

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

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

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

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

GENERATED ON :03/01/2024 NSDL : 30/12/2023 CDSL :30/12/2023

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Table 1 - Summary Statement holding of specified securities

Category	Category of shareholder	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	
								No of Voting Rights					Total as a % of (A+B+C)	No. (a)	As a % of total Shares held(b)	No. (a)		As a % of total Shares held(b)
								Class eg: X	Class eg: Y	Total								
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) = (IV)+(V)+ (VI)	(VIII) As a % of (A+B+C2)	(IX)			(X)	(XI)= (VII)+(X) As a % of (A+B+C2)	(XII)		(XIII)		(XIV)	
(A)	Promoter & Promoter Group	27	13297428	0	0	13297428	45.07	13297428	0	13297428	45.07	0	0	0	130000	0.98	13297428	
(B)	Public	65730	16208062	0	0	16208062	54.93	16208062	0	16208062	54.93	0	0	0	NA	NA	15930757	
(C)	Non Promoter - Non Public				0				0			0		0	NA	NA		
(C1)	Shares Underlying DRs	0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	NA	NA	0	
(C2)	Shares Held By Employee Trust	0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	NA	NA	0	
	Total	65757.00	29505490	0	0	29505490	100.00	29505490	0	29505490	100.00	0	0	130000	0.44	29228185		

GENERATED ON :03/01/2024 NSDL : 30/12/2023 CDSL :30/12/2023

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

	Category & Name of the shareholders	Entity Type	PAN	Nos. of shareholders	No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities				Shares Underlying Outstanding convertible securities (including	ng, as a % assuming full conversion of convertible securities (as a	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form
										No of Voting Rights			Total as a % of Total Voting Rights			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)	
										Class eg: X	Class eg: y	Total								
1	(I)		(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII) As a	(IX)			(X)	(XI)=	(XII)		(XIII)		(XIV)	
(a)	Indian																			
	Individuals / Hindu Undivided Family			15	741566	0	0	741566	2.51	741566	0	741566	2.51	0	2.51	0	0	130000	17.53	741566
	Samvegbhai Arvindbhai Lalbhai*	Promoters		1	207814	0	0	207814	0.70	207814	0	207814	0.70	0	0.70	0	0	100000	48.12	207814
	Samvegbhai Arvindbhai (On behalf of Samvegbhai Arvindbhai	Promoters		1	114943	0	0	114943	0.39	114943	0	114943	0.39	0	0.39	0	0	0	0.00	114943
	Sunil Siddharth Lalbhai	Promoters		1	93326	0	0	93326	0.32	93326	0	93326	0.32	0	0.32	0	0	0	0.00	93326
	Saumya Samvegbhai Lalbhai	Promoters		1	74070	0	0	74070	0.25	74070	0	74070	0.25	0	0.25	0	0	0	0.00	74070
	Swati S Lalbhai	Promoters		1	63450	0	0	63450	0.22	63450	0	63450	0.22	0	0.22	0	0	0	0.00	63450
	Taral S Lalbhai	Promoters		1	51591	0	0	51591	0.17	51591	0	51591	0.17	0	0.17	0	0	0	0.00	51591
	Anamikaben Samvegbhai Lalbhai	Promoters		1	47199	0	0	47199	0.16	47199	0	47199	0.16	0	0.16	0	0	30000	63.56	47199
	Sunil Siddharth Lalbhai (On behalf of Sunil Siddharth HUF)	Promoters		1	31544	0	0	31544	0.11	31544	0	31544	0.11	0	0.11	0	0	0	0.00	31544
	Vimlaben S Lalbhai	Promoters		1	25750	0	0	25750	0.09	25750	0	25750	0.09	0	0.09	0	0	0	0.00	25750
	Astha Lalbhai	Promoters		1	20500	0	0	20500	0.07	20500	0	20500	0.07	0	0.07	0	0	0	0.00	20500
	Nishtha Sunilbhai Lalbhai	Promoters		1	5500	0	0	5500	0.02	5500	0	5500	0.02	0	0.02	0	0	0	0.00	5500
	Sanjaybhai Shrenikbhai Lalbhai (On behalf of Arvindbhai Lalbhai Family Trust)	Promoters		1	3653	0	0	3653	0.01	3653	0	3653	0.01	0	0.01	0	0	0	0.00	3653
	Lalbhai Dalpatbhai Huf	Promoters		1	1169	0	0	1169	0.00	1169	0	1169	0.00	0	0.00	0	0	0	0.00	1169
	Hansaben Niranjanbhai	Promoters		1	562	0	0	562	0.00	562	0	562	0.00	0	0.00	0	0	0	0.00	562
	Sheth Narottambhai Lalbhai	Promoters		1	495	0	0	495	0.00	495	0	495	0.00	0	0.00	0	0	0	0.00	495
(b)	Central Government / State Government(s)			0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0.00	0
(c)	Financial Institutions / Banks			0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0.00	0
(d)	Any Other (Specify)			12	12555862	0	0	12555862	42.55	12555862	0	12555862	42.55	0	42.55	0	0	0	0.00	12555862

