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

1.	Name o	Name of Listed Entity: Atul Limited										
2.	Scrip Co	Scrip Code/Name of Scrip/Class of Security: 500027										
3.	Share H	Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c)										
	a.	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.	Declara	tion: 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.

GENERATED ON :06/04/2020 NSDL : 31/03/2020 CDSL :31/03/2020

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Table I - Summary Statement holding of specified securities

							Sharehold					Shares	ing , as a			Number o	f Shares	
							ing as a %					Underlyin	_			pledged o	r	
							of total	Number of	Voting Rig	ts held in	each class	σ	assuming	Number of	Locked in	otherwise		Number
				No. of	No. of		no. of	of securition	es			Outstandi	1	shares		encumber	ed	of equity
				Partly	shares		shares				ng	conversio					shares	
			fully paid	-	underlyin							convertibl			As a % of		As a % of	
			up equity		andenym	Total nos.	(calculate	No of Voti	ng Rights		Total as a		convertibl		total		total	demateri
					8 D			Class ser	Cl									
		sharehold			Depositor	snares		Class eg:	Class eg:		% of	securities			Shares		Shares	alised
Category	Category of shareholder	ers	held	held	y Receipts	held	1957)	X	у	Total	(A+B+C)	(including	securities	No. (a)	held(b)	No. (a)	held(b)	form
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII) As a		(1	X)		(X)	(XI)=	(X	II)	(X	III)	(XIV)
(A)	Promoter & Promoter Group	23	13289244	0	0	13289244	44.80	13289244	0	13289244	44.80	0	44.80	0	0.00	500000	3.76	13289244
(B)	Public	35804	16372489	0	0	16372489	55.20	16372489	0	16372489	55.20	0	55.20	213	0.00	0	0	15915899
(C)	Non Promoter - Non Public				0				0			0			0.00	0	0	j
(C1)	Shares Underlying DRs	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	0	0	0
(C2)	Shares Held By Employee Trust	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	0	0	0
	Total	35827	29661733	0	0	29661733	100	29661733	0	29661733	100	0	100	213	0.0013	500000	3.7624	29205143

