

TTL/SEC/18-19/  
25<sup>th</sup> April, 2018

To,  
The General Manager,  
Department of Corporate Services,  
Bombay Stock Exchange Limited,  
Phiroze Jeejeebhai Towers,  
Dalal Street, Mumbai – 400 023.

Sub: - Compliance report of Interim Order No. WTM/PS/09/CFD/MAY/2015 dated 20-5-2015 issued by SEBI

Sir,

This is with reference to the SEBI Interim Order No. WTM/PS/09/CFD/MAY/2015 dated 20-5-2015.

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 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. The 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.
5. As regards reducing of promoters shareholding to less than 75% as mentioned in para 21 of the SEBI Interim Order dated 20-5-2015, 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 we have already submitted our detailed reply to SEBI vide our letter dated 14-10-2015.

Thanking You.

Yours faithfully,  
For Taparia Tools Ltd.,

Director