

# FORM NO. MGT-7

[Pursuant to sub-Section(1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11of the Companies (Management and Administration) Rules, 2014]



# Annual Return

Form language  English  Hindi

Refer the instruction kit for filing the form.

## I. REGISTRATION AND OTHER DETAILS

(i) \* Corporate Identification Number (CIN) of the company

L99999GJ1975PLC002859

Pre-fill

Global Location Number (GLN) of the company

\* Permanent Account Number (PAN) of the company

AABCA2390M

(ii) (a) Name of the company

ATUL LIMITED

(b) Registered office address

ATUL HOUSE  
G I PATEL MARG  
AHMEDABAD  
Gujarat  
380014

(c) \*e-mail ID of the company

legal@atul.co.in

(d) \*Telephone number with STD code

02632230000

(e) Website

www.atul.co.in

(iii) Date of Incorporation

11/12/1975

(iv)	Type of the Company	Category of the Company	Sub-category of the Company
	Public Company	Company limited by shares	Indian Non-Government company

(v) Whether company is having share capital

Yes  No

(vi) \*Whether shares listed on recognized Stock Exchange(s)

Yes  No

(a) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code
1	BSE Limited	1
2	National Stock Exchange of India Limited	1,024

(b) CIN of the Registrar and Transfer Agent

U67190MH1999PTC118368

Pre-fill

Name of the Registrar and Transfer Agent

LINK INTIME INDIA PRIVATE LIMITED

Registered office address of the Registrar and Transfer Agents

C-101, 1st Floor, 247 Park,  
Lal Bahadur Shastri Marg, Vikhroli (West)

(vii) \*Financial year From date 01/04/2020 (DD/MM/YYYY) To date 31/03/2021 (DD/MM/YYYY)

(viii) \*Whether Annual general meeting (AGM) held  Yes  No

(a) If yes, date of AGM

Scheduled on  
30/07/2021

(b) Due date of AGM

30/09/2021

(c) Whether any extension for AGM granted

Yes  No

## II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

\*Number of business activities

1

S.No	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	C	Manufacturing	C6	Chemical and chemical products, pharmaceuticals, medicinal chemical and	100

## III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

\*No. of Companies for which information is to be given

41

Pre-fill All

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1	AARANYAK URMI LIMITED	U15400GJ2017PLC100157	Subsidiary	100
2	AASTHAN DATES LIMITED	U01122RJ2010PLC030642	Subsidiary	100

3	AMAL LIMITED	L24100MH1974PLC017594	Associate	49.85
4	ANCHOR ADHESIVES PVT LTD	U24100MH1992PTC067870	Subsidiary	100
5	ATUL BIOSCIENCE LIMITED	U24230GJ1997PLC032369	Subsidiary	100
6	ATUL BIO SPACE LIMITED	U01500GJ2005PLC045244	Subsidiary	100
7	Atul Brasil Quimicos Ltda		Subsidiary	100
8	Atul China Ltd		Subsidiary	100
9	Atul Deutschland GmbH		Subsidiary	100
10	Atul Europe Ltd		Subsidiary	100
11	ATUL FINSERV LIMITED	U51900MH1947PLC005453	Subsidiary	100
12	ATUL FIN RESOURCES LIMITED	U65990GJ2016PLC093639	Subsidiary	100
13	ATUL INFOTECH PRIVATE LIMIT	U72200GJ2000PTC038460	Subsidiary	100
14	Atul Middle East FZ-LLC		Subsidiary	100
15	ATUL NIVESH LIMITED	U70100GJ2016PLC093630	Subsidiary	100
16	ATUL RAJASTHAN DATE PALM	U01122RJ2009PLC028415	Subsidiary	73.98
17	Atul USA Inc		Subsidiary	100
18	BIYABAN AGRI LIMITED	U01122RJ2010PLC030636	Subsidiary	100
19	DPD Ltd		Subsidiary	100
20	RAJA DATES LIMITED	U01122RJ2010PLC030640	Subsidiary	100
21	ATUL AAROGYA LIMITED	U85110GJ2010PLC062180	Associate	41.67
22	ATUL AYURVEDA LIMITED	U24233GJ2010PLC062028	Associate	41.67
23	ATUL CLEAN ENERGY LIMITED	U40106GJ2010PLC059498	Associate	28.47
24	ATUL CROP CARE LIMITED	U01403GJ2010PLC061909	Associate	26
25	ATUL POLYMERS PRODUCTS L	U24100GJ2011PLC065979	Associate	50
26	ATUL ENTERTAINMENT LIMITE	U92190GJ2010PLC061999	Associate	41.67
27	ATUL HOSPITALITY LIMITED	U55101GJ2010PLC062000	Associate	41.67

28	ATUL (RETAIL) BRANDS LIMITE	U24233GJ2010PLC059517	Associate	43.05
29	ATUL SEEDS LIMITED	U01122GJ2010PLC062769	Associate	43.98
30	JAYATI INFRASTRUCTURE LIMITE	U45200GJ2010PLC062029	Associate	43.98
31	LAPOX POLYMERS LIMITED	U51434GJ2009PLC056053	Associate	20
32	OSIA DAIRY LIMITED	U15200GJ2010PLC061906	Associate	43.98
33	OSIA INFRASTRUCTURE LIMITE	U45200GJ2011PLC064854	Associate	42.53
34	RUDOLF ATUL CHEMICALS LIMITE	U24110GJ2005PLC045564	Joint Venture	50
35	ATUL IRELAND LIMITED		Subsidiary	100
36	ATUL PRODUCTS LIMITED	U24304GJ2020PLC117189	Subsidiary	100
37	ATUL NATURAL DYES LIMITED	U24303GJ2020PLC117088	Subsidiary	100
38	ATUL NATURAL FOODS LIMITE	U15400GJ2020PLC117228	Subsidiary	100
39	ATUL RENEWABLE ENERGY LIMITE	U40108GJ2020PLC117137	Subsidiary	100
40	ATUL LIFESCIENCE LIMITED	U24290GJ2021PLC120451	Subsidiary	100
41	AMAL SPECIALITY CHEMICALS	U24239GJ2020PLC117229	Associate	49.85

#### IV. SHARE CAPITAL, DEBENTURES AND OTHER SECURITIES OF THE COMPANY

##### (i) \*SHARE CAPITAL

###### (a) Equity share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Total number of equity shares	80,000,000	29,587,051	29,587,051	29,587,051
Total amount of equity shares (in Rupees)	800,000,000	295,870,510	295,870,510	295,870,510

Number of classes

1

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Equity				
Number of equity shares	80,000,000	29,587,051	29,587,051	29,587,051
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	800,000,000	295,870,510	295,870,510	295,870,510

**(b) Preference share capital**

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid-up capital
Total number of preference shares	8,000,000	0	0	0
Total amount of preference shares (in rupees)	800,000,000	0	0	0

Number of classes

1

Class of shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Redeemable Preference Shares				
Number of preference shares	8,000,000	0	0	0
Nominal value per share (in rupees)	100	100	100	100
Total amount of preference shares (in rupees)	800,000,000	0	0	0

