

**CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING****INTRODUCTION**

The Securities and Exchange Board of India (SEBI), in its Endeavour to protect the interests of investors in general, had formulated the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred as 'Regulations') and were notified by SEBI on January 15, 2015 and become effective from May 15, 2015. As per Regulation 9 of Regulations, every company whose Securities are listed on a stock exchange, is also required to formulate a Code of Conduct for Prevention of Insider Trading to regulate, monitor and report trading by its Directors, Employees and other Connected Persons.

This document embodies the Code of Conduct ("Code") for prevention of Insider Trading to be adopted by Steel Strips Wheels limited and followed by their Directors, Employees and other Connected Persons.

**APPLICABILITY**

This Code of Conduct for Prevention of Insider Trading is applicable on all employees and other connected persons who have access to or could have access to unpublished price sensitive information about the Company. Such persons are required to comply with this Code and to make the necessary disclosures as per Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information as adopted by the Company. This amended Code shall be applicable with effect from May 15, 2015.

**DEFINITIONS**

<b>(a)</b>	<b>"Act"</b>	means the Securities and Exchange Board of India (SEBI) Act, 1992 (15 of 1992)
<b>(b)</b>	<b>"Board"</b>	means Board of Directors of the Company.
©	<b>"Code"</b>	means this Code of Conduct for Prevention of Insider Trading.
<b>(d)</b>	<b>"Company"</b>	"This Company" or "The Company", wherever occur in this code shall mean "Steel Strips Wheels Limited".
<b>(e)</b>	<b>"Compliance Officer"</b>	means any senior officer, designated so and reporting to the board of directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company;
<b>(f)</b>	<b>"Connected Person"</b>	means any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a Director, Officer or an employee of the Company or holds any position including a professional or business relationship between himself and

		<p>the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access. Generally, the following persons shall be deemed to be connected persons unless the contrary is established:</p> <p>(a) an immediate relative of connected persons;  (b) a Holding Company or Associate Company or Subsidiary Company of the Company; or  (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or  (d) an Investment Company, Trustee Company, Asset Management Company or an employee or Director thereof; or  (e) an Official of a Stock Exchange or of Clearing House or Corporation; or  (f) a member of Board of Trustees of a Mutual Fund or a member of the Board of Directors of the Asset Management Company of a Mutual Fund or is an employee thereof; or  (g) a member of the Board of Directors or an employee, of a Public Financial Institution as defined in Section 2 (72) of the Companies Act, 2013; or  (h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or  (i) a Banker of the Company; or  (j) a Concern, Firm, Trust, Hindu undivided family, Company or Association of Persons wherein a Director of the Company or his immediate relative or Banker of the Company, has more than ten per cent of the holding or interest;</p>
(g)	<b>"Designated Persons"</b>	<p>(i) All Directors;  (ii) Key Managerial Personnel (KMP's) as per Companies Act, 2013  (iii) All employees of General Manager cadre and above.  (iv) Promoters/Promoter Group of the Company;  (v) Persons in contractual, fiduciary or advisory relationship with the Company i.e. consultants, retainers, auditors, law firms, analysts etc.  (v) Such Employees/Other persons as designated by the Board of Directors in consultation with Compliance Officer of the Company, from time to time; and  (vi) Immediate relatives of persons covered under clause (i) to (v) above</p>
(h)	<b>'Director'</b>	means a member of the Board of Directors of the Company.
(i)	<b>"Employee"</b>	means every employee of the Company (whether working in India or abroad) including the Directors in the employment of the Company.
(j)	<b>"Generally Available Information"</b>	means information that is accessible to the public on a non-discriminatory basis, such as information published on websites of stock exchanges.

(k)	<b>"Immediate Relative"</b>	means the spouse of the Designated Person, and includes parent, sibling and child of such Designated Person or of the spouse, who are either financially dependent on the Designated Person or consults the Designated Person in taking decisions relating to trading in securities.
(l)	<b>"Insider"</b>	means any person who is a :  (i) Connected Person or (ii) in possession of or having access to Unpublished Price Sensitive Information
(m)	<b>"Promoter"</b>	shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
(n)	<b>"Securities"</b>	shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
(o)	<b>"Specified Persons"</b>	means all Directors, Employees and Connected Persons of the Company (including all Designated Persons)
(p)	<b>"Trading"</b>	Means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly
(q)	<b>"Trading Day"</b>	means a day on which the recognized stock exchanges are open for trading.
®	<b>"Unpublished Price Sensitive Information ("UPSI")"</b>	means any information, relating to a Company or its Securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of Securities of the Company and shall, ordinarily include but not be restricted to, information relating to the following:  (i) financial results; (ii) dividends; (iii) change in capital structure (iv) mergers, de-mergers, acquisitions, delisting's, disposals and expansion of business and such other transactions; (v) changes in Key Managerial Personnel; (vi) material events in accordance with the listing agreement;

## INTERPRETATION

Words and expressions used and not defined in the Code but defined in the Regulations, Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996), or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation.