	Promoter Trust			5	140344	0	0	140344	0.48	140344	0	140344	0.48	0	0.48	0	0	0	0.00	140344
	Samvegbhai Arvindbhai Lalbhai (On behalf of Ankush Trust)	Promoters		1	50000	0	0	50000	0.17	50000	0	50000	0.17	0	0.17	0	0	0	0.00	50000
	Samvegbhai Arvindbhai Lalbhai (On behalf of Adwait Trust)	Promoters		1	50000	0	0	50000	0.17	50000	0	50000	0.17	0	0.17	0	0	0	0.00	50000
	Swati Siddharth Lalbhai (On behalf of Siddharth Family Trust)	Promoters		1	35620	0	0	35620	0.12	35620	0	35620	0.12	0	0.12	0	0	0	0.00	35620
	Sunil Siddharth Lalbhai (On behalf of Vimla Siddharth Family Trust)	Promoters		1	2724	0	0	2724	0.01	2724	0	2724	0.01	0	0.01	0	0	0	0.00	2724
	Swati Siddharth Lalbhai (On behalf of Sunil Lalbhai Employees Trust 1)	Promoters		1	2000	0	0	2000	0.01	2000	0	2000	0.01	0	0.01	0	0	0	0.00	2000
	Bodies Corporate			7	12415518	0	0	12415518	42.08	12415518	0	12415518	42.08	0	42.08	0	0	0	0.00	12415518
	Aagam Holdings Private Limited	Promoters		1	6654100	0	0	6654100	22.55	6654100	0	6654100	22.55	0	22.55	0	0	0	0.00	6654100
	Arvind Farms Pvt Ltd	Promoters		1	2796208	0	0	2796208	9.48	2796208	0	2796208	9.48	0	9.48	0	0	0	0.00	2796208
	Aagam Agencies Pvt Ltd	Promoters		1	1195000	0	0	1195000	4.05	1195000	0	1195000	4.05	0	4.05	0	0	0	0.00	1195000
	Aayojan Resources Private Ltd	Promoters		1	615460	0	0	615460	2.09	615460	0	615460	2.09	0	2.09	0	0	0	0.00	615460
	Akshita Holdings Private Limited	Promoters		1	464400	0	0	464400	1.57	464400	0	464400	1.57	0	1.57	0	0	0	0.00	464400
	Adhinami Investments Private Limited	Promoters		1	455350	0	0	455350	1.54	455350	0	455350	1.54	0	1.54	0	0	0	0.00	455350
	Anusandhan Investments Limited	Promoters		1	235000	0	0	235000	0.80	235000	0	235000	0.80	0	0.80	0	0	0	0.00	235000
	Sub Total (A)(1)			27	13297428	0	0	13297428	45.07	13297428	0	13297428	45.07	0	45.07	0	0	130000	0.98	13297428
2	Foreign																			
(a)	Individuals (Non-Resident Individuals / Foreign Individuals)			0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0.00	0
(b)	Government			0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0.00	0
(c)	Institutions			0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0.00	0
(d)	Foreign Portfolio Investor			0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0.00	0
(e)	Any Other (Specify)			0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0.00	0
	Sub Total (A)(2)			0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0.00	0
	Total Shareholding Of Promoter And Promoter Group (A)= (A)(1)+(A)(2)			27	13297428	0	0	13297428	45.07	13297428	0	13297428	45.07	0	45.07	0	0	130000	0.98	13297428

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

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

Note :
(1) PAN would not be displayed on website of Stock Exchange(s)
(2) The term 'Encumbrance' has the same meaning as assigned under regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

