EMKAY TOOLS

EMKAY TAPS AND CUTTING TOOLS LTD.

Registered Office & factory Address: B-27 & B-27/1, M.I.D.C. Industrial Area, Hingna Road, Nagpur-440016 (India)
CIN: L29220MH1995PLC091091

March 11, 2021

To,

National Stock Exchange of India Limited,

Exchange Plaza, Bandra Kurla Complex

Bandra (E), Mumbai-400051

Series: SM
Symbol: EMKAYTOOLS

Subject: Announcement pursuant to Reg. 8(2) of the SEBI (Prohibition of Insider Trading) PIT Regulation, 2015

Respected Madam / Sir,

We wish to inform you that the Board of Directors of the Company on Thursday March 11, 2021 has considered, and approved revised Policy on Prohibition of Insider Trading for the Company pursuant to the amendment in the SEBI (Prohibition of insider Trading) Regulation, 2015 in compliance with the SEBI notification dated July 17, 2020 and SEBI circulars dated September 09, 2020 and February 09, 2021.

Copy of revised "Policy on Prohibition of Insider Trading of EMKAY TAPS AND CUTTING TOOLS LIMITED" as approved and adopted by the Board of Directors of the Company in their 4/2020-21 meeting held on March 11, 2021 is enclosed herewith for your kind perusal and shall also be available on website of the company www.etctl.com.

Kindly take the above submission on your records.

Thanking You.

For **EMKAY TAPS AND CUTTING TOOLS LIMITED**

SHRUTI RAJESH SOHANE
Digitally signed by SHRUTI RAJESH SOHANE
Date: 2021.03.12 11:07:47 +05'30'

Shruti Sohane
Company Secretary & Compliance Officer

Encl.: As mentioned above.

"POLICY ON PROHIBITION

OF

INSIDER TRADING

OF

EMKAY TAPS AND CUTTING TOOLS LIMITED"

As approved and adopted by Board of Directors of Emkay taps and Cutting Tools Limited in their 4/2020-21 Meeting held on March 11, 2021 in compliance with the SEBI notification dated July 17,2020 and circulars dated September 09, 2020 and February 09, 2021.

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EMKAY TAPS AND CUTTING TOOLS LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

&

CODE OF FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

INTRODUCTION

Insider trading means dealing in Securities of a Company by its Directors, Employees and other connected persons, being Insiders, based on unpublished price sensitive information. Such dealings by Insiders erode the investors' confidence in the integrity of the management and are unhealthy for the capital markets.

The Securities and Exchange Board of India (SEBI), in its endeavour to protect the interests of investors in general, has formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015 [hereinafter referred to as "the Regulations"] under the powers conferred on it under the SEBI Act, 1992. These Regulations are made applicable to all Companies whose shares are listed/ proposed to be listed on Indian Stock Exchange(s). These Regulations has further been amended to SEBI (Prohibition of Insider Trading) amendment Regulations, 2020 vide notification dated July 17,2020

The objective is to provide for a level playing field for the Company Directors, Employees and other connected persons, being insiders, and the outside investors in the securities, thereby ensuring transparency and fair play in securities' transaction(s). SEBI seeks to achieve this objective through barring insiders of a listed company and those of companies proposed to be listed to deal in its securities, while in possession of unpublished price sensitive information.

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As per these Regulations:

1) No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed/ proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

2) No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

In line with the Regulations, it is necessary to formulate a specific Code of Conduct and Fair Disclosure for Emkay Taps and Cutting Tools Limited for use by its Directors, Employees other Connected Persons.

