

Ref: ATULAUTO/SEs/SecretarialComplianceReport/2018-19

To, The Department of Corporate Services, BSE Limited, Mumbai

To, The Listing Compliance Dept. National Stock Exchange of India Ltd, Mumbai

BSE Script Code: 531795

NSE Script Symbol: ATULAUTO

Dear Sir/ Madam,

SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE YEAR ENDED MARCH 31, 2019 REF: SEBI CIRCULAR NO. CIR/CFD/CMD1/27/2019 DATED FEBRUARY 08, 2019

Pursuant to Clause 3(b) of above referred circular, we are submitting herewith Annual Secretarial Compliance Report of the Company for the year ended March 31, 2019, issued by M/s. Bunty Hudda & Associates, Practising Company Secretary.

Please take the same on your records.

Thanking you.

Yours faithfully, For ATUL AUTO LIMITED,

(Paras J. Viramgama) Company Secretary & Compliance Officer

PS Bunty Hudda & Associates Fracticing Company Secretary

E-812, Titanium City Center, Anandnagar-Prahladnagar Road, Satellite, Ahmedabad-380055 Website: www.cshudda.com Email: cshudda@outlook.com (O): +91 7802996480

Annual Secretarial Compliance Report of ATUL AUTO LIMITED

For the year ended March 31, 2019

I Bunty Hudda have examined:

- (a) all the documents and records made available to us and explanation provided by ATUL AUTO LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended March 31, 2019 ("Review Period") in respect of compliance with the provisions of:

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable to the Company during the Financial year)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable to the Company during the Financial year)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the Company during the Financial year)



- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; (Not Applicable to the Company during the Financial year)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

And based on the above examination, I hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

| NO | clause) | | Secretary | |
|-----------|--|--|---|--|
| Sr. No | circulars / quidelines including specific Deviations the Drasticin | | Observations/ Remarks of the Practicing Company | |

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

| Sr. No. | Action taken by | Details of violation | Details of action taken E.g. fines, warning letter, debarment, etc. | Observations/ remarks of the Practicing Company Secretary, if any. |
|------------|-----------------|----------------------|--|---|
|------------|-----------------|----------------------|--|---|



(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. No. Observations of the Practicing Company Secretary in the previous reports reports (The years are to be mentioned) | Actions taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|--|--|---|
|--|--|---|

For Bunty Hudda & Associates Practicing Company Secretary



(CS Bunty Hudda)

Proprietor ACS No.: 31507 COP No.: 11560

Place : Shapar (Dist. Rajkot) Date : May 23, 2019