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(C)	Key Managerial Personnel		0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0				
(D)	Relatives of promoters (other than 'immediate relatives' of promoters disclosed under 'Promoter and Promoter Group' category)		0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0				
(E)	Trusts where any person belonging to 'Promoter and Promoter Group' category is 'trustee', 'beneficiary', or 'author of the trust'		0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0				
(f)	Investor Education and Protection Fund (IEPF)		1	249414	0	0	249414	0.85	249414	0	249414	0.85	0	0.85	0	0	NA	NA	249414	0	0	0
(g)	i. Resident Individual holding nominal share capital up to Rs. 2 lakhs.		61379	3620969	0	0	3620969	12.27	3620969	0	3620969	12.27	0	12.27	0	0	NA	NA	3359935	0	0	0
(h)	ii. Resident individual holding nominal share capital in excess of Rs. 2 lakhs.		12	1107561	0	0	1107561	3.75	1107561	0	1107561	3.75	0	3.75	0	0	NA	NA	1107561	0	0	0
	Shivani T. Trivedi			297000	0	0	297000	1.01	297000	0	297000	1.01	0	1.01	0	0	NA	NA	297000			
	Tejas B. Trivedi			300332	0	0	300332	1.02	300332	0	300332	1.02	0	1.02	0	0	NA	NA	300332	0	0	0
(i)	Non Resident Indians (NRIs)		1850	172640	0	0	172640	0.59	172640	0	172640	0.59	0	0.59	0	0	NA	NA	171881	0	0	0
(j)	Foreign Nationals		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0			
(k)	Foreign Companies		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0			
(l)	Bodies Corporate		713	626943	0	0	626943	2.12	626943	0	626943	2.12	0	2.12	0	0	NA	NA	626893	0	0	0
(m)	Any Other (Specify)		1608	344679	0	0	344679	1.17	344679	0	344679	1.17	0	1.17	0	0	NA	NA	340150	0	0	0
	Trusts		7	7228	0	0	7228	0.02	7228	0	7228	0.02	0	0.02	0	0	NA	NA	7228	0	0	0
	Independent Director		6	16215	0	0	16215	0.06	16215	0	16215	0.06	0	0.06	0	0	NA	NA	16215	0	0	0
	Body Corp-Ltd Liability Partnership		42	27438	0	0	27438	0.09	27438	0	27438	0.09	0	0.09	0	0	NA	NA	27438	0	0	0
	Office Bearers		10	3585	0	0	3585	0.01	3585	0	3585	0.01	0	0.01	0	0	NA	NA	3585	0	0	0
	Hindu Undivided Family		1509	168655	0	0	168655	0.57	168655	0	168655	0.57	0	0.57	0	0	NA	NA	168591	0	0	0
	Clearing Member		7	83585	0	0	83585	0.28	83585	0	83585	0.28	0	0.28	0	0	NA	NA	83585	0	0	0
	Associated Person		27	37973	0	0	37973	0.13	37973	0	37973	0.13	0	0.13	0	0	NA	NA	33508	0	0	0
	Sub Total (B)(4)		65567	6133186	0	0	6133186	20.79	6133186	0	6133186	20.79	0	20.79	0	0	NA	NA	5866814	0	0	0
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)+b(4)		65730	16208062	0	0	16208062	54.93	16208062	0	16208062	54.93	0	54.93	0	0	NA	NA	15930757	0	0	0

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

No. of shareholders	No. of Shares	%
0		

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

No. of shareholders	No. of Shares
0	0

Note :

- (1) PAN would not be displayed on website of Stock Exchange(s).
- (2) The above format needs to be disclosed along with the names of the shareholders holding 1% or more than 1% of shares of the listed entity. Column no.(XIII)is not applicable in the above format.
- (3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available and the balance to be disclosed as held by custodian.
- (4) Categorization and disclosure of each shareholder category should be carried out in the order prescribed in the above format. If a shareholder is falling under more than one category, then the same shall be classified in the
- (5) Sub-categorization of shares under column no.(XV) will be based on shareholding(no. of shares)under the following sub-categories:
 - (i) Shareholder who are represented by a nominee Director on the board of the listed entity or have the right to nominate a representative(i.e. Director)on the board of the listed entity.
 - (ii) Shareholder who have entered into shareholder agreement with the listed entity.
 - (iii) Shareholders acting as persons in concert with promoters.

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

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

Note :

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

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

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

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					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	33.16	33.16	33.16	No	No	
A	Akshita Holdings Private Limited			India	1.57	1.57	1.57	No	No	13-Sep-98
B	Aagam Holdings Private Limited			India	22.55	22.55	22.55	No	No	13-Sep-98
C	Aagam Agencies Private Limited (Formerly known as Adhigam Investments Private Limited)			India	4.05	4.05	4.05	No	No	13-Sep-98
D	Adhinami Investments Private Limited			India	1.54	1.54	1.54	No	No	13-Sep-98
E	Aayojan Resources Private Limited			India	2.09	2.09	2.09	No	No	13-Sep-98
F	Swati Siddharth Lalbhai (On behalf of Sunil Lalbhai Employees Trust 1)			India	0.01	0.01	0.01	No	No	13-Sep-98
G	Sunil Siddharth Lalbhai (On behalf of Sunil Siddharth HUF)			India	0.11	0.11	0.11	No	No	13-Sep-98
H	Swati Siddharth Lalbhai (On behalf of Siddharth Family Trust)			India	0.12	0.12	0.12	No	No	13-Sep-98
I	Sunil Siddharth Lalbhai			India	0.32	0.32	0.32	No	No	13-Sep-98
J	Anusandhan Investments Limited			India	0.80	0.80	0.80	No	No	13-Sep-98
K	Sunil Siddharth Lalbhai (On behalf of Vimla Siddharth Family Trust)			India	0.01	0.01	0.01	No	No	13-Sep-98

Table VI - Statement showing foreign ownership limits

Particular	Approved limits (%)*	Limits utilized (%)
As on shareholding date	100	8.46
As on the end of previous 1st quarter	100	8.10
As on the end of previous 2nd quarter	100	8.02
As on the end of previous 3rd quarter	100	8.58
As on the end of previous 4th quarter	100	9.33
Notes :-		
*Approved limits (%) shows limit permissible by the authority without Board Shareholders		