This document embodies the Code of Conduct to Regulate, Monitor and Report Trading by Insiders along with the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information to be adopted by Emkay Taps and Cutting Tools Limited and followed by its Directors, Employees and other Connected Persons. The Code is based on the principle that Directors, Employees and other Connected Persons of Emkay Taps and Cutting Tools Limited owe, among others, a fiduciary duty to the shareholders of the Company to place

the interest of the shareholders above their own and conduct their personal securities transactions in a manner that does not create any conflict-of-interest situation. The Code is also intended to serve as a guiding charter for

all concerned persons associated with the functioning of the Company and their dealings in Securities of the Company. Further, the Code also seeks to ensure timely and adequate disclosure of Price Sensitive Information to the investor community by the Company to enable them to take informed investment decisions with regard to the Company's Securities.

DEFINITIONS

As used in this Code

Act means the Securities and Exchange Board of India Act, 1992;

Board means Board of Directors of the Company;

Code means this Code of Conduct formulated to Regulate, Monitor and Report Trading by Insiders, along with the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, including modifications made thereto from time-to-time;

Company means Emkay Taps and Cutting Tools Limited;

Compliance officer means an officer, designated so by the Board of Directors of the Company to oversee compliance with this Regulations and Code across the Company. Under this Code of the Company, Company Secretary shall act as a Compliance Officer.

Director means a member of the Board of Directors of the Company;

Designated persons shall include employees and connected persons designated as such by the Board of Directors in consultation with the Compliance Officer on the basis of their functional role, seniority and professional designation in the organisation and the chances of access that such role and function would provide to unpublished price sensitive information;

Employee means every employee of the Company (whether working in India or abroad) including the Directors in the employment of the Company;

Insider means any person who, is a connected person or in possession of or having access to unpublished price sensitive information;

Officer includes any Director, Manager or Company Secretary or any person in accordance with whose directions or instructions the Board of Directors of the Company or any one or more of the Directors is or are accustomed to act including an Auditor;

Trading means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in the Securities of the Company and "trade" shall be construed accordingly;

Unpublished price sensitive information 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 the securities and shall, ordinarily including but not restricted to, information relating to the following:

- Periodical financial results of the Company;
- Intended declaration of dividends, interim or final;
- Change in capital structure of the Company;
- Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- Changes in Key Managerial Personnel of the Company; and
- material events in accordance with the listing agreement;

Working Day shall mean the working day when the regular trading is permitted on the concerned stock exchange(s) where the securities of the company are listed;

All terms used in this Code but not defined hereinabove shall have the meanings ascribed to them under the Regulations or the Companies Act, 2013, to the extent notified and Companies Act, 1956 as far as applicable.

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CODE OF FAIR DISCLOSURE

PUBLIC DISCLOSURE

Prompt public disclosure shall be made of Unpublished Price Sensitive Information that would have an impact on price discovery as soon as any credible and concrete information comes into being so as to make such information generally available to public.

The disclosures to be made by insiders shall also include those relating to trading by such insider's immediate relatives, and by any other person for whom such insider takes trading decisions.

The disclosure of trading in securities shall also include trading in derivatives of such securities that are permitted by any law for the time in force and the traded value of the derivatives shall be taken into account.

The disclosures shall be maintained by the Company for a minimum period of 5 years in physical/ electronic mode.

The following disclosure requirements are mandated under the Regulations:

INITIAL DISCLOSURES

Initial disclosure is required to be made by following persons:

a) Every Promoter, Key Managerial Personnel and Director of the Company shall disclose his holding of securities of the Company (as per Annexure 4) as on the date of these regulations taking effect viz. May 15, 2015, to the Company within 30 days of these regulations taking effect;

b) Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his holding of securities of the Company (as per Annexure 5) as on the date of appointment or becoming a Promoter, to the Company within 7 (Seven) days of such appointment or becoming a promoter.

CONTINUAL DISCLOSURES

Continual disclosure has to be made by following persons:

a) *Pursuant to amendment in the Regulations and introduction of System -Driven Disclosures every promoter, member of promoter Group, designated persons of the Company as covered under the provision of Regulation 7 shall disclose to the Company the number of such securities acquired or disposed of within 2 (two) trading days of such transaction (*as per Annexure's to this code as applicable*), if the value of securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000.00 (Rupees Ten Lacs) or such other value as may be specified;

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

The disclosure of the incremental transactions after any such disclosure by the Company, shall be made when the transactions effected after the prior disclosure cross the threshold viz. 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. 10,00,000.00 (Rupees Ten Lacs only) or such other value as may be specified.

