

Form No. MGT-7**Annual Return (other than OPCs and Small Companies)**

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

All fields marked in * are mandatory

Refer instruction kit for filing the form



Form language

☒ English ☐ Hindi**I REGISTRATION AND OTHER DETAILS**

i *Corporate Identity Number (CIN)

L99999GJ1975PLC002859

ii (a) *Financial year for which the annual return is being filed (From date) (DD/MM/YYYY)

01/04/2024

(b) *Financial year for which the annual return is being filed (To date) (DD/MM/YYYY)

31/03/2025

(c) *Type of Annual filing

☒ Original☐ Revised

(d) SRN of MGT-7 filed earlier for the same financial years

iii

Particulars	As on filing date	As on the financial year end date
Name of the company	ATUL LIMITED	ATUL LIMITED
Registered office address	ATUL HOUSE G I PATEL MARG,NA,AHMEDABAD,Ahmedabad,Gujarat,India,380014	ATUL HOUSE G I PATEL MARG,NA,AHMEDABAD,Ahmedabad,Gujarat,India,380014
Latitude details	23.0369236	23.0369236
Longitude details	72.5501663	72.5501663

(a) *Photograph of the registered office of the Company showing external building and name prominently visible

Out side image.pdf

(b) *Permanent Account Number (PAN) of the company

AA*****0M

(c) *e-mail ID of the company

*****@atul.co.in

(d) *Telephone number with STD code

02*****00

(e) Website	<div style="border: 1px solid black; padding: 2px;">www.atul.co.in</div>											
iv *Date of Incorporation (DD/MM/YYYY)	<div style="border: 1px solid black; padding: 2px;">11/12/1975</div>											
v (a) *Class of Company (as on the financial year end date) <i>(Private company/Public Company/One Person Company)</i>	<div style="border: 1px solid black; padding: 2px;">Public company</div>											
(b) *Category of the Company (as on the financial year end date) <i>(Company limited by shares/Company limited by guarantee/Unlimited company)</i>	<div style="border: 1px solid black; padding: 2px;">Company limited by shares</div>											
(c) *Sub-category of the Company (as on the financial year end date) <i>(Indian Non-Government company/Union Government Company/State Government Company/ Guarantee and association company/Subsidiary of Foreign Company)</i>	<div style="border: 1px solid black; padding: 2px;">Indian Non-Government company</div>											
vi *Whether company is having share capital (as on the financial year end date)	<input checked="" type="radio"/> Yes <input type="radio"/> No											
vii (a) Whether shares listed on recognized Stock Exchange(s)	<input checked="" type="radio"/> Yes <input type="radio"/> No											
(b) Details of stock exchanges where shares are listed												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">S. No.</th> <th style="width: 50%;">Stock Exchange Name</th> <th style="width: 40%;">Code</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td>National Stock Exchange (NSE)</td> <td>A1024 - National Stock Exchange (NSE)</td> </tr> <tr> <td style="text-align: center;">2</td> <td>Bombay Stock Exchange (BSE)</td> <td>A1 - Bombay Stock Exchange (BSE)</td> </tr> </tbody> </table>				S. No.	Stock Exchange Name	Code	1	National Stock Exchange (NSE)	A1024 - National Stock Exchange (NSE)	2	Bombay Stock Exchange (BSE)	A1 - Bombay Stock Exchange (BSE)
S. No.	Stock Exchange Name	Code										
1	National Stock Exchange (NSE)	A1024 - National Stock Exchange (NSE)										
2	Bombay Stock Exchange (BSE)	A1 - Bombay Stock Exchange (BSE)										
viii Number of Registrar and Transfer Agent	<div style="border: 1px solid black; padding: 2px;">1</div>											
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">CIN of the Registrar and Transfer Agent</th> <th style="width: 20%;">Name of the Registrar and Transfer Agent</th> <th style="width: 30%;">Registered office address of the Registrar and Transfer Agents</th> <th style="width: 30%;">SEBI registration number of Registrar and Transfer Agent</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">U67190MH1999PTC118368</td> <td style="text-align: center;">MUFG INTIME INDIA PRIVATE LIMITED</td> <td>C-101, 1st Floor, 247 Park, Lal Bahadur Shastri Marg, Vikhroli (West,),,,Mumbai,Mumbai City,Maharashtra,India,400083</td> <td style="text-align: center;">INR000004058</td> </tr> </tbody> </table>				CIN of the Registrar and Transfer Agent	Name of the Registrar and Transfer Agent	Registered office address of the Registrar and Transfer Agents	SEBI registration number of Registrar and Transfer Agent	U67190MH1999PTC118368	MUFG INTIME INDIA PRIVATE LIMITED	C-101, 1st Floor, 247 Park, Lal Bahadur Shastri Marg, Vikhroli (West,),,,Mumbai,Mumbai City,Maharashtra,India,400083	INR000004058	
CIN of the Registrar and Transfer Agent	Name of the Registrar and Transfer Agent	Registered office address of the Registrar and Transfer Agents	SEBI registration number of Registrar and Transfer Agent									
U67190MH1999PTC118368	MUFG INTIME INDIA PRIVATE LIMITED	C-101, 1st Floor, 247 Park, Lal Bahadur Shastri Marg, Vikhroli (West,),,,Mumbai,Mumbai City,Maharashtra,India,400083	INR000004058									
ix * (a) Whether Annual General Meeting (AGM) held	<input checked="" type="radio"/> Yes <input type="radio"/> No											
(b) If yes, date of AGM (DD/MM/YYYY)	<div style="border: 1px solid black; padding: 2px;">25/07/2025</div>											
(c) Due date of AGM (DD/MM/YYYY)	<div style="border: 1px solid black; padding: 2px;">30/09/2025</div>											
(d) Whether any extension for AGM granted	<input type="radio"/> Yes <input checked="" type="radio"/> No											

