

December 30, 2019

Shalby/SE/2019-20/66

The Listing Department  
**National Stock Exchange of India Ltd**

**Scrip Code : SHALBY**

Through : <https://www.connect2nse.com/LISTING/>

Corporate Service Department  
**BSE Limited**

**Scrip Code: 540797**

Through : <http://listing.bseindia.com>

**Sub.: Intimation of closure of trading window in terms of Code of conduct for prevention of Insider Trading.**

**Dear Sir/Madam,**

This is to inform you that pursuant to the Code of Conduct of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Circular No: NSE/CML/2019/11 dated April 2, 2019 issued by the National Stock Exchange of India and Circular No: LIST/COMP/01/2019-20 dated April 2, 2019 issued by BSE Ltd in this regard, the trading window for dealing in equity shares of the Company shall remain closed for all directors, designated persons and other officials covered under the code from Wednesday, January 1, 2020 till the expiry of 48 hours from the announcement of unaudited financial results for the third quarter and nine months ended on December 31, 2019.

The date of Board meeting of the Company to approve unaudited financial results for the third quarter / nine months ended December 31, 2019 will be intimated in due course of time separately.

Kindly take the above information on your record.

Thanking you,

Yours sincerely  
For **Shalby Limited**

**Jayesh Patel**  
**Company Secretary & Compliance Officer**  
Mem No: ACS14898

**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](mailto:info.sg@shalby.org) | [www.shalby.org](http://www.shalby.org)

CIN: L85110GJ2004PLC044667

**Internal circular for prevention of Insider Trading of Securities**

December 26, 2019

To

Designated persons (officials)

Immediate relatives of designated persons

All Directors/promoters/part of promoter groups

**Sub: Intimation of trading window closure in terms of Code of conduct for prevention of Insider Trading.**

**Dear Sirs/Madam,**

Pursuant to the Code of Conduct of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015 and in accordance with Circular No: NSE/CML/2019/11 dated April 2, 2019 issued by the National Stock Exchange of India and Circular No: LIST/COMP/01/2019-20 dated April 2, 2019 issued by BSE Ltd in this regard, the trading window for dealing in securities of the Company shall remain closed for all directors, designated persons and other officials covered under the code with effect from Wednesday, January 1, 2020 till the expiry of 48 hours from the announcement of financial results for the 3<sup>rd</sup> quarter ended December 31, 2019.

It is the duty of each insider to ensure compliance with the Company's code of conduct for prevention for insider trading and SEBI (Prohibition of Insider Trading) Regulations, 2015. You are advised **not to deal (buy/sell) in equity shares of Shalby Limited**, neither in your name nor in the name of your immediate relatives, from January 1, 2020 till the expiry of 48 hours from the announcement of financial results for Q3 FY 2019-20.

Pls. find attached herewith Code of Conduct to deal with equity shares of the Company as adopted by the Board of Directors for your ease reference.

Thanking you,

Yours sincerely  
For **Shalby Limited**

**Jayesh Patel**  
**Company Secretary & Compliance Officer**  
Mem No: ACS14898

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