

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 :04/04/2024 NSDL : 30/03/2024 CDSL :30/03/2024

Atul Limited

Table I - 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 share	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, (VIII) As	Number of Voting Rights held in each class of securities				No. of Shares Underlying Outstanding convertible securities (X)	Shareholding, as a % assuming full conversion of convertible securities (XI)=	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	ss eg:	Total								
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII) As	(IX)				(X)	(XI)=	(XII)		(XIII)		(XIV)
(A)	Promoter & Promoter Group	27	13298278	0	0	13298278	45.17	13298278	0	13298278	45.17	0	45.17	0	0	130000	0.98	13298278
(B)	Public	66562	16143477	0	0	16143477	54.83	16143477	0	16143477	54.83	0	54.83	0	0	NA	NA	15875753
(C)	Non Promoter - Non Public				0				0			0		0	0	NA	NA	
(C1)	Shares Underlying DRs	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0
(C2)	Shares Held By Employee Trust	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0
	Total	66589	29441755	0	0	29441755	100.00	29441755	0	29441755	100.00	0	100.00	0	0	130000	0.44	29174031

GENERATED ON :04/04/2024 NSDL : 30/03/2024

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	No. of shares underlying Depository	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			No. of Shares Underlying Outstanding convertible securities (X)	Shareholding, as a % assuming full conversion of convertible securities (XI)=	Number of Locked in 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	2.52	741566	0	741566	2.52	0	2.52	0	0	130000	17.53	741566
	Samvegbhai Arvindbhai Lalbhai*	Promoters		1	207814	0	0	207814	0.71	207814	0	207814	0.71	0	0.71	0	0	100000	48.12	207814
	Samvegbhai Arvindbhai (On behalf of Samveg)	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	0.18	51591	0	51591	0.18	0	0.18	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 Niranjambhai	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	12556712	0	0	12556712	42.65	12556712	0	12556712	42.65	0	42.65	0	0	0	0.00	12556712
	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	Promoters	7	12416368	0	0	12416368	42.17	12416368	0	12416368	42.17	0	42.17	0	0	0	0.00	12416368
	Aagam Holdings Private Limited	Promoters	1	6654100	0	0	6654100	22.60	6654100	0	6654100	22.60	0	22.60	0	0	0	0.00	6654100
	Arvind Farms Pvt Ltd	Promoters	1	2796208	0	0	2796208	9.50	2796208	0	2796208	9.50	0	9.50	0	0	0	0.00	2796208
	Aagam Agencies Private Limited (Formerly known as Adhigam Investments Private Limited)	Promoters	1	1195000	0	0	1195000	4.06	1195000	0	1195000	4.06	0	4.06	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	464800	0	0	464800	1.58	464800	0	464800	1.58	0	1.58	0	0	0	0.00	464800
	Adhinami Investments Private Limited	Promoters	1	455700	0	0	455700	1.55	455700	0	455700	1.55	0	1.55	0	0	0	0.00	455700
	Anusandhan Investments Limited	Promoters	1	235100	0	0	235100	0.80	235100	0	235100	0.80	0	0.80	0	0	0	0.00	235100
	Sub Total (A)(1)		27	13298278	0	0	13298278	45.17	13298278	0	13298278	45.17	0	45.17	0	0	130000	0.98	13298278
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	13298278	0	0	13298278	45.17	13298278	0	13298278	45.17	0	45.17	0	0	130000	0.98	13298278

* 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 here 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.

