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**ELITE INDUSTRIES LTD.**  
**Office of the General Counsel**  
**and Company Secretary**

P.O.B. 19 RAMAT-GAN 52100 ISRAEL  
TEL: (972) 3 6752202  
FAX: (972) 3 6701272



January 7, 2002

Anita Klein, Esq.  
Stop 3-4  
Office of International Corporate Finance  
Securities and Exchange Commission  
450 Fifth Street, N.W.  
Washington, D.C. 20549  
U.S.A.

SUPPL

**Re: Elite Industries Ltd. - File No. 82-2958**

Dear Ms. Klein,

Pursuant to Rule 12g3-2(b), we hereby enclose for filing translations of Immediate Reports filed by the Company during the months of October-December 2001.

Kindly acknowledge receipt of this letter by stamping and returning the enclosed copy of this letter in the self-addressed, stamped envelope provided for your convenience.


Sincerely,

  
Michael Avner, Attorney at Law  
General Counsel & Company Secretary

PROCESSED

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FINANCIAL



TRANSLATION FROM THE HEBREW

1. The Securities Authority
2. Registrar of Companies
3. Tel-Aviv Stock Exchange

Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)

Name of corporation: **Elite Industries Ltd.** Date: December 5, 2001  
 Registrar of Companies number: **520003781**

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	11	03/12/01	14,980	2,787,782	150	2,787,932	52.05%	61.79%

pursuant to the Option Plan for Senior Employees.

Signature of Change - Code numbers:

Increase:

- 11 Acquisition on the Stock Exchange - multi-sided trading
- 13 Acquisition for a consideration ex-Stock Exchange, except for the exchange of securities
- 14 Increase in holding following issue in accordance with a Prospectus
- 15 Increase in shares following conversion of convertible securities of exercise of options
- 16 Bonus shares
- 18 Receipt of securities at no consideration

Decrease:

- 51 Sale on the Stock Exchange - multi-sided trading
- 53 Sale for a consideration ex-Stock Exchange, except for the exchange of securities
- 55 Decrease in convertible securities following conversion into shares or redemption thereof; decrease in options following exercise or expiry thereof
- 58 Handing over of securities at no consideration

Form prepared by:  
 Mordechai Anavi, ID 5525336-3, Treasurer  
 Tel. 03-6752427, Fax. 03-6752256  
 Date: December 5, 2001

**TRANSLATION FROM THE HEBREW**

1. The Securities Authority
2. Registrar of Companies
3. Tel-Aviv Stock Exchange

**Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**

Date: December 3, 2001

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/ Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	13	02/12/01	15,500	2,686,297	100,000	2,786,297	52.04%	61.79%
			Elite 5 n.v.	11	02/12/01	15,000	2,786,297	1,485	2,787,782	52.05%	61.79%

pursuant to the Option Plan for Senior Employees.

Nature of Change - Code numbers:

Increase:

- 11 Acquisition on the Stock Exchange - multi-sided trading
- 13 Acquisition for a consideration ex-Stock Exchange, except for the exchange of securities
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- 53 Sale for a consideration ex-Stock Exchange, except for the exchange of securities
- 55 Decrease in convertible securities following conversion into shares or redemption thereof; decrease in options following exercise or expiry thereof
- 58 Handing over of securities at no consideration

Form prepared by:  
 Mordechai Anavi, ID 5525336-3, Treasurer  
 Tel. 03-6752427, Fax. 03-6752256  
 Date: December 3, 2001

**TRANSLATION FROM THE HEBREW**

- 1. The Securities Authority
- 2. Registrar of Companies
- 3. Tel-Aviv Stock Exchange

**Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**

Date: December 2, 2001

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	11	29/11/01	15,000	2,683,502	2,795	2,686,297	51.00%	61.34%

Pursuant to the Option Plan for Senior Employees.

