

Dated: 01.10.2019

Bombay Stock Exchange Limited  
Department of Corporate Services,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 001

The National Stock Exchange of India  
Limited  
Exchange Plaza,  
Plot No. C/1, G Block,  
Bandra-Kurla Complex, Bandra (E),  
Mumbai – 400 051

Steel Strips Wheels Limited  
SCO 49-50, Sector 26,  
Madhya Marg, Chandigarh.

**Sub: Disclosure under Regulation 29(1) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, regarding Acquisition of equity shares of Steel Strips Wheels Limited.**

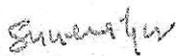
Sir,

Enclosed Please find necessary disclosures as required under Regulation 29(1) & 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, regarding Acquisition of equity shares of Steel Strips Wheels Limited.

Kindly take the same on your records.

Thanking you,

Yours faithfully



(Sunena Garg)

Encl: as above

## ANNEXURE - 1

## 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)	STEEL STRIPS WHEELS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	SUNENA GARG - Acquirer PAC's detail provided in Annexure A		
Whether the acquirer belongs to Promoter/Promoter group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE & NSE		
Details of the acquisition /disposal/holding of shares/voting rights/holding of the Acquirer and PAC as follows:	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC(**)
<u>Before the acquisition under consideration, holding of acquirer along with PACs of:</u>			
a) Shares carrying voting rights : Sunena Garg	526110	3.37	3.22
Other Promoters	4107719	26.35	25.14
b) Shares in the nature of encumbrance (pledge/lien/ non-disposal-undertaking/others) #	4889965	31.37	29.93
c) Voting rights (VR) otherwise than by equity shares			
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C(Sunena Garg)	750000	-	4.59
e) Total (a+b+c+d)	10273794	61.09	62.88
<u>Details of acquisition</u>			
a) Shares carrying voting rights acquired#	1250	0.01	0.01
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 T C acquired			
d) Shares in the nature of encumbrance (pledge/lien/ non-disposal undertaking/others)	0	-	-
e) Total (a+b+c+d)	1250	0.01	0.01
<u>After the acquisition, holding of acquirer along with PACs of:</u>			
a) Shares carrying voting rights :Sunena Garg	527360	3.38	3.23
Other Promoters	4107719	26.35	25.14
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 T C - Sunena Garg (Promoter)	750000	-	4.59
d) Shares in the nature of encumbrance (pledge/lien/ non-disposal-undertaking/others)#	4889965	31.37	29.93
e) Total (a+b+c+d)	10275044	61.10	62.89
Mode of acquisition (e.g. open market/public issue/rights issue/ preferential allotment/inter-se transfer/encumbrance, etc).	Open Market		
Salient features of the securities acquired including time till redemption, ratio at which it can be converted into equity shares, etc.	Acquired equity shares of Rs. 10/- each of Steel Strips Wheels Limited (Target Company) from Open Market.		
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	30.09.2019 = 1250 Equity Shares		
Equity share capital/ total voting capital of the TC before the said acquisition	Rs. 155897200/- dividend into 15589720 equity shares of Rs. 10/- each		
Equity share capital/ total voting capital of the TC after the said acquisition	Rs. 155897200/ dividend into 15589720 equity shares of Rs. 10/- each		
Total diluted share/voting capital of the TC after the said acquisition	Rs. 163397200/- dividend into 16339720 equity shares of Rs. 10/- each		
Note: (#) Voting rights in connection with above stated 4889965 pledged shares are with promoter group. I am holding 750000 convertible warrants and has been shown in the pre-acquisition and post-acquisition of the total holding of Acquirer and PAC. However in column % w.r.t. total share/voting capital wherever applicable the percentage against warrant is not calculated and considered. Without considering the said warrants the total pre-acquisition holding of Acquirer and PAC will be 9523794 and total post-acquisition holding of Acquirer and PAC will be 9525044.			

