



Atul Ltd

Atul 396 020, Gujarat, India legal@atul.co.in | www.atul.co.in (+91 2632) 230000

January 10, 2020

The Manager
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

SCRIP CODE: 500027 BSE Listing portal

The Manager
Listing Department
National Stock Exchange of India Limited
"Exchange Plaza" C – 1, Block G,
Bandra Kurla Complex, Bandra (East)
Mumbai – 400 051
Dear Sirs.

SYMBOL: ATUL NEAPS portal

Sub.: Statement showing shareholding pattern for the Quarter ended December 31, 2019.

Ref.: Regulation 31 of the SEBI (Listing Obligations and Disclosure Requirements)

Regulations, 2015.

Pursuant to Regulation 31 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are forwarding herewith statement showing shareholding pattern of the Company for the Quarter ended December 31, 2019, in the prescribed format.

Kindly take the above on records.

Thank you,

Yours faithfully For Atul Ltd

Lalit Patni

Company Secretary and Chief Compliance Officer

Encl.: as above.



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

1.	Name of	Listed Entity: Atul Limited										
2.	Scrip Cod	rip Code/Name of Scrip/Class of Security: 500027										
3.	Share Ho	lding 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?	Yes	
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.

Atul Limited

Table I - Summary Statement holding of specified securities

					_													
							Sharehold					Shares	ing , as a			Number o		
							ing as a %					Underlyin				pledged o	r	
							of total	Number of	Number of Voting Rights held in each class			g	assuming	Number of	Locked in	otherwise		Number
				No. of	No. of		no. of	of securitie	of securities			Outstandi	full	shares		encumber	ed	of equity
			No. of	Partly	shares		shares					ng	conversio					shares
			fully paid	paid-up	underlyin		(calculate	No of Voti	na Riahts			convertibl	n of		As a % of		As a % of	held in
		Nos. of	up equity	equity	g	Total nos.	d as per	140 01 400	ig MgHt3		Total as a	e	convertibl		total		total	demateri
		sharehold	shares	shares	Depositor	shares	SCRR,	Class eg:			% of	securities	е		Shares		Shares	alised
Category	Category of shareholder	ers	held	held	y Receipts	held	1957)	Х	Class eg: y	Total	(A+B+C)	(including	securities	No. (a)	held(b)	No. (a)	held(b)	form
(1)	(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII) As a		(1	X)		(X)	(XI)=	(X	II)	(X	III)	(XIV)
(A)	Promoter & Promoter Group	24	13288434	0	0	13288434	44.7998	13288434	0	13288434	44.7998	0	44.7998	0	0	500000	17.8814	13288434
(B)	Public	31867	16373299	0	0	16373299	55.1999	16373299	0	16373299	55.1999	0	55.1999	213	0.0055	NA	NA	15910091
(C)	Non Promoter - Non Public				0				0			0			0	NA	NA	
(C1)	Shares Underlying DRs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	NA	0
(C2)	Shares Held By Employee Trust	0	0	0	0	0	0	0	0	0	0	0	0	0	0	NA	NA	0
	Total	31891	29661733	0	0	29661733	99.9997	29661733	0	29661733	99.9997	0	99.9997	213	0.0055	NA	NA	29198525