**Nature of Change - Code numbers:**

**Increase:**

- 11 Acquisition on the Stock Exchange - multi-sided trading
- 13 Acquisition for a consideration ex-Stock Exchange, except for the exchange of securities
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**Form prepared by:**

Mordechai Anavi, ID 5525336-3, Treasurer  
 Tel. 03-6752427, Fax. 03-6752256  
 Date: December 2, 2001

**TRANSLATION FROM THE HEBREW**

1. The Securities Authority
2. Registrar of Companies
3. Tel-Aviv Stock Exchange

**Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**

Date: November 29, 2001

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	11	28/11/01	15,000	2,678,343	5,159	2,683,502	50.97%	61.33%

pursuant to the Option Plan for Senior Employees.

Nature of Change - Code numbers:

Increase:

- 11 Acquisition on the Stock Exchange - multi-sided trading
- 13 Acquisition for a consideration ex-Stock Exchange, except for the exchange of securities
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Form prepared by:

Mordechai Anavi, ID 5525336-3, Treasurer  
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 Date: November 29, 2001

**TRANSLATION FROM THE HEBREW**

1. The Securities Authority
2. Registrar of Companies
3. Tel-Aviv Stock Exchange

**Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**

Date: **November 28, 2001**

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	12	27/11/01	14,990	2,672,543	533	2,673,076	50.86%	61.29%
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	12	27/11/01	14,980	2,673,076	1,281	2,674,357	50.88%	61.29%
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	12	27/11/01	15,000	2,674,357	3,986	2,678,343	50.92%	61.31%

pursuant to the Option Plan for Senior Employees.

Nature of Change - Code numbers:

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Form prepared by:  
 Mordechai Anavi, ID 5525336-3, Treasurer  
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 Date: November 28, 2001

**TRANSLATION FROM THE HEBREW**

1. The Securities Authority  
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**Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**

Date: **October 16, 2001**

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	13	15/10/01	13,729	2,669,009	3,534	2,672,543	50.86%	61.28%

Pursuant to the Option Plan for Senior Employees.

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Form prepared by:

Mordechai Anavi, ID 5525336-3, Treasurer  
 Tel. 03-6752427, Fax. 03-6752256  
 Date: October 16, 2001

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- 1. The Securities Authority
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- 3. Tel-Aviv Stock Exchange

**Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**

Date: **October 15, 2001**

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	13	14/10/01	14,000	2,576,195	84,814	2,661,009	50.74%	61.23%
			Elite 5 n.v.	13	14/10/01	13,774	2,661,009	8,000	2,669,009	50.82%	61.27%

Pursuant to the Option Plan for Senior Employees.

Nature of Change - Code numbers:

Increase:

- 11 Acquisition on the Stock Exchange - multi-sided trading
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- 58 Handing over of securities at no consideration

Form prepared by:  
 Mordechai Anavi, ID 5525336-3, Treasurer  
 Tel. 03-6752427, Fax. 03-6752256  
 Date: October 15, 2001



**TRANSLATION FROM THE HEBREW**

1. The Securities Authority
2. Registrar of Companies
3. Tel-Aviv Stock Exchange

**Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**

Date: **October 10, 2001**

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	13	04/10/01	13,573	2,416,195	160,000	2,576,195	49.86%	60.86%

pursuant to the Option Plan for Senior Employees.

Nature of Change - Code numbers:

Increase:

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Immediate Report of Changes in the Holdings of Interested Parties - in N.I.S. (Regulation 33)

Name of corporation: **Elite Industries Ltd.**  
Registrar of Companies number: **520003781**

Date: **October 10, 2001**

Name of the Interested Party	I.D. Number	# on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase/ Decrease	New Balance	% of Equity	Holding Voting
Strauss-Elite Ltd.	510039829	746099	Elite 5 n.v.	13	25/09/01	12,160	2,415,095	1,100	2,416,195	48.20%	60.15%

Pursuant to the Option Plan for Senior Employees.