## **COMPLIANCE OFFICER:**

The Company Secretary shall hold the position of the Compliance Officer so long as he/she remains the Company Secretary. The Board of Director of the company can also designate another person/Director to act as Compliance officer in addition to the company Secretary.

The Compliance Officer (s) shall be adequately empowered and provided with adequate manpower and infrastructure to effectively discharge his/her/their function. In the performance of his/her/their duties, the Compliance Officer (s) shall have access to all information and documents relating to the Securities of the Company.

The Compliance Officer (s) shall act as the focal point for dealings with Stock Exchanges or SEBI in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

## **PRESERVATION OF "UNPUBLISHED PRICE SENSITIVE INFORMATION" AND PROHIBITION TO DEAL/BUY/SELL/PLEDGE ETC SECURITIES OF THE COMPANY BY INSIDERS**

- (a) The insiders shall maintain the confidentiality of all Unpublished Price Sensitive Information and shall not communicate, provide or allow access of UPSI , relating to company or securities listed or proposed to be listed, to any person, including other insiders, directly or indirectly, including by way of making a recommendation for the purchase or sale of Securities of the Company unless such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- (b) The insiders when in possession of any unpublished price sensitive information pertaining to the Company shall not:
  - (i) Deal/Buy/sell securities of the Company, either on their own behalf or on behalf of any other person.
  - (ii) Communicate, counsel or procure any unpublished price sensitive information to/ from any person.

## **NEED TO KNOW**

Unpublished Price Sensitive Information is to be handled on a "need to know" basis i.e. Unpublished Price Sensitive Information should be disclosed only to those who needs to know the same in furtherance of a legitimate purpose or for the performance or discharge of their legal obligations.

A Chinese wall exists between members of respective departments and of the rest of Company. This Chinese wall is designed to isolate activities of one department from other in order to restrict the dissemination of information obtained by the respective departments/ members on a "need-to-know" basis.

This Chinese wall is supported by the following procedures:

- Physical separation of each Department;
- Limiting computer access to the Inter-department network;
- Restriction on access to data via pen drives, external hard drives etc;

## **LIMITED ACCESS TO CONFIDENTIAL INFORMATION**

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.

## **TRADING WINDOW:**

The Trading Window for Trading in Securities of the Company shall be closed for the Designated Persons when a Designated Person or class of Designated Persons are reasonably expected to have UPSI, including for the following purposes:-

- (a) Declaration of financial results,
- (b) Declaration of dividends,
- (c) Change in capital structure,
- (d) Mergers, de-mergers, acquisitions, delisting's, disposals and expansion of business and such other transactions
- (e) Changes in key managerial personnel, and
- (f) Material events in accordance with the listing agreement.

In respect of the matters mentioned above at S.No. (a) to (f), the Trading Window shall remain closed for 7 days including the date of Board Meeting, in which any of the above matter will be considered.

The Trading Window shall be opened 48 (Forty-Eight) hours after the information referred to above becomes generally available.

Trading window may be closed by the Compliance Officer in consultation with Managing Director during such time in addition to the above event as it may deem fit from time to time.

All the Designated Persons shall strictly conduct all their Trading in the Securities of the Company only when the Trading Window is open with pre clearance approvals and no Designated Person or their Immediate Relatives shall trade in the Securities of the Company during the period the Trading Window is closed or during any other similar period as may be specified by the Compliance Officer from time-to-time.

## **PRE-CLEARANCE OF DEALS IN SECURITIES:**

Applicability:

All Designated persons, who intend to deal in Company's securities (themselves or through immediate relatives) during the period other than trading window closure, are required to obtain the pre-clearance from the compliance officer, for the proposed trade, as per the procedure described hereunder, if the said transaction of the securities of Company is in excess of 1000 in number or Rupees two lacs in market value, whichever is lower, in transaction(s) in a single day. In case of dealing by Compliance Officer(s), pre-clearance from Managing Director shall be required.

