

**STERLING TOOLS LIMITED**

CIN : L29222DL1979PLC009668



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

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

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

Date: 17<sup>th</sup> July 2024**By Listing Centre**

Email: [corp.relations@bseindia.com](mailto:corp.relations@bseindia.com)  
General Manager  
**Corporate Relationship Department**  
**Bombay Stock Exchange Limited**  
1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai - 400001  
Security Code No. 530759

**Sub: Submission of disclosure under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.**

Dear Sir/ Madam,

This is in line with the requirement under Regulation 10(7) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations 2011 (SEBI (SAST) Regulations, 2011), we have received the aforesaid disclosure from Mrs. Promila Aggarwal, Promoter of Sterling Tools Limited.

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

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

Thanking you,  
For Sterling Tools Limited

  
Abhishek Chawla  
Company Secretary & Compliance Officer  
M. No. A34399



ABHISHEK  
CHAWLA

Digitally signed by ABHISHEK CHAWLA  
DN: c=IN, o=STERLING TOOLS LIMITED, ou=STERLING TOOLS LIMITED, email=abhishek@stlfasteners.com, cn=ABHISHEK CHAWLA  
Date: 2024.07.17 12:24:40 +05'30'

**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> Mrs. Promila Aggarwal <b>Address:</b> A-55, New Friends Colony, New Delhi-110025 <b>Contact No.:</b> 012922553 <b>Email:</b> <a href="mailto:ashishg@stlfasteners.com">ashishg@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	16/07/2024
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, The prescribed fee of INR 1,50,000/- (Indian Rupees One Lakh Fifty Thousand only) plus GST @ 18% i.e. Rs.27,000/- (Indian Rupees Twenty Seven Thousand only) aggregating amount to Rs.1,77,000/- (Indian Rupees One Lakh Seventy Seven Thousand only) has been remitted online on 10.07.24 is enclosed herewith as Annexure I.
<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	The intimation under Regulation 10(5) of SEBI (SAST) Regulations, 2011 has been complied with. Copy of intimation is enclosed as Annexure II.
b.	Date of Report	19/06/2024
<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	The report as required under Regulation 10(6) of SEBI (SAST) Regulations, 2011 to be filed with the Stock Exchanges after the completion of acquisition has been complied with. Copy of intimation is enclosed as Annexure III.
b.	Date of Report	26/06/2024

*Promila Aggarwal*  
X Promila Aggarwal

5 Details of the Target Company (TC)				
a.	Name & address of TC	STERLING TOOLS LIMITED Unit No. 515, DLF Tower-A, Jasola District Centre, New Delhi-110025		
b.	Name of the Stock Exchange(s) where the shares of the TC are listed	National Stock Exchange of India Ltd. BSE Ltd.		
6 Details of the acquisition				
a.	Date of acquisition	24/06/2024		
b.	Acquisition price per share (in Rs.)	N.A. (Off market trade i.e., inter se transfer through Gift)		
c.	Regulation which would have been triggered an open offer, had the report not been filed under Regulation 10(7). (whether Regulation 3(1), 3(2), 4 or 5)	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
	1. Mrs. Promila Aggarwal	701000	1.95	755000 2.10
e.	Shareholding of seller/s in TC (in terms of no. & as a percentage of the total share/voting capital of the TC)	Before disposal of shares		After the disposal of shares
		No. of Shares	% w.r.t total share capital of TC	No. of Shares
	1. Mr. Akhill Aggarwal	2687957	7.46	2660957 7.39
	2. Mr. Anish Agarwal	2728957	7.58	2701957 7.50
7 Information specific to the exemption category to which the instant acquisition belongs- Regulation 10(1)(a)(i)				
a.	Provide the names of the seller(s)	Mr. Akhill Aggarwal Mr. Anish Agarwal		
b.	Specify the relationship between the acquirer(s) and the seller(s).	The Acquirer is Mrs. Promila Aggarwal mother of Seller Mr. Akhill Aggarwal, and Anish Agarwal		
c.	Confirm whether the acquirer(s) and the seller(s) are 'immediate relatives' as defined in the Regulation 2(1).	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. (Off market trade i.e., inter se transfer through Gift)		

Promila Aggarwal

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. (Off market trade i.e., inter se transfer 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.	26/06/2024 (attached as annexure III)
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; Yes, it is hereby confirmed that both the acquirer and seller have complied with the provision of Regulation 29 of SEBI (SAST) Regulations, 2011. Copies of the disclosures submitted are enclosed as Annexure IV and V.
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.