Sunena Garg

Sunena Garg

Place: Chandigarh

Date: 01.10.2019

## Part -B\*\*\*

Name of the Target Company(TC)	Steel Strips Wheels Ltd.	
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Whether the acquirer belongs to Promoter/	PAN of the acquirer and/ or PACs
R.K.Garg		ABYPG9179M
Dheeraj Garg		ABJPG6867F
Sunena Garg	Yes	AHJPG2645K
Priya Garg		AEBPG8990G
Munak Investment Private Limited		AABCM1368H
Malwa Chemtex Udyog Limited		AADCM8339G
S.J.Mercantile Private Limited		AAICS1496H
Munak International Private Ltd		AAACM9600K
Steel Strips Financiers P Ltd		AACCS3001J
S.S. Credits Pvt. Ltd		AACCS3002M
Steel Strips Holdings P Ltd		AACCS3181P
Malwa Holdings Pvt Ltd		AABCM1236C
SAB Industries Limited		AACC55078H
SAB Udyog Limited		AAICS1499J
Chandigarh Developers Pvt. Ltd.		AADCC6359G
DHG Marketing Pvt. Ltd		AADCD1364Q
Steel Strips Industries Ltd.		AAICS1498K
Munak Financiers Pvt. Ltd.		AABCM1367J
Steel Strips Limited		AACCS5076K
Chandigarh Aircraft Management Services Pvt. Ltd.		AAGCC5288F

*Sunena Garg*

Sunena Garg

Place: Chandigarh

Date:01.10.2019

(\*) 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

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

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

## ANNEXURE - 2

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

Name of the Target Company (TC)	STEEL STRIPS WHEELS LIMITED		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	SUNENA GARG - Acquirer PAC's detail provided in Annexure A		
Whether the acquirer belongs to Promoter/Promoter group	YES		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE & NSE		
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 : Sunena Garg	526110	3.37	3.22
Other Promoters	4107719	26.35	25.14
b) Shares in the nature of encumbrance (pledge/-lien/-non-disposal-undertaking/-others)#	4889965	31.37	29.93
c) Voting rights (VR) otherwise than by equity shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (Sunena Garg)	750000	-	4.59
e) Total (a+b+c+d)	10273794	61.09	62.88
<b>Details of acquisition/-sale</b>			
a) Shares carrying voting rights acquired/Sold #	1250	0.01	0.01
b) VRs acquired/Sold otherwise than by equity shares	-	-	-
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C	-	-	-
d) Shares encumbrance/ invoked/ released by the acquirer	-	-	-
e) Total (a+b+c+d)	1250	0.01	0.01
<b>After the acquisition/ sale, holding of:</b>			
a) Shares carrying voting rights :Sunena Garg	527360	3.38	3.23
Other Promoters	4107719	26.35	25.14
b) Shares encumbered with the acquirer			
Shares encumbered by the other promoter/promoter group#	4889965	31.37	29.93
c) VRs otherwise than by equity shares	-	-	-
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C -Sunena Garg (Promoter)	750000	-	4.59
e) Total (a+b+c+d)	10275044	61.10	62.89
Mode of acquisition/ sale (e.g. open market/ off market/ public issue/ rights issue/ preferential allotment/ inter-se transfer etc).	Acquired equity shares of Rs. 10/- each of Steel Strips Wheels Limited (Target Company) from Open Market.		
Date of acquisition/-sale of shares/-VR or date of receipt of intimation of allotment of shares, warrants whichever is applicable	30.09.2019 = 1250 Shares		
Equity share capital/ total voting capital of the TC before the said acquisition/ sale	Rs. 155897200/- dividend into 15589720 equity shares of Rs. 10/- each		
Equity share capital/ total voting capital of the TC after the said acquisition/ sale	Rs. 155897200/- dividend into 15589720 equity shares of Rs. 10/- each		
Total diluted share/voting capital of the TC after the said acquisition	Rs. 163397200/- dividend into 16339720 equity shares of Rs. 10/- each		
Note: (#) Voting rights in connection with above stated 4889965 pledged shares are with promoter group. I am holding 750000 convertible warrants and has been shown in the pre-acquisition and post-acquisition of the total holding of Acquirer and PAC. However in column % w.r.t. total share/voting capital wherever applicable the percentage against warrant is not calculated and considered. Without considering the said warrants the total pre-acquisition holding of Acquirer and PAC will be 9523794 and total post-acquisition holding of Acquirer and PAC will be 9525044			

