

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



Through NEAPS

National Stock Exchange of India Limited

“Exchange Plaza”,
Bandra–Kurla Complex, Bandra (E)
Mumbai-400051

Security Code No.: STERTOOLS

By Listing Centre

**General Manager
Department of Corporate Services
Bombay Stock Exchange Limited**

1st Floor, P. J. Towers
Dalal Street, Fort
Mumbai – 400001

Security Code No.: 530759

**Date: 22nd June, 2021
Ref.: STL/SD/2021-2022**

Sub.: Submission of Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the year ended 31st March, 2021

Dear Sir,

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, 2021.

Kindly take the same in your record.

Thanking you,

Yours truly,
For Sterling Tools Limited


**Vaishali Singh
Company Secretary cum Compliance Officer**

Encl.: As Above



SANTOSH KUMAR PRADHAN COMPANY SECRETARIES

Secretarial Compliance Report of Sterling Tools Limited (CIN: L29222DL1979PLC009668) for the Year ended 31st March, 2021

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, 2021 (“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. However, the Listed Entity has received a query from NSE regarding credit rating on 6th January, 2021, which was duly replied by the Company.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the Previous reports	Observations made in the Secretarial Compliance report for the Year ended 31.03.2020 (The Years are to be mentioned)	Actions taken by the listed entity, if any	Comments Of the Practicing Company Secretary On The actions taken by the listed entity
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**SANTOSH KUMAR PRADHAN
COMPANY SECRETARIES**

1.	Regulation 17 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015	The composition of the Board of the Listed Entity was not proper for the period from 7 th February, 2019 to 22 nd May, 2019.	The Company has made the composition of Board of Directors in order in compliance with Regulation 17 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 with effect from 23 rd May, 2019.	The Board of the Listed Entity has been duly constituted with effect from 23.05.2019 as per Regulation 17 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015. Further, NSE & BSE have waived off, the penalties levied on the Company, vide their letters dated 5 th February, 2020 and 7 th May, 2021 respectively.

Place: Ghaziabad
Date: 22.06.2021

**For Santosh Kumar Pradhan
Company Secretaries**

Santosh
Kumar
Pradhan

Digitally signed by
Santosh Kumar Pradhan
Date: 2021.06.22
15:38:23 +05'30'

**Santosh Kumar Pradhan
Proprietor
C. P. No. : 7647
FCS No. F6973**

UDIN: F006973C000497287