Atul Limited

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

						No. of		calculated	Number o	f Voting Right	ts held in	each class	Underlyin g Outstandi	assuming full	Number o	f Locked in	Number o pledged o otherwise encumber	r	Number of equity
			Nos. of	No. of fully paid up equity	1-	shares underlyin		as per SCRR, 1957 As a	No of Voti	ng Rights		Total as a	convertibl	n of convertibl		As a % of total		As a % of total	shares held in demateri
			sharehold		shares	Depositor			Class eg:			% of	securities			Shares		Shares	alised
	Category & Name of the shareholders	PAN	ers	held	held	y Receipts		(A+B+C2)	_	Class eg: y T				securities	No. (a)		No. (a)	held(b)	form
	(1)	(II)	(III)	(IV)	(V)	(VI)		(VIII) As a		(IX)		,	(X)	(XI)=	` '	KII)	1 -		(XIV)
1	Indian		, , ,												`	1			1
a)	Individuals / Hindu Undivided Family		16	880725	(0	880725	2.9692	880725	0	880725	2.9692	0	2.9692	C	0	0		0 88072
	Samvegbhai Arvindbhai Lalbhai		1	202377	(0	202377	0.6823	202377	0	202377	0.6823	0	0.6823	C	0	0	(202377
	Saumya Samvegbhai Lalbhai		1	174070	(0	174070	0.5869	174070	0	174070	0.5869	0	0.5869	C	0	0)	0 174070
	Samvegbhai Arvindbhai (Karta of HUF)		1	114943	(0	114943	0.3875	114943	0	114943	0.3875	0	0.3875	C	0	0)	114943
	Sunil Siddharth Lalbhai		1	91772	. (0	91772	0.3094	91772	0	91772	0.3094	0	0.3094	C	0	0)	91772
	Vimla S Lalbhai*		1	65982		0	65982	0.2224	65982	0	65982	0.2224	0	0.2224	C	0	0) (0 65982
	Swati S Lalbhai		1	63500		0	63500	0.2141		0	63500			0.2141	C	0	0	(0 63500
	Taral S Lalbhai		1	50022		0	50022	0.1686		0	50022	0.1686		0.1686	C	0	0		50022
	Anamikaben Samveghbhai Lalbhai		1	47199		0	47199	0.1591		0	47199			0.1591	C	0	0	(47199
	Sunil Siddharth Lalbhai (Karta of Sunil Siddharth HUF)		1	31544		0	31544	0.1063		0	31544	0.1063	0	0.1063	C	0	0	(31544
	Astha Lalbhai		1	20500		0	20500	0.0691	20500	0	20500	0.0691		0.0691	C	0	0	(20500
	Hansa Niranjanbhai		1	5999		0	5999	0.0202	5999	0	5999			0.0202	C	0	0	(5999
	Nishtha Sunilbhai Lalbhai		1	5500	(0	5500	0.0185	5500	0	5500	0.0185	0	0.0185	C	0	0	(5500
	Sanjaybhai Shrenikbhai Lalbhai (Trustee of Arvindbhai																		
	Lalbhai Family Trust)		1	3653	-	0	3653			0	3653	0.0123		0.0123	C	0	0	(3653
	Sunil Lalbhai Employees Trust		1	2000	(0	2000	0.0067	2000	0	2000	0.0067	0	0.0067	C	0	0	(2000