*Promila Aggarwal*

**PROMILA AGGARWAL**  
Promoter of Sterling Tools Limited

Date: 16.07.2024  
Place: New Delhi

**Annexure -I**

**Details of Payment**

Date of Payment	10.07.2024
Mode of Payment	Online through SEBI Website- www.sebi.gov.in
Amount	INR 1,50,000/- (Indian Rupees One Lakh Fifty Thousand only) plus GST @ 18% i.e. Rs.27,000/- (Indian Rupees Twenty Seven Thousand only) aggregating amount to Rs.1,77,000/- (Indian Rupees One Lakh Seventy Seven Thousand only) has been remitted online
Purpose of Payment	Payment of Fees by acquirer under Regulation 10(7) of SAST
Receipt number	113369447812

*Pranilo Aggarwal*

*Pranilo Aggarwal*

**PROMILA AGGARWAL**

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

**By NEAPS**

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

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

**By Listing Centre**

Email: [corp.relations@bseindia.com](mailto:corp.relations@bseindia.com)  
General Manager  
**Corporate Relationship Department**  
**Bombay Stock Exchange Limited**  
1<sup>st</sup> Floor, P. J. Towers  
Dalal Street, Fort  
Mumbai – 400001  
**Security Code No. 530759**

Date: 18-06-2024

**Sub: Prior Intimation under Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for proposed acquisition of Shares by way of Gift.**

Dear Sir/ Madam,


This is in line with the requirement under Regulation 10(5) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations 2011, I, the undersigned being the part of Promoter/Promoter Group of Sterling Tools Limited, hereby submit the 'PRIOR INTIMATION' as required under the aforesaid regulations in the specified format of SEBI in respect of *inter se* acquisition of 54000 (0.15%) equity shares of Sterling Tools Limited being the Target Company as detailed below and in the attached disclosures:

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 Total Share Holding
On or after 24-Jun-2024	Mr. Akhill Aggarwal	Promila Aggarwal	27,000	0.07
	Mr. Anish Agarwal		27,000	0.07
<b>Total</b>			<b>54,000</b>	<b>0.15</b>

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 Acquirer is mother of Mr. Akhill Aggarwal and Mr. Anish Agarwal) 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.

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

Thank You,

  
Promila Aggarwal

Place: New Delhi  
Date : 18.06.2024

As  
Cc: Email: [csec@stfasteners.com](mailto:csec@stfasteners.com)  
Sterling Tools Limited  
Unit No. 515, DLF Tower A,  
Jasola District Centre, New Delhi – 110025

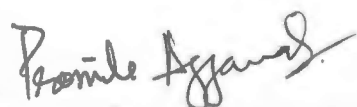
**PROMILA AGGARWAL**

A-55, New Friends Colony,

New Delhi - 110025

**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 Transferee/ Acquirer is Mrs. Promila Aggarwal, Mother of Mr. Akhill Aggarwal and Mr. Anish Agarwal (Seller/Transferor)
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. Akhill Aggarwal Mr. Anish Agarwal
	b. Proposed date of acquisition	On or after 24-Jun-2024
	c. Number of shares to be acquired from each person mentioned in 4(a) above	27000 Equity Shares to be acquired from Mr. Akhill Aggarwal, and 27000 Equity Shares to be acquired from Mr. Anish Agarwal
	d. Total shares to be acquired as % of share capital of TC	0.15%
	e. Price at which shares are proposed to be acquired	NIL. Shares are proposed to be transferred by way of gift. Therefore, no consideration is involved.
	f. Rationale, if any, for the proposed transfer	The proposed acquisition is only a private family arrangement 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— Mrs. Promila Aggarwal is mother of Mr. Akhill Aggarwal and Mr. Anish Agarwal.
6.	If, frequently traded, volume weighted average market price for a period of 60 trading days preceding the date of issuance 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.	Not Applicable, since the shares are proposed to be transferred by way of Gift.  Therefore, no consideration involved.



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

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 is 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	<b>Before the proposed transaction</b>		<b>After the proposed transaction</b>	
		<b>No. of shares /voting rights</b>	<b>% w.r.t total share capital of TC</b>	<b>No. of shares /voting rights</b>	<b>% w.r.t total share capital of TC</b>
a.	Acquirer and PAC (other than sellers) (*) 1. Mrs. Promila Aggarwal	7,01,000	1.95	7,55,000	2.10
	<b>Total Acquirer and PAC</b>	<b>7,01,000</b>	<b>1.95</b>	<b>7,55,000</b>	<b>2.10</b>
b.	Sellers: 1. Mr. Akhill Aggarwal 2. Mr. Anish Agarwal	26,87,957 27,28,957	7.46 7.58	26,60,957 27,01,957	7.39 7.50
	<b>Total Sellers</b>	<b>54,16,914</b>	<b>15.04</b>	<b>53,62,914</b>	<b>14.89</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.