(e) If yes, provide the Service Request Number (SRN) of the GNL-1 application form filed for extension

(f) Extended due date of AGM after grant of extension (DD/MM/YYYY)

(g) Specify the reasons for not holding the same

II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

i *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	20	Manufacture of chemicals and chemical products	100

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

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

45

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Jo int Venture	% of shares held
1	U15400GJ2017PLC100157		AARANYAK URMI LIMITED	Subsidiary	100
2	U01122RJ2010PLC030642		AASTHAN DATES LIMITED	Subsidiary	100
3	L24100MH1974PLC017594		AMAL LIMITED	Associate	49.86
4	U24100MH1992PTC067870		ATUL ADHESIVES PRIVATE LIMITED	Subsidiary	100
5	U24230GJ1997PLC032369		ATUL BIOSCIENCE LIMITED	Subsidiary	100
6	U01500GJ2005PLC045244		ATUL BIO SPACE LIMITED	Subsidiary	100
7		Foreigncompany 1	Atul Brasil Quimicos Ltda	Subsidiary	100

8		Foreigncompany 2	Atul China Ltd	Subsidiary	100
9		Foreigncompany 3	Atul Deutschland GmbH	Subsidiary	100
10		Foreigncompany 4	Atul Europe Ltd	Subsidiary	100
11	U51900MH1947PLC005453		ATUL FINSERV LIMITED	Subsidiary	100
12	U65990GJ2016PLC093639		ATUL FIN RESOURCES LIMITED	Subsidiary	100
13	U72200GJ2000PTC038460		ATUL INFOTECH PRIVATE LIMITED	Subsidiary	100
14		Foreigncompany 5	Atul Middle East FZ-LLC	Subsidiary	100
15	U70100GJ2016PLC093630		ATUL NIVESH LIMITED	Subsidiary	100
16	U01122RJ2009PLC028415		ATUL RAJASTHAN DATE PALMS LIMITED	Subsidiary	73.98
17		Foreigncompany 6	Atul USA Inc	Subsidiary	100
18	U01122RJ2010PLC030636		BIYABAN AGRI LIMITED	Subsidiary	100
19		Foreigncompany 7	DPD Ltd	Subsidiary	98
20	U01122RJ2010PLC030640		RAJA DATES LIMITED	Subsidiary	100
21	U85110GJ2010PLC062180		ATUL AAROGYA LIMITED	Subsidiary	100
22	U24233GJ2010PLC062028		ATUL AYURVEDA LIMITED	Subsidiary	100
23	U40106GJ2010PLC059498		ATUL CLEAN ENERGY LIMITED	Subsidiary	100
24	U01403GJ2010PLC061909		ATUL CROP CARE LIMITED	Subsidiary	100
25	U24100GJ2011PLC065979		ATUL POLYMERS PRODUCTS LIMITED	Subsidiary	100
26	U92190GJ2010PLC061999		ATUL ENTERTAINMENT LIMITED	Subsidiary	100
27	U55101GJ2010PLC062000		ATUL HOSPITALITY LIMITED	Subsidiary	100
28	U24233GJ2010PLC059517		ATUL (RETAIL) BRANDS LIMITED	Subsidiary	100
29	U01122GJ2010PLC062769		ATUL SEEDS LIMITED	Subsidiary	100