DISCLOSURES BY OTHER CONNECTED PERSONS

The Company may, at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as many times as there holding changes pursuant to trading in securities of the company in order to monitor compliance with these regulations.

DISSEMINATION OF INFORMATION

The Company shall ensure uniform and universal dissemination of unpublished price sensitive information and avoid selective disclosure.

The Company also ensures prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

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CHIEF INVESTOR RELATIONS OFFICER

The Company designates its Company Secretary and Compliance Officer as the Chief Investor Relations Officer, who shall deal with the dissemination of information and disclosure of unpublished price sensitive information.

RESPONSE TO QUERIES, REQUESTS

Appropriate and fair response shall be made by the Company to queries on news reports and requests for verification of market rumours by regulatory authorities.

The Company shall ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.

The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.

CODE OF CONDUCT

COMPLIANCE OFFICER

- Company Secretary of the Company shall act as Compliance Officer to ensure compliance and for effective implementation of the Regulations and also this Code across the Company.
- The Compliance Officer shall report to the Managing Director of the Company.
- The Compliance Officer shall hold the position so long as he/ she is in the employment of the Company. Till such time a successor is appointed, the Head of Finance shall, in the interim period act as the Compliance Officer.
- In order to discharge his/ her functions effectively, the Compliance Officer shall be adequately empowered and provided with adequate manpower and infrastructure to effectively discharge his/ her functions. In the performance of his/ her duties, the Compliance Officer shall have access to all information and documents relating to the Securities of the Company.
- The Compliance Officer shall act as the focal point for dealings with SEBI in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

DUTIES OF THE COMPLIANCE OFFICER

The Compliance Officer shall be responsible for

- Setting forth policies in consultation with the Managing Director/ Board of Directors and their compliance thereof.
- Prescribing procedures for various activities referred to in the Code.
- Monitoring adherence to the rules for the preservation of "Unpublished Price Sensitive Information".
- Monitoring of trades as required under these Regulations.
- Grant of pre-dealing approvals to the designated persons for dealings in the Company's Securities and monitoring of such dealings.
- Review, approval and public disclosure and monitoring of trading plans submitted by insiders and obtaining such express undertakings as he may deem necessary in this regard
- Implementation of this Code under the overall supervision of the Board of Directors.

The Compliance Officer shall maintain a record (either manual or in electronic form) of the details of trading by employees and connected persons as may be deemed necessary.

The Compliance Officer shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors, as the case may be at such frequency as the Board may stipulate.

NEED TO KNOW

All insiders who are in possession of any unpublished price sensitive information shall handle such information with care and deal with such information when transacting any business strictly on a "Need to Know" basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

TRADING WINDOW

- Designated persons are required to execute trades subject to compliance with the Code and the Regulations.
- Other than the period(s) for which the Trading Window (i.e. Trading Period) is closed as prescribed hereunder, the same shall remain open for Dealing in the Securities of the Company.
- Unless otherwise specified by the Compliance Officer, the Trading Window for Dealing in Securities of the Company shall be closed when the Compliance Officer determines that a designated person or class of designated persons are reasonably expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.
- Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.

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- The trading window shall also be applicable to any person having contractual or fiduciary relation with the company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the company.
- The timing for re-opening of the trading window will be determined by the Compliance Officer after considering various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market.
- The trading window shall, in any event not open earlier than 48 hours after the information becomes generally available.