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

Date: 18.06.2024  
Place: Faridabad



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

**Annexure-A**

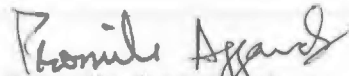
**DECLARATION BY ACQUIRER**

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 Total Share holding
On or after 24-Jun-2024	Mr. Akhill Aggarwal	Promila Aggarwal	27,000	0.07
	Mr. Anish Agarwal		27,000	0.07
		<b>Total</b>	<b>54,000</b>	<b>0.15</b>

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.



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

Date: 18.06.2024

Place: Faridabad

**PROMILA AGGARWAL**

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

**Annexure III**

<b><u>By NEAPS</u></b>  Email: <a href="mailto:takeover@nse.co.in">takeover@nse.co.in</a>  <b>National Stock Exchange of India Limited</b> "Exchange Plaza", Bandra-Kurla Complex, Bandra (E) Mumbai-400051 <b>Scrip Code: STERTOOLS</b>	<b><u>By Listing Centre</u></b>  Email: <a href="mailto:corp.relations@bseindia.com">corp.relations@bseindia.com</a> General Manager <b>Corporate Relationship Department</b> <b>Bombay Stock Exchange Limited</b> 1 <sup>st</sup> Floor, P. J. Towers Dalal Street, Fort Mumbai – 400001 <b>Security Code No. 530759</b>
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**Date: 26<sup>th</sup> June 2024**

**Sub: Disclosure under regulation 10(6), 29(1) & 29(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

Dear Sir/ Madam,

In terms of requirement of Regulation 10(6), 29(1) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011, I, Promila Aggarwal, part of Promoter/Promoter Group of Sterling Tools Limited, resident of A-55, New Friends Colony, New Delhi – 110025, hereby submitting the disclosure as required in the aforesaid regulations in the specified format of SEBI with regard to the Acquisition of 54000 Equity shares of Sterling Tools Limited on 24<sup>th</sup> June, 2024 through off market trade i.e., inter-se transfer (by way of Gift).

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

Thank You,

  
**Promila Aggarwal**  
**PROMOTER OF STERLING TOOLS LIMITED**

Place: New Delhi  
Date : 26<sup>th</sup> June 2024

**Cc: Email: [csec@stlfasteners.com](mailto:csec@stlfasteners.com)**  
**Sterling Tools Limited**  
Unit No. 515, DLF Tower A,  
Jasola District Centre, New Delhi – 110025

**PROMILA AGGARWAL**

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

**Disclosures under Regulation 10(6) –Report to Stock Exchanges in respect of any acquisition made in reliance upon exemption provided for in Regulation 10 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

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

  
PROMILA AGGARWAL  
PROMOTER OF STERLING TOOLS LIMITED

Place : New Delhi  
Date : 26.06.2024

**PROMILA AGGARWAL**

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

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

**Part-A - Details of the Acquisition**

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

*Promila*

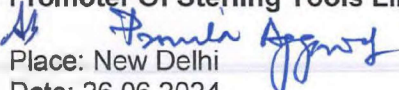
**PROMILA AGGARWAL**

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

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

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

Place: New Delhi  
Date: 26.06.2024



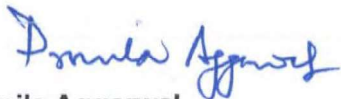
## PROMILA AGGARWAL

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

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Part-B\*\*\*

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



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



Place: New Delhi  
Date: 26.06.2024

**Note:**

(\*) 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.

(\*\*\*) Part-B shall be disclosed to the Stock Exchanges but shall not be disseminated.

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

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




**PROMILA AGGARWAL**

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

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

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

(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

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

Place: New Delhi  
Date: 26.06.2024



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

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

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

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



Anish Agarwal

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

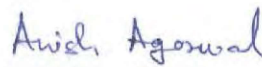
**ANISH AGARWAL**  
A-55, New Friends Colony,  
New Delhi – 110025

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

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

(\*\*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

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

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

Place: New Delhi  
Date: 26.06.2024

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

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

**APPENDIX -A**

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

**1. Pre- disposal Shareholding:**

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

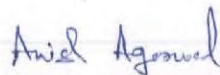
**2. Details of Sale:**

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

**3. Post disposal Shareholding:**

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

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

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

Place: New Delhi

Date: 26.06.2024