

Shareholding Pattern under Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

1.	Name of Listed Entity: Atul Limited
2.	Scrip Code/Name of Scrip/Class of Security: 500027
3.	Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c)
	a. If under 31(1)(b) then indicate the report for Quarter ending
	b. If under 31(1)(c) then indicate date of allotment/extinguishment
4.	Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-

	Particulars	Yes*	No*
1	Whether the Listed Entity has issued any partly paid up shares?		No
2	Whether the Listed Entity has issued any Convertible Securities or Warrants?		No
3	Whether the Listed Entity has any shares against which depository receipts are issued?		No
4	Whether the Listed Entity has any shares in locked-in?		No
5	Whether any shares held by promoters are pledge or otherwise encumbered?	Yes	

* If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, locked-in shares, No of shares pledged or otherwise encumbered by promoters, as applicable, shall not be displayed at the time of dissemination on the Stock Exchange website. Also wherever there is 'No' declared by Listed Entity in above table the values will be considered as 'Zero' by default on submission of the format of holding of specified securities.

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Atul Limited

Table I - Summary Statement holding of specified securities

Category	Category of shareholder	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities				No. of Shares Underlying Outstanding convertible securities (including Warrants)	ng, as a % assuming full conversion of convertible securities (as a % of total Shares held)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form
								No of Voting Rights			Total as a % of (A+B+C)			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)	
								Class eg: X	Class eg: y	Total								
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) = (IV)+(V)+	(VIII) As a	(IX)				(X)	(XI)=	(XII)		(XIII)		(XIV)
(A)	Promoter & Promoter Group	27	1,33,00,118	0	0	1,33,00,118	45.17	1,33,00,118	-	1,33,00,118	45.17	0	45.17	0	0	1,30,000	0.98	1,33,00,118
(B)	Public	59,083	1,61,41,637	0	0	1,61,41,637	54.83	1,61,41,637	-	1,61,41,637	54.83	0	54.83	0	0	NA	NA	1,59,05,273
(C)	Non Promoter - Non Public				0				-			0			0	NA	NA	
(C1)	Shares Underlying DRs	-	-	0	0	-	0.00	-	-	-	0.00	0	0.00	0	0	NA	NA	-
(C2)	Shares Held By Employee Trust	-	-	0	0	-	0.00	-	-	-	0.00	0	0.00	0	0	NA	NA	-
	Total	59,110	2,94,41,755	0	0	2,94,41,755	100.00	2,94,41,755	-	2,94,41,755	100.00	0	100.00	0	0	1,30,000	0.44	2,92,05,391

