



**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

Date: 27.05.2025

The Bombay Stock Exchange Limited  
Department of Corporate Services,  
25<sup>th</sup> Floor, 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

**BSE Code: 513262**

**NSE Code: SSWL**

**Sub: Annual Secretarial Compliance Report for the Financial Year ended  
March 31, 2025**

Dear Sir/Madam,

In Compliance with the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with Annexure 15 of SEBI's Master Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024, please find enclosed herewith the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2025 issued by Sh. Sushil Kumar Sikka (PCS), Proprietor of M/s S. K. Sikka & Associates, Practicing Company Secretaries.

You are requested to take the same on record.

Thanking you.

Yours faithfully,  
**For Steel Strips Wheels Limited**

(Kanika Sapra)  
Company Secretary and Compliance officer

Encl: as above

**Regd. Office :** Village Somalheri/Lehli, P.O. Dappar, Tehsil Derabassi, Distt. Mohali, Punjab (India)  
Tel. : +91 (1762) 275249, 275872, 275173 Fax : +91 (1762) 275228  
Email : hrdho@sswlindia.com Website : www.sswlindia.com

**SECRETARIAL COMPLIANCE REPORT OF STEEL STRIPS WHEELS LIMITED**  
**FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2025**

To,  
Steel Strips Wheels Limited  
Village Somalheri/Lehli,  
P.O. Dappar, Teh. Derabassi,  
Distt. Mohali. Punjab- 140506

I, Sushil Kumar Sikka, Prop. of M/s S. K. Sikka & Associates, have examined:

- (a) all the documents and records made available to me 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, 2025** ("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 {SEBI LODR Regulations};
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company during the Review Period)**
- (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 Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021{ SEBI (SBEB) Regulations, 2021};
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the Company during the Review Period)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



(h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 to the extent applicable.

and circulars/ guidelines issued thereunder;

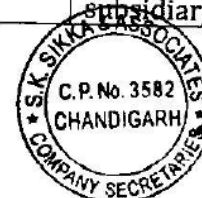
and based on the above examination, I hereby report that during the Review Period :

(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: Not Applicable

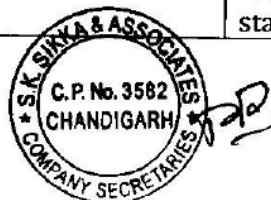
(b) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable

(c) I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr.No	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1.	<b>Secretarial Standards:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	YES	-
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	YES YES	- -
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/ information under a separate section on the website</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website</li> </ul>	YES YES YES	- - -
4.	<b>Disqualification of Director:</b> None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013	YES	-
5.	<b>Details related to Subsidiaries of listed entities:</b> (a) Identification of material subsidiary companies	NA	The Company does not have material subsidiary.



	(b) Requirements with respect to disclosure of material as well as other subsidiaries	YES	-
6.	<b>Preservation of Documents:</b> The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations.	YES	-
7.	<b>Performance Evaluation:</b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	YES	-
8.	<b>Related Party Transactions:</b> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	YES NA	- Please refer to point No. 8(a)
9.	<b>Disclosure of events or information:</b> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations within the time limits prescribed thereunder.	YES	-
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	YES	-
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	YES	-
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries</b> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the	NA	There was no resignation of statutory



	listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the SEBI LODR Regulations by listed entities.		auditors from the Company or its subsidiary
13.	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc	YES	No Non-Compliance was observed

In terms of SEBI Circular SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024, I, further confirm that:

The Listed entity has complied with the following requirements for disclosure of Employee Benefit Scheme Documents in terms of Regulation 46(2) (za) of the SEBI LODR Regulations:

- The Employee Benefit Scheme Document which have been approved by the shareholders of the Listed Entity is uploaded on its website.
- The documents uploaded on the website have minimum information to be disclosed to shareholders as per SEBI (SBEB) Regulations, 2021.

**Assumptions & Limitation of scope and Review:**

- Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- My responsibility is to certify based upon my examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- I have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
- This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Chandigarh

Date: 23.05.2025



**S.K. SIKKA & ASSOCIATES**  
Company Secretaries

(SUSHIL KUMAR SIKKA)

Prop. FCS 4241, COP 3582

Peer Review Cert. No. 1057/2021

UDIN: F004241G000426401