**(c) Unclassified share capital**

Particulars	Authorised Capital
Total amount of unclassified shares	0

**(d) Break-up of paid-up share capital**

Class of shares	Number of shares	Total nominal amount	Total Paid-up amount	Total premium
<b>Equity shares</b>				
<b>At the beginning of the year</b>	29,661,733	296,617,330	296,617,330	
<b>Increase during the year</b>	0	0	0	0
i. Public Issues	0	0	0	
ii. Rights issue	0	0	0	0
iii. Bonus issue	0	0	0	0
iv. Private Placement/ Preferential allotment	0	0	0	0
v. ESOPs	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0
vii. Conversion of Preference share	0	0	0	0
viii. Conversion of Debentures	0	0	0	0
ix. GDRs/ADRs	0	0	0	0

x. Others, specify				
<b>Decrease during the year</b>	74,682	746,820	746,820	498,023,133
i. Buy-back of shares	74,682	746,820	746,820	498,023,133
ii. Shares forfeited	0	0	0	0
iii. Reduction of share capital	0	0	0	0
iv. Others, specify				
<b>At the end of the year</b>	29,587,051	295,870,510	295,870,510	
<b>Preference shares</b>				
<b>At the beginning of the year</b>	0	0	0	
<b>Increase during the year</b>	0	0	0	0
i. Issues of shares	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0
iii. Others, specify				
<b>Decrease during the year</b>	0	0	0	0
i. Redemption of shares	0	0	0	0
ii. Shares forfeited	0	0	0	0
iii. Reduction of share capital	0	0	0	0
iv. Others, specify				
<b>At the end of the year</b>	0	0	0	

(ii) Details of stock split/consolidation during the year (for each class of shares)

0

Class of shares		(i)	(ii)	(iii)
Before split / Consolidation	Number of shares			
	Face value per share			
After split / Consolidation	Number of shares			
	Face value per share			

**(iii) Details of shares/Debentures Transfers since closure date of last financial year (or in the case of the first return at any time since the incorporation of the company) \***

Nil

[Details being provided in a CD/Digital Media]

Yes  No  Not Applicable

Separate sheet attached for details of transfers

Yes  No

Note: In case list of transfer exceeds 10, option for submission as a separate sheet attachment or submission in a CD/Digital Media may be shown.

Date of the previous annual general meeting	<input type="text"/>
---	----------------------

Date of registration of transfer (Date Month Year)	<input type="text"/>
--	----------------------

Type of transfer	<input type="text"/>	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
------------------	----------------------	--

Number of Shares/ Debentures/ Units Transferred	<input type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input type="text"/>
---	----------------------	---	----------------------

Ledger Folio of Transferor	<input type="text"/>
----------------------------	----------------------

Transferor's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Ledger Folio of Transferee	<input type="text"/>
----------------------------	----------------------

Transferee's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)	<input type="text"/>
--	----------------------

Type of transfer	<input type="text"/>	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
------------------	----------------------	--

Number of Shares/ Debentures/ Units Transferred	<input type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input type="text"/>
---	----------------------	---	----------------------

Ledger Folio of Transferor		<input type="text"/>		
Transferor's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>	
	Surname	middle name	first name	
Ledger Folio of Transferee		<input type="text"/>		
Transferee's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>	
	Surname	middle name	first name	

**(iv) \*Indebtedness including debentures (Outstanding as at the end of financial year)**

Particulars	Number of units	Nominal value per unit	Total value
Non-convertible debentures	0	0	0
Partly convertible debentures	0	0	0
Fully convertible debentures	0	0	0
Secured Loans (including interest outstanding/accrued but not due for payment) excluding deposits			0
Unsecured Loans (including interest outstanding/accrued but not due for payment) excluding deposits			0
Deposit			0
<b>Total</b>			0

**Details of debentures**

Class of debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Non-convertible debentures	0	0	0	0
Partly convertible debentures	0	0	0	0
Fully convertible debentures	0	0	0	0

**(v) Securities (other than shares and debentures)**



Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Total					

**V. \*Turnover and net worth of the company (as defined in the Companies Act, 2013)**

**(i) Turnover**

35,123,489,941

**(ii) Net worth of the Company**

37,113,414,786

**VI. (a) \*SHARE HOLDING PATTERN - Promoters**

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	880,725	2.98	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	12,413,672	41.96	0	

10.	Others	0	0	0	
	<b>Total</b>	13,294,397	44.94	0	0

**Total number of shareholders (promoters)**

23

**(b) \*SHARE HOLDING PATTERN - Public/Other than promoters**

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	5,408,799	18.28	0	
	(ii) Non-resident Indian (NRI)	148,407	0.5	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	229,798	0.78	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	639,569	2.16	0	
4.	Banks	16,914	0.06	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	2,805,569	9.48	0	
7.	Mutual funds	6,153,568	20.8	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	520,250	1.76	0	
10.	Others Trust and others	369,780	1.25	0	
	<b>Total</b>	16,292,654	55.07	0	0

**Total number of shareholders (other than promoters)**

50,174

**Total number of shareholders (Promoters+Public/  
Other than promoters)**

50,197

**(c) \*Details of Foreign institutional investors' (FIIs) holding shares of the company**

1

Name of the FII	Address	Date of Incorporation	Country of Incorporation	Number of shares held	% of shares held
As per Annexure B	As per Annexure B				

**VII. \*NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS  
(Details, Promoters, Members (other than promoters), Debenture holders)**

Details	At the beginning of the year	At the end of the year
Promoters	23	23
Members (other than promoters)	35,804	50,174
Debenture holders	0	0

**VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL****(A) \*Composition of Board of Directors**

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
<b>A. Promoter</b>	2	0	2	0	0.99	0
<b>B. Non-Promoter</b>	2	7	2	7	0.02	0.1
(i) Non-Independent	2	1	2	1	0.02	0.05
(ii) Independent	0	6	0	6	0	0.05
<b>C. Nominee Directors representing</b>	0	0	0	0	0	0
(i) Banks & FIs	0	0	0	0	0	0
(ii) Investing institutions	0	0	0	0	0	0
(iii) Government	0	0	0	0	0	0
(iv) Small share holders	0	0	0	0	0	0
(v) Others	0	0	0	0	0	0
Total	4	7	4	7	1.01	0.1

Number of Directors and Key managerial personnel (who is not director) as on the financial year end date

13

**(B) (i) \*Details of directors and Key managerial personnel as on the closure of financial year**

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
SUNIL SIDDHARTH LA	00045590	Managing Director	91,772	
BHARATHY NARAYAN	00198716	Whole-time director	5,800	
BANSIDHAR SUNDERI	00035019	Director	162	
SAMVEGBHAI ARVIND	00009278	Managing Director	202,377	
SUSIM MUKUL DATTA	00032812	Director	10,000	
VEDANTHACHARI SRI	00030248	Director	5,000	
RAJENDRA AMBALAL	00009851	Director	14,960	
GOPI KANNAN RENGARAJAN	00048645	Whole-time director	50	
MUKUND MANOHAR CHANDRAN	00101004	Director	50	
SHUBHALAKSHMI AMMAL	02599310	Director	50	
BALDEV RAJ ARORA	00194168	Director	100	
LALIT PATNI	ABHPP8893Q	Company Secretary	0	
GOPI KANNAN RENGARAJAN	ABNPT8054F	CFO	50	

