

**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



**Date:** 5<sup>th</sup> February 2025

**To,**  
**The Manager - Listing Department,**  
**National Stock Exchange of India Limited,**  
**Exchange Plaza, Plot No. C-1, G- Block,**  
**Bandra Kurla Complex, Bandra (East),**  
**Mumbai – 400051.**

**Ref:** Notice issued by NSE having reference number NSE/LIST-SOP/COMP/FINES/1340 dated 21st November 2024

**Sub:** Board Comments on SOP Fine levied by the Exchange

**Dear Sir/Madam,**

This is to inform you that the Board of Directors has reviewed NSE's letter no. NSE/LIST-SOP/COMP/FINES/1340, dated 21st November 2024, regarding the notice of non-compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The notice pertains to a one-day delay in submitting the Corporate Governance Report under Regulation 27(2), resulting in a SOP fine of ₹2,000+GST. The Board acknowledges NSE's observations and fully recognizes the importance of strict regulatory compliance.

The Company Secretary clarified that the XBRL file for the Corporate Governance Report was successfully uploaded to BSE on 19<sup>th</sup> October 2024 and was publicly available. However, due to a technical error and oversight, it was not uploaded on the NSE portal. Upon identifying this issue on 22<sup>nd</sup> October 2024 at approximately 10:30 AM, the company immediately contacted NSE officials and re-uploaded the file as instructed. Since it was uploaded with one day delay, NSE levied a fine of ₹2,000 + GST, which the company duly paid on 26<sup>th</sup> Nov. 2024.

The Board is committed to preventing such occurrences in the future. Accordingly, it has directed a strengthening of internal compliance mechanisms and has advised the necessary steps to ensure all regulatory requirements are met on time, thereby safeguarding investor interests and avoiding further penalties.

This is in compliance with the SEBI Circular no SEBI/HO/CFD/PoD2/CIR/P/0155 dated 11<sup>th</sup> November, 2024.

Sincerely,  
For **STERLING TOOLS LIMITED**

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

Enclosure: Letter dated 21st Nov., 24 issued by NSE

## National Stock Exchange Of India Limited

NSE/LIST-SOP/COMB/FINES/1340

November 21, 2024

The Company Secretary  
**Sterling Tools Limited**  
Unit No. 515, Dlf Tower A,  
Jasola District Centre,  
Delhi - 110025

Dear Sir/Madam,

**Subject: Notice for non-compliance with SEBI (LODR) Regulations, 2015 (“Listing Regulations”) and/or Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018 (“Depository Regulations”)**

Your attention is drawn towards SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (hereinafter referred to as “Master Circular”), specifying Standard Operating Procedure for imposing fines and suspension of trading in case of non-compliance with the Listing Regulations and/or Depository Regulations. On verification of the Exchange records, it has been observed that your Company has not complied/delayed complied with certain Listing Regulation(s) and/or Depository Regulations. The details of non-compliance(s)/delayed compliance(s), total fine payable by your Company and the particulars about manner in which fine should be remitted to the Exchange is enclosed as **Annexure**.

You are requested to inform the Promoters about identified non-compliance/delayed compliance and to ensure compliance with respective regulation(s) and/or make the payment of fines **within 15 days** from the date of this notice, failing which the Exchange may initiate following actions as per Master Circular:

1. Initiate freezing of entire shareholding of the Promoters in the Company as well as in other securities held in the Demat account of the Promoters.
2. Trading in securities of your Company shall take place on 'Trade for Trade' basis, in case of consecutive defaults with Regulations 17(1), 18(1), 27(2) of Listing Regulations and Regulation 76 of Depository Regulations i.e., Shifting of trading in securities to Z Category as per Master Circular.

You may also file request for waiver of fines with detailed submission indicating reasons for waiver, considering the extant Policy for Exemption of Fines, and shall indicate whether it intends to seek personal hearing before the concerned Committee.

However, before filing an application for waiver of fines, you are requested to refer to the below policies available on the Exchange’s website. For ready reference you may refer below links:

**National Stock Exchange Of India Limited**

- i. **Policy on exemption of fine:**  
[https://archives.nseindia.com/content/equities/Policy\\_for\\_exemption\\_SOP\\_Equity.pdf](https://archives.nseindia.com/content/equities/Policy_for_exemption_SOP_Equity.pdf)
- ii. **Policy on processing of waiver application:**  
[https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy\\_on\\_processing\\_of\\_waiver\\_application\\_segregation\\_of\\_commonly\\_listed\\_entities.pdf](https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy_on_processing_of_waiver_application_segregation_of_commonly_listed_entities.pdf)

The request for waiver of fine can be submitted to Exchange through NEAPS portal along with documentary evidence on the below link:

**NEAPS>>Compliance>>Fine Waiver>>Waiver Request.**

Further, as per Master Circular, your Company is also required to ensure that the said non-compliance which has been identified by the Exchange and subsequent action taken by the Exchange in this regard shall be placed before the Board in the next Board Meeting and comments made by the Board shall be duly informed to the Exchange at the below mentioned path in NEAPS portal along with this letter for dissemination having the announcement text as 'Board comments on fine levied by the Exchange'.

**Path: NEAPS > COMPLIANCE > Announcements > Announcements/ CA (Subject: Updates)**

In case of any clarification, you may contact any of the below mentioned Exchange Officers from Listing Compliance Department: -

- Ms. Sonam Yadav
- Ms. Harshita Chaubal
- Ms. Madhu Kadam
- Ms. Suman Lahoti
- Mr. Aniket Raut

Yours faithfully  
For **National Stock Exchange of India Limited**

**Rachna Jha**  
**Manager**

**Annexure**

Regulation	Quarter	Fine amount per day (Rs.)/Fine amount per instance	Days of non-compliance / No. of instance(s)	Fine amount (Rs.)
Reg. 27(2)	30-Sep-2024	2000	1	2000
<b>Total Fine</b>				<b>2000</b>
<b>GST (@18%)</b>				<b>360</b>
<b>Total Fine payable (Inclusive of 18% GST)</b>				<b>2360*</b>

\* In case the Company is non-compliant as on the date of this letter then fine amount will keep on increasing every day till the date compliance is achieved.

**Notes:**

- If the fine amount is paid before receipt of this letter, then inform the Exchange accordingly.
- Please update the payment details on below mentioned path:  
NEAPS > Payment > SOP Fine Payment.
- The above payment may be made vide RTGS / NEFT / Net Banking favouring 'National Stock Exchange of India Limited'. The bank details towards the payment of fine are as follows:

BENEFICIARY NAME	NATIONAL STOCK EXCHANGE OF INDIA LIMITED
BANK NAME	IDBI BANK LTD
A/C NO	Please refer Unique Account Code used for making Annual Listing fees to the Exchange
BRANCH	BANDRA KURLA COMPLEX, MUMBAI
RTGS/IFSC CODE	IBKL0001000

- The fine paid as above will be credited to IPFT as envisaged in the circular.