30	U45200GJ2010PLC062029		JAYATI INFRASTRUCTURE LIMITED	Subsidiary	100
31	U51434GJ2009PLC056053		ATUL CONSUMER PRODUCTS LIMITED	Subsidiary	100
32	U15200GJ2010PLC061906		OSIA DAIRY LIMITED	Subsidiary	100
33	U45200GJ2011PLC064854		OSIA INFRASTRUCTURE LIMITED	Subsidiary	100
34	U24110GJ2005PLC045564		RUDOLF ATUL CHEMICALS LIMITED	Joint Venture	50
35		Foreigncompany 8	ATUL IRELAND LIMITED	Subsidiary	100
36	U24304GJ2020PLC117189		ATUL PRODUCTS LIMITED	Subsidiary	100
37	U24303GJ2020PLC117088		ATUL NATURAL DYES LIMITED	Subsidiary	100
38	U15400GJ2020PLC117228		ATUL NATURAL FOODS LIMITED	Subsidiary	100
39	U40108GJ2020PLC117137		ATUL RENEWABLE ENERGY LIMITED	Subsidiary	100
40	U24290GJ2021PLC120451		ATUL LIFESCIENCE LIMITED	Subsidiary	100
41	U24239GJ2020PLC117229		AMAL SPECIALITY CHEMICALS LIMITED	Associate	49.86
42	U24220GJ2021PLC125797		ATUL PAINTS LIMITED	Subsidiary	100
43	U85120GJ2021PLC127178		ATUL HEALTHCARE LIMITED	Subsidiary	100
44	U15549GJ2021PLC123199		SEHAT FOODS LIMITED	Subsidiary	100
45	U85320GJ2020PLC113263		VALSAD INSTITUTE OF MEDICAL SCIENCES LIMITED	Joint Venture	50

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	80000000.00	29471802.00	29441755.00	29441755.00
Total amount of equity	800000000.00	294718020.00	294417550.00	294417550.00

shares (in rupees)				
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Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Equity				
Number of equity shares	80000000	29471802	29441755	29441755
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	800000000.00	294718020.00	294417550	294417550

(b) Preference share capital

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of preference shares	8000000.00	0.00	0.00	0.00
Total amount of preference shares (in rupees)	800000000.00	0.00	0.00	0.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Cumulative Redeemable Preference shares				
Number of preference shares	8000000	0	0	0
Nominal value per share (in rupees)	100	100	100	100
Total amount of preference shares (in rupees)	800000000.00	0.00	0	0

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

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

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
	Physical	DEMAT	Total			
(i) Equity shares						
At the beginning of the year	267724	29174031	29441755.00	294417550	294417550	
Increase during the year	0.00	35535.00	35535.00	355350.00	355350.00	0.00
i Public Issues	0	0	0.00	0	0	
ii Rights issue	0	0	0.00	0	0	
iii Bonus issue	0	0	0.00	0	0	
iv Private Placement/ Preferential allotment	0	0	0.00	0	0	
v ESOPs	0	0	0.00	0	0	
vi Sweat equity shares allotted	0	0	0.00	0	0	
vii Conversion of Preference share	0	0	0.00	0	0	
viii Conversion of Debentures	0	0	0.00	0	0	
ix GDRs/ADRs	0	0	0.00	0	0	
x Others, specify <div>Demat</div>	0	35535	35535.00	355350	355350	0
Decrease during the year	35535.00	0.00	35535.00	355350.00	355350.00	0
i Buy-back of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify <div>Demat</div>	35535	0	35535.00	355350	355350	
At the end of the year	232189.00	29209566.00	29441755.00	294417550.00	294417550.00	
(ii) Preference shares						