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### **Atul Limited** Table II - Statement showing shareholding pattern of the Promoter and Promoter Group Number of Shares Shares ing , as a pledged or Underlyin |% Number of Voting Rights held in each class Number of Locked in otherwise calculated of securities encumbered Outstandi full No. of of equity shares conversio No. of Partly as per fully paid | paid-up SCRR, convertibl n of As a % of As a % of held in underlyin No of Voting Rights 1957 As a up equity |equity Total nos Γotal as a convertibl demateri % of % of sharehold shares Depositor shares Class eg: securities Shares Shares alised y Receipts held (A+B+C2) (including securities No. (a) held(b) held(b) **Category & Name of the shareholders** Class eg: y Total (A+B+C) No. (a) form (11) (III) (IV) (V) (VI) (VII) = (VIII) As a (XI)= (XIII) (XIV) 880725 880725 2.9692 2.9692 880725 Individuals / Hindu Undivided Family 880725 880725 2.9692 202377 202377 202377 Samvegbhai Arvindbhai Lalbhai 202377 20237 0.68 0.68 0.68 0.00 0.00 174070 174070 0.59 174070 174070 0.59 0.59 0.00 0.00 174070 Saumya Samvegbhai Lalbhai Samvegbhai Arvindbhai (On behalf of Samvegbhai Arvindbhai Lalbhai HUF) 114943 114943 114943 0.39 0.00 114943 114943 0.39 0.00 Sunil Siddharth Lalbhai 91772 91772 91772 91772 0.31 0.31 91772 Vimla S Lalbhai\* 65982 65982 0.22 65982 65982 0.22 0.22 0.00 0.00 65982 Swati S Lalbhai 63500 63500 63500 63500 0.21 0.21 0.00 0.00 63500 0.17 Taral S Lalbhai 50022 50022 0.17 50022 50022 0.17 0.00 0.00 50022 Anamikaben Samveghbhai Lalbhai 47199 47199 47199 0.16 47199 0.16 0.16 0.00 0.00 47199 Sunil Siddharth Lalbhai (On behalf of Sunil Siddharth HUF) 31544 31544 31544 31544 31544 0.11 Astha Lalbhai 20500 20500 0.07 20500 20500 0.07 0.07 0.00 0.00 20500 Hansa Niranjanbhai (On behalf of Manini Niranjan Trust and 5999 5999 5999 0.00 5999 5999 0.02 0.02 0.00 5500 5500 5500 5500 0.02 0.02 0.00 5500 Nishtha Sunilbhai Lalbhai 0.02 0.00 Sanjaybhai Shrenikbhai Lalbhai (On behalf of Arvindbhai Lalbhai Family Trust) 3653 3653 3653 0.01 0.00 3653 0.01 3653 0.01 0.00 Sunil Lalbhai Employees Trust 2000 2000 0.01 2000 2000 0.01 0.01 0.00 0.00 2000 Rajivbhai Chinubhai Lalbhai (On behalf of Lalbhai Dalpatbhai 0.00 1169 1169 0.00 1169 1169 0.00 0.00 0.00 1169 Sheth Narottambhai Lalbhai (on behalf of Sheth Narottambhai Lalbhai HUF) 495 495 495 495 0.00 495 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 Central Government / State Government(s) 0.00 Financial Institutions / Banks 0.00 0.00 0.00 41.8335 Any Other (Specify) 7 12408519 0 12408519 41.8335 12408519 0 12408519 41.8335 500000 17.8814 12408519 7 12408519 0 12408519 41.8335 12408519 0 12408519 17.8814 12408519 **Bodies Corporate** 41.8335 41.8335 500000 6650700 6650700 22.42 6650700 6650700 22.42 22.42 0.00 0.00 6650700 Aagam Holdings Private Limited 17.88 2796208 2796208 2796208 9.43 9.43 Arvind Farms Pvt Ltd 9.43 2796208 2796208 0.00 500000 Aagam Agencies Pvt Ltd (formerly known as Adhigam Investn 4.02 1193401 0 1193401 4.02 1193401 1193401 4.02 0.00 0.00 1193401 614460 614460 614460 614460 2.07 2.07 0.00 0.00 614460 Aayojan Resources Private Ltd 463400 463400 1.56 463400 463400 1.56 1.56 0.00 0.00 463400 Akshita Holdings Private Limited Adhinami Investments Pvt Ltd 455350 455350 1.54 455350 455350 1.54 1.54 0.00 0.00 455350 235000 235000 235000 0.79 235000 Anusandhan Investments Limited 0.79 235000 0.79 0.00 0.00 44.8027 0 13289244 500000 17.8814 13289244 23 13289244 0 13289244 13289244 44.8027 44.8027 Sub Total (A)(1) Individuals (Non-Resident Individuals / Foreign Individuals) 0.00 0.00 0.00 0.00 0.00 0.00 0.00 Government 0.00 0.00 0.00 0.00 0.00 Institutions Foreign Portfolio Investor 0.00 0.00 0.00 0.00 0.00 0.00 Any Other (Specify) 0.00 0.00 0.00 0.00 Sub Total (A)(2) 0.00 0.00 0.00 0.00 0.00 Total Shareholding Of Promoter And Promoter Group (A)=

44.8027 13289244

0 13289244

44.8027

0 13289244

44.8027

500000 17.8814 13289244

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.

23 13289244

### 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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<sup>\*</sup> 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)