## **Pre-trading Procedure:**

For the purpose of obtaining a pre-trading approval, the concerned Designated Person shall make an application in the prescribed form (**see Annexure 1**) to the Compliance Officer. (The Compliance Officer should submit his/her application for pre-trading approval to the Managing Director). Such application should be complete and correct in all respects and should be accompanied by such undertakings and declaration (**see Annexure 2**) indemnity bonds and other documents/papers as may be prescribed by the Compliance Officer from time-to-time.

No Designated Person shall apply for pre-trading approval if such person is in possession of UPSI, even if the Trading Window is not closed.

The Compliance Officer(s) will scrutinize the application within 2 working days of submission and communicate the approval/ refusal (along with reasons therefore) to the applicant. In the absence of the Compliance Officer(s), the preclearance application will be decided upon by the Managing Director.

Every approval letter shall be issued in the format given in **Annexure 3 or in the format** as may be prescribed by the Company from time-to- time. Every approval shall be dated and shall be valid for a period of 7 (seven) Trading Days from the date of approval.

#### **Completion of Pre-cleared Trading:**

- (a) All the Designated Persons shall ensure that they / their Immediate Relatives complete execution of every pre-cleared deal in the Company's Securities as prescribed above no later than 7 (seven) Trading Days from the date of the approval. The Designated Person shall file within 2 (two) Trading Days of the execution of the deal, the details of such deal, with the Compliance Officer in the prescribed form (**see Annexure 4**). In case the transaction is not undertaken, a report to that effect shall be filed (see Annexure 4).
- (b) If a deal is not executed by the concerned Designated Person / Immediate Relatives pursuant to the approval granted by the Compliance Officer within 7 (seven) Trading Days, the Designated Person shall apply once again to the Compliance Officer for pre clearance of the transaction covered under the said approval.

#### **Opposite transactions in the Securities**

Designated Persons who deal, buy or sell any number of shares of the Company, shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. However, the Compliance Officer(s) is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. If a contra trade be executed, advertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.

#### **TRADING PLAN**

The Designated Persons, who are perpetually in possession of UPSI, shall have an option to formulate their trading plan and present the same to Compliance Officer(s) for approval. Upon approval of Trading Plan, the Compliance Officer(s) shall notify the same to Stock Exchanges where securities of the Company are listed. The Compliance Officer(s) shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and may seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

The Trading plan shall comply with following requirements:

- a) Trading/Dealing in securities will commence after six months of public disclosure of trading plan.
- b) No Trading/Dealing between twenty (20) trading days prior to last day of any financial period for which results are required to be announced and till second(2) trading day after disclosure of financial results.
- c) Trading plan should be for a period of atleast 12 months and there should not be any time overlapping in two trading plans.

- d) Trading plan shall set out either the value of trades to be effected or number of securities to be traded alongwith the nature of trade and the intervals at or the dates on which such trades shall be effected.
- e) The Trading should not entail/result in market abuse.
- f) The trading plan once approved shall be irrevocable & the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information.

## **DISCLOSURES**

- (a) Every Promoter, key managerial personnel, Director and Designated Person (as and when identified by the Board) of the Company shall disclose their holding, and the holding of their Immediate Relatives and of any other person for whom such person takes trading decisions, of the Company's Securities to the Company **within 30 (thirty) days** of the Regulations taking effect (i.e., by June 14, 2015) or forthwith on being identified as a Designated Person, as the case may be, in prescribed format **(see Form A)**.
- (b) Every person on appointment as a key managerial personnel or a Director of the Company or upon becoming a Promoter of the Company or on being identified as a Designated Person shall disclose their holding, and the holding of their Immediate Relatives and of any other person for whom such person takes trading decisions, of the Company's Securities as on the date of appointment or becoming a Promoter, to the Company **within 7 (seven) days** of such appointment or becoming a Promoter or on being identified as a Designated Person, as the case may be, in prescribed format **(see Form B)**.
- (c) Every Promoter, key managerial personnel, Director and Designated Person of the Company shall disclose annual statements of their holding, and the holding of their Immediate Relatives and of any other person for whom such person takes trading decisions, of the Company's Securities to the Compliance Officer as on 31st March every year in such form and manner **(see Annexure 5)** as may be prescribed by the Compliance Officer from time-to-time. Such statement shall be submitted by 20th April every year.
- (d) Every Promoter, Director and Employee of the Company shall disclose in prescribed format **(see Form C)** to the company the number of such Securities of the Company acquired or disposed by them or their Immediate Relatives and by any other person for whom such person takes trading decisions, within 2 (two) Trading Days of such transaction if the value of the Securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10 lakhs or such other value as may be specified.

