

Ref. SSWL/
Dated: 11.10.2019

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

BSE Code: 513262

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

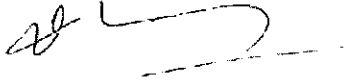
Sub: Steel Strips Wheels Limited- Disclosure for reason of encumbrance by Dheeraj Garg (Promoter) for himself and on behalf of promoter group

Dear Sir,

Pursuant to SEBI Circular no. SEBI/HO/CFD/DCR1/CIR/P/2019/90 dated 7th August, 2019 and the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, please find enclosed disclosure in the required format in terms of Regulation 31(1) and Regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Kindly take the same on your records please.

Thanking you.
Yours faithfully,



Dheeraj Garg
(For himself and on behalf of Promoter Group of Steel strips Wheels Limited)

Annexure - II

Format for disclosure of reasons for encumbrance

Name of listed company	Steel Strips Wheels Limited
Name of the recognised stock exchanges where the shares of the company are listed	BSE Limited National Stock Exchange of India Limited
Name of the promoter(s) / PACs whose shares have been encumbered	1. Dheeraj Garg 2. Priya Garg 3. Chandigarh Developers Private Limited 4. DHG Marketing Private Limited 5. Sab Industries Limited
Total promoter shareholding in the listed company	No. of shares - 9525044 % of total share capital - 61.10%
Encumbered shares as a % of promoter shareholding	51.34%
Whether encumbered share is 50% or more of promoter shareholding	Yes
Whether encumbered share is 20% or more of total share capital	Yes

Signature of Authorised Signatory

Dheeraj Garg



Place : Chandigarh
Date : 11.10.2019

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 1	Encumbrance 2	Encumbrance 3	Encumbrance 4	Encumbrance 5
		(Date of creation of encumbrance: 22.08.2016)	(Date of creation of encumbrance: 31.08.2016)	(Date of creation of encumbrance: 22.01.2019)	(Date of creation of encumbrance: 17.08.2018)	(Date of creation of encumbrance: 24.09.2018)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge	Pledge	Pledge	Pledge
No. and % of shares encumbered		No. of shares : 300000 % of total share capital: 1.93%	No. of shares: 65000 % of total share capital: 0.42%	No. of shares : 30000 % of total share capital: 0.19%	No. of shares : 435000 % of total share capital : 2.79%	No. of shares : 42000 % of total share capital : 0.27%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Catalyst Trusteeship Limited (on behalf of Tata Capital financial Services Limited)	Catalyst Trusteeship Limited (on behalf of Tata Capital financial Services Limited)	Catalyst Trusteeship Limited (on behalf of Tata Capital financial Services Limited)	IL&FS Securities Services Limited (Bajaj Finance Limited)	IL&FS Securities Services Limited (Bajaj Finance Limited)
	Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC
	Names of all other entities in the agreement	Listed company and its group companies (if any) DHG Marketing Pvt Ltd Other entities (if any) : Nil	Listed company and its group companies (if any) DHG Marketing Pvt Ltd Other entities (if any) : Nil	Listed company and its group companies (if any) DHG Marketing Pvt Ltd Other entities (if any) : Nil	Listed company and its group companies (if any) Chandigarh Developers Pvt Ltd Other entities (if any) : Nil	Listed company and its group companies (if any) Chandigarh Developers Pvt Ltd Other entities (if any) : Nil
	Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating	NO	NO	NO	NO	NO
Security Cover / Asset Cover	Value of shares on the date of event/agreement (A)	Rs. 16,95,30,000	Rs. 3,70,85,750	Rs. 2,63,91,000	Rs. 51,46,48,500	Rs. 4,42,07,100
	Amount involved (against which shares have been encumbered) (B)	Rs. 6,00,00,000	Rs. 1,25,00,000	0	Rs. 20,00,00,000	0
	Ratio of A/B	2.83	2.97	0	2.57	0
End use of money	Borrowed amount to be utilized for what purpose- a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	General Corporate purposes	General Corporate purposes	No additional loan was taken. Additional shares were pledged as margin top up.	General Corporate purposes	No additional loan was taken. Additional shares were pledged as margin top up.

Signature of Authorised Signatory

(DHEERAJ GARG)

Date : 11.10.2019

Place: Chandigarh

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 6	Encumbrance 7	Encumbrance 8	Encumbrance 9	Encumbrance 10
		(Date of creation of encumbrance: 10.10.2018)	(Date of creation of encumbrance:07.12.2018)	(Date of creation of encumbrance: 07.01.2019)	(Date of creation of encumbrance:17.12.2014)	(Date of creation of encumbrance: 16.10.2017)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge	Pledge	Pledge	Pledge
No. and % of shares encumbered		No. of shares : 40000 % of total share capital : 0.26%	No. of shares : 33000 % of total share capital : 0.21%	No. of shares : 19132 % of total share capital : 0.12%	No. of shares : 500000 % of total share capital : 3.29%	No. of shares : 100000 % of total share capital : 0.64%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	IL&FS Securities Services Limited (Bajaj Finance Limited)	IL&FS Securities Services Limited (Bajaj Finance Limited)	IL&FS Securities Services Limited (Bajaj Finance Limited)	Allahabad Bank	Allahabad Bank
	Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.	YES, NBFC	YES, NBFC	YES, NBFC	YES, Scheduled Commercial Bank	YES, Scheduled Commercial Bank
	Names of all other entities in the agreement	Listed company and its group companies (if any) ChandigarhDevelopers Pvt Ltd Other entities (if any) : Nil	Listed company and its group companies (if any) Chandigarh Developers Pvt Ltd Other entities (if any) : Nil	Listed company and its group companies (if any) Chandigarh Developers Pvt Ltd Other entities (if any) : Nil	Listed company and its group companies (if any) SAB Industries Limited Other entities (if any) : Nil	Listed company and its group companies (if any) SAB Industries Limited Other entities (if any) : Nil
	Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating	NO	NO	NO	NO	NO
Security Cover / Asset Cover	Value of shares on the date of event/agreement (A)	Rs. 4,07,78,000	Rs. 3,14,78,700	Rs. 1,74,78,038.60	Rs. 16,00,75,000	Rs. 8,89,05,000
	Amount involved (against which shares have been encumbered) (B)	0	0	0	Rs. 17,50,00,000	Rs. 12,50,00,000
	Ratio of A/B	0	0	0	0.91	0.71
End use of money	Borrowed amount to be utilized for what purpose- a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	Shares were pledged as collateral security for availing working capital facility by SAB Industries Ltd. (Group Company)	Shares were pledged as collateral security for availing enhanced working capital facility of Rs. 12.50 crore by SAB Industries Ltd. (Group Company)

Signature of Authorised Signatory

(DHEERAJ GARG)



Date : 11.10.2019

Place: Chandigarh

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 11 (Date of creation of encumbrance: 19.03.2018)	Encumbrance 12 (Date of creation of encumbrance: 04.01.2019)	Encumbrance 13 (Date of creation of encumbrance: 02.02.2019)	Encumbrance 14 (Date of creation of encumbrance: 06.09.2018)	Encumbrance 15 (Date of creation of encumbrance: 25.09.2018)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge	Pledge	Pledge	Pledge
No. and % of shares encumbered		No. of shares : 824000 % of total share capital : 5.3%	No. of shares : 35000 % of total share capital : 0.22%	No. of shares : 63000 % of total share capital : 0.40%	No. of shares : 400000 % of total share capital : 2.57%	No. of shares : 32000 % of total share capital : 0.21%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Clix Finance India Unlimited on behalf of Clix Finance India Pvt Ltd	Clix Finance India Pvt Ltd	Clix Finance India Pvt Ltd	Clix Finance India Pvt Ltd	Clix Finance India Pvt Ltd
	Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC
	Names of all other entities in the agreement	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg
	Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating	NO	NO	NO	NO	NO
Security Cover / Asset Cover	Value of shares on the date of event/agreement (A)	Rs. 86,42,93,600	Rs. 3,16,99,500	Rs. 5,46,24,150	Rs. 46,45,20,000	Rs. 3,35,39,200
	Amount involved (against which shares have been encumbered) (B)	Rs. 35,00,00,000	0	0	Rs. 20,00,00,000	0
	Ratio of A/B	2.47	0	0	2.32	0
End use of money	Borrowed amount to be utilized for what purpose- a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	Partially for personal use and partially for general corporate use.	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	Partially for personal use and partially for general corporate use.	No additional loan was taken. Additional shares were pledged as margin top up.

Signature of Authorised Signatory

(DHEERAJ GARG)

Date : 11.10.2019

Place: Chandigarh

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 16	Encumbrance 17	Encumbrance 18	Encumbrance 19	Encumbrance 20
		(Date of creation of encumbrance: 30.10.2018)	(Date of creation of encumbrance:03.01.2019)	(Date of creation of encumbrance: 04.01.2019)	(Date of creation of encumbrance:15.11.2016)	(Date of creation of encumbrance: 21.11.2016)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge	Pledge	Pledge	Pledge
No. and % of shares encumbered		No. of shares : 45000 % of total share capital : 0.29%	No. of shares : 20000 % of total share capital : 0.13%	No. of share : 10000 % of total share capital : 0.06%	No. of shares : 475000 % of total share capital :3.06%	No. of shares : 205000 % of total share capital :1.32%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Clix Finance India Pvt Ltd	Clix Finance India Pvt Ltd	Clix Finance India Pvt Ltd	Catalyst Trusteeship Limited (Tata Capital financial Services Limited)	Catalyst Trusteeship Limited (Tata Capital financial Services Limited)
	Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC
	Names of all other entities in the agreement	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg
	Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating	NO	NO	NO	NO	NO
Security Cover / Asset Cover	Value of shares on the date of event/agreement (A)	Rs. 4,29,61,500	Rs. 1,81,57,000	Rs. 90,57,000	Rs. 25,25,10,000	Rs. 10,15,05,750
	Amount involved (against which shares have been encumbered) (B)	0	0	0	Rs. 7,00,00,000	Rs. 3,50,00,000
	Ratio of A/B	0	0	0	3.60	2.90
End use of money	Borrowed amount to be utilized for what purpose- a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	Partially for personal use and partially for general corporate use.	Partially for personal use and partially for general corporate use.

Signature of Authorised Signatory

(DHEERAJ GARG)



Date : 11.10.2019

Place: Chandigarh

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 21	Encumbrance 22	Encumbrance 23	Encumbrance 24	Encumbrance 25
		(Date of creation of encumbrance:28.04.2017)	(Date of creation of encumbrance: 07.12.2018)	(Date of creation of encumbrance:22.01.2019)	(Date of creation of encumbrance: 29.05.2018)	(Date of creation of encumbrance:11.06.2018)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge	Pledge	Pledge	Pledge
No. and % of shares encumbered		No. of shares: 150000 % of total share capital : 0.96%	No. of shares: 34000 % of total share capital: 0.22%	No. of shares : 60000 % of total share capital: 0.38%	No. of shares : 758833 % of total share capital : 4.88%	No. of shares : 275000 % of total share capital : 1.77%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Catalyst Trusteeship Limited (Tata Capital financial Services Limited)	Catalyst Trusteeship Limited (Tata Capital financial Services Limited)	Catalyst Trusteeship Limited (Tata Capital financial Services Limited)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)
	Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC
	Names of all other entities in the agreement	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg Rajender Kumar Garg Priya Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg
	Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc ? If yes, provide details about the instrument, including credit rating	NO	NO	NO	NO	NO
Security Cover / Asset Cover	Value of shares on the date of event/agreement (A)	Rs. 13,58,77,500	Rs. 3,24,32,600	Rs. 5,27,82,000	Rs. 52,54,29,900	Rs. 35,00,47,500
	Amount involved (against which shares have been encumbered) (B)	0	0	0	Rs. 38,00,00,000	Rs. 13,75,00,000
	Ratio of A/B	0	0	0	1.38	2.55
End use of money	Borrowed amount to be utilized for what purpose- a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	Partially for repayment of existing loan, partially for Personal use and partially for general corporate use.	Partially for Personal use and partially for general corporate use.

Signature of Authorised Signatory

(DHEERAJ GARG)

Date : 11.10.2019

Place: Chandigarh

Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 26 (Date of creation of encumbrance: 21.06.2018)	Encumbrance 27 (Date of creation of encumbrance: 24.08.2018)	Encumbrance 28 (Date of creation of encumbrance: 24.09.2018)	Encumbrance 29 (Date of creation of encumbrance: 30.10.2018)	Encumbrance 30 (Date of creation of encumbrance: 07.12.2018)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge	Pledge	Pledge	Pledge
No. and % of shares encumbered		No. of shares : 468000 % of total share capital : 3.00%	No. of shares : 292571 % of total share capital : 1.88%	No. of shares : 170000 % of total share capital : 1.09%	No. of shares : 45000 % of total share capital : 0.29%	No. of shares : 200000 % of total share capital : 1.28%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)
	Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC	YES, NBFC
	Names of all other entities in the agreement	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg
	Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating	NO	NO	NO	NO	NO
Security Cover / Asset Cover	Value of shares on the date of event/agreement (A)	Rs. 56,75,90,400	Rs. 34,80,57,090.15	Rs. 17,89,33,500	Rs. 4,29,61,500	Rs. 19,07,80,000
	Amount involved (against which shares have been encumbered) (B)	13,25,00,000	0	0	0	0
	Ratio of A/B	4.28	0	0	0	0
End use of money	Borrowed amount to be utilized for what purpose- a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	Partially for Personal use and partially for general corporate use.	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.

Signature of Authorised Signatory

(DHEERAJ GARG)

Date : 11.10.2019

Place: Chandigarh



Details of all the existing events/ agreements pertaining to encumbrance

		Encumbrance 31 (Date of creation of encumbrance:03.01.2019)	Encumbrance 32 (Date of creation of encumbrance: 22.01.2019)
Type of encumbrance (pledge, lien, negative lien, non-disposal undertaking etc. or any other covenant, transaction, condition or arrangement in the nature of encumbrance)		Pledge	Pledge
No. and % of shares encumbered		No. of shares : 75000 % of total share capital : 0.48%	No. of shares : 85000 % of total share capital : 0.55%
Specific details about the encumbrance	Name of the entity in whose favour shares encumbered (X)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)	Piramal Trusteeship Services Pvt. Ltd (Piramal Capital and Housing Finance Limited)
	Whether the entity X is a scheduled commercial bank, public financial institution, NBFC or housing finance company? If No, provide the nature of the business of the entity.	YES, NBFC	YES, NBFC
	Names of all other entities in the agreement	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg	Listed company and its group companies (if any) : Nil Other entities (if any) : Dheeraj Garg
	Whether the encumbrance is relating to any debt instruments viz. debenture, commercial paper, certificate of deposit etc.? If yes, provide details about the instrument, including credit rating	NO	NO
Security Cover / Asset Cover	Value of shares on the date of event/agreement (A)	Rs. 6,80,88,750	Rs. 7,47,74,500
	Amount involved (against which shares have been encumbered) (B)	0	0
	Ratio of A/B	0	0
End use of money	Borrowed amount to be utilized for what purpose- a) Personal use by promoters and PACs (b) For the benefit of listed company Provide details including amount, purpose of raising money by listed company, schedule for utilization of amount, repayment schedule etc. (a) Any other reason (please specify)	No additional loan was taken. Additional shares were pledged as margin top up.	No additional loan was taken. Additional shares were pledged as margin top up.

Signature of Authorised Signatory

(DHEERAJ GARG)

Date : 11.10.2019

Place: Chandigarh

