

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
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E-mail : st3rling@stlfasteners.com
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By NEAPS/Digital Exchange-NSE	By Listing Centre
National Stock Exchange of India Limited "Exchange Plaza", Bandra-Kurla Complex, Bandra (E) Mumbai-400051	General Manager BSE Limited 1 st Floor, P. J. Towers Dalal Street Mumbai – 400001
Security Code No.: STERTOOLS	Security Code No.: 530759

Date: 26th May, 2022
Ref.: STL/SD/06/2022-2023

Sub: Submission of Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended 31st March 2022

Dear Sir/ Madam,

Please find enclosed herewith the "Annual Secretarial Compliance Report" issued by a Company Secretary in Practice as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Circular No. CIR/ CFD/ CMD 1/27/2019 dated 8th February, 2019 for the year ended 31st March, 2022.

Kindly take the same in your record.

Thanking you,

Sincerely,

For **Sterling Tools Limited**

A handwritten signature in blue ink, appearing to read 'Vaishali Singh', written over a light blue horizontal line.

Vaishali Singh
Company Secretary



**Secretarial Compliance Report
of
Sterling Tools Limited**

(CIN: L29222DL1979PLC009668)

for the Year ended 31st March, 2022

I, Santosh Kumar Pradhan, Company Secretary in Practice, have examined:

- (a) All the documents and records made available to us and explanation provided by **Sterling Tools Limited (hereinafter referred to as the Listed Entity)**,
- (b) The filling/ submissions made by the Listed Entity to the Stock Exchanges,
- (c) Website of the Listed Entity,
- (d) Any other document/ filling, as may be relevant, which has been relied upon to make this certification for the Year ended 31st March, 2022 ("Review Period") in respect of Compliance of the Provisions of:
 - (a) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulation, Circulars, Guidelines issued thereunder; and
 - (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose Provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended;
- (b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Depositories and participants) Regulation, 2018;
- (e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulation, 2018:-**Not applicable during the Review period.**
- (f) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018:-**Not applicable during the Review period.**



- (g) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not applicable during the Review period.**
- (h) Securities and Exchange Board of India (Issued and Listing of Debt Securities Regulation, 2008):- **Not applicable during the Review period.**
- (i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulation, 2013:- **Not applicable during the Review period.**

and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the review period:

- (a) The Listed Entity has generally complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- (b) The Listed Entity has maintained proper records under the provisions of the above Regulations and circulars / guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) There were no actions taken against the Listed Entity/ its promoters/ directors either by SEBI or by Stock Exchanges (including under the standard Operating procedures issued by SEBI though various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.

The Listed Entity has received following Clarifications and E-mails from the National Stock Exchange, which were duly replied by the Company during the period under review:

- i. Regarding giving corporate guarantee to Sterling Gtake E-mobility Limited on 12th August, 2021,
- ii. Regarding termination of JV Agreement with Fabory Masters on 15th February, 2022;
- iii. Regarding giving corporate guarantee to Sterling Gtake E-mobility Limited on 18th February, 2022.



(d) The listed entity is not required to take any actions to comply with the observations made in previous reports as there were no observations made in the previous report.

Place: Ghaziabad
Date: 26.05.2022

**For Santosh Kumar Pradhan
Company Secretaries**



**Santosh Kumar Pradhan
Proprietor**

C. P. No. : 7647

FCS No. F6973

P.R. No. 1388/2021

UDIN: F006973D000393832