take-overs) Regulations, 2011 in a prescribed format.

You are requested to kindly take note of the same.

Thanking you.

Sincerely



**Anish Agarwal**

Encl.: as above.

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	STERLING TOOLS LIMITED		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	BOMBAY STOCK EXCHANGE NATIONAL STOCK EXCHANGE		
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.  <b>PROMOTERS &amp; PAC:</b> 1. Shri Manohar Lal Aggarwal 2. Shri Anil Aggarwal 3. Shri Atul Aggarwal 4. Shri Akhill Aggarwal 5. Mrs. Promila Aggarwal 6. Shri Anish Aggarwal		
4. Particulars 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 TC (*)
As of March 31st of the year, holding of:			
(a) Shares	23693030	65.77%	65.77%
(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.			
<b>Total</b>	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

Name(s) of person and Persons Acting in Concert (PAC) with the Person	Whether the person belongs to Promoter / Promoter group	PAN of the person and PACs
Shri Manohar Lal Aggarwal	Promoter	AAUPA6258N
Shri Anil Aggarwal	Promoter	AAUPA6313L
Shri Atul Aggarwal	Promoter	AAUPA6243R
Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Aggarwal	Promoter Group	ALXPA8676L

*Anish Aggarwal*

Signature of the Authorized Signatory:

Place: New Delhi

Date: 01-04-2021

**Note**

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 means 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 the Stock Exchanges but shall not be disseminated.

Date: 3<sup>rd</sup> April, 2019

The Compliance Officer  
**Sterling Tools Limited**  
Office No. 243 C-10  
Regus Elegance,  
2F, Elegance  
Jasola District Centre  
Old Mathura Road  
New Delhi-110025

**National Stock Exchange  
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General Manager  
**Corporate Relationship Department  
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1<sup>st</sup> Floor, P. J. Towers  
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Mumbai – 400001

**Scrip Code: STERTOOLS**

**Security Code No. 530759**

**Sub: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for Financial Year Ending 31<sup>st</sup> March, 2019.**

Dear Sir,

Please find enclosed herewith a disclosure of aggregate shareholding and voting rights in M/s Sterling Tools Limited as on 31<sup>st</sup> March, 2019 under Regulation 30(1) and/or 30(2) of SEBI (Substantial Acquisition of Shares and Take-overs) Regulations, 2011 in a prescribed format.

You are requested to kindly take note of the same.

Thanking you.

Sincerely

  
**Anil Aggarwal**

Encl.: as above.

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	STERLING TOOLS LIMITED		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	BOMBAY STOCK EXCHANGE NATIONAL STOCK EXCHANGE		
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.  <b>PROMOTERS &amp; PAC:</b> 1. Shri Manohar Lal Aggarwal 2. Shri Anil Aggarwal 3. Shri Atul Aggarwal 4. Akhill Aggarwal 5. Promila Aggarwal 6. Anish Agarwal		
4. Particulars 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 TC (*)
As of March 31st of the year, holding of: (a) Shares (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.	23523675	65.30%	65.30%
<b>Total</b>	<b>23523675</b>	<b>65.30%</b>	<b>65.30%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

Name(s) of person and Persons Acting in Concert (PAC) with the Person	Whether the person belongs to Promoter / Promoter group	PAN of the person and PACs
Shri Manohar Lal Aggarwal	Promoter	AAUPA6258N
Shri Anil Aggarwal	Promoter	AAUPA6313L
Shri Atul Aggarwal	Promoter	AAUPA6243R
Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Agarwal	Promoter Group	ALXPA8676L

Signature of the Authorized Signatory:

Place: New Delhi

Date: 03-04-2019

**Note**

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

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Date: 1<sup>st</sup> April, 2020

The Compliance Officer  
**Sterling Tools Limited**  
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**Security Code No. 530759**

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Dear Sir,

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You are requested to kindly take note of the same.

Thanking you.

Sincerely

--Sd--

**Anil Aggarwal**

Encl.: as above.



**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	<b>STERLING TOOLS LIMITED</b>		
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As of March 31st of the year, holding of:			
(a) Shares	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>
(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.			
<b>Total</b>	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

<b>Name(s) of person and Persons Acting in Concert (PAC) with the Person</b>	<b>Whether the person belongs to Promoter / Promoter group</b>	<b>PAN of the person and PACs</b>
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Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Agarwal	Promoter Group	ALXPA8676L

--Sd--

Signature of the Authorized Signatory:

**Place: New Delhi**

**Date: 01-04-2020**

**Note**

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Date: 1<sup>st</sup> April, 2021

The Compliance Officer  
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Dear Sir,

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You are requested to kindly take note of the same.

Thanking you.

Sincerely

  
**Anil Aggarwal**

Encl.: as above.

**Format for Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

**Part-A-Details of Shareholding**

1. Name of the Target Company (TC)	STERLING TOOLS LIMITED		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	BOMBAY STOCK EXCHANGE NATIONAL STOCK EXCHANGE		
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<b>Total</b>	<b>23693030</b>	<b>65.77%</b>	<b>65.77%</b>

**Part-B\*\***

**Name of the Target Company: STERLING TOOLS LIMITED**

Name(s) of person and Persons Acting in Concert (PAC) with the Person	Whether the person belongs to Promoter / Promoter group	PAN of the person and PACs
Shri Manohar Lal Aggarwal	Promoter	AAUPA6258N
Shri Anil Aggarwal	Promoter	AAUPA6313L
Shri Atul Aggarwal	Promoter	AAUPA6243R
Shri Akhill Aggarwal	Promoter	AGRPA9376N
Mrs. Promila Aggarwal	Promoter Group	AAUPA6299F
Shri Anish Agarwal	Promoter Group	ALXPA8676L

Signature of the Authorized Signatory:

Place: New Delhi

Date: 01-04-2021

**Note**

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 means 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 the Stock Exchanges but shall not be disseminated.