(a)	Central Government / President of India		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0			
(b)	State Government / Governor		1	336	0	0	336	0.00	336	0	336	0.00	0	0.00	0	0	NA	NA	0	0	0	0
(C)	Shareholding by Companies or Bodies Corporate where Central / State Government is a promoter		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0			
	Sub Total (B)(3)		1	336	0	0	336	0.00	336	0	336	0.00	0	0.00	0	0	NA	NA	0	0	0	0
4	Non-Institutions			0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0			
(a)	Associate companies / Subsidiaries		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0			
(b)	Directors and their relatives (excluding Independent Directors and nominee Directors)		4	10980	0	0	10980	0.04	10980	0	10980	0.04	0	0.04	0	0	NA	NA	10980	0	0	0
(C)	Key Managerial Personnel		0	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	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	0.00	0	0	0	0.00	0	0.00	0	0	NA	NA	0			
(f)	Investor Education and Protection Fund (IEPF)		1	248980	0	0	248980	0.85	248980	0	248980	0.85	0	0.85	0	0	NA	NA	248980	0	0	0
(g)	i. Resident Individual holding nominal share capital up to Rs. 2 lakhs.		62287	3643825	0	0	3643825	12.38	3643825	0	3643825	12.38	0	12.38	0	0	NA	NA	3393270	0	0	0
(h)	ii. Resident individual holding nominal share capital in excess of Rs. 2 lakhs.		13	1186882	0	0	1186882	4.03	1186882	0	1186882	4.03	0	4.03	0	0	NA	NA	1186882	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)		1838	167074	0	0	167074	0.57	167074	0	167074	0.57	0	0.57	0	0	NA	NA	165367	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		667	557106	0	0	557106	1.89	557106	0	557106	1.89	0	1.89	0	0	NA	NA	557106	0	0	0
(m)	Any Other (Specify)		1590	274437	0	0	274437	0.93	274437	0	274437	0.93	0	0.93	0	0	NA	NA	269908	0	0	0
	Trusts		7	7443	0	0	7443	0.03	7443	0	7443	0.03	0	0.03	0	0	NA	NA	7443	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		41	28099	0	0	28099	0.10	28099	0	28099	0.10	0	0.10	0	0	NA	NA	28099	0	0	0
	Office Bearers		8	3342	0	0	3342	0.01	3342	0	3342	0.01	0	0.01	0	0	NA	NA	3342	0	0	0
	Hindu Undivided Family		1496	157053	0	0	157053	0.53	157053	0	157053	0.53	0	0.53	0	0	NA	NA	156989	0	0	0
	Clearing Member		5	24312	0	0	24312	0.08	24312	0	24312	0.08	0	0.08	0	0	NA	NA	24312	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)		66400	6089284	0	0	6089284	20.68	6089284	0	6089284	20.68	0	20.68	0	0	NA	NA	5832493	0	0	0
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)+b(4)		66562	16143477	0	0	16143477	54.83	16143477	0	16143477	54.83	0	54.83	0	0	NA	NA	15875753	0	0	0

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

No. of shareholders	No. of Shares	%
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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 category falling
- (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.

GENERATED ON :04/04/2024

NSDL : 30/03/2024

CDSL :30/03/2024

Atul Limited																			
Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder																			
	Category & Name of the shareholders	PAN	Nos. of shareholders	No. of fully paid up equity shares held	Partly paid up equity shares held	No. of 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			No. of Shares Underlying Outstanding convertible securities	Shareholding, as a % assuming full conversion of convertible	Number of Locked in shares		Number of Shares pledged or otherwise		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) =	(VIII) As	(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					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	33.24	33.24	33.24	No	No	
A	Akshita Holdings Private Limited			India	1.58	1.58	1.58	No	No	13-Sep-98
B	Aagam Holdings Private Limited			India	22.60	22.60	22.60	No	No	13-Sep-98
C	Aagam Agencies Private Limited (Formerly known as Adhigam Investments Private Limited)			India	4.06	4.06	4.06	No	No	13-Sep-98
D	Adhinami Investments Private Limited			India	1.55	1.55	1.55	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	8.72
As on the end of previous 1st quarter	100	8.46
As on the end of previous 2nd quarter	100	8.10
As on the end of previous 3rd quarter	100	8.02
As on the end of previous 4th quarter	100	8.58
Notes :-		
*Approved limits (%) shows limit permissible by the authority without Board Shareholders		