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

	Category & Name of the shareholders	PAN (II)	Nos. of sharehold ers (III)	up equity	Partly paid-up equity shares held (V)	No. of shares underlyin g Depositor y Receipts		calculated as per SCRR, 1957 As a	Number of securition No of Voti	ng Rights Class eg: y		Total as a % of	Underlyin g Outstandi ng convertibl e securities	assuming full conversio n of convertibl	t S	As a % of otal chares neld(b)	encumber	r otherwise ed	Number of equity shares held in demateri alised form (XIV)
1	Institutions	(11)	(111)	(10)	(V)	(VI)	(VII) -	(VIII) AS a		<u>''</u>	^, 		(^)	(////		<u> </u>	(/	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	(XIV)
(a)	Mutual Fund		24	6939875	0	0	6939875	23.40	6939875	0	6939875	23.40	0	23.40	0	0.00	(		6939575
(α)	Hdfc Trustee Company Ltd - A/C Hdfc Mid - Capo		1	2121942	0	0	2121942	7.15	2121942		2121942	7.15		7.15	0	0.00		) (	2121942
	Dsp Small Cap Fund		1	1367698	0	0	1367698		1367698		1367698	4.61		4.61	0	0.00			1367698
	Aditya Birla Sun Life Trustee Private Limited A/C		1	810128	C	0	810128	2.73	810128		810128	2.73		2.73	0	0.00		) (	810128
	Canara Robeco Mutual Fund A/C Canara Robeco		1	496148	0	0	496148		496148		496148	1.67		1.67	0	0.00			496148
	Kotak Emerging Equity Scheme		1	398218	0	0	398218	1.34	398218		398218	1.34		1.34	0	0.00		) (	398218
	L And T Mutual Fund Trustee Ltd-L And T Mid Car		1	376649	C	0	376649		376649		376649	1.27		1.27		0.00			376649
(b)	Venture Capital Funds		0	0	C	0	0	0.00	0	0	0	0.00		0.00	0	0.00			0
(c)	Alternate Investment Funds		9	30802	C	0	30802		30802	0	30802	0.10		0.10	0	0.00			30802
(d)	Foreign Venture Capital Investors		0	0	C	0	0	0.00	0	0	0	0.00		0.00		0.00		) (	0
(e)	Foreign Portfolio Investor		105	2043329	C	0	2043329	6.89	2043329	0	2043329	6.89	0	6.89	0	0.00	C	) C	2042529
	Kotak Funds - India Midcap Fund		1	357439	C	0	357439		357439		357439	1.21		1.21	0	0.00		) (	357439
(f)	Financial Institutions / Banks		21	. 25625	C	0	25625	0.09	25625	0	25625	0.09	0	0.09	0	0.00	C	) C	14544
(g)	Insurance Companies		9	269157	C	0	269157	0.91	269157	0	269157	0.91	0	0.91	0	0.00	C	) C	269157
(h)	Provident Funds/ Pension Funds		0	0	C	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	C	) C	0
(i)	Any Other (Specify)		0	0	C	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	C	0	0
	Sub Total (B)(1)		168	9308788	0	0	9308788	31.38	9308788	0	9308788	31.38	0	31.38	0	0.00	0		9296607
	Central Government/ State Government(s)/																		
2	President of India																		
	_																		
	Central Government / State Government(s)		1	. 336		0	336		336		336	0.00		0.00	0	0.00		0	0
_	Sub Total (B)(2)		1	. 336	0	0	336	0.00	336	0	336	0.00	0	0.00	0	0.00	C	) 0	0
3	Non-Institutions			_													0	) 0	
(a)	Individuals			0	C										0		C	) (	)
	i. Individual shareholders holding nominal share																		
	capital up to Rs. 2 lakhs.		33334	3775674	0	0	3775674	12.73	3775674	0	3775674	12.73	0	12.73	213	0.01	C		3339102
	ii. Individual shareholders holding nominal share																		
	capital in excess of Rs. 2 lakhs.		14	1853373	0	0	1853373			0	1853373	6.25		6.25	0	0.00			1853373
	Shivani T. Trivedi			557954 554432		0	557954 554432	1.88	557954 554432	0	557954 554432	1.88 1.87		1.88 1.87		0.00			557954
(b)	Tejas B. Trivedi NBFCs registered with RBI			354432		0	554432	1.87 0.00	554432	0	554432	0.00		0.00		0.00			554432
(b)	Trust Employee		1	. 25		0	25		25	0	25	0.00		0.00	0	0.00			25
	Overseas Depositories(holding DRs) (balancing			. 23		0	23	0.00	23	0	2.5	0.00		0.00	0	0.00		1	23
(4)	figure)				ر ا		0	0.00	_	0	٥	0.00	١	0.00	٥	0.00	ر ا		
(a) (e)	Any Other (Specify)		2286	1434293		0	1434293	4.84	1434293	0	1434293	4.84		4.84	0	0.00			1426792
(~)	IEPF		1	212504		) O	212504	0.72	212504		212504	0.72		0.72	n	0.00			212504
	Trusts		5	641		0	641	0.00	641	n	641	0.00		0.00	n	0.00		) (	641
	Hindu Undivided Family		814			) <u> </u>	231325	0.78	231325	n	231325	0.78		0.78	n	0.00			231325
	Non Resident Indians (Non Repat)		300		0	0	97015	0.33	97015		97015	0.33		0.33		0.00			97015
	Other Directors		3	1100	0	0	1100	0.00	1100		1100	0.00		0.00	0	0.00			1100
	Non Resident Indians (Repat)		655		0	0	94585	0.32	94585		94585	0.32		0.32	0	0.00			93663
	Office Bearers		12	1	C	0	5311	0.02	5311		5311	0.02		0.02	0	0.00			5311
	Clearing Member		83	+	C	0	14263	0.05	14263		14263	0.05		0.05	0	0.00			14263
	Bodies Corporate		363		C	0	611039	2.06	611039		611039	2.06		2.06	0	0.00		) (	611039
	Associated Person		45		C	0	137429		137429		137429	0.46		0.46		0.00		) (	130850
	Associated Companies		5	29081	C	0	29081	0.10	29081	0	29081	0.10	0	0.10	0	0.00	C	) (	29081
	Sub Total (B)(3)		35635		0	0	7063365			0	7063365	23.81	0	23.81	213	0.01		0	6619292
	Total Public Shareholding (B)=																		
									-			55.20		55.20			-	-	