**(ii) Particulars of change in director(s) and Key managerial personnel during the year**

0

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation	Nature of change (Appointment/ Change in designation/ Cessation)

**IX. MEETINGS OF MEMBERS/CLASS OF MEMBERS/BOARD/COMMITTEES OF THE BOARD OF DIRECTORS**

**A. MEMBERS/CLASS /REQUISITIONED/NCLT/COURT CONVENED MEETINGS**

Number of meetings held

1

Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	31/07/2020	42,360	119	50.61

**B. BOARD MEETINGS**

\*Number of meetings held

7

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	28/07/2020	11	11	100
2	24/07/2020	11	10	90.91
3	23/10/2020	11	11	100
4	11/12/2020	11	11	100
5	22/12/2020	11	11	100
6	29/01/2021	11	11	100
7	19/03/2021	11	11	100

**C. COMMITTEE MEETINGS**

Number of meetings held

15

S. No.	Type of meeting	Date of meeting	Total Number of Members as on the date of the meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committee	27/04/2020	4	4	100
2	Audit Committee	23/07/2020	4	3	75
3	Audit Committee	22/10/2020	4	4	100
4	Audit Committee	28/01/2021	4	3	75
5	Stakeholder R	27/04/2020	3	3	100
6	Stakeholder R	23/07/2020	3	3	100
7	Stakeholder R	22/10/2020	3	3	100
8	Stakeholder R	28/01/2021	3	3	100
9	Corporate Soc	27/04/2020	3	3	100
10	Nomination an	23/10/2020	3	3	100

**D. \*ATTENDANCE OF DIRECTORS**

S. No.	Name of the director	Board Meetings			Committee Meetings			Whether attended AGM held on
		Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	04/06/2021
								(Y/N/NA)
1	SUNIL SIDDH	7	7	100	10	10	100	Yes
2	BHARATHY N	7	7	100	3	3	100	Yes
3	BANSIDHAR S	7	6	85.71	7	5	71.43	No
4	SAMVEGBHA	7	7	100	0	0	0	Yes
5	SUSIM MUKU	7	7	100	3	3	100	Yes
6	VEDANTHACI	7	7	100	4	4	100	Yes
7	RAJENDRA A	7	7	100	4	4	100	No
8	GOPI KANNA	7	7	100	6	6	100	Yes
9	MUKUND MAI	7	7	100	5	5	100	Yes
10	SHUBHALAKS	7	7	100	1	1	100	Yes
11	BALDEV RAJ	7	7	100	12	12	100	Yes

**X. \*REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**

Nil

Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered

4

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	SUNIL SIDDHARTH	Managing Direct	55,641,778	84,364,000	0	0	140,005,778
2	SAMVEGBHAI ARV	Managing Direct	11,747,812	15,994,560	0	0	27,742,372
3	BHARATHY NARA	Whole-time Dire	15,546,765	0	0	0	15,546,765
4	GOPI KANNAN REI	Whole-time Dire	19,761,306	0	0	0	19,761,306
	Total		102,697,661	100,358,560	0	0	203,056,221

Number of CEO, CFO and Company secretary whose remuneration details to be entered

1

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	LALIT PATNI	Company Secre	8,236,880	0	0	0	8,236,880

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
	Total		8,236,880	0	0	0	8,236,880

Number of other directors whose remuneration details to be entered

7

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	RAJENDRA AMBAL	Director	0	975,000	0	0	975,000
2	BANSIDHAR SUND	Director	0	1,258,000	0	0	1,258,000
3	SUSIM MUKUL DA	Director	0	1,200,000	0	0	1,200,000
4	VEDANTHACHARI	Director	0	1,400,000	0	0	1,400,000
5	MUKUND MANOHA	Director	0	1,500,000	0	0	1,500,000
6	SHUBHALAKSHMI	Director	0	1,100,000	0	0	1,100,000
7	BALDEV RAJ AROI	Director	0	1,800,000	0	0	1,800,000
	Total		0	9,233,000	0	0	9,233,000

#### XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

\* A. Whether the company has made compliances and disclosures in respect of applicable provisions of the Companies Act, 2013 during the year  Yes  No

B. If No, give reasons/observations

#### XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

(A) DETAILS OF PENALTIES / PUNISHMENT IMPOSED ON COMPANY/DIRECTORS /OFFICERS  Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order	Name of the Act and section under which penalised / punished	Details of penalty/ punishment	Details of appeal (if any) including present status

(B) DETAILS OF COMPOUNDING OF OFFENCES  Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order	Name of the Act and section under which offence committed	Particulars of offence	Amount of compounding (in Rupees)

**XIII. Whether complete list of shareholders, debenture holders has been enclosed as an attachment**

Yes  No

(In case of 'No', submit the details separately through the method specified in instruction kit)

**XIV. COMPLIANCE OF SUB-SECTION (2) OF SECTION 92, IN CASE OF LISTED COMPANIES**

In case of a listed company or a company having paid up share capital of Ten Crore rupees or more or turnover of Fifty Crore rupees or more, details of company secretary in whole time practice certifying the annual return in Form MGT-8.

Name

Ashish C Doshi

Whether associate or fellow

Associate  Fellow

Certificate of practice number

2356

**I/We certify that:**

(a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.

(b) Unless otherwise expressly stated to the contrary elsewhere in this Return, the Company has complied with all the provisions of the Act during the financial year.

**Declaration**

I am Authorised by the Board of Directors of the company vide resolution no. ...  dated

(DD/MM/YYYY) to sign this form and declare that all the requirements of the Companies Act, 2013 and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been complied with. I further declare that:

1. Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.
2. All the required attachments have been completely and legibly attached to this form.