PRE-CLEARANCE OF DEALS IN SECURITIES

- Trading by designated persons shall be subject to preclearance by the Compliance Officer when the trading window is open, if the value of the proposed trades is above the thresholds mentioned hereunder
- Such preclearance would be necessary, only if the value of the securities traded by such designated persons, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000.00 (Rupees Ten Lacs only);
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- The applications for pre-clearance shall be made by the concerned designated person to the Compliance Officer in the prescribed form (as per Annexure 1).

- No designated person shall apply for pre-clearance of any proposed trade, if such designated person is in possession of unpublished price sensitive information, even if the trading window is not closed.

- The compliance officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for preclearance of trades.

- Prior to approving any trades, the compliance officer may, if required seek declarations (as per Annexure 2), to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. While seeking such declarations, he shall have regard to whether any declaration is reasonably capable of being rendered inaccurate.

- Such application for pre clearance of dealing, along with the enclosures must necessarily be sent through electronic mail followed by hard copies of all the documents. The e-mail for this purpose should be sent to the Compliance Officer on the official e-mail id.

- On receipt of approval of pre-clearance application from the Compliance Officer, the designated person shall execute the trade within 7 (seven) trading days, failing which fresh pre-clearance would be needed for the trades to be executed.

- The designated person who is permitted to trade shall not execute any contra trade upto 6 months. The compliance officer is empowered to grant relaxation from strict application of this restriction for reasons to be recorded in writing, if such relaxation is not in violation of the regulations.

- Any contra trade executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade will be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the SEBI.

TRADING PLAN

- An Insider willing to deal in the securities of the Company shall be entitled to formulate a Trading Plan ("the Plan") and present it to the Compliance Officer for approval, pursuant to which trades may be carried out on his behalf.

- Such Plan shall be formulated in accordance with and governed by the Regulations.

- The Compliance Officer shall review the Plan to assess whether the Plan would have any potential for violation of the Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the Plan. Upon approval of the Plan, the Compliance Officer shall notify the same to the Exchanges.

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- The Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the same, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the Plan.

- The implementation of the 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 so as to avoid a violation of the Regulations.

PENALTY FOR CONTRAVENTION

- Every person, to whom the Code is applicable, shall be individually responsible for complying with the provisions of this Code.

- Any person who violates the Code, shall, in addition to any other penal action that may be taken against him under any law, also be subject to disciplinary action by the Company which may include wage freeze, suspension, ineligible for future participation in employee stock option plans, etc.

- The action by the company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI(Prohibition of Insider Trading) amendment Regulations, 2020.

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- In case it is observed by the company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 then he/she shall promptly inform the stock exchange(s) where the concerned securities are traded, in such form and such manner as may be specified by the Board from time to time.

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EMKAY TAPS AND CUTTING TOOLS LIMITED

ANNEXURE 1

APPLICATION FOR PRE-CLEARANCE APPROVAL IN SECURITIES OF THE COMPANY

To,
The Compliance Officer
Emkay Taps and Cutting Tools Limited
B-27 & B-27/1,
M.I.D.C. Industrial Area,
Hingna Road,
Nagpur – 440 016
Maharashtra, India

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct to regulate, monitor and report trading by Insiders, I seek approval for purchase/ sale/ subscription of the securities of the Company as detailed below:

Name: _____

State whether {Director/Officer/Designated Person/Other}

Nature of transaction (Buy/ sell/ Subscribe)	*Name of Proposed Buyer/ Seller	No. of Securities to be dealt	**Date of purchase/ allotment	***Previous approval no. and date for purchase/ allotment)	DP/BEN ID of the account / folio no. where the securities will be credited/ debited	No. of Securities held in such Account /Folio No.
					DP ID_____ BEN ID _____ FOLIO NO.	

* applicable for off market transaction

** applicable only if the application is in respect of sale of Securities

*** applicable only if the application is in respect of sale of Securities for which an earlier purchase sanction was granted by the Compliance Officer

I enclose herewith the form of undertaking signed by me.

Signature
Name:
Date:
Place:

Note: This application has to be necessarily submitted through electronic mail to the Compliance Officer on the official e-mail id followed by a hard copy.