Nature of Change - Code numbers:

Increase:

- 11 Acquisition on the Stock Exchange - multi-sided trading
- 13 Acquisition for a consideration ex-Stock Exchange, except for the exchange of securities
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Form prepared by:

Mordechai Anavi, ID 5525336-3, Treasurer  
Tel. 03-6752427, Fax. 03-6752256  
Date: October 10, 2001

**TRANSLATED FROM THE HEBREW**

To: 1. The Securities Authority  
2. Registrar of Companies  
3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970**  
**Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
Registrar of Companies number: **520003781**  
Name of the reporting corporation: **Bank Hapoalim Group**  
Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

Date: December 28, 2001  
File no.: 803418

The Interested Party Name of the party	Corporation Number	The Security		** Code	Details of Date d.m.y.		the changes Rate		in the holding Previous Balance		of the security Increase or Decrease		Present Balance
		No. on T.A.S.E.	Name of Security						n.v. in N.I.S.				
Mutual Investment Funds	999000010	746016	Elite	12	23/12/01		2853.00	39,779.00	359.00	40,138.00			40,138.00
			Elite	12	23/12/01		2890.00	40,138.00	918.00	41,056.00			41,056.00
			Elite	12	23/12/01		2930.00	41,056.00	900.00	41,956.00			41,956.00
			Elite	12	25/12/01		2928.00	41,956.00	266.00	42,222.00			42,222.00
			Elite	12	26/12/01		3039.00	42,222.00	149.00	42,371.00			42,371.00
			Elite	12	26/12/01		3040.00	42,371.00	251.00	42,622.00			42,622.00
		746099	Elite	12	23/12/01		15100.00	30,170.49	69.00	30,239.49			30,239.49
			Elite	12	23/12/01		15250.00	30,239.49	350.00	30,589.49			30,589.49
			Elite	12	24/12/01		15880.00	30,589.49	390.00	30,979.49			30,979.49
			Elite	12	24/12/01		16000.00	30,979.49	45.00	31,024.49			31,024.49
			Elite	12	24/12/01		16100.00	31,024.49	200.00	31,224.49			31,224.49
			Elite	12	25/12/01		15950.00	31,224.49	242.00	31,466.49			31,466.49
			Elite	12	25/12/01		15990.00	31,466.49	50.00	31,516.49			31,516.49
			Elite	12	25/12/01		16000.00	31,516.49	808.00	32,324.49			32,324.49
			Elite	12	25/12/01		16010.00	32,324.49	260.00	32,584.49			32,584.49
			Elite	12	25/12/01		16100.00	32,584.49	89.00	32,673.49			32,673.49
			Elite	12	25/12/01		16200.00	32,673.49	1,226.00	33,899.49			33,899.49
			Elite	12	26/12/01		15900.00	33,899.49	100.00	33,999.49			33,999.49
			Elite	52	26/12/01		15900.00	33,999.49	-500.00	33,499.49			33,499.49
			Elite	12	26/12/01		15950.00	33,499.49	200.00	33,699.49			33,699.49
			Elite	60	26/12/01		15950.00	33,699.49	-100.00	33,599.49			33,599.49
			Elite	12	27/12/01		15680.00	33,599.49	150.00	33,749.49			33,749.49

					Elite		52	27/12/01	15680.00	33,749.49	-500.00	33,249.49
					Elite		12	27/12/01	15990.00	33,249.49	252.00	33,501.49
					Elite		52	27/12/01	16000.00	33,501.49	-100.00	33,401.49
Provident Funds	999000009	746099			Elite		12	25/12/01	16076.13	438,538.95	10,134.00	448,672.95
					Elite		52	25/12/01	16076.13	448,672.95	-18,693.00	429,979.95
					Elite		52	27/12/01	16022.58	429,979.95	-10,951.00	419,028.95

Total Mutual Investment Funds	999000010	746016 746099			Elite NIS Elite NIS			% of Equity 0.44	Voting 0.34	39,779.00 30,170.49	2,843.00 3,231.00	42,622.00 33,401.49
Total Provident Funds	999000009	746016 746099			Elite NIS Elite NIS			% of Equity 4.49	Voting 2.18	71,743.00 438,538.95	0.00 -19,510.00	71,743.00 419,028.95