**Note: Attention is also drawn to the provisions of Section 447, section 448 and 449 of the Companies Act, 2013 which provide for punishment for fraud, punishment for false statement and punishment for false evidence respectively.**

**To be digitally signed by**

Director

DIN of the director

00048645

**To be digitally signed by**

Company Secretary

Company secretary in practice

Membership number

4625

Certificate of practice number



**Attachments**

- 1. List of share holders, debenture holders
- 2. Approval letter for extension of AGM;
- 3. Copy of MGT-8;
- 4. Optional Attachment(s), if any

<b>Attach</b>
<b>Attach</b>
<b>Attach</b>
<b>Attach</b>

**List of attachments**

Draft MGT - 8 2020-21.pdf
Committee Meetings.pdf
Detail of FII_FPI.pdf

<b>Remove attachment</b>
--------------------------

---

Modify
--------

Check Form
------------

Prescrutiny
-------------

Submit
--------

---

**This eForm has been taken on file maintained by the Registrar of Companies through electronic mode and on the basis of statement of correctness given by the company**

<b>IX MEETINGS OF MEMBERS/CLASS OF MEMBERS/BOARD/COMMITTEES OF THE BOARD OF DIRECTORS</b>					
<b>C Committee Meetings</b>					
<b>Number of Meetings held</b>				15	
<b>List of other 5 committee meetings</b>				<b>Attendance</b>	
<b>Sr. No.</b>	<b>Type of Meeting</b>	<b>Date of Meeting</b>	<b>Total No. of Members as on the date of meeting</b>	<b>No. of Member attended</b>	<b>% of attendance</b>
11	Investment Committee	22/10/2020	5	5	100
12	Investment Committee	11/12/2020	5	5	100
13	Investment Committee	18/03/2021	5	5	100
14	Risk Management Committee	22/10/2020	3	3	100
15	Risk Management Committee	28/01/2021	3	3	100

Atul Limited									
Details in respect of shares held by or on behalf of the Filis/ FPIs.									
Sr. No	Name Of Fil/FPI	FII/FPI	Folio No/DP Id	Pan No.	Address	Country Of Incorporation	Regn. No. with SEBI / RBI	No. of Share	% of share holding
1	DIMENSIONAL EMERGING CORE EQUITY MARKET ETF OF DIMENSIONAL ETF TRUST	FPI	IN30005410112036	AADTD6744K	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-US-FP-0827-20/ NA	997	0.0034
2	ELARA GLOBAL FUNDS-ELARA EMERGING MARKETS FUND	FPI	IN30134820148240	AACCE1807A	ICICI BANK LTD SMS DEPT 1ST FLOOR EMPIRE COMPLEX 414 S B MARG LOWER PAREL MUMBAI MAHARASHTRA		INMUFP240816/ NA	1550	0.0052
3	EMERGING MARKETS CORE EQUITY PORTFOLIO (THE PORTFOLIO) OF DFA INVESTMENT DIMENSIONS GROUP INC. (DFAIDG)	FPI	IN30005410013410	AACCD1644G	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-US-FP-0314-16/N.A.	101950	0.3446
4	EMERGING MARKETS SMALL CAPITALIZATION EQUITY INDEX FUND B	FPI	IN30343810016679	AAAAE3543M	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI		INUSFP172517/CIRCULAR NO 533	3837	0.013
5	FLEXSHARES MORNINGSTAR EMERGING MARKETS FACTOR TILT INDEX FUND	FPI	IN30343810011537	AAATF4143K	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI		INUSFP242515/CIRCULAR NO.533	259	0.0009
6	ISHARES CORE MSCI EM IMI UCITS ETF	FPI	IN30005410105204	AADCI7836E	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-IR-FP-0734-15/NA	30958	0.1046
7	ISHARES INDIA SC MAURITIUS COMPANY	FPI	IN30005410104453	AACCI7987F	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-MU-FP-0503-15/NA	26939	0.091
8	KIM PRIVATE PRIME GLOBAL EMERGING EQUITY MASTER INVESTMENT TRUST 2	FPI	IN30014210769583	AADTK7122J	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI		INSKFP071919/A.P. (DIR SERIES) CIRCULAR NO 112	2872	0.0097
9	PUBLIC EMPLOYEES RETIREMENT ASSOCIATION OF NEW MEXICO	FPI	IN30014210743212	AABTP6710H	HSBC SECURITIES SERVICES 11TH FLR, BLDG NO.3, NESCO - IT PARK NESCO COMPLEX, W E HIGHWAY GOREGAON EAST, MUMBAI		INUSFP216615/A.P.(DIR SERIES) CIRCULAR NO.112	984	0.0033
10	SOCIETE GENERALE - ODI	FPI	IN30378610007557	AABC57484C	SBI-SG GLOBAL SECURITIES SERVICES PL JEEVAN SEVA EXTENSION BUILDING GROUND FLOOR S V ROAD SANTACRUZ WEST MUMBAI		INFRFP100119/ NA	5	0
11	STATE STREET MSCI ACWI EX USA IMI SCREENED NON-LENDING COMMON TRUST FUND	FPI	IN30016710132344	AAPTS8365R	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI		INUSFP234015/NA	205	0.0007
12	STATE STREET MSCI EMERGING MARKETS SMALL CAP INDEX NON-LENDING COMMON TRUST FUND	FPI	IN30016710055675	AAITS0342K	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI		INUSFP022816/NA	7988	0.027
13	AB SICAV I - INDIA GROWTH PORTFOLIO	FPI	IN30005410099516	AAICA0319F	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-LU-FP-0203-18/NA	10200	0.0345
14	EB DV ACWI EX-U.S. SMALL CAP FUND	FPI	IN30016710112575	AAATE5261B	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI		INUSFP136316/NA	1085	0.0037
15	EXCEL FUNDS MAURITIUS COMPANY LTD	FPI	IN30005410085777	AADCE9744R	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-MU-FP-1252-15/NA	2680	0.0091
16	ISHARES CORE EMERGING MARKETS MAURITIUS CO	FPI	IN30005410105077	AADCI1923N	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-MU-FP-0520-15/NA	122165	0.4129
17	NORTHERN TRUST COLLECTIVE EMERGING MARKETS SMALL CAP INDEX FUND- NON LENDING	FPI	IN30005410085015	AACTN1585B	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-US-FP-0952-15/NA	15179	0.0513
18	OREGON PUBLIC EMPLOYEES RETIREMENT SYSTEM MANAGED THROUGH WILLIAM BLAIR AND COMPANY II	FPI	IN30016710140738	AAATO2984K	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI		INUSFP006417/NA	19120	0.0646
19	SSGA SPDR ETFs EUROPE I PUBLIC LIMITED COMPANY - SPDR MSCI EMERGING MARKETS SMALL CAP UCITS ETF	FPI	IN30016710121383	AAUCS9527P	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI		INIRFP026114/NA	2954	0.01
20	STICHTING DEPOSITARY APG EMERGING MARKETS EQUITY POOL	FPI	IN30343810013442	AAVCS6547E	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI		INNLF147615/CIRCULAR NO. 533	22338	0.0755
21	THE EMERGING MARKETS SMALL CAP SERIES OF THE DFA INVESTMENT TRUST COMPANY	FPI	IN30005410013268	AAATD7768G	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-US-FP-0339-16/NA	69658	0.2354
22	THE REGENTS OF THE UNIVERSITY OF CALIFORNIA - STATE STREET GLOBAL ADVISORS	FPI	IN30016710146165	AADCT1007C	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI		INUSFP242917/NA	13379	0.0452
23	TIZIANA GMBH	FPI	IN30014210774118	AAICT0716D	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI		INGEFP047420/A.P. DIR SER CIR NO 112	175	0.0006
24	UTAH STATE RETIREMENT SYSTEMS	FPI	IN30005410023614	AAATU2901Q	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-US-FP-2719-16/N.A.	590	0.002
25	BVK PERSONALVORSORGE DES KANTONS ZURICH	FPI	IN30343810014327	AACTB5009N	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI		INCHFP113016/CIRCULAR NO. 533	4894	0.0165
26	CALIFORNIA STATE TEACHERS RETIREMENT SYSTEM - AQR CAPITAL MANAGEMENT, LLC	FPI	IN30016710161102	AAFFC0559D	DEUTSCHE BANK AG, DB HOUSE, HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI		INUSFP000920/NA	5418	0.0183
27	COLLEGE RETIREMENT EQUITIES FUND - STOCK ACCOUNT	FPI	IN30016710049693	AAACC9040K	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI		INUSFP083617/NA	11083	0.0375
28	EMERGING MARKETS CORE EQUITY FUND OF DIMENSIONAL FUNDS ICVC	FPI	IN30016710156689	AACCD1506B	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI		INUKFP032216/ NA	6419	0.0217
29	EMERGING MARKETS SOCIAL CORE EQUITY PORTFOLIO OF DFA INVESTMENT DIMENSIONS GROUP INC.	FPI	IN30005410017712	AABCE6264C	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI		IN-US-FP-0315-16/N.A.	4562	0.0154
30	GOLDMAN SACHS (SINGAPORE) PTE. - ODI	FPI	IN30152430051010	AAFCG0345N	STANDARD CHARTERED BANK SECURITIES SERVICES OPERATIONS 3RD FLOOR, 23-25, M.G ROAD FORT, MUMBAI, INDIA		INSGFP097519/ NA	371	0.0013
31	GOLDMAN SACHS FUNDS - GOLDMAN SACHS EMERGING MARKETS EQUITY PORTFOLIO	FPI	IN30016710005578	AACCG2692R	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI		INLUF143915/EC.CO.FII/2496/11.01.02(153)/2000-2001	160120	0.5412