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EMKAY TAPS AND CUTTING TOOLS LIMITED

ANNEXURE 2

UNDERTAKING TO BE EXECUTED AND ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To,
The Compliance Officer
Emkay Taps and Cutting Tools Limited
B-27 & B-27/1,
M.I.D.C. Industrial Area,
Hingna Road,
Nagpur – 440 016
Maharashtra, India

I, _____s/o_____ hereby declare that

1. I am a Director/Officer/ Designated Person (state designation) of ..... Limited.

2. I am not in possession of or otherwise privy to any unpublished price sensitive information up to the time of signing this undertaking.

3. In case I have access to or I receive any price sensitive information after signing this undertaking but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would, and would, completely refrain from dealing in the securities of the Company till the time such price sensitive information becomes public.

4. I have not contravened the Code of Conduct of the Company.

5. I shall execute my order in respect of securities of the Company within 7 days after the approval of pre-clearance is given. If the order is not executed within 7 days after the approval is given, I undertake to obtain fresh pre- clearance approval for the transaction.
6. I shall not engage into the reverse transaction i.e., Buying/ Selling of shares, within 6 months of buying/ selling respectively.

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

9. I have made full disclosure in the matter

Signature:
Name:
Date:
Place:

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EMKAY TAPS AND CUTTING TOOLS LIMITED

ANNEXURE 3

PRE-CLEARANCE APPROVAL LETTER

Approval No:

Dear Mr. /Ms.

Sub: Approval/Disapproval of your application dated _____ for pre-clearance approval

With reference to your above application seeking approval for undertaking certain transactions in Securities of the Company detailed therein, please be informed that you are _____ hereby authorised/not authorised 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). If you do not execute the approved transaction /deal on or before this date you would have to seek fresh pre-clearance approval before executing any transaction/deal in the Securities of the Company.

Yours truly,
For Emkay Taps and Cutting Tools Limited

_____
Compliance Officer

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EMKAY TAPS AND CUTTING TOOLS LIMITED

ANNEXURE 4

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2)]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6		7	

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place:

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EMKAY TAPS AND CUTTING TOOLS LIMITED

ANNEXURE 5

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) - Disclosure on becoming a Key Managerial Personnel/ Director/ Promoter/ member of the promoter group]

Name of the company: _____

ISIN of the Company: _____

Details of securities held on appointment of Key Managerial Personnel (KMP) or Director on upon becoming a Promoter or member of the promoter group of a Listed Company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN CIN/DIN & Address with contact nos.	Category of person (KMP/Director or Promoter or member of the Promoter group immediate relative to/others, etc.)	Date appointment of KMP/Director/ OR Date of becoming Promoter/member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or Member of the Promoter group		% of Shareholding
			Type of securities (For e.g.- Shares, Warrants, Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

Note: "securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of insider Trading) Regulations, 2015.

Details of Open Interest (OI) in derivatives on the securities of the Company held on appointment of KMP or Director or upon becoming a promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract Specifications	Number of units (contracts *lot size)	Notional Value in Rupee terms	Contract Specifications	Number of units (contracts* lot size)	Notional Value in Rupee terms
7	8	9	10	11	12

Note: In case of Options, notional value shall be calculated based on premium pus strike price of options.

Name & signature:

Designations:

Date:

Place:

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EMKAY TAPS AND CUTTING TOOLS LIMITED

ANNEXURE 6

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) - Disclosure on becoming a Key Managerial Personnel/ Director/ Promoter/ member of the promoter group]

