



Atul Ltd

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May 19, 2022

The Manager Listing Department BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai – 400 001 Through: BSE Listing portal SCRIP CODE: 500027 Dear Sirs,

The Manager Listing Department National Stock Exchange of India Limited "Exchange Plaza" C – 1, Block G Bandra Kurla Complex, Bandra (East) Mumbai – 400 051 Through: Digital Exchange portal SYMBOL: ATUL

Sub: Secretarial compliance report for the year ended March 31, 2022

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed Secretarial Compliance report for the year ended on March 31, 2022.

Thank you,

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Yours faithfully,

For Atul Ltd

Lalit Patni Company Secretary and Chief Compliance Officer

Encl.: as above.



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& ASSOCIATES Company Secretaries Peer Reviewed Firm

SECRETARIAL COMPLIANCE REPORT OF ATUL LIMITED FOR THE YEAR ENDED 31ST MARCH, 2022

I, Ashish C. Doshi, Partner of SPANJ & ASSOCIATES, Company Secretaries in Practice having office at TF/1, Anison Bldg, 3rd Floor, State Bank of India Lane, Swastik Soc., Nr. Stadium Circle, C. G. Road, Navrangpura, Ahmedabad-380 009 have examined:

- (a) all the documents and records made available to us and explanation provided by the Company, its officers, agents and authorized representatives during the conduct of the Audit of Atul Limited having its registered office at Atul House, G. I. Patel Marg, Ahmedabad-380014 ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,

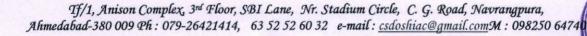
for the year ended 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:

- (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 there under whichever were applicable to the company during the year, 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 (No events during the year);
- (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;
- Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (No events during the year);

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- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (No events during the year);
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) During the year under review, there were no events which required Compliance with the conditions as mentioned in Para 6(A) & 6 (B) of the SEBI Circular CIR/CFD/CMD1/114/2019, Dated 18th October, 2019

and circulars/ guidelines issued there under;

However, it has been observed that there were no events requiring compliance under the regulations covered under para (b), (e) and (f) mentioned hereinabove.

Based on the above examination, We 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 which were applicable to the 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 our 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: NIL

Sr. No.	Action taken by	Details violation	of	Details of action taken E.g. fines, warning letter, debarment, etc.	
		NIL			

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable



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Sr. No.	Observations of the Practicing Company Secretary in the previous reports	made in the secretarial	 Comments of the Practicing Company Secretary on the actions taken by the listed entity
	Ν	Not Applicable	

Date: 26th April, 2022

Place : Ahmedabad





ASHISH C DOSHI, PARTNER SPANJ & ASSOCIATES Company Secretaries ACS/FCS No.: F3544 COP No.: 2356 P R Cer No. : 702/2020 UDIN: F003544D000206857



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