32	INDIA MIDCAP (MAURITIUS) LTD.	FPI	IN30014210694504	AACCI2898H	HSBC SECURITIES SERVICES 11TH FLR, BLDG NO.3, NESCO - IT PARK NESCO COMPLEX, W E HIGHWAY GOREGAON EAST, MUMBAI	INMUFP213816/A.P. (DIR SERIES) CIRCULAR NO.112	221273	0.7479
33	ISHARES IV PUBLIC LIMITED COMPANY- ISHARES MSCI EM IMI ESG SCREENED UCITS ETF	FPI	IN30005410106088	AAFCI0124F	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-IR-FP-0680-18/NA	2814	0.0095
34	MERCURY SERIES UNION MID AND SMALL CAP FUND	FPI	IN30014220770863	AAGTM3830J	HSBC SECURITIES SERVICES 11TH FLOOR BLDG 3 NESCO IT PARK NESCO COMPLEX W E HIGHWAY GOREGAON EAST MUMBAI	INCYFP044519/A.P. (DIR SERIES) CIRCULAR NO 112	3253	0.011
35	OMERS ADMINISTRATION CORPORATION - OAC CUSTODY ACCOUNT (SCV6)	FPI	IN30005410102126	AAAAO0108N	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-CA-FP-1592-17/NA	3530	0.0119
36	PUB EQUITIES EMERGING MARKETS 1	FPI	IN30343810015452	AACTP9572E	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INCHFP001517/CIRCULAR NO. 533	6263	0.0212
37	ALLIANZGI NFI EMERGING MARKETS VALUE FUND	FPI	IN30016710111373	AADA0795L	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP183415/NA	7413	0.0251
38	AMERICAN CENTURY ETF TRUST - AVANTIS EMERGING MARKETS EQUITY FUND	FPI	IN30016710160958	AAHTA6005C	DEUTSCHE BANK AG, DB HOUSE, HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP004020/NA	395	0.0013
39	CF DV ACWI EX-U.S. IMI FUND	FPI	IN30016710148961	AACT2858A	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP018918/NA	99	0.0003
40	CITIGROUP PENSION PLAN - WILLIAM BLAIR INVESTMENT MANAGEMENT LLC	FPI	IN30016710162814	AAATC8808N	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP039720/NA	4868	0.0165
41	CITY OF LOS ANGELES FIRE AND POLICE PENSION PLAN	FPI	IN30005410032536	AABTC0471C	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-0652-14/NA	1814	0.0061
42	FIRST COMMERCIAL BANK IN ITS CAPACITY AS MASTER CUSTODIAN OF CAPITAL INDIA MEDIUM AND SMALL CAP EQUITY FUND	FPI	IN30005410103862	AABTC2852M	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-TW-FP-1608-16/NA	3000	0.0101
43	FLORIDA RETIREMENT SYSTEM - WILLIAM BLAIR & COMPANY LLC (EMSC)	FPI	IN30016710131593	AAAJF0103H	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP207115/NA	50094	0.1693
44	ISHARES EMERGING MARKETS IMI EQUITY INDEX FUND	FPI	IN30343810006451	AABTB6669D	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INAUFP233415/CIRCULAR NO. 533	2484	0.0084
45	ISHARES EMSC MAURITIUS CO	FPI	IN30005410104429	AACCI5902Q	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-MU-FP-0519-15/NA	5445	0.0184
46	MACKENZIE MAXIMUM DIVERSIFICATION EMERGING MARKETS INDEX ETF	FPI	IN30016710138794	AAEAM9600M	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INCAFP217216/NA	212	0.0007
47	MORGAN STANLEY ASSET MANAGEMENT INC SUB-	FII	69700	NA	C/O STOCK HOLDING CORPN INDIA LTD 224 "MITTAL COURT" "B" WING NARIMAN POINT MUMBAI	NA	800	0.0027
48	PEOPLE&apos;S BANK OF CHINA	FPI	IN30016710121650	AAAJP1319B	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INCNFP043014/NA	2011	0.0068
49	STATE STREET GLOBAL SMALL CAP EQUITY EX-U.S. INDEX NON-LENDING SERIES FUND	FPI	IN30016710080770	AAJTS4147D	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP023316/NA	20543	0.0694
50	BLACKROCK AQUILA EMERGING MARKETS FUND	FPI	IN30016710113756	AABTA6155F	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUKFP322416/NA	911	0.0031
51	CALSTRS MANAGED BY STATE STREET GLOBAL ADVISORS	FPI	IN30016710019557	AAFFC0559D	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP112717/NA	1993	0.0067
52	CITY OF NEW YORK GROUP TRUST	FPI	IN30016710030167	AAATC8419K	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP213516/NA	10312	0.0349
53	CREDIT SUISSE (SINGAPORE) LIMITED - ODI	FPI	IN30005410109141	AAACC7328N	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-SG-FP-0039-20/ NA	321	0.0011
54	GOVERNMENT PENSION FUND GLOBAL	FPI	IN30005410076881	AACCN1454E	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-NO-FP-1305-16/NA	141267	0.4775
55	GROWTH MARKETS EQUITY SUB-TRUST N	FPI	IN30014220770437	AABTG7589D	HSBC SECURITIES SERVICES 11TH FLOOR BLDG 3 NESCO IT PARK NESCO COMPLEX W E HIGHWAY GOREGAON EAST MUMBAI	INCYFP143415/A.P. (DIR SERIES) CIRCULAR NO 112	1285	0.0043
56	GYMKHANA PARTNERS L.P.	FPI	IN30005410092551	AAQFG3264J	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-2999-16/NA	24275	0.082
57	INTERNATIONAL MONETARY FUND - MANAGER A	FPI	IN30005410112315	EXEMPTCATG	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-2878-16/ NA	2204	0.0074
58	MV SCIF MAURITIUS	FPI	IN30016710081087	AAGCM4803N	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INMUFP003417/NA	7007	0.0237
59	PUB EQUITIES EMERGING MARKETS 2	FPI	IN30343810015477	AACTP9573F	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INCHFP001417/CIRCULAR NO. 533	4585	0.0155
60	STATE STREET MSCI EMERGING MARKETS SMALL CAP INDEX SECURITIES LENDING FUND	FPI	IN30016710047132	AAHTS6002P	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP022916/NA	4138	0.014
61	VANGUARD FIDUCIARY TRUST COMPANY INSTITUTIONAL TOTAL INTERNATIONAL STOCK MARKET INDEX TRUST	FPI	IN30343810018480	AACTV9551H	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP022719/CIRCULAR NO. 533	7377	0.0249
62	ALASKA PERMANENT FUND	FPI	IN30016710021055	AADTA7800K	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP117816/NA	2271	0.0077
63	BLACKROCK GLOBAL FUNDS GLOBAL SMALLCAP FUND	FPI	IN30016710023635	AACCM3444P	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INLUFP210016/NA	1374	0.0046
64	CALIFORNIA PUBLIC EMPLOYEES&apos; RETIREMENT SYSTEM	FPI	IN30016710032725	AAATC6038J	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP111015/NA	39622	0.1339
65	DSP GLOBAL FUNDS ICAV - DSP INDIA EQUITY FUND	FPI	IN30014210767723	AAHCD1709R	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI	INIRFP019719/A.P. (DIR SERIES) CIRCULAR NO 112	153	0.0005