**Form Completed By:**  
Pasha Naomi, ID 47610159, Section Manager  
Tel. 03-5675281, Fax. 03-5675848

**TRANSLATED FROM THE HEBREW**

- To: 1. The Securities Authority  
 2. Registrar of Companies  
 3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970**  
**Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**  
 Name of the reporting corporation: **Bank Hapoalim Group**  
 Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

Date: **December 21, 2001**  
 File no.: **803418**

The Interested Party Name of the party	Corporation Number	The Security		Details of the changes in the holding of the security			Present Balance		
		No. on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate		Previous Balance	Increase or Decrease
Mutual Investment Funds	999000010	746016	Elite	12	16/12/01	2823.00	40,979.00	800.00	41,779.00
			Elite	52	19/12/01	2761.00	41,779.00	-1,907.00	39,872.00
			Elite	52	19/12/01	2790.00	39,872.00	-93.00	39,779.00
		746099	Elite	12	18/12/01	14870.00	30,920.49	23.00	30,943.49
			Elite	12	18/12/01	14880.00	30,943.49	77.00	31,020.49
			Elite	52	19/12/01	14770.00	31,020.49	-900.00	30,120.49
			Elite	12	19/12/01	14780.00	30,120.49	200.00	30,320.49
			Elite	52	20/12/01	14520.00	30,320.49	-150.00	30,170.49
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS				40,979.00 30,920.49	-1,200.00 -750.00	39,779.00 30,170.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS			% of Equity 0.39 Voting 0.31	71,743.00 438,538.95	0.00 0.00	71,743.00 438,538.95
						% of Equity 4.70 Voting 2.26			

**Form Completed By:**  
**Pasha Naomi, ID 47610159, Section Manager**  
**Tel. 03-5675281, Fax. 03-5675848**

**TRANSLATED FROM THE HEBREW**

To: 1. The Securities Authority  
 2. Registrar of Companies  
 3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970**  
**Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Elite Industries Ltd.  
 520003781  
 Bank Hapoalim Group  
 62 Yehuda Halevy St., Tel-Aviv 65227

Date: December 14, 2001  
 File no.: 803418

Name of corporation:  
 Registrar of Companies number:  
 Name of the reporting corporation:  
 Address:

The Interested Party		The Security		Details of the changes in the holding of the security			of the security		
Name of the party	Corporation Number	No. on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate	Previous Balance	Increase or Decrease	Present Balance
Mutual Investment Funds	999000010	746099	Elite	52	09/12/01	14710.00	30,440.49	-107.00	30,333.49
			Elite	52	09/12/01	14750.00	30,333.49	-13.00	30,320.49
			Elite	12	10/12/01	14650.00	30,320.49	100.00	30,420.49
			Elite	12	13/12/01	14510.00	30,420.49	18.00	30,438.49
			Elite	12	13/12/01	14700.00	30,438.49	482.00	30,920.49
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS				40,979.00 30,440.49	0.00 480.00	40,979.00 30,920.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS			% of Equity 0.40 Voting 0.32	71,743.00 438,538.95	0.00 0.00	71,743.00 438,538.95
						% of Equity 4.70 Voting 2.26			

**Form Completed By:**  
 Pasha Naomi, ID 47610159, Section Manager  
 Tel. 03-5675281, Fax. 03-5675848

**TRANSLATED FROM THE HEBREW**

To: 1. The Securities Authority  
2. Registrar of Companies  
3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970**  
**Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
Registrar of Companies number: **520003781**  
Name of the reporting corporation: **Bank Hapoalim Group**  
Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