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(d)	Any Other (Specify)		12	1,25,58,552	-	-	1,25,58,552	42.66	1,25,58,552	-	1,25,58,552	42.66	-	42.66	-	-	-	-	1,25,58,552	
	Promoter Trust		5	1,40,444	-	-	1,40,444	0.48	1,40,444	-	1,40,444	0.48	-	0.48	-	-	-	-	1,40,444	
	Samvegbhai Arvindbhai Lalbhai (On behalf of Ankush Trust)	Promoters	1	50,000	-	-	50,000	0.17	50,000	-	50,000	0.17	-	0.17	-	-	-	-	50,000	
	Samvegbhai Arvindbhai Lalbhai (On behalf of Adwait Trust)	Promoters	1	50,000	-	-	50,000	0.17	50,000	-	50,000	0.17	-	0.17	-	-	-	-	50,000	
	Swati Siddharth Lalbhai (On behalf of Siddharth Family Trust)	Promoters	1	35,620	-	-	35,620	0.12	35,620	-	35,620	0.12	-	0.12	-	-	-	-	35,620	
	Sunil Siddharth Lalbhai (On behalf of Vimla Siddharth Family Trust)	Promoters	1	2,824	-	-	2,824	0.01	2,824	-	2,824	0.01	-	0.01	-	-	-	-	2,824	
	Swati Siddharth Lalbhai (On behalf of Sunil Lalbhai Employees Trust)	Promoters	1	2,000	-	-	2,000	0.01	2,000	-	2,000	0.01	-	0.01	-	-	-	-	2,000	
	Bodies Corporate		7	1,24,18,108	-	-	1,24,18,108	42.18	1,24,18,108	-	1,24,18,108	42.18	-	42.18	-	-	-	-	1,24,18,108	
	Aagam Holdings Private Limited	Promoters	1	66,54,100	-	-	66,54,100	22.60	66,54,100	-	66,54,100	22.60	-	22.60	-	-	-	-	66,54,100	
	Arvind Farms Pvt Ltd	Promoters	1	27,96,208	-	-	27,96,208	9.50	27,96,208	-	27,96,208	9.50	-	9.50	-	-	-	-	27,96,208	
	Aagam Agencies Pvt Ltd	Promoters	1	11,95,000	-	-	11,95,000	4.06	11,95,000	-	11,95,000	4.06	-	4.06	-	-	-	-	11,95,000	
	Aayojan Resources Private Ltd	Promoters	1	6,16,400	-	-	6,16,400	2.09	6,16,400	-	6,16,400	2.09	-	2.09	-	-	-	-	6,16,400	
	Akshita Holdings Private Limited	Promoters	1	4,65,300	-	-	4,65,300	1.58	4,65,300	-	4,65,300	1.58	-	1.58	-	-	-	-	4,65,300	
	Adhinami Investments Private Limited	Promoters	1	4,56,000	-	-	4,56,000	1.55	4,56,000	-	4,56,000	1.55	-	1.55	-	-	-	-	4,56,000	
	Anusandhan Investments Limited	Promoters	1	2,35,100	-	-	2,35,100	0.80	2,35,100	-	2,35,100	0.80	-	0.80	-	-	-	-	2,35,100	
	Sub Total (A)(1)		27	1,33,00,118	-	-	1,33,00,118	45.17	1,33,00,118	-	1,33,00,118	45.17	-	45.17	-	-	-	1,30,000	0.98	1,33,00,118
2	Foreign																			
(a)	Individuals (Non-Resident Individuals / Foreign Individuals)		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
(b)	Government		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
(c)	Institutions		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
(d)	Foreign Portfolio Investor		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
(e)	Any Other (Specify)		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Sub Total (A)(2)		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	Total Shareholding Of Promoter And Promoter Group (A)= (A)(1)+(A)(2)		27	1,33,00,118	-	-	1,33,00,118	45.17	1,33,00,118	-	1,33,00,118	45.17	-	45.17	-	-	-	1,30,000	0.98	1,33,00,118

* Out of 2,07,814 shares, Samvegbhai Arvindbhai Lalbhai holds 5,437 shares as trustee of Manini Niranjan Trust (PAN: AAATM1426G)

Details of Shares which remain unclaimed may be given hear along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.

Note :

(1) PAN would not be displayed on website of Stock Exchange(s)

(2) The term 'Encumbrance' has the same meaning as assigned under regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

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Table III - Statement showing shareholding pattern of the Public shareholder

