



## Atul Ltd

Atul 396 020, Gujarat, India  
E-mail: lalit\_patni@atul.co.in | Website: www.atul.co.in  
Telephone: (+91 2632) 230000 | 3261

The Manager  
Listing Department  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai – 400 001

May 09, 2020

**SCRIP CODE: 500027**  
BSE Listing portal

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

**SYMBOL: ATUL**  
NEAPS portal

Dear Sirs,

**Sub: Compliance as per Regulation 40(9) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the half year ended March 31, 2020**

Pursuant to Regulation 40(9) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are pleased to enclose herewith a Certificate, for the second half of the financial year 2019-20 from the practicing Company Secretary, certifying that all certificates have been issued by the Company within one month of the date of lodgment for transfer, sub-division, consolidation, renewal and exchange.

Thank you,

For Atul Ltd

Sd/-  
Lalit Patni  
Company Secretary and  
Chief Compliance Officer  
Telephone: (+91 2632) 230232

Encl: as above



**SPANJ**  
**& ASSOCIATES**  
**Company Secretaries**

**CERTIFICATE UNDER REGULATION 40 (9) OF  
SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS  
AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

**FOR THE HALF YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

We have examined all Share Transfer Deeds, Memorandum of Transfers, Registers, files and other documents made available to us in electronic format provided by e-mail to us relating to *Atul Limited* maintained by *Link Intime India Private Limited* pertaining to transfer of equity shares of the company for the period from *1<sup>st</sup> October, 2019 to 31<sup>st</sup> March, 2020* for the purpose of issuing a Certificate as per Regulation 40 (9) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and based on the information provided by the Company, We hereby certify that the Company has delivered during half year ended on *31<sup>st</sup> March, 2020*:

- (A) Share Certificate(s) relating to the transfer of Shares received, if any, during the period from *1<sup>st</sup> October, 2019 to 31<sup>st</sup> March, 2020* as entered in the Memorandum of Transfers have been issued within thirty days of the date of lodgment for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/allotment monies from respective date of lodgment of each deed excepting those rejected on technical grounds.

Due to prevailing situation of COVID 19 pandemic and consequential lockdowns declared by each state Government, it was not possible to physically verify the data by us however, on the basis of the information and explanations provided to us and records received in the electronic mode provided by the company as well as Registrar on best effort basis with a disclaimer of difficulties faced by RTA in pandemic situation and relaxations provided by SEBI vide its circular date 16<sup>th</sup> April, 2020, for the purpose of our verification, we have verified the details and the present certificate has been issued.

Place: Ahmedabad  
Date: 09<sup>th</sup> May, 2020

**FOR SPANJ & ASSOCIATES**  
**Company Secretaries**

  
**CS Ashish C. Doshi**  
**Partner**

**COP No.: 2356**

**UDIN: F003544B000218275**