Date: December 7, 2001  
File no.: 803418

The Interested Party Name of the party	Corporation Number	The No. on T.A.S.E.	The Security Name of Security	** Code	Details of the changes in the holding of the security			Present Balance	
					Date d.m.y.	Rate	Previous Balance		
Mutual Investment Funds	999000010	746016	Elite	12	02/12/01	2833.00	40,302.00	157.00	40,459.00
			Elite	12	02/12/01	2835.00	40,459.00	120.00	40,579.00
			Elite	12	04/12/01	2840.00	40,579.00	400.00	40,979.00
		746099	Elite	52	02/12/01	14800.00	30,390.49	-50.00	30,340.49
			Elite	52	04/12/01	14750.00	30,340.49	-72.00	30,268.49
			Elite	52	04/12/01	14810.00	30,268.49	-28.00	30,240.49
			Elite	12	06/12/01	15000.00	30,240.49	200.00	30,440.49
Provident Funds	999000009	746099	Elite	53	02/12/01	15500.00	533,463.95	-94,925.00	438,538.95
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS		% of Equity	0.40	Voting 0.31	677.00 50.00	40,979.00 30,440.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS		% of Equity	4.70	Voting 2.26	0.00 -94,925.00	71,743.00 438,538.95

**Form Completed By:**  
Pasha Naomi, ID 47610159, Section Manager  
Tel. 03-5675281, Fax. 03-5675848

**TRANSLATED FROM THE HEBREW**

To: 1. The Securities Authority  
2. Registrar of Companies  
3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970  
Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
Registrar of Companies number: **520003781**  
Name of the reporting corporation: **Bank Hapoalim Group**  
Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

Date: **November 30, 2001**  
File no.: **803418**

The Interested Party		Corporation Number	The Security		** Code	Details of the changes in the holding of the security		Present Balance
Name of the party	No. on T.A.S.E.		Name of Security	Date d.m.y.		Rate	Previous Balance	
Mutual Investment Funds	999000010	746016	Elite	27/11/01	2780.00	38,302.00	2,000.00	40,302.00
		746099	Elite	25/11/01	13990.00	26,701.49	213.00	26,914.49
			Elite	25/11/01	14370.00	26,914.49	441.00	27,355.49
			Elite	25/11/01	14380.00	27,355.49	21.00	27,376.49
			Elite	25/11/01	14400.00	27,376.49	336.00	27,712.49
			Elite	25/11/01	14450.00	27,712.49	793.00	28,505.49
			Elite	26/11/01	14650.00	28,505.49	-80.00	28,425.49
			Elite	26/11/01	14750.00	28,425.49	939.00	29,364.49
			Elite	27/11/01	15050.00	29,364.49	300.00	29,664.49
			Elite	27/11/01	15100.00	29,664.49	500.00	30,164.49
			Elite	27/11/01	15150.00	30,164.49	400.00	30,564.49
			Elite	27/11/01	15280.00	30,564.49	200.00	30,764.49
			Elite	29/11/01	15010.00	30,764.49	-374.00	30,390.49
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS	% of Equity	0.40	38,302.00 26,701.49	2,000.00 3,689.00	40,302.00 30,390.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS	% of Equity	5.68	71,743.00 533,463.95	0.00 0.00	71,743.00 533,463.95

**Form Completed By:**  
**Pasha Naomi, ID 47610159, Section Manager**  
**Tel. 03-5675281, Fax. 03-5675848**



**TRANSLATED FROM THE HEBREW**

- To: 1. The Securities Authority  
2. Registrar of Companies  
3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970**  
**Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
Registrar of Companies number: **520003781**  
Name of the reporting corporation: **Bank Hapoalim Group**  
Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

