

## 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, 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(2) 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 558447 shares in National Fittings Limited (Target Company) as at 31<sup>st</sup> May, 2025.
2. As per the requirement stated under the Regulation 29(2) of the SEBI SAST Regulations, we enclose with this letter, a disclosure of the change in our shareholding in the Target Company, pursuant to the buying. The enclosed disclosure is in the relevant format notified by SEBI in respect of Regulation 29(2) of the SEBI SAST Regulations.

This letter is intended for the information and records of the Target Company and the Stock Exchanges.

Thanking You,  
Yours sincerely,

For and on behalf of Acquirer

**(Counter Cyclical Investments Private Limited)**



Parminder Pal Singh Bhatia  
Director  
(DIN: 07159378)

# 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

## **Disclosures under Regulation 29 (2) 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 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 Disposal under consideration, holding of:</b> a) Shares carrying voting rights  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	<b>558447</b>	<b>6.14%</b>	<b>6.14%</b>

## 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

category)			
e) Total (a+b+c+d)	<b>558447</b>	<b>6.14%</b>	<b>6.14%</b>
<b>Details of Acquisition/Sale</b>			
a) Shares carrying voting rights acquired/sold	<b>45173</b>	<b>0.49%</b>	<b>0.49%</b>
b) VR's 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) Shars encumbered/invoked/released by the acquirer			
e) Total (a+b+c+d)	<b>45173</b>	<b>0.49%</b>	<b>0.49%</b>
<b>After the Acquisition/Sale, holding of:</b>			
a) Shares carrying voting rights acquired	<b>513274</b>	<b>5.65%</b>	<b>5.65%</b>
b) Shares encumbered with the acquirer			
c) VR's 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 sale			
e) Total (a+b+c+d)	<b>513274</b>	<b>5.65%</b>	<b>5.65%</b>

## 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

Mode of Acquisition/Sale (e.g. opens market / off market/ public issue / rights issue / preferential allotment / inter-se transfer, etc.)	OPEN MARKET
Date of Acquisition/Sale of shares/VR or date of receipt of intimation of allotment of shares, whichever is applicable	31 <sup>st</sup> May 2025
Equity share capital / total voting capital of the TC before the said acquisition/sale	90,83,182 Shares
Equity share capital/ total voting capital of the TC after the said acquisition/sale	90,83,182 Shares
Total diluted share/voting capital of the TC after the said acquisition	90,83,182 Shares

(\*) 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.

For and on behalf of

**Counter Cyclical Investments Private Limited**



**Authorised Signatory**

**Name:** -Mr. Parminderpal Singh Bhatia

**Designation:** - Director

Date: 02.06.2025