The Company shall notify the particulars of such trading to the stock exchange on which its Securities are listed within 2 (two) Trading Days of receipt of disclosure or from becoming aware of such information.

- (e) The company may, at its discretion require an other connected person or class of connected persons to make disclosure of holdings and trading in securities of the

company in the prescribed format **(See Form D)** and at such frequency as may be determined by the company in order to monitor compliance with these regulations.

## **GENERAL**

- (i) In case it is observed by the Company/Compliance Officer(s) that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, SEBI shall be informed by the Company.
- (ii) Designated Persons are advised to pursue this Code and Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, carefully and acquaint themselves with all the provisions contained therein. The Compliance Officer(s) shall assist the Designated Persons in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading.
- (iii) The Compliance Officer(s) shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of "Price Sensitive Information", pre-clearing of trades by designated employees or their immediate relatives and the implementation of the Code of Conduct for Prevention of Insider Trading under the overall supervision of the Board of the company.
- (iv) The Compliance officer(s) shall maintain records of all the declarations or information in the appropriate form given by the designated persons for a minimum period of five years.
- (v) The Compliance Officer shall place status reports before the Board of Directors in their meeting and also before the Chairman of the Audit Committee, on quarterly basis, detailing Trading in the Securities by the Designated Persons along with the documents that such persons had executed in accordance with the pre-trading procedure prescribed under the Code.

## **CONTRAVENTION**

Any contravention of the code by Designated Persons shall attract strictest disciplinary action including but not restricted to recovery of profits made, wage freeze, suspension and/or termination of employment.



**Annexure 1**

Date: \_\_\_\_\_

The Compliance officer  
Steel Strips Wheels Limited  
SCO 49-50, Sector 26,  
Madhya Marg, Chandigarh

Dear Sir,

I intend to deal in the Securities of the Company. Detailed particulars of the Proposed Transaction are as follows:

<b>S.NO</b>	<b>PARTICULARS</b>	<b>DETAILS</b>
1	Name	
2	Designation, Department & Employee Code	
3	DPID-Client Id & Details of Depository	
4	Name(s) of Account Holder(s)	
5	Relation with Designated Employee	
6	No of securities held (including those held by immediate relatives) before proposed Transaction	
7	Nature of Proposed Transaction	
8	Estimated number of securities to be dealt in proposed Transaction (including by immediate relatives)	
9	Estimated value of securities to be dealt in proposed Transaction (including by immediate relatives)	
10	Tentative date of proposed transaction	
11	Reason for proposed Transaction	

You are requested to pre-clear the above transaction.

Thanking you,

(Signature)

## ANNEXURE 2

### FORMAT OF UNDERTAKING/DECLARATION TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-TRADING APPROVAL

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

I, \_\_\_\_\_, Son/Daughter of \_\_\_\_\_, Resident of \_\_\_\_\_ hereby declare that I am the Designated Person \_\_\_\_\_ of Steel Strips Wheels Limited.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information [as defined in the Company's Code of Conduct for Prevention of Insider Trading (the Code)] up to and at the time of signing this Undertaking/Declaration.

In case I have access to or I receive any Unpublished Price Sensitive Information after signing this Undertaking/Declaration but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would, and ensure that my Immediate Relatives would completely refrain from Trading in the Securities of the Company till the time such Unpublished Price Sensitive Information becomes generally available.

I declare that I have not contravened the Code as notified by the Company from time to time.

I undertake to submit the necessary report within two Trading Days of execution of the transaction/a 'Nil' report if the transaction is not undertaken.

I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.

I agree to comply with the provisions of the Code and provide any information relating to the trade as may be required by the Compliance Officer and permit the Company to disclose such detail to SEBI, if so required by SEBI.

I declare that I have made full and true disclosure in the matter.