*Sunena Garg*

Sunena Garg

Place: Chandigarh

01.10.2019

(\*) 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

## Annexure A

Promoter & Promotergroup share holding Prior to acquisition		existing (i.e prior to conversion of warrants into equity shares)		Diluted (i.e. Post conversion of warrants into equity shares)	
Sr No	Name	No. of equity shares of Rs.10/- each	%	No. of equity shares of Rs.10/- each	%
1	Dheeraj Garg	4640228	29.76	4640228	28.40
2	R K Garg	292571	1.88	292571	1.79
3	Priya Garg	79262	0.51	79262	0.49
4	Sunena Garg	526110	3.37	1276110	7.81
5	Sab Industries Limited	1324187	8.49	1324187	8.10
6	S A B Udyog Limited	1142582	7.33	1142582	6.99
7	Chandigarh Developers Private Limited	569132	3.65	569132	3.48
8	Dhg Marketing Private Limited	501094	3.21	501094	3.07
9	Malwa Chemtex Udyog Ltd	385000	2.47	385000	2.36
10	Steel Strips Financiers Pvt Limited	20000	0.13	20000	0.12
11	*Munak International Pvt.Ltd	2250	0.01	2250	0.01
12	S.S.Credits (P) Ltd	1600	0.01	1600	0.01
13	*S.J .Mercantile Pvt Limited	1250	0.01	1250	0.01
14	*Steel Strips Leasing Ltd.	500	0.00	500	0.00
15	Malwa Holdings ( P ) Ltd	400	0.00	400	0.00
16	Munak Investments (P) Ltd	400	0.00	400	0.00
17	*Munak Financers Pvt Ltd.	400	0.00	400	0.00
18	*Steel Strips Ltd.	300	0.00	300	0.00
19	Steel Strips Holdings (P) Ltd	120	0.00	120	0.00
20	Chandigarh Aircraft Management Services Pvt. Ltd	36408	0.23	36408	0.22
(A)	Total	9523794	61.09	10273794	62.88
(B) convertible warrants of the face value of Rs. 1162/- each					
1	Sunena Garg	750000	-	-	-
	Sub Total (B)	750000	-	-	-
(C)	Total (A)+(B)	10273794	-	10273794	62.88

## Promoter &amp; Promotergroup share holding Post Acquisition

Promoter & Promotergroup share holding Post Acquisition		existing (i.e prior to conversion of warrants into equity shares)		Diluted (i.e. Post conversion of warrants into equity shares)	
Sr No	Name	No. of equity shares of Rs.10/- each	%	No. of equity shares of Rs.10/- each	%
(A)					
1	Dheeraj Garg	4640228	29.76	4640228	28.40
2	R K Garg	292571	1.88	292571	1.79
3	Priya Garg	79262	0.51	79262	0.49
4	Sunena Garg	527360	3.38	1277360	7.82
5	Sab Industries Limited	1324187	8.49	1324187	8.10
6	S A B Udyog Limited	1142582	7.33	1142582	6.99
7	Chandigarh Developers Private Limited	569132	3.65	569132	3.48
8	Dhg Marketing Private Limited	501094	3.21	501094	3.07
9	Malwa Chemtex Udyog Ltd	385000	2.47	385000	2.36
10	Steel Strips Financiers Pvt Limited	20000	0.13	20000	0.12
11	*Munak International Pvt.Ltd	2250	0.01	2250	0.01
12	S.S.Credits (P) Ltd	1600	0.01	1600	0.01
13	*S.J .Mercantile Pvt Limited	1250	0.01	1250	0.01
14	*Steel Strips Leasing Ltd.	500	0.00	500	0.00
15	Malwa Holdings ( P ) Ltd	400	0.00	400	0.00
16	Munak Investments (P) Ltd	400	0.00	400	0.00
17	*Munak Financers Pvt Ltd.	400	0.00	400	0.00
18	*Steel Strips Ltd.	300	0.00	300	0.00
19	Steel Strips Holdings (P) Ltd	120	0.00	120	0.00
20	Chandigarh Aircraft Management Services Pvt. Ltd	36408	0.23	36408	0.22
	Sub Total (A)	9525044	61.10	10275044	62.89
(B) convertible warrants of the face value of Rs. 1162/- each					
1	Sunena Garg	750000	-	-	-
	Sub Total (B)	750000	-	-	-
(C)	Total (A)+(B)	10275044	-	10275044	62.89

\* As per Company's Member (Shareholder) register, Steel Strips Leasing Ltd (now known as Steel Strips Industries Ltd),Munak Financers P Ltd,Steel Strips Ltd& SA holdings P.Ltd (now known as SJ Mercantile P Ltd) have sold 500,400,300&50 Shares respectively long back but not yet lodged by purchasers in public category with the company.These shares are still standing in the name of above stated promoters in physical form in member register.Further as per the Company member register, Munak International P Ltd(MIPL) is holding 2250 shares.However out of this,50 shares have already been sold by MIPL long back,however the same is still outstanding in its name.

*Sunena Garg*

Sunena Garg

Place: Chandigarh

Date:01.10.2019