Date: November 23, 2001  
File no.: 803418

The Interested Party Name of the party	Corporation Number	The Security		** Code	Details of the changes		in the holding		Increase or Decrease	Present Balance
		No. on T.A.S.E.	Name of Security		Date d.m.y.	Rate	Previous Balance	of the security		
Mutual Investment Funds	999000010	746016 746099	Elite Elite	52 52	22/11/01 19/11/01	2549.00 13000.00	39,702.00 27,027.49	-1,400.00 -500.00	38,302.00 26,527.49	
			Elite Elite	52 52	19/11/01 19/11/01	13030.00 13450.00	26,527.49 25,527.49	-1,000.00 -104.00	25,527.49 25,423.49	
			Elite Elite	52 52	19/11/01 19/11/01	13500.00 13510.00	25,423.49 25,352.49	-71.00 -49.00	25,352.49 25,303.49	
			Elite Elite	12 52	20/11/01 21/11/01	13200.00 13200.00	25,303.49 26,303.49	1,000.00 -13.00	26,303.49 26,290.49	
			Elite Elite	52 12	21/11/01 21/11/01	13290.00 13300.00	26,290.49 26,253.49	-37.00 500.00	26,253.49 26,753.49	
			Elite Elite	52 52	21/11/01 19/11/01	13390.00 13029.05	26,753.49 533,573.95	-52.00 -110.00	26,701.49 533,463.95	
Provident Funds	999000009	746099	Elite	52	19/11/01					
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS				39,702.00 27,027.49	-1,400.00 -326.00	38,302.00 26,701.49	
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS			% of Equity 0.36 Voting 0.29	71,743.00 533,573.95	0.00 -110.00	71,743.00 533,463.95	
						% of Equity 5.68 Voting 2.68				

**Form Completed By:**  
Pasha Naomi, ID 47610159, Section Manager  
Tel. 03-5675281, Fax. 03-5675848

**TRANSLATED FROM THE HEBREW**

To: 1. The Securities Authority  
 2. Registrar of Companies  
 3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970  
 Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

**Elite Industries Ltd.**  
**520003781**  
**Bank Hapoalim Group**  
**62 Yehuda Haley St., Tel-Aviv 65227**

Date: November 16, 2001  
 File no.: 803418

Name of corporation:  
 Registrar of Companies number:  
 Name of the reporting corporation:  
 Address:

The Interested Party Name of the party	Corporation Number	The Security No. on T.A.S.E.	Name of Security	** Code	Details of the changes in the holding of the security			Present Balance		
					Date d.m.y.	Rate	Previous Balance			
Mutual Investment Funds	999000010	746099	Elite	12	11/11/01	13800.00	24,997.49	153.00	25,150.49	
			Elite	12	11/11/01	13830.00	25,150.49	1,847.00	26,997.49	
			Elite	12	14/11/01	13950.00	26,997.49	130.00	27,127.49	
			Elite	52	15/11/01	13730.00	27,127.49	-100.00	27,027.49	
n.v. in N.I.S.										
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS			% of Equity 0.36	Voting 0.30	39,702.00 24,997.49	0.00 2,030.00	39,702.00 27,027.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS			% of Equity 5.68	Voting 2.68	71,743.00 533,573.95	0.00 0.00	71,743.00 533,573.95

**Form Completed By:**  
 Pasha Naomi, ID 47610159, Section Manager  
 Tel. 03-5675281, Fax. 03-5675848

TRANSLATED FROM THE HEBREW

To: 1. The Securities Authority  
 2. Registrar of Companies  
 3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970  
 Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**  
 Name of the reporting corporation: **Bank Hapoalim Group**  
 Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

Date: **November 9, 2001**  
 File no.: **803418**

The Interested Party		The Security		Details of the changes in the holding of the security			Present Balance		
Name of the party	Corporation Number	No. on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate		Previous Balance	Increase or Decrease
Mutual Investment Funds	999000010	746099	Elite	12	08/11/01	13670.00	23,997.49	1.00	23,998.49
			Elite	12	08/11/01	13810.00	23,998.49	999.00	24,997.49
n.v. in N.I.S.									
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS				39,702.00 23,997.49	0.00 1,000.00	39,702.00 24,997.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS			% of Equity 0.34 Voting 0.29	71,743.00 533,573.95	0.00 0.00	71,743.00 533,573.95
						% of Equity 5.68 Voting 2.68			