	Rajivbhai Chinubhai Lalbhai (on behalf of Lalbhai Dalpatbhai																		
	HUF)		1	1169	(0	1169	0.0041	1169	0	1169	0.0041	0	0.0041	C	0	0	(1169
	Sheth Narottambhai Lalbhai (on behalf of Sheth																		
	Narottambhai Lalbhai HUF)		1	495	(0	495	0.0017	495	0	495	0.0017	0	0.0017	C	0	0	(0 495
_	Central Government / State Government(s)		0	0	(0	0	0	0	0	0	0	0	0	C	0	0	() (
	Financial Institutions / Banks		0	0		0	0	0	0	0	0	0	0	0	0	0	0		<u>) </u>
	Any Other (Specify)		8	12407709		0	12407709		12407709		L2407709			41.8306		0	500000		
	Bodies Corporate		8	12407709		0	12407709		12407709		L 240770 9			41.8306	0	0	500000	17.881	
	Aagam Holdings Pvt Ltd		1	6650700		0	6650700				6650700	22.4218		22.4218	C	0	0	(0 6650700
	Arvind Farms Pvt Ltd		1	2796208	(0	2796208	9.427	2796208	0	2796208	9.427	0	9.427	C	0	500000	17.881	4 2796208
	Aagam Agencies Pvt Ltd (formerly known as Adhigam														_				
	Investments Pvt Ltd)		1	1008301) 0	1008301	3.3993		0	1008301	3.3993		3.3993	0	0	0		1008301
	Aayojan Resources Pvt Ltd		1	614000) 0	614000	2.07		0	614000			2.07	0		0		614000
	Akshita Holdings Pvt Ltd		1	463300	+) 0	463300	1.5619		0	463300			1.5619	0	0	0		463300
	Adhinami Investments Pvt Ltd		1	455100) 0	455100	1.5343		0	455100			1.5343			0		455100
	Anusandhan Investments Ltd		1 1	235000 185100	() 0	235000 185100	0.7923 0.624		0	235000 185100			0.7923 0.624	0	0	0		235000 0 185100
	Aahvan Agencies Ltd		1			0				0 1							F00000	17.001	
,	Sub Total (A)(1)		24	13288434	, () <u> </u>	13288434	44./998	13288434	U 1	L3288434	44.7998	1 0	44.7998	0	<u>, </u>	500000	17.881	4 13288434
	Foreign																		+
(2)	Individuals (Non-Resident Individuals / Foreign Individuals)			_		, ,	_	_	_		^	_	_	_	_		_] .	ا ا
	Government		1 0	0) U	0	0	0	0	0	1 0	0	0		, 0	0	<u>'</u>	<u>/</u>
•	Institutions		1 0	0) 0	0	0	0	0	0	0		0) 0	0		<u></u>
	Foreign Portfolio Investor		1 0	0) U	0	0	0	0	0	1 0	0	0		, 0	0	<u>'</u>	<u>/</u>
	Any Other (Specify)		0	0) 0	0	0	0	0	0	0	0	0) 0	0		
-	Sub Total (A)(2)		0	0) 0	0	0	0	0	<u> </u>	0	0	0) 0	0		
	Total Shareholding Of Promoter And Promoter Group (A)=		"			1 0	"	"			0	"	1			, 0	1	,	+
	Total Shareholding of Fromoter And Promoter Group (A)=	I	Ī	Ī	Ī	1	I	Ī	Ī	1		Ī	Ī	I		I	Ī		