	Category & Name of the shareholders	PAN	Nos. of shareholders	No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities			Shares Underlying Outstanding convertible securities (including	ng, as a % assuming full conversion of convertible securities (as a	Number of Locked in shares		Number of Shares pledged or otherwise		Number of equity shares held in dematerialised form	Sub-categorization of shares				
									No of Voting Rights		Total as a % of Total Voting Rights			No.	As a % of total Shares held(b)	No.	As a % of total Shares held(b)		Sub-categorization(i)	Sub-categorization(ii)	Sub-categorization(ii)		
									Class eg: X	Class eg: y												Total	(a)
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) = (IV)+(V)+	(VIII) As a	(IX)			(X)	(XI)=	(XII)	(XIII)	(XIV)	(XV)							
1	Institutions (Domestic)																						
(a)	Mutual Fund		23	37,56,534	0	0	37,56,534	12.76	37,56,534	-	37,56,534	12.76	-	12.76	-	-	NA	NA	37,56,234	-	-	-	
	Dsp Midcap Fund		1	14,50,415	0	0	14,50,415	4.93	14,50,415	-	14,50,415	4.93	-	4.93	-	-	NA	NA	14,50,415	-	-	-	
	Kotak Emerging Equity Scheme		1	5,95,114	0	0	5,95,114	2.02	5,95,114	-	5,95,114	2.02	-	2.02	-	-	NA	NA	5,95,114	-	-	-	
	Icici Prudential Balanced Advantage Fund		1	5,14,781	0	0	5,14,781	1.75	5,14,781	-	5,14,781	1.75	-	1.75	-	-	NA	NA	5,14,781	-	-	-	
	Aditya Birla Sun Life Trustee Private Limited A/C A		1	4,88,436	0	0	4,88,436	1.66	4,88,436	-	4,88,436	1.66	-	1.66	-	-	NA	NA	4,88,436	-	-	-	
(b)	Venture Capital Funds		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(c)	Alternate Investment Funds		12	1,92,970	0	0	1,92,970	0.66	1,92,970	-	1,92,970	0.66	-	0.66	-	-	NA	NA	1,92,970	-	-	-	
(d)	Banks		14	15,752	0	0	15,752	0.05	15,752	-	15,752	0.05	-	0.05	-	-	NA	NA	6,255	-	-	-	
(e)	Insurance Companies		6	27,42,152	0	0	27,42,152	9.31	27,42,152	-	27,42,152	9.31	-	9.31	-	-	NA	NA	27,42,152	-	-	-	
	Life Insurance Corporation Of India		1	16,00,737	0	0	16,00,737	5.44	16,00,737	-	16,00,737	5.44	-	5.44	-	-	NA	NA	16,00,737	-	-	-	
	Sbi Life Insurance Co. Ltd		1	7,69,791	0	0	7,69,791	2.61	7,69,791	-	7,69,791	2.61	-	2.61	-	-	NA	NA	7,69,791	-	-	-	
(f)	Provident Funds/ Pension Funds		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(G)	Asset Reconstruction Companies		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(h)	Sovereign Wealth Funds		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(i)	NBFCs registered with RBI		1	1,301	0	0	1,301	0.00	1,301	-	1,301	0.00	-	0.00	-	-	NA	NA	1,301	-	-	-	
(j)	Other Financial Institutions		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(k)	Any Other (Specify)		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
	Sub Total (B)(1)		56	67,08,709	0	0	67,08,709	22.79	67,08,709	-	67,08,709	22.79	-	22.79	-	-	NA	NA	66,98,912	-	-	-	
	Institutions (Foreign)																						
(a)	Foreign Direct Investment		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(b)	Foreign Venture Capital Investors		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(c)	Sovereign Wealth Funds		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(d)	Foreign Portfolio Investors Category I		135	31,31,144	0	0	31,31,144	10.64	31,31,144	-	31,31,144	10.64	-	10.64	-	-	NA	NA	31,31,144	-	-	-	
	Government Pension Fund Global		1	5,21,074	0	0	5,21,074	1.77	5,21,074	-	5,21,074	1.77	-	1.77	-	-	NA	NA	5,21,074	-	-	-	
(e)	Foreign Portfolio Investors Category II		11	1,70,911	0	0	1,70,911	0.58	1,70,911	-	1,70,911	0.58	-	0.58	-	-	NA	NA	1,70,911	-	-	-	
(f)	Overseas Depositories(holding DRs) (balancing figure)		-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA	-	-	-	-	
(g)	Any Other (Specify)		1	800	0	0	800	0.00	800	-	800	0.00	-	0.00	-	-	NA	NA	-	-	-	-	
	Foreign Institutional Investors		1	800	0	0	800	0.00	800	-	800	0.00	-	0.00	-	-	NA	NA	-	-	-	-	
	Sub Total (B)(2)		147	33,02,855	0	0	33,02,855	11.22	33,02,855	-	33,02,855	11.22	-	11.22	-	-	NA	NA	33,02,055	-	-	-	

