

September 30, 2019

Shalby/SE/2019-20/48

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 securities of the Company shall remain closed for all directors, designated persons and other officials covered under the code from Tuesday, October 1, 2019 till the expiry of 48 hours from the announcement of unaudited financial results for the second quarter and half year ended on September 30, 2019.

The date of Board meeting of the Company to approve unaudited financial results for the second quarter/half year of FY 2019-20 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 | www.shalby.org

CIN: L85110GJ2004PLC044667

Internal circular issued to prevent insider trading

September 30, 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 Tuesday, October 1, 2019 till the expiry of 48 hours from the announcement of financial results for the 2nd quarter and half year ended September 30, 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 October 1, 2019 till the expiry of 48 hours from the announcement of financial results for Q2/half of 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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