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
At the beginning of the year	0	0	0.00	0	0	
Increase during the year	0.00	0.00	0.00	0.00	0.00	0
i Issues of shares	0	0	0.00	0	0	
ii Re-issue of forfeited shares	0	0	0.00	0	0	
iii Others, specify <div></div>			0			
Decrease during the year	0.00	0.00	0.00	0.00	0.00	0
i Redemption of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify <div></div>			0			
At the end of the year	0.00	0.00	0.00	0.00	0.00	0

ISIN of the equity shares of the company

INE100A01010

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

0

Class of shares		<div></div>
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

Number of transfers

Attachments:

1. Details of shares/Debentures Transfers

iv Debentures (Outstanding as at the end of financial year)

(a) Non-convertible debentures

*Number of classes

0

Classes of non-convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of non-convertible 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
Total				

(b) Partly convertible debentures

*Number of classes

0

Classes of partly convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of partly convertible 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
Total				

(c) Fully convertible debentures

*Number of classes

0

Classes of fully convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of fully convertible 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
Total				

(d) Summary of Indebtedness

Particulars	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	0.00	0.00	0.00	0.00
Partly convertible debentures	0.00	0.00	0.00	0.00
Fully convertible debentures	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00

v Securities (other than shares and debentures)

0

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

5074680672899

ii * Net worth of the Company

55381029794.84

VI SHARE HOLDING PATTERN**A Promoters**

S. No	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	741566	2.52	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	12418908	42.18	0	0.00

10	Others				
	Trusts	140444	0.48	0	0.00
	Total	13300918.00	45.18	0.00	0

Total number of shareholders (promoters)

27

B Public/Other than promoters

S. No	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	5094114	17.30	0	0.00
	(ii) Non-resident Indian (NRI)	177043	0.60	0	0.00
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	3149	0.01	0	0.00
	(ii) State Government	336	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	2873682	9.76	0	0.00
4	Banks	15622	0.05	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	2883476	9.79	0	0.00
7	Mutual funds	4066237	13.81	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	618038	2.10	0	0.00

10	Others				
	IEPF, Trust and HUF	409140	1.39	0	0.00
	Total	16140837.00	54.81	0.00	0

Total number of shareholders (other than promoters)

59615

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

59642.00

Breakup of total number of shareholders (Promoters + Other than promoters)

Sl.No	Category	
1	Individual - Female	10636
2	Individual - Male	19189
3	Individual - Transgender	0
4	Other than individuals	29817
	Total	59642.00

C Details of Foreign institutional investors' (FIIs) holding shares of the company

147

Name of the FII	Address	Date of Incorporation	Country of Incorporation	Number of shares held	% of shares held
ABSL UMBRELLA UCITS FUND PLC - INDIA QUALITY ADVANTAGE FUND	STANDARD CHARTERED BANK SECURITIES SERVICES, 3RD FLOOR 23-25 MAHATMA GANDHI ROAD FORT, MUMBAI	05/08/2014	Ireland	2312	0.01
ABU DHABI INVESTMENT AUTHORITY - MONSOON	JP Morgan Chase Bank N.A, INDIA SUB CUSTODY 9th Floor, Tower A Block 9, NKP, Western Express Highway,Goregaon E.	20/03/1976	United Arab Emirates	62360	0.21
ABU DHABI INVESTMENT AUTHORITY - STABLE	JP Morgan Chase Bank N.A, INDIA SUB CUSTODY 9th Floor, Tower A Block 9, NKP, Western Express Highway,Goregaon E.	20/03/1976	United Arab Emirates	78550	0.27