3	Central Government/ State Government(s)																			
(a)	Central Government / President of India	-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA		-	
(b)	State Government / Governor	1	336	0	0	336	0.00	336	-	336	0.00	-	0.00	-	-	NA	NA		-	
(C)	Shareholding by Companies or Bodies Corporate where Central / State Government is a promoter	-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA		-	
	Sub Total (B)(3)	1	336	0	0	336	0.00	336	-	336	0.00	-	0.00	-	-	NA	NA		-	
4	Non-Institutions																			
(a)	Associate companies / Subsidiaries	-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA		-	
(b)	Directors and their relatives (excluding Independent Directors and nominee Directors)	4	10,980	0	0	10,980	0.04	10,980	-	10,980	0.04	-	0.04	-	-	NA	NA		10,980	
(C)	Key Managerial Personnel	-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA		-	
(D)	Relatives of promoters (other than 'immediate relatives' of promoters disclosed under 'Promoter and Promoter Group' category)	-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA		-	
(E)	Trusts where any person belonging to 'Promoter and Promoter Group' category is 'trustee', 'beneficiary', or 'author of the trust'	-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA		-	
(f)	Investor Education and Protection Fund (IEPF)	1	2,55,814	0	0	2,55,814	0.87	2,55,814	-	2,55,814	0.87	-	0.87	-	-	NA	NA		2,55,814	
(g)	i. Resident Individual holding nominal share capital up to Rs. 2 lakhs.	54,718	34,42,297	0	0	34,42,297	11.69	34,42,297	-	34,42,297	11.69	-	11.69	-	-	NA	NA		32,22,104	
(h)	ii. Resident individual holding nominal share capital in excess of Rs. 2 lakhs.	16	14,31,788	0	0	14,31,788	4.86	14,31,788	-	14,31,788	4.86	-	4.86	-	-	NA	NA		14,31,788	
	Shivani T. Trivedi		2,97,000	0	0	2,97,000	1.01	2,97,000	-	2,97,000	1.01	-	1.01	-	-	NA	NA		2,97,000	
	Tejas B. Trivedi		3,00,332	0	0	3,00,332	1.02	3,00,332	-	3,00,332	1.02	-	1.02	-	-	NA	NA		3,00,332	
(i)	Non Resident Indians (NRIs)	2,016	1,86,648	0	0	1,86,648	0.63	1,86,648	-	1,86,648	0.63	-	0.63	-	-	NA	NA		1,85,889	
(j)	Foreign Nationals	-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA		-	
(k)	Foreign Companies	-	-	0	0	-	-	-	-	-	-	-	-	-	-	NA	NA		-	
(l)	Bodies Corporate	631	5,85,145	0	0	5,85,145	1.99	5,85,145	-	5,85,145	1.99	-	1.99	-	-	NA	NA		5,85,145	
(m)	Any Other (Specify)	1,493	2,17,065	0	0	2,17,065	0.74	2,17,065	-	2,17,065	0.74	-	0.74	-	-	NA	NA		2,12,586	
	Trusts	8	4,827	0	0	4,827	0.02	4,827	-	4,827	0.02	-	0.02	-	-	NA	NA		4,827	
	Independent Director	4	215	0	0	215	0.00	215	-	215	0.00	-	0.00	-	-	NA	NA		215	
	Body Corp-Ltd Liability Partnership	49	22,730	0	0	22,730	0.08	22,730	-	22,730	0.08	-	0.08	-	-	NA	NA		22,730	
	Office Bearers	8	3,242	0	0	3,242	0.01	3,242	-	3,242	0.01	-	0.01	-	-	NA	NA		3,242	
	Hindu Undivided Family	1,394	1,48,932	0	0	1,48,932	0.51	1,48,932	-	1,48,932	0.51	-	0.51	-	-	NA	NA		1,48,868	
	Clearing Member	4	121	0	0	121	0.00	121	-	121	0.00	-	0.00	-	-	NA	NA		121	
	Associated Person	26	36,998	0	0	36,998	0.13	36,998	-	36,998	0.13	-	0.13	-	-	NA	NA		32,583	
	Sub Total (B)(4)	58,879	61,29,737	0	0	61,29,737	20.82	61,29,737	-	61,29,737	20.82	-	20.82	-	-	NA	NA		59,04,306	
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)+b(4)	59,083	1,61,41,637	0	0	1,61,41,637	54.83	1,61,41,637	-	1,61,41,637	54.83	-	54.83	-	-	NA	NA		1,59,05,273	

Details of the shareholders acting as persons in Concert including their Shareholding (No. and %):

No. of shareholders	No. of Shares	%
0		

Details of Shares which remain unclaimed may be given hear along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.

No. of shareholders	No. of Shares
0	0

Note :

(1) PAN would not be displayed on website of Stock Exchange(s).