66	EMERGING MARKETS SMALL CAPITALIZATION EQUITY INDEX FUND	FPI	IN30343810017116	AAAAE5365K	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP176217/CIRCULAR NO 533	33912	0.1146
67	EMERGING MARKETS SMALL CAPITALIZATION EQUITY INDEX NON-LENDABLE FUND	FPI	IN30343810016687	AAAAE5345P	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP172617/CIRCULAR NO 533	45185	0.1527
68	FIDELITY SALEM STREET TRUST FIDELITY TOTAL INTERNATIONAL INDEX FUND	FPI	IN30005410090210	AAATF5391H	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-1501-16/NA	4782	0.0162
69	GOLDMAN SACHS FUNDS - GOLDMAN SACHS EMERGING MARKETS MULTI-ASSET PORTFOLIO	FPI	IN30016710153373	AAHCG0481F	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INLUF083218/NA	366	0.0012
70	GREATER INDIA PORTFOLIO	FPI	IN30016710062247	AAATS3449K	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP325016/NA	11387	0.0385
71	GUIDESTONE FUNDS EMERGING MARKETS EQUITY FUND	FPI	IN30005410094616	AACTG7732P	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-1497-17/NA	5158	0.0174
72	HANDI HUTA JAYA	FPI	IN30081210506290	ANOPH7009K	831 MOUNTBATTEN RD, #04-01 TESSA LODGE SINGAPORE	INIDFP196115/ NA	1500	0.0051
73	ISHARES MSCI EM SMALL CAP UCITS ETF	FPI	IN30005410105132	AADCJ3486J	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-IR-FP-2571-16/NA	4607	0.0156
74	KOTAK FUNDS - INDIA MIDCAP FUND	FPI	IN30014210753517	AAGCK4148L	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI	INLUF336616/A.P. (DIR SERIES) CIRCULAR NO 112	156951	0.5305
75	VANGUARD TOTAL INTERNATIONAL STOCK INDEX FUND	FPI	IN30343810003257	AABTV0442N	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP101917/CIRCULAR NO.533	219217	0.7409
76	VARANIUM INDIA OPPORTUNITY LTD	FPI	IN30378610000359	AAFCP1017J	SBI SG GLOBAL SECURITIES SERVICE P L JEEVAN SEVA ANNEXE BUILDING, A WING GR FLOOR, S.V. ROAD, SANTACRUZ W MUMBAI	INMUF067814/A.P.(DIR SERIES) CIRCULAR NO 53	217	0.0007
77	VIKASA INDIA EIF I FUND	FPI	IN30371911035620	AAECV7994B	Tower 3, Wing B, Kohinoor City Mall, Kohinoor City,Kiroli Road, Kurla(W), MUMBAI MAHARASHTRA	20140400/11111	462	0.0016
78	WISDOMTREE EMERGING MARKETS EX-STATE-OWNED ENTERPRISES FUND	FPI	IN30005410103194	AAATW3397G	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-0262-15/NA	29426	0.0995
79	WISDOMTREE INDIA EX-STATE-OWNED ENTERPRISES FUND	FPI	IN30005410103356	AAATW5311J	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-0126-19/NA	75	0.0003
80	ALLIANZ GLOBAL INVESTORS GMBH ACTING ON BEHALF OF ALLIANZGI-FONDS DSPT	FPI	IN30343810014255	AAAAD7542B	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INGEFP084616/CIRCULAR NO. 533	2568	0.0087
81	CALIFORNIA STATE TEACHERS RETIREMENT SYSTEM - STATE STREET GLOBAL ADVISORS TRUST COMPANY 1	FPI	IN30016710161127	AAFFC0559D	DEUTSCHE BANK AG, DB HOUSE, HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP001020/NA	5107	0.0173
82	GOLDMAN SACHS INDIA LIMITED	FPI	IN30016710044058	AADC0260C	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INMUF146915/NA	173831	0.5875
83	MCKINLEY CAPITAL MEASA FUND OEIC LIMITED	FPI	IN30014210760924	AALCM7458C	HSBC SECURITIES SERVICES 11TH FLR, BLDG NO.3, NESCO - IT PARK NESCO COMPLEX, W E HIGHWAY GOREGAON EAST, MUMBAI	INUEFP036618/A.P.(DIR SERIES) CIRCULAR NO.112	1648	0.0056
84	MSCI ACWI EX-U.S. IMI INDEX FUND B2	FPI	IN30343810019275	AJAM5506D	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP062119/CIRCULAR NO. 533	1949	0.0066
85	NORTHERN TRUST COMMON ALL COUNTRY WORLD EX-US INVESTABLE MARKET INDEX FUND-NON LENDING	FPI	IN30005410038629	AABTN0934H	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-2461-15/NA	419	0.0014
86	QIC INTERNATIONAL EQUITIES FUND	FPI	IN30005410084852	AAATQ0265H	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-AU-FP-0713-16/NA	320	0.0011
87	SHELL PENSIONS TRUST LIMITED AS TRUSTEE OF THE SHELL CONTRIBUTORY PENSION FUND	FPI	IN30343810006941	AAETS8177Q	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUKFP044415/CIRCULAR NO.53	5573	0.0188
88	SIIP INDIA OPPORTUNITIES FUND	FPI	IN30005410075801	AAOC52099A	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-IR-FP-0775-17/NA	1859	0.0063
89	STATE STREET GLOBAL ALL CAP EQUITY EX-US INDEX PORTFOLIO	FPI	IN30016710128284	AAPTS4453E	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP143615/NA	1482	0.005
90	VANGUARD INVESTMENT SERIES PLC - VANGUARD ESG EMERGING MARKETS ALL CAP EQUITY INDEX FUND	FPI	IN30014210772917	AAHCX3894R	HSBC SECURITIES SERVICES 11TH FLOOR BLDG 3 NESCO IT PARK NESCO COMPLEX W E HIGHWAY GOREGAON EAST MUMBAI	INIRFP049720/A.P. (DIR SERIES) CIRCULAR NO 112	222	0.0008
91	WILLIAM BLAIR EMERGING MARKETS SMALL CAP GROWTH COLLECTIVE INVESTMENT FUND	FPI	IN30016710116328	AAATW3081H	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP166716/NA	31268	0.1057
92	AMERICAN CENTURY ETF TRUST-AVANTIS EMERGING MARKETS EQUITY ETF	FPI	IN30016710159933	AAHTA5157H	DEUTSCHE BANK AG, DB HOUSE, HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP083219/NA	2445	0.0083
93	DFA INTERNATIONAL CORE EQUITY FUND	FPI	IN30152430049717	AABTD3438N	STANDARD CHARTERED BANK SECURITIES SERVICES, 3RD FLOOR 23-25 M.G. ROAD FORT, MUMBAI	INCAFP268915/ NA	1268	0.0043
94	DFA INTERNATIONAL VECTOR EQUITY FUND	FPI	IN30152430049709	AABTD3519Q	STANDARD CHARTERED BANK SECURITIES SERVICES, 3RD FLOOR 23-25 M.G. ROAD FORT, MUMBAI	INCAFP268815/ NA	1269	0.0043
95	DIMENSIONAL FUNDS PLC - MULTI-FACTOR EQUITY FUND	FPI	IN30016710128022	AAFCD1235L	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INIRFP127115/NA	1382	0.0047
96	EMERGING MARKETS SUSTAINABILITY CORE 1 PORTFOLIO	FPI	IN30005410097678	AAEC9320Q	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-0240-18/NA	3401	0.0115
97	GOLDMAN SACHS TRUST - GOLDMAN SACHS EMERGING MARKETS EQUITY FUND	FPI	IN30343810002939	AAAAG1053C	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP143015/CIRCULAR NO.53	119973	0.4055
98	GS INDIA EQUITY	FPI	IN30179910089196	AAGAG1254K	BNP PARIBAS HOUSE 1 NORTH AVENUE, MAKER MAXITY BANDRA KURLA COMPLEX, BANDRA EAST MUMBAI	INGEFP021920/ NA	4412	0.0149
99	JOHN HANCOCK FUNDS II EMERGING MARKETS FUND	FPI	IN30005410080999	AAATJ9049G	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-1649-15/NA	603	0.002
100	KUWAIT INVESTMENT AUTHORITY FUND 227	FPI	IN30005410055118	AAATK3858Q	CITIBANK N.A. CUSTODY SERVICES FIFC-11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-KU-FP-1457-17/NA	63068	0.2132

