



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 www.etctl.com

Date: 19.03.2022

To,
Listing Department,
National Stock Exchange of India Limited,
Exchange Plaza, Bandra Kurla Complex,
Bandra East, Mumbai-400051.

NSE Trading Symbol: EMKAYTOOLS
ISIN: INE332S01011

Reference: SEBI (Prohibition of Insider Trading) Regulations, 2015-Code of Conduct for Designated Person.
Subject: Inadvertent Contra-Trading executed by AJAYPRAKASH MURLIDHAR KANORIA, HUF ("the HUF") the Promoter.

Dear Madam/Sir,

With reference to the captioned subject matter, Emkay Taps and Cutting Tools Limited (the Company) is notifying the stock exchange of the occurrence of an inadvertent contra-trade executed by a designated person- Ajayprakash Murlidhar Kanoria HUF one of the Promoter's of the Company, during the fourth quarter of FY 2021-2022.

It was an honest mistake on their part and was inadvertent trading done by them. It happened unintentionally and inadvertently in order to maintain the minimum public shareholding to 25% as same got exceeded due to purchase of 33600 shares wherein pre-clearance was allowed only for 32000 shares, as the promoter was under the impression that every respective share purchase transaction has six months cooling period and not six months from the last purchase the contra trade happened and same was immediately informed to the compliance officer.

The Audit Committee meeting was convened at a shorter notice and was notified of this matter. Based on the submission of Ajayprakash Kanoria, Karta of Ajayprakash Murlidhar Kanoria HUF, the Audit Committee has concluded, at its Meeting held on 17.03.2022, that this was an inadvertent trade made without intent to violate the Company's Insider Trading Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").

However, the Audit Committee has determined that there was a violation of the Company's Policy and PIT Regulations and has therefore unanimously decided that Ajayprakash Murlidhar Kanoria HUF has to remit the entire profit, of Rs. 15,768 derived by the virtue of Contra-trade, to the Investor Protection and Education Fund administered by SEBI pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Also please find enclosed the required information in the format as prescribed by the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 in Annexure A.

Kindly take it on your records.

Thanks & Regards,

For Emkay taps and Cutting Tools Limited

S. Sohane

Shruti Sohane

Company Secretary & Compliance Officer





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Annexure A

Report by Emkay Taps and Cutting Tools Limited (the Company) for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Schedule B and Schedule C of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Particulars	Details
1.	Name of the listed company	Emkay Taps and Cutting Tools Limited
2.	Please tick appropriate checkbox Reporting in capacity of: Listed Company Intermediary Fiduciary	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Ajayprakash Murlidhar Kanoria, HUF ("the HUF")
	ii. PAN of the DP	AAFHA0002B
	iii. Designation of DP	HUF is Promoter, Ajayprakash Kanoria the Karta is Chairman, Managing Director & CEO of the company
	iv. Functional Role of DP	Mr. Ajayprakash Kanoria, Karta of the above mentioned HUF is involved in the day to day affairs of the Company.
	v. Whether DP is Promoter or belongs to Promoter Group	Yes
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	NSE: EMKAYTOOLS
	No of shares traded and value (Rs.)(Date- wise)	Sold (contra-traded) 1,800 equity shares during the fourth quarter of the FY 2021-2022 and made a profit of Rs. 15,768 during the Trading Window Open period.
	D. In case value of trade(s) is more than Rs.10 lakh in a calendar quarter	
	i. Date of intimation of trade(s) by concerned	The company has already intimated to the SE on 15.03.2022
	ii. DP/director/promoter/promote rgroup to Company	The HUF, the promoter of the company informed the same to the Company on 14.03.2022
4.	Details of violations observed under Code of Conduct	Violation of "Code of practices and procedures for fair disclosure of unpublished price sensitive information" (Insider Trading Policy) and Clause 10 of Schedule B and Clause 8 of Schedule C of SEBI (Prohibition of Insider Trading) Regulations, 2015.





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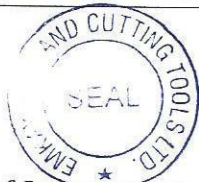
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5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Audit Committee has determined that there was a violation of the Company's Policy and PIT Regulations and has therefore asked Mr. Ajayprakash Kanoria, Karta of the HUF to remit entire profit, of Rs. 15,768 derived by selling in total 1,800 equity shares to Investor Protection & Education Fund (IPEF) in line with the SEBI (Prohibition of Insider Trading) Regulations, 2015.												
6.	Reasons recorded in writing for taking action stated above.	The Karta of the HUF understands that he sold 1,800 abovementioned equity shares during Open Trading Window in contravention to the SEBI (Prohibition of Insider Trading) Regulations, 2015. It was an honest mistake and was inadvertent trading done by the HUF. No harm has been caused to the investors. Nevertheless, there was a violation of "Code of practices and procedures for fair disclosure of unpublished price sensitive information" (Insider Trading Policy) and Clause 10 of Schedule B and Clause 8 of Schedule C of SEBI (Prohibition of Insider Trading) Regulations, 2015.												
7.	Details of the previous instances of violations, if any, since last financial year.	NA												
8.	If any amount collected for Code of Conduct violation(s)	NIL												
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online												
	ii. Details of transfer/payment													
	In case of online:													
	<table border="1"> <thead> <tr> <th>Particulars</th><th>Details</th></tr> </thead> <tbody> <tr> <td>Name of the transferor</td><td>Ajayprakash Murlidhar Kanoria HUF</td></tr> <tr> <td>Bank Name, branch and Account number</td><td>Bank of Maharashtra, Sitabuldi Branch Ac No: 20108001822</td></tr> <tr> <td>UTR/Transaction reference Number</td><td>MAHBH22076457756</td></tr> <tr> <td>Transaction date</td><td>17.03.2022</td></tr> <tr> <td>Transaction Amount (in Rs.)</td><td>Rs. 15,768.00</td></tr> </tbody> </table>	Particulars	Details	Name of the transferor	Ajayprakash Murlidhar Kanoria HUF	Bank Name, branch and Account number	Bank of Maharashtra, Sitabuldi Branch Ac No: 20108001822	UTR/Transaction reference Number	MAHBH22076457756	Transaction date	17.03.2022	Transaction Amount (in Rs.)	Rs. 15,768.00	
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UTR/Transaction reference Number	MAHBH22076457756													
Transaction date	17.03.2022													
Transaction Amount (in Rs.)	Rs. 15,768.00													
9.	Any other relevant information	NA												

Yours faithfully,

S. Sohane



Name and Signature of Company Secretary & Compliance Officer: Shruti Sohane

Email ID: shrutisohane@emkaytaps.com

Signed at Nagpur on 16th day of March, 2022