(2) The above format needs to be disclosed along with the names of the shareholders holding 1% or more than 1% of shares of the listed entity. Column no.(XIII)is not applicable in the above format.

(3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available and the balance to be disclosed as held by custodian.

(4) Categorization and disclosure of each shareholder category should be carried out in the order prescribed in the above format. If a shareholder is falling under more than one category, then the same shall be classified in the category falling first in the order prescribed in the above

(5) Sub-categorization of shares under column no.(XV) will be based on shareholding(no. of shares)under the following sub-categories:

(i) Shareholder who are represented by a nominee Director on the board of the listed entity or have the right to nominate a representative(i.e. Director)on the board of the listed entity.

(ii) Shareholder who have entered into shareholder agreement with the listed entity.

(iii) Shareholders acting as persons in concert with promoters.

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Atul Limited																			
Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder																			
	Category & Name of the shareholders	PAN	Nos. of shareholders	No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities				Shares Underlying Outstanding convertible securities (including	ng, as a % assuming full conversion of convertible securities (as a	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form
									No of Voting Rights			Total as a % of (A+B+C)			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)	
									Class eg: X	Class eg: y	Total								
	(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII) As a	(IX)			(X)	(XI)=	(XII)		(XIII)		(XIV)	
1	Custodian/DR Holder		0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	NA	0
2	Employee Benefit Trust / Employee Welfare Trust under SEBI (Share based Employee Benefits and Sweat Equity) Regulations, 2021		0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	NA	0
	Total Non-Promoter- Non Public Shareholding (C)= (C)(1)+(C)(2)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	NA	0

Note :

(1) PAN would not be displayed on website of Stock Exchange(s).

(2) The above format needs to be disclosed along with the names of the shareholders holding 1% or more than 1% of shares of the listed entity. Column no.(XIII)is not applicable in the above format.

(3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available.

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NSDL : 31/12/2024

CDSL

Table V - Statement showing shareholding pattern of the Significant Beneficiary Owner (SBO)

	Name	PAN	Passport No. in case of a foreign national	Nationality	Details of holding/ exercise of right of the SBO in the reporting company,					Date of creation / acquisition of significant beneficial interest
					Shares	Voting rights	Rights on distributable dividend or any other distribution	Exercise of control	Exercise of significant influence	
	Sunil Siddharth Lalbhai			India	33.24	33.24	33.24	No	No	
A	Aagam Holdings Private Limited			India	22.60	22.60	22.60	No	No	13-Sep-98
B	Aagam Agencies Private Limited			India	4.06	4.06	4.06	No	No	13-Sep-98
C	Aayojan Resources Private Limited			India	2.09	2.09	2.09	No	No	13-Sep-98
D	Akshita Holdings Private Limited			India	1.58	1.58	1.58	No	No	13-Sep-98
E	Adhinami Investments Private Limited			India	1.55	1.55	1.55	No	No	13-Sep-98
F	Anusandhan Investments Limited			India	0.80	0.80	0.80	No	No	13-Sep-98
G	Swati Siddharth Lalbhai (On behalf of Siddharth Family Trust)			India	0.12	0.12	0.12	No	No	13-Sep-98
H	Sunil Siddharth Lalbhai (On behalf of Vmla Siddharth Family Trust)			India	0.01	0.01	0.01	No	No	13-Sep-98
I	Swati Siddharth Lalbhai (On behalf of Sunil Lalbhai Employees Trust 1)			India	0.01	0.01	0.01	No	No	13-Sep-98
J	Sunil Siddharth Lalbhai (On behalf of Sunil Siddharth HUF)			India	0.11	0.11	0.11	No	No	13-Sep-98
K	Sunil Siddharth Lalbhai			India	0.32	0.32	0.32	No	No	13-Sep-98

Table VI - Statement showing foreign ownership limits		
Particular	Approved limits (%)*	Limits utilized (%)
As on shareholding date	100	11.22
As on the end of previous 1st quarter	100	9.70
As on the end of previous 2nd quarter	100	8.10
As on the end of previous 3rd quarter	100	8.02
As on the end of previous 4th quarter	100	8.58
Notes :-		
*Approved limits (%) shows limit permissible by the authority without Board Shareholders approval		