^{*} Out of 65982 shares, Vimlaben S Lalbhai holds 35620 shares as trustee of Siddharth Family trust (PAN: AAAAS4739D) and 4612 share as trustee of Vimla Siddharth trust (PAN: AAATV0622P)

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.

Atul Limited
Table III - Statement showing shareholding pattern of the Public shareholder

					No. of		Jilig /o	Number o		ghts held in	each class	Shares Underlyin g Outstandi	assuming full	Number o	f Locked in	Number of pledged of encumber	r otherwise	Number
				paid-up	shares underlyin	Total nos.	as per SCRR, 1957 As a	No of Voti	ng Rights	1	Total as a	ng convertibl e	conversion of convertible		As a % of total		As a % of total	of equity shares held in
		sharehold			Depositor			Class eg:			% of	securities			Shares		Shares	demateria
Category & Name of the shareholders	PAN	ers	held	held	y Receipts		(A+B+C2)	_	Class eg: y	Total	(A+B+C)	(including	securities	No. (a)	held(b)	No. (a)	held(b)	lised form
(1)	(11)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII) As a			(IX)	,	(X)	(XI)=		(II)		(III)	(XIV)
Institutions	(/	(/	ζ /	ζ-,	(/	(/	((/	()	,		,-	1	
Mutual Fund		24	6623843	0	0	6623843	22.3313	6623843	; (0 6623843	22.3313	C	22.3313	C	0 0	NA	NA	6623543
Hdfc Trustee Company Ltd - A/C Hdfc Mid -																		
Capopportunities Fund		1	2121042	0	0	2121042	7.1508	2121042		2121042	7.1508	C	7.1508	c		NA	NA	2121042
Dsp Small Cap Fund		1	1126607	0	0	1126607	3.7982	1126607		1126607	3.7982		3.7982	+		NA	NA	1126607
, ,																		
Aditya Birla Sun Life Trustee Private Limited A/C																		
Aditya Birla Sun Life Equity Advantage Fund		1	796750	0	0	796750	2.6861	796750		796750	2.6861	0	2.6861			NA	NA	796750
Kotak Emerging Equity Scheme		1	480119	0	0	480119	1.6186	480119	+	480119	1.6186		1.6186			NA	NA	480119
Canara Robeco Mutual Fund A/C Canara Robeco																		
Emerging Equities		1	417049	0	0	417049	1.406	417049		417049	1.406	C	1.406	c c		NA	NA	417049
Franklin India Smaller Companies Fund		1	385642	0	0	385642		385642	+	385642	1.3001		1.3001			NA	NA	385642
L And T Mutual Fund Trustee Ltd-L And T Mid																		
Cap Fund		1	297066	0	0	297066	1.0015	297066	6 (297066	1.0015	C	1.0015	c		NA	NA	297066
Venture Capital Funds		0	0	0	0	0	0	0) (0 0	0	C	C	C		NA	NA	(
Alternate Investment Funds		5	14472	0	0	14472	0.0488	14472	! (0 14472	0.0488	C	0.0488	C	0	NA	NA	14472
Foreign Venture Capital Investors		0	0	0	0	0	0	0		0 0	0	C	C	C	C	NA	NA	(
Foreign Portfolio Investor		103	2043605	0	0	2043605	6.8897	2043605	(2043605	6.8897	C	6.8897	C	0	NA	NA	2042805
Kotak Funds - India Midcap Fund		1	367418	0	0	367418	1.2387	367418	3 (367418	1.2387	C	1.2387	C) (NA	NA	367418
Financial Institutions / Banks		21	22330	0	0	22330	0.0753	22330		22330	0.0753	C	0.0753	C	0	NA	NA	11249
Insurance Companies		6	287542	0	0	287542		287542		287542	0.9694	-	0.9694	+	0	NA	NA	287542
Provident Funds/ Pension Funds		0	0	0	0	0	0	0		0 0	0	C	0	C	0	NA	NA	(
Any Other (Specify)		0	0	0	0	0	0	0) (0 0	0	C	C	C	C	NA	NA	(
Sub Total (B)(1)		159	8991792	0	0	8991792	30.3145	8991792	2 (8991792	30.3145	C	30.3145	C	C	NA	NA	8979611
Central Government/ State Government(s)/																		
President of India																		
Central Government / State Government(s)		1	336	0	0	336	0.0011	336	6	336	0.0011	C	0.0011		C	NA	NA	(
Sub Total (B)(2)		1	336	0	0	336	0.0011	336	6	336	0.0011	C	0.0011	. 0	C	NA	NA	(
Non-Institutions																		
Individuals			0	0										C)	NA	NA	
i. Individual shareholders holding nominal share																		
capital up to Rs. 2 lakhs.		29703	3842170	0	0	3842170	12.9531	3842170	(3842170	12.9531	C	12.9531	. 213	0.0055	NA	NA	3398980
ii. Individual shareholders holding nominal share																		
capital in excess of Rs. 2 lakhs.		15	2022557	0	0	2022557	6.8187	2022557	′ (0 2022557	6.8187		6.8187			NA	NA	2022557
Shivani T. Trivedi			589269	0	0	589269	1.9866	589269	(589269	1.9866		1.9866			NA	NA	589269
Tejas B. Trivedi			604432	0	0	604432	2.0378	604432	. (0 604432	2.0378	C	2.0378	C		NA	NA	604432
NBFCs registered with RBI		0	0	0	0	0	0	0) (0 0	0	C	0	C		NA	NA	
Trust Employee		1	25	0	0	25	0.0001	25	6 (0 25	0.0001	C	0.0001	. C	0 0	NA	NA	25
Overseas Depositories(holding DRs) (balancing																		
figure)		0	0	0	0	0	0	0) (0 0	0	C		C		NA	NA	
Any Other (Specify)		1988	1516419	0	0	1516419	5.1124	1516419		0 1516419	5.1124		5.1124			NA	NA	1508918
IEPF		1	212954	0	0	212954	0.7179	212954	.	212954	0.7179		0.7179			NA	NA	212954
Trusts		4	353	0	0	353	0.0012	353		353	0.0012		0.0012	+		NA	NA	353
Hindu Undivided Family		734	230283	0	0	230283	0.7764	230283		230283	0.7764	C	0.7764			NA	NA	230283
Non Resident Indians (Non Repat)		267	102365	0	0	102365	0.3451	102365		0 102365	0.3451	C	0.3451			NA	NA	102365
Non Resident Indians (Repat)		487	97309	0	0	97309	0.3281	97309	1	97309	0.3281		0.3281	1		NA	NA	96387
Office Bearers	1	12	5388	۱ n	I 0	5388	0.0182	5388	el (5388	0.0182	1 (0.0182		۱I (NA	NA	5388

