

**Closure of the Trading Window Notice**

**December 31, 2022**

To,  
All Directors / Auditors / Designated Persons and immediate relatives of Designated Persons

Dear All,

**Subject: Notice of the Closure of the Trading Window pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015.**

Pursuant to the company's code of conduct and SEBI (prohibition of Insider Trading) Regulations, 2015, as amended from time to time, Notice is hereby given that, the Trading window of our company shall remain closed from January 01, 2023 till 48 hours from the conclusion of the Board Meeting to be held for approval of the Unaudited Financial Results for the quarter and nine months ended December 31, 2022.

It is the duty of each Designated Person to ensure compliance with the company's code of conduct (updated on the website) and SEBI Insider Trading Regulations. Therefore, during the Trading window closure period, the Directors, Promoters, Employees, Designated persons and immediate relatives of designated persons of company shall not deal in Shivam Autotech Limited's "securities", neither in their own name nor in the name of their "Immediate Relative".

For the purpose of this notice for closure of trading window,

**"Designated Persons"** means

- a. All Directors;
- b. Key Managerial Personnel (KMP's) as per Companies Act, 2013;
- c. Designated Employee(s);
- d. Promoters /Promoter Group of the Company;
- e. Person in contractual, fiduciary or advisory relationship with the Company i.e. consultants, retainers, auditors, law firms and analysts etc.
- f. Other person as designated by the Board of Directors in consultation with the Compliance Officer of the Company, from time to time; and
- g. Immediate relatives of person covered under clause (a) to (f) above.

**"Designated Employee(s)"** shall include:

- (i) All functional Heads; and
- (ii) Every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer.

This is for your kind reference and records.

**For Shivam Autotech Limited**

**Preeti Sharma**  
**Company Secretary & Compliance Officer**  
**M.No. A32847**