ABU DHABI INVESTMENT AUTHORITY - XENON	JP Morgan Chase Bank N.A, INDIA SUB CUSTODY 9th Floor, Tower A Block 9, NKP, Western Express Highway,Goregaon E.	20/03/1976	United Arab Emirates	2476	0.01
AL MEHWAR COMMERCIAL INVESTMENTS L.L.C. - (WANDA)	HSBC SECURITIES SERVICES 11TH FLOOR BLDG 3 NESCO IT PARK NESCO COMPLEX W E HIGHWAY GOREGAON EAST MUMBAI	05/05/2014	United Arab Emirates	74440	0.25
ALASKA PERMANENT FUND	STANDARD CHARTERED BANK SECURITIES SERVICES, 3RD FLOOR 23-25 MAHATMA GANDHI ROAD FORT, MUMBAI	01/11/1976	United States	1491	0.01
ALLIANZ GLOBAL INVESTORS GMBH ACTING ON BEHALF OF ALLIANZGI-FONDS DSPT	JP Morgan Chase Bank N.A, INDIA SUB CUSTODY 9th Floor, Tower A Block 9, NKP, Western Express Highway,Goregaon E.	20/03/1956	Germany	241	0.01
AMERICAN CENTURY ETF TRUST - AVANTIS EMERGING MARKETS EQUITY FUND	DEUTSCHE BANK AG, DB HOUSE, HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	17/09/2019	United States	1013	0.01
AMERICAN CENTURY ETF TRUST - AVANTIS EMERGING MARKETS EX-CHINA EQUITY ETF	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	03/10/2023	United States	130	0.01
AMERICAN CENTURY ETF TRUST-AVANTIS EMERGING MARKETS EQUITY ETF	DEUTSCHE BANK AG, DB HOUSE, HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	17/09/2019	United States	7635	0.01
AMERICAN CENTURY ETF TRUST-AVANTIS EMERGING MARKETS SMALL CAP EQUITY ETF	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI	31/12/2016	United States	404	0.01
BNP PARIBAS FINANCIAL MARKETS	BNP PARIBAS, CUSTODY OPERATIONS BNP PARIBAS HOUSE, 6TH FLOOR 1 NORTH AVENUE,MAKER MAXITY BKC,BANDRA EAST,MUMBAI	28/04/1994	France	1	0.01

BNP PARIBAS FINANCIAL MARKETS - ODI	BNP PARIBAS HOUSE 1 NORTH AVENUE, MAKER MAXITY BANDRA KURLA COMPLEX, BANDRA EAST MUMBAI	28/04/1994	Falkland Islands (Malvinas)	97932	0.32
BNYM MELLON CF SL ACWI EX-U.S IMI FUND	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	20/09/2012	United States	342	0.01
BNYM MELLON DB SL ACWI EX- U.S. SMALL CAP FUND	DEUTSCHE BANK AG, DB HOUSE HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI	21/09/2012	United States	309	0.01
BOFA SECURITIES EUROPE SA - ODI	CITIBANK N.A. CUSTODY SERVICES FIFC- 9TH FLOOR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	25/09/2018	France	58669	0.2
BVK PERSONALVORSORGE DES KANTONS ZURICH	JP Morgan Chase Bank N.A, INDIA SUB CUSTODY 9th Floor, Tower A Block 9, NKP, Western Express Highway,Goregaon E.	19/06/2015	Switzerland	4120	0.01
CALIFORNIA PUBLIC EMPLOYEES' RETIREMENT SYSTEM	HSBC SECURITIES SERVICES 11TH FLOOR BLDG 3 NESCO IT PARK NESCO COMPLEX W E HIGHWAY GOREGAON EAST MUMBAI	16/10/2012	United States	20844	0.07
CALIFORNIA PUBLIC EMPLOYEES' RETIREMENT SYSTEM MANAGED BY CONNOR, CLARK & LUNN INVESTMENT MANAGEMENT LTD	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI	16/10/2012	United States	2951	0.01
CALIFORNIA STATE TEACHERS RETIREMENT SYSTEM - NORTHERN TRUST INVESTMENTS, INC.	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI	16/12/2012	United States	6148	0.02

CC&L Q EMERGING MARKETS EQUITY FUND LP	CITIBANK N.A. CUSTODY SERVICES FIFC- 9TH FLOOR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	15/03/2016	United States	1014	0.01
CC&LQ EMERGING MARKETS EQUITY UCITS FUND, A SUB-FUND OF CONNOR, CLARK & LUNN UCITS ICAV	HSBC SECURITIES SERVICES 11TH FLOOR BLDG 3 NESCO IT PARK NESCO COMPLEX W E HIGHWAY GOREGAON EAST MUMBAI	16/11/2005	Canada	856	0.01
CI WISDOMTREE EMERGING MARKETS DIVIDEND INDEX ETF	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAY GOREGAON (EAST), MUMBAI	30/10/2007	United States	71	0.01
CITADEL SECURITIES SINGAPORE PTE. LIMITED	JP Morgan Chase Bank N.A, India Sub Custody 9th Floor, Tower A Block 9, NKP, Western Express Highway,Goregaon E.	15/10/2020	Singapore	450	0.01
CITIGROUP GLOBAL MARKETS MAURITIUS PRIVATE LIMITED - ODI	CITIBANK N.A. CUSTODY SERVICES FIFC- 9TH FLOOR, G BLOCK PLOT C-54 AND C-55, BKC BANDRA - EAST, MUMBAI	21/07/2000	Mauritius	42	0.01

