

Date: May 30, 2025

To,
National Stock Exchange of India Limited,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E), Mumbai – 400051
Symbol: ATALREAL

BSE Limited,
25th Floor,
Phiroz Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400001
Script Code: 543911

Subject: Submission of Annual Secretarial Compliance Report for the Financial year 2024-2025.

Dear Sir/Madam,

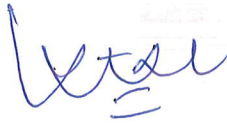
Pursuant to provisions of Regulation 24A SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the company hereby submits Annual Secretarial Compliance Report for the Financial year 2024-2025 in the prescribed format.

Kindly take the same on your record.

Thanking You,

Yours faithfully,

For Atal Realtech Limited



Mr. Vijaygoopal Parasram Atal
Managing Director
Din: 00126667

Place: Nashik



AKSHAY R. BIRLA AND ASSOCIATES

Practicing Company Secretaries

Office Add: Off. No. 23, 3rd Floor, Mansing Market, Jalgaon - 425001 (MH)

Cell: +91-9028110641, 9067890641

Email id: csakshaybirla@gmail.com

Secretarial Compliance Report of Atal Realtech Limited for the Financial year ended 31st March, 2025

To,
The Board of Directors
Atal Realtech Limited
CIN: L45400MH2012PLC234941
Office No. B 406, Third Floor, ABH Capital,
Opp. Ramayan Bungalow, Sharanpur Road,
Near Rajiv Gandhi Bhavan, H P T College,
Nashik - 422005 Maharashtra India

I/We Akshay R. Birla and Associates, have examined:

- a) all the documents and records made available to us and explanation provided by Atal Realtech 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 31st March, 2025 ("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; **(Not Applicable during the Review Period)**
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable during the Review Period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable during the Review Period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable during the Review Period)**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable during the Review Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

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





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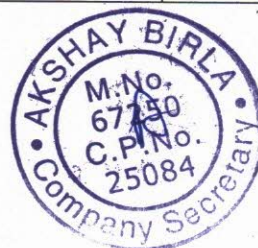
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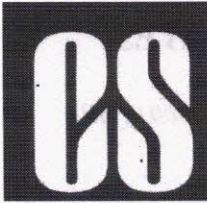
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- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ circular no.	Deviations	Action taken by	Type of action
1	2	3	4	5	6
1	Financial Results under Regulation 33 of SEBI (LODR) Regulations 2015 year ended - 31 st March, 2025	Regulation 33 of SEBI (LODR) Regulations 2015	Discrepancies in Financial Results	The Company	Filing of required declaration on receipt of stock exchange query.
2	Shareholding Pattern for the quarter ended 31 st December, 2024.	Regulation - 31 of SEBI (LODR) Regulations, 2015.	Discrepancy in shareholding pattern.	The Company	Reply in this regard to stock exchange.
3	Reconciliation of Share Capital Audit Report for the quarter ended 31 st December, 2024.	Regulation - 76 of SEBI (LODR) Regulations, 2015.	Discrepancy in Reconciliation of Share Capital Audit Report.	The Company	Filing of revised Reconciliation of Share Capital Audit Report for quarter ended 31 st December, 2024
4	Financial Results under Regulation 33 (2) (b) of SEBI (LODR) Regulations 2015 Quarter Ended - 30 th June 2024	Regulation 33 (2) (b) of SEBI (LODR) Regulations 2015	Discrepancies in Financial Results.	The Company	Filing of financial statements as per the requirement of Regulation 33 on receipt of query of stock exchange.
5	Financial Results under Regulation 33 (2) (b) of SEBI (LODR) Regulations 2015 Quarter Ended - 31 st March 2024	Regulation 33 (2) (b) of SEBI (LODR) Regulations 2015	Discrepancies in Financial Results.	The Company	Filing of financial statements as per the requirement of Regulation 33 on receipt