Bodies Corporate	363	647226	0	0	647226	2.182	647226	(647226	2.182	0	2.182	0	0	NA	NA	647226
Associated Person	44	145763	0	0	145763	0.4914	145763	(145763	0.4914	0	0.4914	0	0	NA	NA	139184
Associated Companies	6	44810	0	0	44810	0.1511	44810	(44810	0.1511	0	0.1511	0	0	NA	NA	44810
Sub Total (B)(3)	31707	7381171	0	0	7381171	24.8843	7381171		7381171	24.8843	0	24.8843	213	0.0055	NA	NA	6930480
Total Public Shareholding (B)=																	
(B)(1)+(B)(2)+(B)(3)	31867	16373299	0	0	16373299	55.1999	16373299		16373299	55.1999	0	55.1999	213	0.0055	NA	NA	15910091

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

No. of shareholders	No. of Shares

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 above format needs to disclose name of all holders holding more than 1% of total number of shares
- (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.

Atul Lir	nited																	
Table IV	 Statement showing shareholding pattern of the No 	n Promoter- N	on Public	sharehold	ler													
													Shares	ing , as a		Number	of Shares	
								Sharehold					Underlyin			pledged	or	
								ing %		of Voting Rig	ghts held in	each class	g	assuming	Number of Locked	in otherwi	se	Number
						No. of		calculate	of securities			Outstandi	full	shares	encumb	ered	of equity	
				No. of	Partly	shares		d as per					ng	conversio				shares
				fully paid	paid-up	underlyin		SCRR,	No of Vot	ing Rights			convertib	n of	As a %	of	As a % of	held in
			Nos. of	up equity	equity	g	Total nos.	1957 As a	110 01 100			Total as a	е	convertibl	total		total	demateri
			sharehold	shares	shares	Depositor	shares	% of	Class eg:			% of	securities	е	Shares		Shares	alised
	Category & Name of the shareholders	PAN	ers	held	held	y Receipts	held	(A+B+C2)	Х	Class eg: y	Total	(A+B+C)	(including	securities	No. (a) held(b)	No. (a)	held(b)	form
	(1)	(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII) As a		(1	X)		(X)	(XI)=	(XII)		(XIII)	(XIV)
1	Custodian/DR Holder		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0.0000	NA	NA	0
	Employee Benefit Trust (under SEBI (Share based																	
2	Employee Benefit) Regulations, 2014)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0.0000	NA	NA	0
	Total Non-Promoter- Non Public Shareholding (C)=																	
	(C)(1)+(C)(2)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0.0000	NA	NA	0

Note:

- (1) PAN would not be displayed on website of Stock Exchange(s).
- (2) The above format needs to disclose name of all holders holding more than 1% of total number of shares
- (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.

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

						ding/ exercise o	of right of the SB	O in the reportir	ng company,	
	Name	PAN	Passport No. in case of a foreign national	Nationality	Shares	Voting rights	Rights on distributable dividend or any other distribution	Exercise of control	Exercise of significant influence	Date of creation / acquisition of significant beneficial interest
1	Sunil Siddharth Lalbhai			India	32.96	32.96	32.96			
А	Akshita Holdings Private Limited			India	1.56	1.56	1.56	No	No	13-Sep-98
В	Private Limited Aagam Holdings Private Limited			India	22.42	22.42	22.42	No	No	13-Sep-98
С	Aagam Agencies Private Limited (Formerly known as Adhigam Investments			India	3.4	3.4	3.4	No	No	13-Sep-98
D	Adhinami Investments Private Limited			India	1.53	1.53	1.53	No	No	13-Sep-98
Е	Aahvan Agencies Limited			India	0.62	0.62	0.62	No	No	13-Sep-98
F	Aayojan Resources			India	2.07	2.07	2.07	No	No	13-Sep-98
G	Private Limited Sunil Lalbhai Emplovees Trust			India	0.01	0.01	0.01	No	No	13-Sep-98
Н	Vimla Siddharth Trust			India	0.02	0.02	0.02	No	No	13-Sep-98
Γ	Sunil Siddharth HUF			India	0.11	0.11	0.11	No	No	13-Sep-98
J	Siddharth Family Trust			India	0.12	0.12	0.12	No	No	13-Sep-98
K	Sunil Siddharth Lalbhai			India	0.31	0.31	0.31	No	No	13-Sep-98
L	Anusandhan Investments Limited		_	India	0.79	0.79	0.79	No	No	13-Sep-98