101	LEGAL AND GENERAL ASSURANCE (PENSION MANAGEMENT) LIMITED	FPI	IN30005410004986	AABCL0025A	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-UK-FP-1156-17/EC.CO.FII/3481/11.01.02(625)/2000-2001	692	0.0023
102	WASHINGTON STATE INVESTMENT BOARD MANAGED BY STATE STREET GLOBAL ADVISORS GUARANTEED EDUCATION TUITION-GET	FPI	IN30016710105044	AAAJW0112B	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP098215/NA	151	0.0005
103	WILLIAM BLAIR EMERGING INDIA COLLECTIVE INVESTMENT FUND	FPI	IN30016710108979	AAATW2812Q	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP166416/NA	976	0.0033
104	WILLIAM BLAIR SICAV	FPI	IN30005410063765	AAAAW0684M	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-LU-FP-2123-16/NA	61990	0.2095
105	VANGUARD FUNDS PLC / VANGUARD ESG GLOBAL ALL CAP UCITS ETF	FPI	IN30014210777921	AAHCV9696F	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI	INIRFP016921/A.P. DIR SER CIR NO 112	14	0
106	VANGUARD INVESTMENTS FUNDS ICVC-VANGUARD FTSE GLOBAL ALL CAP INDEX FUND	FPI	IN30016710150969	AAGCV3937J	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUKFP043018/NA	210	0.0007
107	WILLIAM BLAIR EMERGING MARKETS SMALL CAP GROWTH FUND	FPI	IN30016710100894	AAATW2514K	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP206216/NA	51813	0.1751
108	WORLD EX U.S. CORE EQUITY PORTFOLIO OF DFA INVESTMENT DIMENSIONS GROUP INC.	FPI	IN30005410074905	AABCW4402G	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-0317-16/NA	3254	0.011
109	STICHTING SHELL PENSIOENFONDS	FPI	IN30343810006932	AACT57576B	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INNLF023317/CIRCULAR NO.533	10575	0.0357
110	THE SULTANATE OF OMAN MINISTRY OF DEFENCE PENSION FUND	FPI	IN30014210751487	AAOAS1206M	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI	INOMFP222316/A.P. (DIR SERIES) CIRCULAR NO 112	3215	0.0109
111	VANGUARD FIDUCIARY TRUST COMPANY INSTITUTIONAL TOTAL INTERNATIONAL STOCK MARKET INDEX TRUST II	FPI	IN30343810020249	AADTV1640C	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP012120/CIRCULAR NO.533	68042	0.23
112	WISDOMTREE INDIA INVESTMENT PORTFOLIO, INC.	FPI	IN30005410102206	AAACV7548L	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-MU-FP-0800-15/NA	9403	0.0318
113	PUBLIC EMPLOYEES RETIREMENT SYSTEM OF MISSISSIPPI	FPI	IN30016710021264	AADCP8726G	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP051117/NA	249	0.0008
114	SANFORD C. BERNSTEIN FUND, INC.	FPI	IN30016710032042	AADC51513J	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP224815/NA	20397	0.0689
115	SPDR S AND P EMERGING MARKETS ETF	FPI	IN30016710031520	AAGT54584D	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP131416/NA	7787	0.0263
116	T.A. WORLD EX U.S. CORE EQUITY PORTFOLIO OF DFA INVESTMENT DIMENSIONS GROUP INC.	FPI	IN30005410025384	AACT9049F	CITIBANK N.A. CUSTODY SERVICES FIFC- 11TH FLR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	IN-US-FP-0316-16/NA	3454	0.0117
117	THE BOEING COMPANY EMPLOYEE RETIREMENT PLANS MASTER TRUST	FPI	IN30343810003458	AAABT6404E	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP073215/CIRCULAR NO.53	13409	0.0453
118	UPS GROUP TRUST	FPI	IN30016710078107	AAATU3821D	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP013716/NA	14359	0.0485
119	VANGUARD FTSE ALL-WORLD EX-US SMALL-CAP INDEXFUND	FPI	IN30016710059172	AAABTV0979Q	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP067617/NA	69764	0.2358
120	VANGUARD TOTAL WORLD STOCK INDEX FUND	FPI	IN30016710047358	AAABTV0279R	DEUTSCHE BANK AG DB HOUSE, HAZARIMAL SOMANI MARG POST BOX NO. 1142, FORT MUMBAI	INUSFP067417/NA	5766	0.0195
121	VIRGINIA RETIREMENT SYSTEM	FPI	IN30016710130865	AAATV3654P	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INUSFP158315/NA	869	0.0029
122	MERCER QIF FUND PLC- MERCER INVESTMENT FUND 1	FPI	IN30016710124393	AAJCM5945N	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INIRFP033015/NA	1655	0.0056
123	PREMIER INVESTMENT FUND LIMITED	FPI	IN30317320000220	AACCP9387L	C/O KOTAK MAHINDRA BANK LIMITED KOTAK INFINITI, BLDG.NO.21, 6TH FLR ZONE IV,CUSTODY SERVS, INFINITY PARK GEN. AK VAIDYA MARG, MALAD E, MUMBAI	INMUF067016/	47998	0.1622
124	PUBLIC EMPLOYEES RETIREMENT SYSTEM OF OHIO	FPI	IN30343810012152	AAATP5186E	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP130016/CIRCULAR NO. 533	3964	0.0134
125	SUNSUPER SUPERANNUATION FUND	FPI	IN30016710096503	AAKTS6613F	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	INAUFP165017/NA	1400	0.0047
126	UNIVERSAL-INVESTMENT-GESELLSCHAFT MBH ON BEHALF OF UI-FONDS BAV RBI AKTIEN	FPI	IN30343810016429	AAAAU9895N	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INGEFP118517/CIRCULAR NO 533	1295	0.0044
127	VANGUARD EMERGING MARKETS STOCK INDEX FUND, A SERIES OF VANGUARD INTERNATIONAL EQUITY INDEX FUNDS	FPI	IN30343810016654	AAATY0918K	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP068617/CIRCULAR NO 533	229347	0.7752
128	VANGUARD ESG INTERNATIONAL STOCK ETF	FPI	IN30343810018375	AACTV8876B	JPMORGAN CHASE BANK N.A. INDIA SUB CUSTODY 6th FLOOR, PARADIGM B MINDSPACE, MALAD W, MUMBAI	INUSFP014619/CIRCULAR NO. 533	1369	0.0046

