



TAPARIA TOOLS LTD.

MUMBAI OFFICE : 423-424/A-2, SHAH & NAHAR, LOWER PAREL (W), MUMBAI-400 013. (INDIA).

☎: 022-61478646 / 24938646-50, FAX : 091-022-2495 3230 E.mail : htaparia@tapariatools.com

CIN NO. :L99999MH1965PLC013392 Web site : <http://www.tapariatools.com>



ISO 9001 : 2008
Reg.No.RQ91/375

TTL/SEC/2019-2020/
26th October 2019

htaparia@tapariatools.com

To,
The General Manger,
Department of Corporate Services
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers, Dalal Street,
Fort, Mumbai - 400 023

Sub. : Compliance Report of Interim Order No. WTM/PS/09/CFD/MAY/2015 dated 20-05-2015 issued by SEBI.

This is with reference to the SEBI Order No. WTM/PS/09/CFD/MAY/2015 dated 20-05-2015.

In continuation to the earlier compliance reports, we hereby submit the further Compliance Report as under:

1. Voting rights and corporate benefits like dividend, rights, bonus shares have been frozen to the extent specified in para 22(a) of the Interim Order.
2. As required by para 22(b) of the Interim Order, the Promoters and alleged promoters have been already informed that they should not buy/sale or deal with shares of Taparia Tools Ltd.
3. The promoters and alleged promoters have been advised that they should not accept new directorships of any listed company, as required by para 22(c) of the Interim Order.
4. All directors have been advised that they should not accept new directorships of any listed company, as required by para 22(d) of the Interim Order.

As regards reducing of promoters shareholding to less than 75% as mentioned in para 22 of the SEBI Interim Order dated 20-05-2015, we have to state that as per the proper interpretation of the statutory provisions, the promoters shareholding is already less than 75%. It is not 94% as mentioned in the SEBI Interim Order. In the SEBI Interim Order, some shareholders have been mentioned as 'promoter group'. However, they are not at all of promoters group, as per definition of 'promoter and promoter group'. In this regard, the Company had already submitted detailed reply to SEBI vide letter dated 14-10-2015.

Personal hearing on the same was held on 03rd October 2018. Thereafter, the



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details required by SEBI were submitted.

Thereafter, the Company has received Order dated 26th June 2019 from SEBI confirming the directions issued vide Interim Order dated 20th May 2015.

the Company has filed an Appeal on 13th August 2019 at Securities Appellate Tribunal (SAT) Mumbai against the Order dated 26th June 2019 received from SEBI confirming the directions issued by SEBI VIDE Interim Order dated 20th May 2015.

The matter pertains to the event which has taken place sometime ago and ever since the Company has been disclosing the correct shareholding pattern to the Bombay Stock Exchange. The Company has been disclosing the same shareholding pattern since 31st December 2010 and wish to continue till the matter is decided by the Hon'ble Securities Appellate Tribunal.

The Date of the hearing of Appeal is fixed on 5th November 2019 at SAT, Mumbai.

Thanking you.

Yours faithfully,
For TAPARIA TOOLS LTD.

Director