VII NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS

[Details of Promoters, Members (other than promoters), Debenture holders]

Details	At the beginning of the year	At the end of the year
Promoters	27	27
Members (other than promoters)	66562	59615
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
A Promoter	2	0	2	0	1.01	0
B Non-Promoter	2	8	3	7	0.01	0.01
i Non-Independent	2	0	3	0	0.01	0
ii Independent	0	8	0	7	0	0.01
C Nominee Directors representing	0	0	0	0	0.00	0.00
i. Banks and 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	8	5	7	1.02	0.01

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

14

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

Name	DIN/PAN	Designation	Number of equity shares held	Date of cessation (after closure of financial year : If any) (DD/MM/YYYY)
SUNIL SIDDHARTH LALBHAI	00045590	Managing Director	93326	
SAMVEGBHAI ARVINDBHAI LALBHAI	00009278	Managing Director	202377	
BHARATHY NARAYANAN MOHANAN	00198716	Whole-time director	5800	25/05/2025
GOPI KANNAN RENGACHARI THIRUKONDA	00048645	Whole-time director	50	
BALDEV RAJ ARORA	00194168	Director	100	

PRADEEP JYOTI BANERJEE	02985965	Director	15	
RANGASWAMY RATHAKRISHNAN IYER	00474407	Director	0	
SHARADCHANDRA DAMODAR ABHYANKAR	00108866	Director	0	
SUJAL ANIL SHAH	00058019	Director	0	
PRAVEEN PURUSHOTTAM KADLE	00016814	Director	0	
PADMAJA CHUNDURU	08058663	Director	0	
VIVEK YESHWANT GADRE	08906935	Whole-time director	0	
GOPI KANNAN RENGACHARI THIRUKONDA	ABNPT8054F	CFO	50	
LALIT PATNI	ABHPP8893Q	Company Secretary	0	

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

9

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation (DD/MM/YYYY)	Nature of change (Appointment/ Change in designation/ Cessation)
PRAVEEN PURUSHOTTAM KADLE	00016814	Additional Director	01/05/2024	Appointment
PRAVEEN PURUSHOTTAM KADLE	00016814	Director	26/07/2024	Change in designation
MUKUND MANOHAR CHITALE	00101004	Director	16/10/2024	Cessation
PADMAJA CHUNDURU	08058663	Additional Director	24/01/2025	Appointment
PADMAJA CHUNDURU	08058663	Director	06/03/2025	Change in designation
VIVEK YESHWANT GADRE	08906935	Additional Director	24/01/2025	Appointment
VIVEK YESHWANT GADRE	08906935	Director	06/03/2025	Change in designation
SHUBHALAKSHMI AAMOD PANSE	02599310	Director	26/03/2025	Cessation
BALDEV RAJ ARORA	00194168	Director	31/03/2025	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 (DD/MM/YYYY)	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	26/07/2024	66589	85	47

B BOARD MEETINGS

*Number of meetings held

5

S.No	Date of meeting (DD/MM/YYYY)	Total Number of directors as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	26/04/2024	11	11	100
2	19/07/2024	12	12	100
3	25/10/2024	11	11	100
4	24/01/2025	13	13	100
5	28/03/2025	12	12	100

C COMMITTEE MEETINGS

Number of meetings held

15

S.No	Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members as on the date of meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committee	25/04/2024	5	5	100

2	Audit Committee	18/07/2024	6	6	100
3	Audit Committee	24/10/2024	5	5	100
4	Audit Committee	23/01/2025	5	5	100
5	Stakeholders Relationship Committee	26/04/2024	3	3	100
6	Stakeholders Relationship Committee	18/07/2024	3	3	100
7	Stakeholders Relationship Committee	24/10/2024	3	3	100
8	Stakeholders Relationship Committee	23/01/2025	3	3	100
9	Investment Committee	09/12/2024	4	4	100
10	Investment Committee	27/02/2025	5	4	80
11	Corporate Social Responsibility Committee	25/04/2024	3	3	100
12	Nomination and Remuneration Committee	26/04/2024	3	3	100
13	Nomination and Remuneration Committee	24/01/2025	3	3	100
14	Risk Management Committee	18/07/2024	4	4	100
15	Risk Management Committee	21/01/2025	4	4	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	
								25/07/2025 (Y/N/NA)
1	SUNIL SIDDHARTH LALBHAI	5	5	100	9	9	100	Yes
2	SAMVEGBHAI ARVINDBHAI LALBHAI	5	5	100	0	0	0	Yes
3	BHARATHY NARAYANAN MOHANAN	5	5	100	3	3	100	Yes
4	GOPI KANNAN	5	5	100	6	6	100	Yes

