

July 27, 2020

Shalby/SE/2020-21/39

The Listing Department
National Stock Exchange of India Ltd
Mumbai-400 051
Scrip Code : SHALBY
Through : <https://www.connect2nse.com/LISTING/>

Corporate Service Department
BSE Limited
Mumbai-400 001
Scrip Code: 540797
Through : <http://listing.bseindia.com>

Sub: Annual Secretarial Compliance Report

Dear Sir / Madam,

Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; we are submitting herewith the Annual Secretarial Compliance Report issued by Practicing Company Secretary for the year ended March 31, 2020.

We request to take the same on your records and disseminate the same to the members.

Thanking you,

Yours sincerely,
For **Shalby Limited**

Jayesh Patel
Company Secretary & Compliance Officer
Mem. No: ACS14898
Encl.: as above

SHALBY LIMITED

Regd. Office: Opp. Karnavati Club, S. G. Road, Ahmedabad - 380 015, Gujarat, India.
Tel: 079 40203000 | Fax: 079 40203109 | info.sg@shalby.org | www.shalby.org
CIN: L85110GJ2004PLC044667

SHAMBHU J. BHIKADIA
B.Com. LLB, ACS
Company Secretary

Flat No. E/202, Vraj Vihar-4,
Nr. Chandan Party Plot,
Satellite,
Ahmedabad-380 015
(M) 09898222972
email:keyur.bhikadia@gmail.com

SECRETARIAL COMPLIANCE REPORT of
Shalby Limited

For the year ended March 31, 2020

I, Shambhu J Bhikadia, Practicing Company Secretary, have examined:

- all the documents and records made available to me and explanation provided by Shalby Limited("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended March 31, 2020 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;(Not Applicable to the Company during the Review Period)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;(Not Applicable to the Company during the Review Period)
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;(Not Applicable to the Company during the Review Period)
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013;(Not Applicable to the Company during the Review Period)
- The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;and based on the above examination, I hereby report that, during the Review Period:



SHAMBHU J. BHIKADIA
B.Com. LLB, ACS
Company Secretary

Flat No. E/202, Vraj Vihar-4,
Nr. Chandan Party Plot,
Satellite,
Ahmedabad-380 015
(M) 09898222972
email:keyur.bhikadia@gmail.com

- a) The listed entity has complied with the provisions of the above Regulations and circulars / guidelines issued thereunder, except in respect of matters specified below:

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

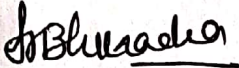
Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary, if any.
NIL				

- d) The Company has prima facie complied with and included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI circular CIR/CFD/CMD1/114/2019, dated October 18,2019 in the terms of appointment of statutory auditor of the Company.
- e) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Ahmedabad
Date: June 15, 2020




Shambhu J Bhikadia
ACS No. 8024
CP No. 3894
UDIN:A008024B000342811