



May 30, 2019

The National Stock Exchange of India Ltd
"Exchange Plaza", Bandra Kurla Complex,
Bandra East,
Mumbai - 400 051
(Scrip Code - SHIVAMAUTO)

The BSE Limited
Phiroje Jeejeebhoy Towers
Dalal Street Fort
Mumbai - 400 001
(Scrip Code - 532776)

Sub: Compliance under Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015.

Dear Sir(s),

In compliance with Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and pursuant to SEBI circular CIR/CFD/CMD1/27/2019 dated February 08, 2019, we enclose herewith Secretarial Compliance Report duly issued by Satyender Kumar & Associates, Company Secretaries, for the financial year ended March 31, 2019.

Kindly take the above information on your record and oblige.

Thanking you.

For ShivamAutotech Limited

Shivani Kakkar
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Shivani Kakkar
Company Secretary
M. no. 25097



GURUGRAM WORKS : 58 Km. Stone, Delhi - Jaipur Highway, Village - Binola,
Distt. Gurugram - 122413, Haryana (India).
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E-mail : admn@shivamautotech.com Website : www.shivamautotech.com
CIN No : L34300DL2005PLC139163

ISO / ITS 16949
ISO 14001
OHSAS 18001



DNV

CERTIFIED FIRM



**SECRETARIAL COMPLIANCE REPORT OF SHIVAM AUTOTECH LIMITED
FOR THE YEAR ENDED MARCH 31, 2019**

- We Satyender Kumar & Associates have examined:
- all the documents and records made available to us and explanation provided by Shivam Autotech Limited ("the listed entity/ Company"),
 - 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, 2019 ("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, 2009 (upto 10th November, 2018) and Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (with effect from 11th November, 2018; *not applicable to the Company during the period under review*)
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 (upto 10th September 2018) and The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (with effect from 11th September 2018); *not applicable to the Company during the period under review*
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *not applicable to the Company during the period under review*
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *not applicable to the Company during the period under review*
- 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 period under review*



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

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996/ Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

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

(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, if any.
1.	Regulation 40 of (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Delay in dispatch of shares after effecting transfer, and delay in effecting transmission of shares.	Slight delay in dispatch of 1850 shares after effecting transfer; one request for duplicate-cum-transmission, transmission of such request was effected beyond prescribed time by the RTA;
2.	Regulation 54 of SEBI (Depositories and Participants) Regulations, 1996/ Regulation 74 of SEBI (Depositories and Participants) Regulations, 2018	Non confirmation of demat request within time prescribed under regulations	Ten requests (<i>prior to 24.1.2019</i>) for dematerialisation of shares received by the RTA have been confirmed beyond the prescribed time.

(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 our 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.
<i>Not Applicable</i>				



(d) 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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
<i>Not Applicable</i>				

For SATYENDER KUMAR & ASSOCIATES
Company Secretaries

Place: Gurugram
Date : 27.5.2019



Satyender Kumar
Satyender Kumar
(Proprietor)
C.P. No. 5189
FCS 4087