

Dated 20.06.2019

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(**) |
| Before the acquisition under consideration, holding of acquirer along with PACs of: | | | |
| a) Shares carrying voting rights : Sunena Garg | 229591 | 1.47 | 1.41 |
| Other Promoters | 3697199 | 23.72 | 22.63 |
| b) Shares in the nature of encumbrance (pledge/lien/ non-disposal-undertaking/others) # | 5289965 | 33.93 | 32.37 |
| 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) | 9966755 | 59.12 | 61.00 |
| Details of acquisition | | | |
| a) Shares carrying voting rights acquired | 29398 | 0.19 | 0.18 |
| 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) | - | - | - |
| e) Total (a+b+c+d) | 29398 | 0.19 | 0.18 |
| After the acquisition, holding of acquirer along with PACs of: | | | |
| a) Shares carrying voting rights :Sunena Garg | 258989 | 1.66 | 1.59 |
| Other Promoters | 3697199 | 23.72 | 22.63 |
| 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)# | 5289965 | 33.93 | 32.37 |
| e) Total (a+b+c+d) | 9996153 | 59.31 | 61.18 |
| Mode of acquisition (e.g. open market/public issue/ rights-issue/ preferential allotment/inter-se transfer/ encumbrance, etc). | Open Market | | |
| Salient fetures 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 | 18.06.2019 = 2600 Shares 19.06.2019 = 26798 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 5289965 pledged shares are with promoter group. Smt Sunena Garg, promoter is 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 9216755. and total post-acquisition holding of Acquirer and PAC will be 9246153. | | | |

Sunena Garg

Sunena Garg
Place: Chandigarh
20.06.2019

| 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(**) |
| Before the acquisition under consideration, holding of: | | | |
| a) Shares carrying voting rights : Sunena Garg | 229591 | 1.47 | 1.41 |
| Other Promoters | 3697199 | 23.72 | 22.63 |
| b) Shares in the nature of encumbrance (pledge/-lien/-non-disposal-undertaking/-others)# | 5289965 | 33.93 | 32.37 |
| 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) | 9966755 | 59.12 | 61.00 |
| Details of acquisition/ sale | | | |
| a) Shares carrying voting rights acquired/Sold | 29398 | 0.19 | 0.18 |
| 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) | 29398 | 0.19 | 0.18 |
| After the acquisition/ sale, holding of: | | | |
| a) Shares carrying voting rights :Sunena Garg | 258989 | 1.66 | 1.59 |
| Other Promoters | 3697199 | 23.72 | 22.63 |
| b) Shares encumbered with the acquirer | - | - | - |
| Shares encumbered by the other promoter/promoter group# | 5289965 | 33.93 | 32.37 |
| 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) | 9996153 | 59.31 | 61.18 |
| 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 | 18.06.2019 = 2600 Shares 19.06.2019 = 26798 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 5289965 pledged shares are with promoter group. Smt Sunena Garg, promoter is 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 9216755 and total post-acquisition holding of Acquirer and PAC will be 9246153. | | | |

Sunena Garg

Sunena Garg
Place: Chandigarh
20.06.2019

(*) 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 & Promoter group 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 | 229591 | 1.47 | 979591 | 6.00 |
| 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. | 25888 | 0.17 | 25888 | 0.16 |
| (A) | Total | 9216755 | 59.12 | 9966755 | 61.00 |
| (B) | convertible warrants of the face value of Rs. 1162/- each | | | | |
| 1 | Sunena Garg | 750000 | - | - | - |
| | Sub Total (B) | 750000 | - | - | - |
| (C) | Total (A)+(B) | 9966755 | - | 9966755 | 61.00 |

Promoter & Promoter group share holding Post Acquisition

| Promoter & Promoter group 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 | 258989 | 1.66 | 1008989 | 6.18 |
| 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. | 25888 | 0.17 | 25888 | 0.16 |
| | Sub Total (A) | 9246153 | 59.31 | 9996153 | 61.18 |
| (B) | convertible warrants of the face value of Rs. 1162/- each | | | | |
| 1 | Sunena Garg | 750000 | - | - | - |
| | Sub Total (B) | 750000 | - | - | - |
| (C) | Total (A)+(B) | 9996153 | - | 9996153 | 61.18 |

*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 MercantileP Ltd) have sold 500,400,300&50 Shares resp. 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 our 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: 20.06.2019