

COUNTER CYCLICAL INVESTMENTS PRIVATE LIMITED

Regd off: FN 401 PN 16 Shirkey Building L/O Rajnagar SB Colony
Nagpur MH 440013

CIN: U65999PN2018PTC175591 E-mail: keshav.equity@gmail.com

To,
NATIONAL FITTINGS LIMITED
Sf 112 Mathapur Road Kaniyur Village
Karumathampatty Via, Coimbatore,
Combatore District, Tamil Nadu, India,
641659
E-mail - nationalfittingsltd@gmail.com

To,
BSE LIMITED
Corporate Relationship Department
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai- 400001
E-mail-Corp.relations@bseindia.com

SUBJECT: - DISCLOSURES UNDER REGULATION 29(1) OF SECURITIES AND EXCHANGE BOARD OF INDIA (SUBSTANTIAL ACQUISITION OF SHARES & TAKEOVERS) REGULATIONS, 2011

Dear Sir,

This is to inform you that –

1. We, Counter Cyclical Investments Private Limited (Portfolio Manager – Acquirer) along with the Clients of Portfolio Manager (persons acting in concert) was holding a total of 452810 shares in National Fittings Limited (Target Company) as at 03rd October, 2024 which amount to the shareholding of 4.99% of total paid up share capital of the Target Company.
2. On 03rd October, 2024 an acquisition of 1649 shares in the Target Company amounting to the shareholding of 0.01% of total paid up share capital of the Target Company was done by the Counter Cyclical Investments Private Limited.
3. Taking into consideration the above, the Acquirer's shareholding along with the persons acting in concert, taken together, has reached to a total of 454459 shares in the Target Company which amounts to the shareholding of 5.00% of total paid up share capital of the Target Company.
4. In compliance with the provisions of Regulation 29(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares & Takeovers) Regulations, 2011, the Acquirer is required to disclose the aggregate shareholding in the Target Company, which aggregates to five percent or

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more of the shares of the Target Company, to the stock exchange where the shares of the Target Company are listed and to the Target Company.

5. Please find enclosed herewith the requisite disclosure in the prescribed format regarding aggregate shareholding in the Target Company.

Thanking You,
Yours faithfully,

For and on behalf of Acquirer
(Counter Cyclical Investments Private Limited)



Parminder Pal Singh Bhatia

Director

(DIN: 07159378)

Date: 04/10/2024

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Disclosures under Regulation 29(1) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Part-A- Details of the Acquisition

Name of the Target Company (TC)	NATIONAL FITTINGS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Counter Cyclical Investment Private Limited (PMS) through its clients		
Whether the acquirer belongs to Promoter/Promoter group	NO		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited (BSE)		
Details of the acquisition as follows	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition under consideration, holding of acquirer along with PACs of:			
a) Shares carrying voting rights	452810	4.99%	4.99%
b) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)			
c) Voting rights (VR) otherwise than by equity 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)			
Total (a + b + c + d)	452810	4.99%	4.99%

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Details of acquisition			
a) Shares carrying voting rights acquired	1649	0.01%	0.01%
b) VRs acquired otherwise than by equity shares			
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired			
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)			
Total (a + b + c + d)	1649	0.01%	0.01%
After the acquisition, holding of acquirer along with PACs of:			
a) Shares carrying voting rights	454459	5.00%	5.00%
b) VRs otherwise than by equity shares			
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition			
d) Shares in the nature of encumbrance (pledge/ lien/ non-disposal undertaking/ others)			
Total (a + b + c + d)	454459	5.00%	5.00%
Mode of acquisition (e.g. open market / public issue / rights issue / preferential allotment / inter-se transfer/encumbrance, etc.)	OPEN MARKET		

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Date of acquisition of/ date of receipt of intimation of allotment of shares / VR/ warrants/convertible securities/any other instrument that entitles the acquirer to receive shares in the TC.	03 rd October, 2024
Equity share capital / total voting capital of the TC before the said acquisition	90,83,182 Shares
Equity share capital/ total voting capital of the TC after the said acquisition	90,83,182 Shares
Total diluted share/voting capital of the TC after the said acquisition	90,83,182 Shares

For and on behalf of
Counter Cyclical Investments Private Limited



Authorised Signatory

Name: - Mr Parminderpal Singh Bhatia

Designation: - Director

Date: 04-10-2024