

1. Name of Listed Entity: **Atul Limited**
2. Scrip Code/Name of Scrip/Class of Security: ATUL
3. Share Holding Pattern Filed under: 31b
4. Share Holding Pattern as on : 30-Sep-2019
5. **Declaration:** The Listed entity is required to submit the following declaration to the extent of submission of information:-

S. No.	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?	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	Promoter and Promoter Group
6	Whether the Listed Entity has issued any differential Voting Rights?	No	
7	Whether the Listed Entity has issued any Warrants ?	No	
8	Whether the listed entity has any significant beneficial owner?	Yes	

Table I - Summary Statement holding of specified securities

Category (I)	Category of shareholder (II)	Nos. of shareholders (III)	No. of fully paid up equity shares held (IV)	No. of Partly paid-up equity shares held (V)	No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI) = (VII)+(X) As a % of (A+B+C2)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)					
								Class eg: X	No of Voting Rights	Class eg: y	Total			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)				
																				Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)	
																				Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)	
A	Promoter & Promoter Group	24	13263524	0	0	13263524	44.72	13263524	0	13263524	44.72	0	0	520000	3.92	13263524							
B	Public	30186	16398209	0	0	16398209	55.28	16398209	0	16398209	55.28	0	0	0	0	15906815							
C	Non Promoter-Non Public	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
C1	Shares underlying DRs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
C2	Shares held by Employee Trusts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0							
	Total	30210	29661733	0	0	29661733	100	29661733	0	29661733	100	0	0	520000	1.75	29170339							

	Rajivbhai Chinubhai Lalbhai		1	1225	0	0	1225	0	1225	0	1225	0	0	0	0	0	0	1225	
	Sheth Narottambhai Lalbhai		1	495	0	0	495	0	495	0	495	0	0	0	0	0	0	495	
b	Central Government/ State Government(s)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
c	Financial Institutions/ Banks		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
d	Any Other (specify)		8	12382743	0	0	12382743	41.75	12382743	0	12382743	41.75	0	0	0	0	520000	4.2	12382743
	Bodies Corporate		8	12382743	0	0	12382743	41.74	12382743	0	12382743	41.74	0	0	0	0	520000	18.33	12382743
	Aagam Holdings Pvt Ltd		1	6650700	0	0	6650700	22.42	6650700	0	6650700	22.42	0	0	0	0	20000	0.3	6650700
	Arvind Farms Pvt Ltd		1	2772642	0	0	2772642	9.35	2772642	0	2772642	9.35	0	0	0	0	500000	18.03	2772642
	Adhigam Investments Pvt Ltd		1	1008301	0	0	1008301	3.4	1008301	0	1008301	3.4	0	0	0	0	0	0	1008301
	Aayojan Resources Private Ltd		1	613700	0	0	613700	2.07	613700	0	613700	2.07	0	0	0	0	0	0	613700
	Akshita Holdings Private Limited		1	463300	0	0	463300	1.56	463300	0	463300	1.56	0	0	0	0	0	0	463300
	Adhinami Investments Private Limited		1	454000	0	0	454000	1.53	454000	0	454000	1.53	0	0	0	0	0	0	454000
	Anusandhan Investments Limited		1	235000	0	0	235000	0.79	235000	0	235000	0.79	0	0	0	0	0	0	235000
	Aahvan Agencies Limited		1	185100	0	0	185100	0.62	185100	0	185100	0.62	0	0	0	0	0	0	185100
	Sub-Total (A)(1)		24	13263524	0	0	13263524	44.72	13263524	0	13263524	44.72	0	0	0	0	520000	3.92	13263524
2	Foreign		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
a	Individuals (Non-Resident Individuals/ Foreign Individuals)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
b	Government		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
c	Institutions		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
d	Foreign Portfolio Investor		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
e	Any Other (specify)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Sub-Total (A)(2)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)		24	13263524	0	0	13263524	44.72	13263524	0	13263524	44.72	0	0	0	0	520000	3.92	13263524

¹ 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)