**Form Completed By:**  
 Pasha Naomi, ID 47610159, Section Manager  
 Tel. 03-5675281, Fax. 03-5675848

**TRANSLATED FROM THE HEBREW**

- To: 1. The Securities Authority  
 2. Registrar of Companies  
 3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970**  
**Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.** Date: **October 26, 2001**  
 Registrar of Companies number: **520003781** File no.: **803418**  
 Name of the reporting corporation: **Bank Hapoalim Group**  
 Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

The Interested Party Name of the party	Corporation Number	The Security No. on T.A.S.E.	Name of Security	** Code	Details of the changes in the holding of the security			Present Balance	
					Date d.m.y.	Rate	Previous Balance		
Mutual Investment Funds	999000010	746099	Elite	12	24/10/01	13820.00	23,837.49	160.00	23,997.49
					n.v. in N.I.S.				
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS				39,702.00 23,837.49	0.00 160.00	39,702.00 23,997.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS			% of Equity 0.33 Voting 0.29	71,743.00 533,573.95	0.00 0.00	71,743.00 533,573.95
						% of Equity 5.68 Voting 2.68			

**Form Completed By:**  
 Pasha Naomi, ID 47610159, Section Manager  
 Tel. 03-5675281, Fax. 03-5675848

**TRANSLATED FROM THE HEBREW**

To: 1. The Securities Authority  
2. Registrar of Companies  
3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970**  
**Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
Registrar of Companies number: **520003781**  
Name of the reporting corporation: **Bank Hapoalim Group**  
Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

Date: **October 19, 2001**  
File no.: **803418**

The Interested Party Name of the party	Corporation Number	The Security		Details of the changes of the security			Present Balance		
		No. on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate		Previous Balance	Increase or Decrease
Mutual Investment Funds	999000010	746016	Elite	52	18/10/01	2650.00	40,702.00	-1,000.00	39,702.00
		746099	Elite	12	14/10/01	13530.00	23,187.49	300.00	23,487.49
			Elite	12	16/10/01	13950.00	23,487.49	350.00	23,837.49
n.v. in N.I.S.									
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS			% of Equity 0.33	40,702.00 23,187.49	-1,000.00 650.00	39,702.00 23,837.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS			Voting 0.29	71,743.00 533,573.95	0.00 0.00	71,743.00 533,573.95
% of Equity 5.68 Voting 2.68									

**Form Completed By:**  
**Pasha Naomi, ID 47610159, Section Manager**  
**Tel. 03-5675281, Fax. 03-5675848**

TRANSLATED FROM THE HEBREW

- To: 1. The Securities Authority  
 2. Registrar of Companies  
 3. Tel-Aviv Stock Exchange

**Re: Securities Regulations (Periodic & Immediate Reports) 1970  
 Immediate Report of Changes in the Holdings of Interested Parties - (Regulation 33)**

Name of corporation: **Elite Industries Ltd.**  
 Registrar of Companies number: **520003781**  
 Name of the reporting corporation: **Bank Hapoalim Group**  
 Address: **62 Yehuda Halevy St., Tel-Aviv 65227**

Date: **October 12, 2001**  
 File no.: **803418**

The Interested Party	Corporation Number	The Security		Details of the changes in the holding of the security			Present Balance		
		No. on T.A.S.E.	Name of Security	** Code	Date d.m.y.	Rate		Previous Balance	Increase or Decrease
Mutual Investment Funds	999000010	746099	Elite	12	07/10/01	13280.00	22,503.49	144.00	22,647.49
			Elite	12	07/10/01	13300.00	22,647.49	540.00	23,187.49
n.v. in N.I.S.									
Total Mutual Investment Funds	999000010	746016 746099	Elite NIS Elite NIS				40,702.00 22,503.49	0.00 684.00	40,702.00 23,187.49
Total Provident Funds	999000009	746016 746099	Elite NIS Elite NIS			% of Equity 0.32 Voting 0.28	71,743.00 533,573.95	0.00 0.00	71,743.00 533,573.95
						% of Equity 5.68 Voting 2.68			

**Form Completed By:**  
 Pasha Naomi, ID 47610159, Section Manager  
 Tel. 03-5675281, Fax. 03-5675848