Name of the company: _____

ISIN of the Company: _____

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of Listed Company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, and address with contact nos.	Category of Person (Promoter/ member of the promoter group/ designated person / Directors/ immediate relative to/ others etc.	Securities held prior to acquisition/disposal		Securities acquired/ Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquition of shares/disposal of shares, specify		Date of Intimation to company	Mode of acquition/disposal (on market/public/rights/preferential offer/off market/public/rights/preferential offer/off market Inter-se transfer, SOPs, etc.)	Exchnage on which the trade was executed
		Type of securities (For eg. - Shares Warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of shareholding	Type securitites (For e.g.- Shares, Warrants,ConvertibleDebentures, Rights entitlement, etc.)	No.	value	Transaction Type (Purchase/Sale Pledge/Revocation/Invocation/Others- please specify)	Type of securities (For eg.- Shares, Warrants, convertible Debentures, Rights entitlement etc.	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: (i) "Securities" shall have the meaning as defined under regulation 2(10 (i) of SEBI (Prohibition of Insider Trading) regulations, 2015.

(ii) Value of transaction excludes taxes/brokerage/other charges

EMKAY TAPS AND CUTTING TOOLS LIMITED

Details of trading in Derivatives on the Securities of the Company by Promoter, member of Promoter group, Designated person or Director of a Listed Company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in Derivatives (Specify type of contract, Futures or options etc.)						Exchange on which the trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of Units (Contracts* lot size)	Notional Value	Number of Units (Contracts* lot size)	
16	17	18	19	20	21	22

Note: In case of options, notional value shall be calculated based on Premium plus strike price of options.

Name & Signature:
Designation:
Date:
Place:

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EMKAY TAPS AND CUTTING TOOLS LIMITED

ANNEXURE 7

FORM D

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (3) -Transactions by Other Connected Persons as identified by the Company

Name of the company: _____

ISIN of the Company: _____

Details of trading in Securities by other connected persons as identified by the Company

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with Company	Securities held prior to acquisition/ disposal		Securities acquired/Disposed				Securities held post to acquisition/ disposal		Date of allotment advice/acquisition of shares/ disposal of shares specify		Date of Intimation to company	Mode of acquisition / Disposal (on market/public/rights/ Preferential offer/off market/Inter-se transfer, ESOPs Etc.)	Exchange on which the trade was executed
		Type of securities (For eg.- Shares, warrants, convertible debentures, Rights entitlement, etc.	No. and % of Shareholding	Type of securities (For eg.- Shares, warrants, convertible debentures, Rights entitlement, etc.	No.	value	Transaction type Purchase/sale/Pledge/Revocation/Invocation/others- please specify)	Type of securities (For eg.- Shares, warrants, convertible debentures, Rights entitlement, etc.	No. and % of Shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note:

(i) "Securities" shall have the meaning as defined under regulation 2(10 (i) of SEBI (Prohibition of Insider Trading) regulations, 2015.

(ii) (ii) Value of transaction excludes taxes/brokerage/other charges

Details of trading in Derivatives on the Securities of the Company by other connected persons as identified by the Company

Trading in Derivatives (Specify type of contract, Futures or options etc.)						Exchange on which the trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of Units (Contracts* lot size)	Notional Value	Number of Units (Contracts* lot size)	
16	17	18	19	20	21	22

Note: In case of options, notional value shall be calculated based on Premium plus strike price of options.

Name & Signature:
Designation:
Date:
Place:

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ANNEXURE 8

REGISTER OF PERIOD OF CLOSURE OF TRADING WINDOW

Sr. No.	Date of Notifying Trading Window Closure	Start Date of Trading Window Closure	Last Date of Trading Window Closure	Purpose for closure of Trading Window

ANNEXURE 9

REGISTER OF PRE-CLEARANCE FOR TRADING IN SECURITIES

Sr. No.	Name	Designation	Department	Date and Time of Receipt of Pre-Clearance Application	Name of Person in whose name transaction is being made	Relationship
1	2	3	4	5	6	7

Nature of transaction (buy/Sell)	Estimated no. of Securities	Estimated Consideration	Date of Communication of Clearance by the Compliance Officer	reasons for non-clearance, if any	No. of securities actually traded and date of transaction
8	9	10	11	12	13

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