**SPANJ**  
**& ASSOCIATES**  
**Company Secretaries**  
**Peer Reviewed Firm**

Form No. MGT - 8

[Pursuant to section 92 (2) of the companies Act, 2013 and rule 11 (2) of Companies  
(Management and Administration) Rules, 2014]

**CERTIFICATE BY A COMPANY SECRETARY IN PRACTICE**

I, partner of SPANJ & Associates, have examined the registers, records and books and papers of **ATUL LIMITED** (the Company) as required to be maintained under the Companies Act, 2013 (the Act) and the rules made there under for the financial year ended on 31<sup>st</sup> March, 2021. In my opinion and to the best of my information and according to the examinations carried out by me and explanations furnished to me by the company, its officers and agents in electronic form in online system in view of the prevailing situation of COVID-19 in the country, I certify that:

- A. the Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
- B. during the aforesaid financial year the Company has complied with provisions of the Act & Rules made there under in respect of:
  - 1. its status under the Act;
  - 2. maintenance of registers/records & making entries therein within the time prescribed thereof;
  - 3. filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities within/beyond the prescribed time with/without additional fees as the case may be;
  - 4. calling/ convening/ holding meetings of Board of Directors or its committees, if any, and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
  - 5. closure of Register of Members on 24<sup>th</sup> July, 2020 for e-voting at the AGM of the financial year ended 31<sup>st</sup> March 2020.
  - 6. as informed by the company there were no instances relating to advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;

**SPANJ**  
**& ASSOCIATES**  
**Company Secretaries**  
**Peer Reviewed Firm**

**ATUL LIMITED**

7. Contracts/arrangements with related parties as specified in section 188 of the Act were as per details in Note No. 28.4 of Notes to Accounts. We were given to understand that related party transactions were at arm's length basis which were approved by Audit committee in terms of provisions of Companies Act 2013 as well applicable clauses of SEBI (LODR) Regulations;
8. there were no instances of issue or allotment or ~~buy back of securities~~/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities. The company has appointed and authorized R & T Agents to process transfer or transmission of shares in physical and electronic form and or issue of security certificates as and when required, However during the year under review, Company has bought back 74,682 equity shares from open market through stock exchanges at an average price of ₹ 6,678.58/- per equity share { Volume weighted average price calculated in terms of the SEBI (Buy-back of Securities) Regulations, 2018};
9. There were no instance of keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares during the year.
10. The company has complied with the provisions relating to Declaration and payment of dividend during the year. The company has also transferred unpaid/ unclaimed dividend/other amounts and shares, as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act. Moreover in terms of MCA circular dated 29/05/2017, the company has complied with the procedure as prescribed under Rule 3(a) of IEPF Authority Rules, 2016 and completed process for transfer of shares to designated Demat account as notified by the MCA;
11. signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per sub - sections (3), (4) and (5) thereof;
12. constitution/ appointment/ re-appointments/ retirement/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them however there was no instance of filling up casual vacancies;
13. appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act and have passed necessary resolution with consent of shareholders as proposed in the notice of Annual General Meeting ;



**SPANJ**  
**& ASSOCIATES**  
**Company Secretaries**  
**Peer Reviewed Firm**

**ATUL LIMITED**

14. There were no instance of obtaining approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Companies Act, 2013;
15. there was no instance of acceptance/ renewal/ repayment of public deposits;
16. The amount of borrowings from its directors, members, public financial institutions, banks and others were within the borrowing limits approved by the shareholders and creation/ modification/ satisfaction of charges in that respect was carried out, wherever applicable;
17. loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Companies Act, 2013 as disclosed in notes on accounts to the audited accounts of the company ;
18. The company has not altered the provisions of the Memorandum and/ or Articles of Association of the Company;

Place: Ahmedabad

Date:

Signature:

Name of practicing C S: Ashish C. Doshi,  
PARTNER  
SPANJ & ASSOCIATES  
Company Secretaries  
ACS/FCS No.: F3544  
C P No.: 2356  
P R No.: 702/2020

UDIN: