

## STEEL STRIPS WHEELS LTD.

CIN: L27107PB1985PLC006159

Head Office :

ISO/TS16949 Certified

SCO 49-50, Sector-26,

Madhya Marg, Chandigarh-160 019 (INDIA) Tel.: +91-172-2793112, 2790979, 2792385

Fax: +91-172-2794834 / 2790887 Website: www.sswlindia.com

Dated: 27-05-2022

The Bombay Stock Exchange Limited Department of Corporate Services, 25<sup>th</sup> Floor, 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: Annual Secretarial Compliance Report for the financial year ended 31st March 2022.

Ref: SEBI Circular CIR/CFD/CMD1/27/2019 Dated February 8, 2019.

Dear Sir/Madam,

It is hereby informed that in the submission made by the Company on 26.05.2022 for the above mentioned report, incorrect cover letter was attached mistakenly alongwith the report. Accordingly, hereby the Company is re-submitting the Annual Secretarial Compliance report in Compliance with the Regulation 24 A of the SEBI (LODR) Regulations, 2015, read with the SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 with correct cover letter duly signed by Sh. Sushil Kumar Sikka (PCS), Proprietor of S. K. Sikka & Associates, Company Secretaries for the financial year ended 31st March 2022. It is also informed that there is no change in the report already submitted.

This is for your information and records please.

Thanking you.

Yours faithfully, For Steel Strips Wheels Limited

(Shaman Jindal) Company Secretary

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## S.K. SIKKA & ASSOCIATES

Company Secretaries

# 5441, Sector 38 (West), Chandigarh - 160 014

Mobile : 98142-61166

E-mail: sikkasushil@gmail.com

## SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2022

[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 Dt. 8th February, 2019]

I, Sushil Kumar Sikka, Proprietor of S. K. Sikka & Associates, have examined:

- (a) all the documents and records made available to us and explanation provided by **Steel Strips Wheels Limited** ("the listed entity");
- (b) the filings/ submissions made by the listed entity to the stock exchanges;
- (c) website of the listed entity;
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:

- (a) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, 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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable to the Company during the Audit Period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits & Sweat Equity) Regulations, 2021 (erstwhile Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 and Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not Applicable to the Company during the Audit Period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not Applicable to the Company during the Audit Period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) other regulations as applicable from time to time;
  - and circulars/guidelines issued thereunder;



Based on the above examination, I hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary	
	micidaling specific states,	NIL		

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

S. No.	Action taken by	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.	
			NIL		

Further no action has been taken against the promoters/directors/material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SESI through various circulars) under the aforesaid Acts/Regulations and circulars/guidelines issued thereunder

(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No.	Observations of the Practicing Company Secretary in the previous reports	the year ended (the years are to be mentioned)	Actions taken by the listed entity, if any  As informed in my	Comments of the Practicing Company Secretary on the actions taken by the listed entity  The matter stands
1.	Regulation 17(1) of SEBI (LODR) Regulations, 2015  One Independent Director was required to be appointed to make the composition of the Board of Directors in conformity with SEBI Listing Regulations.	made in the Annual Secretarial Compliance report for the year ended 31.03.2021	As informed in my previous report for the FY ending 31.03.2021, the Company had appointed an Independent Director on the Board w.e.f. 09.11.2020 and hence, the board Composition was corrected in accordance with the SEBI Listing Regulations and duly paid fines imposed by BSE and NSE.	closed as on end of FY 2021-22.

C.P. No. 3582 CHANDIGARH

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	Further, BSE and NSE had denied the Company's request for waiver of said	12
	fine.	
Place: Chandigarh	C. P. No. 3582	-

Place: Chandigarh Date:26/05/2022

CHANDIGARH \* STEEM Kumar S

(Suspil Kumar Sikka)

C P No.: 3582

UDIN: F004241D000393542