(Signature of the Applicant)

Designation: \_\_\_\_\_

Date: \_\_\_\_\_

### ANNEXURE 3

#### FORMAT FOR PRE-TRADING APPROVAL LETTER

Date: \_\_\_\_\_  
Approval No: \_\_\_\_\_ of \_\_\_\_\_

To,  
Mr./Mrs./Ms. \_\_\_\_\_  
Emp. No.: \_\_\_\_\_  
Designation: \_\_\_\_\_

Subject: PRE-TRADING APPROVAL/DISAPPROVAL

Dear Mr./Mrs./Ms. \_\_\_\_\_

With reference to your application dated \_\_\_\_\_ seeking approval for undertaking certain transactions in Securities of the Company detailed therein, please be informed that you are / your Immediate Relative of Steel Strips Wheels Limited is hereby authorized/not authorized to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till \_\_\_\_\_ (i.e. for {7} trading days from date hereof).

If you / your Immediate Relative \_\_\_\_\_ do (es) not execute the approved transaction /trade on or before this date you would have to seek fresh pre-trading approval before executing any transaction/deal in the Securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within two {2} Trading Days from the date of the transaction/deal as declared in your application letter. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours truly,

Compliance Officer

Encl: Format for submission of details of transaction (Annexure 4)

**ANNEXURE 4**  
**FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS**

[To be submitted within 2 Trading Days of transaction/Trading in Securities of the Company]

Date: \_\_\_\_\_

The Compliance officer  
Steel Strips Wheels Limited  
SCO 49-50, Sector 26,  
Madhya Marg, Chandigarh

Dear Sir,

Subject: **DETAILS OF PRE-APPROVED TRANSACTION**

Ref: Your Approval letter No. \_\_\_\_\_ Dated \_\_\_\_\_

I hereby inform you that I am/my immediate relatives \_\_\_\_\_ of Steel Strips Wheels Limited,

- have not bought/sold/subscribed any Securities of the Company.
- have bought/sold/subscribed the Securities of the company , as per the following details:

Name of Holder	Date of transaction	No. of Securities dealt with(*)	Bought/Sold/ Subscribed	DP ID/CLIENT ID (electronic form) or Folio no. for physical where the Sec will be debited or credited	Price (Rs.)

\*remaining shares, if any , may be purchased within the validity period of your approval No. \_\_\_\_\_ dated \_\_\_\_\_.

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 (five) years and produce to the Compliance Officer/ SEBI any of the following documents:

1. Broker's contract note
2. Proof of payment to/from brokers
3. Extract of bank passbook/ statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slips (applicable in case of sale transactions).

I declare that the above information is correct and that no provisions of the Company's Insider Trading Code and /or applicable laws/ regulations have been contravened for effecting the above said transaction (s).

I agree not to buy/sell the Securities (including derivatives) for a period of six months from the date of the aforesaid transaction (applicable in case of purchase/ sale transaction by Designated Persons only).

In case there is any urgent need to sell these Securities within the said period, I shall approach the Company (Compliance Officer) for necessary approval (applicable in case of Sale only).

Yours Truly,

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

# Emp. No. \_\_\_\_\_

# Dept./ Div. \_\_\_\_\_

Strike out whichever is not applicable

# to be filled in only by Employees.

**ANNEXURE 5**

**FORMAT OF ANNUAL STATEMENT OF HOLDINGS BY PROMOTER/ KEY MANAGERIAL PERSONNEL/DIRECTOR/ DESIGNATED PERSON AND THEIR IMMEDIATE RELATIVES**

Date:

The Compliance officer  
Steel Strips Wheels Limited  
SCO 49-50, Sector 26,  
Madhya Marg, Chandigarh

Sub:-**STATEMENT OF SHAREHOLDINGS IN STEEL STRIPS WHEELS LTD.**

Dear Sir,

As on March 31\_\_\_\_\_, I along with my immediate relatives hold the Securities of the Company, details whereof are as under:

ANNUAL DISCLOSURE

STATEMENT OF SHAREHOLDINGS OF DIRECTORS/OFFICERS/DESIGNATE EMPLOYEES.

Name	Designation	No. of shares held on at the beginning of the year	No. of Shares bought during the year	No. of shares sold during the year	No. of shares held on at the end of the year	Folio No./DP ID/Client ID

DETAILS OF SHARES HELD BY DEPENDENT FAMILY MEMBERS

Name of Relative	Relationship	No. of shares held on at the beginning of the year.	No. of Shares bought during the year	No. of shares sold during the year	No. of shares held on at the end of the year	Folio No./DP ID/Client ID

Yours Truly,

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

# Emp No. \_\_\_\_\_

# Dept/ Div. \_\_\_\_\_

Strike out whichever is not applicable.

# to be filled in only by Employees.