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.

GENERATED ON :06/04/2020

NSDL: 31/03/2020

CDSL:31/03/2020

Atul Limited Table IV - Statement showing shareholding pattern of the	Non Promoter-	Non Public	sharehold	ler														
					No. of		Sharehold ing % calculate	Number o		ghts held in	each class	Underlyin g	assuming	Number o	f Locked in	Number of pledged of otherwise encumber	or e	Number
			No. of	Partly	No. of shares		d as per			Outstandi	conversio				T	of equity shares		
			fully paid	1	underlyin		CCDD	N= -£\/-+	in a Dialata			convertibl		As a % of			As a % of	
		Nos. of	up equity	1.	•	Total nos.	-	No of Vot	ing Rights		Total as a		convertibl		total		total	demate
		sharehold		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)	X	Class eg: y	Total	(A+B+C)	(including	securities	No. (a)	held(b)	No. (a)	held(b)	form
(1)	(11)	(111)	(IV)	(V)	(VI)	(VII) =	(VIII) As a		(	X)		(X)	(XI)=	()	(II)	()	XIII)	(XIV)
1 Custodian/DR Holder		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
Employee Benefit Trust (under SEBI (Share based																		
Employee Benefit) Regulations, 2014)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	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	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.

**GENERATED ON :06/04/2020** NSDL: 31/03/2020 CDSL:31/03/2020

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

					Details of noi					
					whether dire	t or indirect*	Т	Т	ı	Date of
	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	creation / acquisition of significant beneficial interest
1	Sunil Siddharth Lalbhai	AAFPL0691R		India	32.97	32.97	32.97	No	No	
Α	Akshita Holdings Private Limited	AAACA9600M		India	1.56	1.56	1.56	No	No	13-Sep-98
В	Aagam Holdings Private Limited	AAACA3899C		India	22.42	22.42	22.42	No	No	13-Sep-98
С	Aagam Agencies Private Limited (Formerly known as Adhigam Investments	AABCA2703J		India	4.02	4.02	4.02	No	No	13-Sep-98
D	Adhinami Investments Private Limited	AABCA7790D		India	1.54	1.54	1.54	No	No	13-Sep-98
Е	Aayojan Resources Private Limited Sunil Lalbhai	AAACA3895Q		India	2.07	2.07	2.07	No	No	13-Sep-98
F	Sunil Lalbhai Emplovees Trust	AACTS5853K		India	0.01	0.01	0.01	No	No	13-Sep-98
G	Vimla Siddharth Trust	AAATV0622P		India	0.02	0.02	0.02	No	No	13-Sep-98
Н	(Karta of Sunil	AAFHS8242F		India	0.11	0.11	0.11	No	No	13-Sep-98
I	Siddharth Family Trust	AAAAS4739D		India	0.12	0.12	0.12	No	No	13-Sep-98
J	Sunil Siddharth Lalbhai	AAFPL0691R		India	0.31	0.31	0.31	No	No	13-Sep-98
K	Anusandhan Investments Limited	AAACA4013C		India	0.79	0.79	0.79	No	No	13-Sep-98