	RENGACHARI THIRUKONDA							
5	BALDEV RAJ ARORA	5	5	100	14	14	100	Yes
6	PRADEEP JYOTI BANERJEE	5	5	100	2	2	100	Yes
7	RANGASWAMY RATHAKRISHNAN IYER	5	5	100	6	6	100	Yes
8	SHARADCHANDRA DAMODAR ABHYANKAR	5	5	100	0	0	0	No
9	SUJAL ANIL SHAH	5	5	100	4	4	100	Yes
10	PRAVEEN PURUSHOTTAM KADLE	4	4	100	3	3	100	Yes
11	PADMAJA CHUNDURU	2	2	100	0	0	0	Not applicable
12	VIVEK YESHWANT GADRE	2	2	100	0	0	0	Not applicable

X REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

☐ Nil

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

5

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	SUNIL SIDDHARTH LALBHAI	Managing Director	53854269	62416000	0	0	116270269.00
2	SAMVEGBHAI ARVINDBHAI LALBHAI	Managing Director	13775572	17634030	0	0	31409602.00
3	BHARATHY NARAYANAN MOHANAN	Whole-time director	16599090	0	0	0	16599090.00
4	GOPI KANNAN RENGACHARI THIRUKONDA	Whole-time director	23504296	0	0	0	23504296.00
5	VIVEK YESHWANT GADRE	Whole-time director	3564402	0	0	0	3564402.00
	Total		111297629.0 0	80050030.00	0.00	0.00	191347659.00

B *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 Secretary	10896268	0	0	0	10896268.00
	Total		10896268.00	0.00	0.00	0.00	10896268.00

C *Number of other directors whose remuneration details to be entered

9

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	MUKUND MANOHAR CHITALE	Director	0	750000	0	240000	990000.00
2	SHUBHALAKSHMI AAMOD PANSE	Director	0	1620000	0	560000	2180000.00
3	BALDEV RAJ ARORA	Director	0	1710000	0	860000	2570000.00
4	PRADEEP JYOTI BANERJEE	Director	0	1080000	0	330000	1410000.00
5	RANGASWAMY RATHAKRISHNAN IYER	Director	0	1395000	0	580000	1975000.00
6	SHARADCHANDRA DAMODAR ABHYANKAR	Director	0	900000	0	300000	1200000.00
7	SUJAL ANIL SHAH	Director	0	1260000	0	500000	1760000.00
8	PRAVEEN PURUSHOTTAM KADLE	Director	0	1095000	0	400000	1495000.00
9	PADMAJA CHUNDURU	Director	0	150000	0	150000	300000.00
	Total		0.00	9960000.00	0.00	3920000.00	13880000.00

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 (DD/MM/YYYY)	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 (DD/MM/YYYY)	Name of the Act and section under which offence committed	Particulars of offence	Amount of compounding (in rupees)

XIII Details of Shareholder / Debenture holder

Number of shareholder/ debenture holder

59642

XIV Attachments

(a) List of share holders, debenture holders

Details of Shareholder or
Debenture holder.xlsm

(b) Optional Attachment(s), if any

Form MGT-8_Atul.pdf
Clarification notes to Form MGT 7
2024-25.pdf

XV 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.

