

June 29, 2021

**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 24A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015.**

Dear Sir(s),

In compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) (Second Amendment) 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, Practicing Company Secretaries, for the financial year ended March 31, 2021.

Kindly take the above information on your record and oblige.

Thanking you.

For Shivam Autotech Limited



Samta Bajaj  
Company Secretary and Compliance Officer  
M. No. 50269





**SECRETARIAL COMPLIANCE REPORT OF SHIVAM AUTOTECH LIMITED  
FOR THE YEAR ENDED MARCH 31, 2021**

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, 2021 ("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; (*compliance yet to be initiated for rights issue during the period under review*)
- (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

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 and circulars/ guidelines issued there under.
- (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.
<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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Point No. 2 Para A of Schedule III of Regulation 30 of (Listing Obligations and Disclosure Requirements) Regulations, 2015 about delay in Intimation of consolidation of shares.	31.3.2020	The Company has ensured that in future there should be a proper and timely compliance with respect to all the Compliances and intimations to the Stock Exchange as required under Regulation 30 read with Schedule III of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015. The practice of preparing a Secretarial Checklist has also been adopted by the Company through the Compliance Mantra Software.	None.

Limitations

*The prevailing lockdown on account of COVID-19 situation has impacted the physical verification of the documents and records as being maintained by the Company at their offices and we are constrained to determine the quantum of said impact. We have taken all possible steps as possible with the present limitations of COVID 19, to verify the records as made available to us on a remote basis by the Company through electronic medium and as a best possible endeavor have taken necessary confirmation representation undertakings, from the officials of Company, wherever required.*

For SATYENDER KUMAR & ASSOCIATES  
Company Secretaries

*Satyender Kumar,*  
SATYENDER KUMAR  
(Proprietor)  
C.P. No. 5189  
FCS 4087  
UDIN-F004087C000537983

Place: Gurugram  
Date : 29.6.2021