Table III - Statement showing shareholding pattern of the Public shareholder

	Category & Name of the Shareholders (I)	PAN (II)	Nos. of shareholder (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held VII = IV+V+VI	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) VIII	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)
									Class X	Class Y	Total	Total as a % of Total Voting rights			No. (a)	As a % of total Shares held (b)	No. (Not applicable)	As a % of total shares held (Not applicable) (b)	
1	Institutions		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
a	Mutual Funds/		23	6614254	0	0	6614254	22.3	6614254	0	6614254	22.3	0	0	0	0	0	0	6613954
	Hdfc Trustee Company Ltd - A/C Hdfc Mid - Capopportunities Fund		1	2050487	0	0	2050487	6.91	2050487	0	2050487	6.91	0	0	0	0	0	0	2050487
	Dsp Small Cap Fund		1	1063267	0	0	1063267	3.58	1063267	0	1063267	3.58	0	0	0	0	0	0	1063267
	Aditya Birla Sun Life Trustee Private Limited A/C Aditya Birla Sun Life Equity Advantage Fund		1	796750	0	0	796750	2.69	796750	0	796750	2.69	0	0	0	0	0	0	796750
	Kotak Emerging Equity Scheme		1	501816	0	0	501816	1.69	501816	0	501816	1.69	0	0	0	0	0	0	501816
	L&T Mutual Fund Trustee Limited-L&T Emerging Businesses Fund		1	486040	0	0	486040	1.64	486040	0	486040	1.64	0	0	0	0	0	0	486040
	Franklin India Smaller Companies Fund		1	385642	0	0	385642	1.3	385642	0	385642	1.3	0	0	0	0	0	0	385642
	Canara Robeco Mutual Fund A/C Canara Robeco Emerging Equities		1	364463	0	0	364463	1.23	364463	0	364463	1.23	0	0	0	0	0	0	364463
b	Venture Capital Funds		0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0.00	0	0	0
c	Alternate Investment Funds		4	8722	0	0	8722	0.03	8722	0	8722	0.03	0	0	0	0	0	0	8722
d	Foreign Venture Capital Investors		0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0.00	0	0	0
e	Foreign Portfolio Investors		100	2137502	0	0	2137502	7.21	2137502	0	2137502	7.21	0	0	0	0	0	0	2136702
	Kotak Funds - India Midcap Fund		1	372418	0	0	372418	1.26	372418	0	372418	1.26	0	0	0	0	0	0	372418
f	Financial Institutions/Banks		22	30670	0	0	30670	0.1	30670	0	30670	0.1	0	0	0	0	0	0	19577
g	Insurance Companies		5	226870	0	0	226870	0.76	226870	0	226870	0.76	0	0	0	0	0	0	226870
h	Provident Funds/		0	0	0	0	0.00	0	0	0	0	0.00	0	0	0	0.00	0	0	0

	Pension Funds																		
i	Any Other (specify)	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00				0
	Sub-Total (B)(1)	154	9018018	0	0	9018018	30.4	9018018	0	9018018	30.4	0	30.4	0	0				9005825
2	Central Government/ State Government(s)/ President of India	1	336	0	0	336	0	336	0	336	0	0	0	0	0				0
	Sub-Total (B)(2)	1	336	0	0	336	0	336	0	336	0	0	0	0	0				0
3	Non-institutions	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00				0
a	Individuals -	28252	5852355	0	0	5852355	19.73	5852355	0	5852355	19.73	0	19.73	0	0				5381141
i	Individual shareholders holding nominal share capital up to Rs. 2 lakhs.	28237	3830186	0	0	3830186	12.91	3830186	0	3830186	12.91	0	12.91	0	0				3358972
ii	Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.	15	2022169	0	0	2022169	6.82	2022169	0	2022169	6.82	0	6.82	0	0				2022169
	Shivani Tejas Trivedi	1	584794	0	0	584794	1.97	584794	0	584794	1.97	0	1.97	0	0				584794
	Tejas B. Trivedi	1	604432	0	0	604432	2.04	604432	0	604432	2.04	0	2.04	0	0				604432
b	NBFCs registered with RBI	1	4609	0	0	4609	0.02	4609	0	4609	0.02	0	0.02	0	0				4609
c	Employee Trusts	1	10	0	0	10	0.00	10	0	10	0.00	0	0.00	0	0.00				10
d	Overseas Depositories (holding DRs) (balancing figure)	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00				0
e	Any Other (specify)	1778	1522891	0	0	1522891	5.13	1522891	0	1522891	5.13	0	5.13	0	0				1515240
	Bodies Corporate	332	695545	0	0	695545	2.34	695545	0	695545	2.34	0	2.34	0	0				695545
	Clearing Members	103	13830	0	0	13830	0.05	13830	0	13830	0.05	0	0.05	0	0				13830
	HUF	671	229691	0	0	229691	0.77	229691	0	229691	0.77	0	0.77	0	0				229691
	IEPF	1	197624	0	0	197624	0.67	197624	0	197624	0.67	0	0.67	0	0				197624
	Non-Resident Indian (NRI)	608	194668	0	0	194668	0.66	194668	0	194668	0.66	0	0.66	0	0				193596
	Others	61	191221	0	0	191221	0.64	191221	0	191221	0.64	0	0.64	0	0				184642
	Trusts	2	312	0	0	312	0	312	0	312	0	0	0	0	0				312
	Sub-Total (B)(3)	30031	7379855	0	0	7379855	24.88	7379855	0	7379855	24.88	0	24.88	0	0				6900990
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)	30186	16398209	0	0	16398209	55.28	16398209	0	16398209	55.28	0	55.28	0	0				15906815

Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder

Category & Name of the Shareholders (I)	PAN (II)	No. of share holder (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total no. shares held (VII = IV+V+VI)	Shareholding % calculate d as per SCRR, 1957 As a % of (A+B+C2) (VIII)	Number of Voting Rights held in each class of securities (IX)				No. of Shares Outstanding convertible securities (including Warrants) (X)	Total shareholdin g, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerializ ed form (XIV) (Not Applicable)									
								No of Voting Rights			Total as a % of Total Voting rights			No.	As a % of total Shares held	No. (Not applicable)	As a % of total shares held (Not applicable)										
								Class X	Class Y	Total																	
								1	Custodian/DR Holder	0	0			0	0	0	0.00		0	0	0	0.00	0	0.00			0
								2	Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)	0	0			0	0	0	0.00		0	0	0	0.00	0	0.00			0
									Total Non-Promoter- Non Public Shareholding (C)= (C)(1)+(C)(2)	0	0			0	0	0			0	0	0	0.00	0	0.00			0

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, whether direct or indirect*					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	
1	Sunil Siddharth Lalbhai			India	32.96	32.96	32.96			
A	Akshita Holdings Private Limited			India	1.56	1.56	1.56	No	No	13-Sep-1998
B	Aagam Holdings Private Limited			India	22.42	22.42	22.42	No	No	13-Sep-1998
C	Aagam Agencies Private Limited (Formerly known as Adhigam Investments Private Limited)			India	3.4	3.4	3.4	No	No	13-Sep-1998
D	Adhinami Investments Private Limited			India	1.53	1.53	1.53	No	No	13-Sep-1998
E	Aahvan Agencies Limited			India	0.62	0.62	0.62	No	No	13-Sep-1998
F	Aayojan Resources Private Limited			India	2.07	2.07	2.07	No	No	13-Sep-1998
G	Sunil Lalbhai Employees Trust			India	0.01	0.01	0.01	No	No	13-Sep-1998
H	Vimla Siddharth Trust			India	0.02	0.02	0.02	No	No	13-Sep-1998
I	Sunil Siddharth HUF			India	0.11	0.11	0.11	No	No	13-Sep-1998
J	Siddharth Family Trust			India	0.12	0.12	0.12	No	No	13-Sep-1998
K	Sunil Siddharth Lalbhai			India	0.31	0.31	0.31	No	No	13-Sep-1998
L	Anusandhan Investments Limited			India	0.79	0.79	0.79	No	No	13-Sep-1998

Table II- Unclaim Details

Details of Shares which remain unclaimed may be given here 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 share held

Table III- Unclaim Details

Details of Shares which remain unclaimed may be given here 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 share held

Table III- Person in Concert

Details of the shareholders acting as persons in Concert including their Shareholding			
Name of shareholder	Name of PAC	No. of share	Holding %