



**SECRETARIAL COMPLIANCE REPORT OF SHIVAM AUTOTECH LIMITED
FOR THE YEAR ENDED MARCH 31, 2022**

We Satyender Kumar & Associates have examined:

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

For the year ended March 31, 2022 ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) 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:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (*the rights issue size was less than Rs.50 crore*)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (*not applicable to the Company during the period under review*)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (*not applicable to the Company during the period under review*)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (*not applicable to the Company during the period under review*)
- (g) 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*)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (applicable to the Company to the extent of Compliance of Regulation 76)



and circulars/ guidelines issued there under; 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 mentioned at S.No. [(a) and (c) to (i)] and circulars/ guidelines issued there under. With regard to rights issue of equity shares issued by the Company during the period under review, the Company has complied the provisions as laid down in Regulation 3 of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. The Company has filed Letter of Offer relating to Rights issue of equity shares of upto Rs.40 crores with the Board for information and dissemination and also filed the same with Stock Exchanges. The Company has obtained In-Principle approval of Stock Exchanges for rights issue of shares and listing/trading approval was also obtained in this regard. Regarding publication of notices to the Shareholders as per the requirements of Letter of Offer dated 10.12.2021, we have observed that the Company has published three notices (pre-issue advertisement, post-issue advertisement and Corrigendum cum Addendum to the Letter of Offer) in Hindi Newspaper in English Language.
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far 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 there under:

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 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
	N.A	N.A.	N.A.	N.A



- (e) The reporting of clause 6(A) and 6(B) of the Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

For SATYENDER KUMAR & ASSOCIATES
Company Secretaries

Place: Gurugram
Date : 30.05.2022



Satyender Kumar
Satyender Kumar
(Proprietor)
C.P. No. 5189
FCS 4087
UDIN: F004087D000427477
Peer Reviewed Unit