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 applicable provisions of the Act during the financial year.
- (c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.
- (d) Where the annual return discloses the fact that the number of members, (except in case of one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

I/ We have examined the registers, records and books and papers of ATUL LIMITED as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on (DD/MM/YYYY) 31/03/2025

In my/ our opinion and to the best of my information and according to the examinations carried out by me/ us and explanations furnished to me/ us by the company, its officers and agents, I/ we 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 therefor;
- 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;
- 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, proper notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
- 5 closure of Register of Members / Security holders, as the case may be.
- 6 advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;
- 7 contracts/arrangements with related parties as specified in section 188 of the Act;
- 8 issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;
- 9 keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act
- 10 declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;
- 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/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;
- 13 appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;
- 14 approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;
- 15 acceptance/ renewal/ repayment of deposits;
- 16 borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, 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 Act ;

18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

To be digitally signed by

Name

Ashish C Doshi

Date (DD/MM/YYYY)

11/09/2025

Place

Ahmedabad

Whether associate or fellow:

☐ Associate ☒ Fellow

Certificate of practice number

2*5*

XVI Declaration under Rule 9(4) of the Companies (Management and Administration) Rules, 2014

*(a) DIN/PAN/Membership number of Designated Person

ABHPP8893Q

*(b) Name of the Designated Person

LALIT PATNI

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 13 dated* (DD/MM/YYYY) 25/04/2025 to sign this form and declare that all the requirements of 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.

*To be digitally signed by

*Designation

(Director /Liquidator/ Interim Resolution Professional (IRP)/Resolution Professional (RP))

Director

*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator

0*0*8*4*

***To be digitally signed by**

☒ Company Secretary ☐ Company secretary in practice

***Whether associate or fellow:**

☐ Associate ☒ Fellow

Membership number

4*2*

Certificate of practice number

Note: Attention is drawn to provisions of Section 448 and 449 of the Companies Act, 2013 which provide for punishment for false statement / certificate and punishment for false evidence respectively.

For office use only:

eForm Service request number (SRN)

AB6609079

eForm filing date (DD/MM/YYYY)

11/09/2025

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

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

We, SPANJ & Associates, Company Secretaries 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 thereunder for the financial year ended on 31st March, 2025. In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished to us by the company, its officer's and agents, we 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, the Company is Listed Public Limited Company having CIN: L99999GJ1975PLC002859;
 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 from 13th July, 2024 to 19th July, 2024 for the purpose of Annual General Meeting of the financial year ended 31st March 2024.
 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;

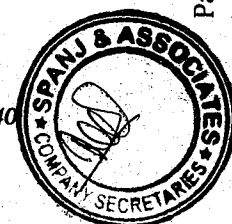
*If/1, Anison Complex, 3rd Floor, Nr. Stadium Circle, C. G. Road, Navrangpura,
Ahmedabad-380 009 Ph: 079-26421414, 26421555, e-mail: csdoshtiac@gmail.com M: 098250 64740*



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. 30.4 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 as 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;
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 ;
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;



SPANJ
& ASSOCIATES
Company Secretaries
Peer Reviewed Firm

ATUL LIMITED

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: 11/09/2025



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.: 6467/2025

UDIN: F003544G001225160

Clarification note on MGT 7 of Atul Limited 2024-25

The following clarification notes be noted due to technical restrictions and mandatory requirements for providing details which are at present not available either due to lack of data available in depositories records or non-submission of KYC by shareholders even after regular requests.

Note to Point no. VI SHARE HOLDING PATTERN – sub point B

“Breakup of total number of shareholders (Promoters + Other than promoters)” - *This is mandatory field of the Form*

Category wise Individual male female detail under above tab is tentative or indicative and reported in the mandatory field of the form as per detail retrieved by the Registrar and Transfer Agent from depository records. Due to non-availability of proper data based with depositories and independent software | system, the Company or its officers have relied Soley on information received by RTA from Depositories system and the same is not verified by us.

Note to Point no. VI SHARE HOLDING PATTERN – sub point C

“Detail of Foreign institutional investors” - *This is mandatory field of the Form*

Date of incorporation and Country of incorporation of Foreign entities are not available in the records of depositories however to the best of our ability we have searched the details from the public records available with Legal Entity Identifier websites (<https://www.legalentityidentifier.in>, <https://www.lei-lookup.com> etc) and) is mentioned in the Form. The form permits only 25 entry hence detail of all the entities are provided in PDF form as an optional attachment to reflect correct position of holding.

List of shareholders

PAN of shareholders is mandatory field in excel template of list of shareholders made available by the MCA, without PAN we were not allowed to save the form and not allowed to attach the template in the Form MGT 7, to overcome this technical restrictions, for such case whose PAN is not available in records - due to non-updation of KYC by shareholders, we have added dummy PAN - ABCDP0001E for such cases.