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					of query of stock exchange.
6	Promoter and Promoter group shareholding and SDD (Database of designated Persons) of depositories.	SEBI Circulars No. SEBI/HO/ISD/ISD/CIR/P/2020/168 and SEBI/CIR/CFD/DCR 1/CIR/P/2020/181.	PAN Details mismatch in Shareholding pattern.	The Company	Filing of the required disclosures on receipt of stock exchange query.
7	Non-compliance under Regulation - 46 (1) of SEBI (LODR) Regulations, 2015	Regulation - 46 (1) of SEBI (LODR) Regulations, 2015	Non-compliance under Regulation - 46 (1) of SEBI (LODR) Regulations, 2015.	The Company	Filing of the required disclosures on receipt of stock exchange query.
8	Financial Results under Regulation 33 of SEBI (LODR) Regulations 2015 Quarter Ended - December 2023	Regulation 33 of SEBI (LODR) Regulations 2015	Discrepancies in Financial Results.	The Company	Reply in this regard to stock exchange and filing as required.
9	Corporate Governance Report for the Quarter ended March 31, 2024.	Regulation 27(2) of SEBI (LODR) Regulations, 2015.	Discrepancies in Corporate Governance Report for the Quarter ended March 31, 2024	The Company	Filing of the required disclosures on receipt of stock exchange query.

Details of violation	Fine amount	Observations/ remark of the PCS	Management response	Remarks
7	8	9	10	11
Discrepancies in Financial Results year ended - 31 st March 2025	None	The Company had failed to comply with the declaration requirements under Regulation of SEBI LODR.	The management made the required compliance.	
Discrepancy in shareholding pattern	None	The company had filed reply to SEBI as in the relevant Quarter, Rights Issue of shares was made.	The management made the required compliance.	
Discrepancy in Reconciliation of	None	The company is required to mention RTA SEBI	The management	





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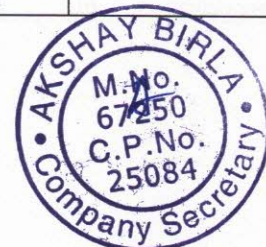
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Share Capital Audit Report.		Registration number in XBRL Form for the Quarter ended December, 2024. The Company rectified the same.	made the required compliance.	
Discrepancy in Financial results. (Financials not signed by Chairperson /MD/WTD/Authorized Director)	None	The Company had submitted the financials without mentioning name and designation of person signing the financials.	The management made the required compliance.	
Discrepancy in Financial results. (Financials not signed by Chairperson/MD/WTD/Authorized Director)	None	The Company had submitted the financials without mentioning name and designation of person signing the financials.	The management made the required compliance.	
Discrepancies in Shareholding pattern SDD (Database of designated Persons) of depositories.	None	Company is required to update the PAN details of Promoter and Promoter group on CDSL in accordance with the query raised by stock exchange.	The management made the required compliance on receipt of stock exchange query.	
Non-compliance under Regulation - 46 (1) of SEBI (LODR) Regulations, 2015	None	The Company had failed to maintain functional website.	The Management filed the reply with stock exchange on receipt of query and took necessary actions to comply with the Regulation 46 (1).	
Discrepancies in Financial Results Quarter Ended - December 2023	None	The Company had failed to comply with the disclosure requirements	The management made the required	





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		under Regulation of SEBI LODR	compliance on receipt of stock exchange query.	
Discrepancies in Corporate Governance Report for the Quarter ended March 31, 2024	None	There were some Discrepancies in Corporate Governance Report for the Quarter ended March 31, 2024	The management made the required compliance on receipt of stock exchange query	

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ circular no.	Deviations	Action taken by	Type of action
1	2	3	4	5	6
1	Reminder before freezing of promoter demat account (action under SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023)	SEBI/HO/CFD/PoD 2/CIR/P/2023/120 dated July 11, 2023	Non-Compliance of SEBI (LODR) Regulations, 2015	The Company	Compliance with the provision and payment of fine.

Details of violation	Fine amount	Observations/ remark of the PCS	Management response	Remarks
7	8	9	10	11
Non-Compliance of SEBI (LODR) Regulations, 2015	23600	The Company had failed to comply with the disclosure requirements under Regulation of SEBI LODR	The management submitted the required filings on receipt of SEBI query and has paid fine.	





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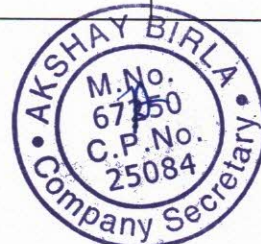
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c) Additional affirmations:

Sr. no	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	None
2	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entityAll the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations /circulars /guidelines issued by SEBI.	Yes	None
3	Maintenance and disclosure on website <ul style="list-style-type: none">The listed entity is maintaining a functional website.Timely dissemination of the documents/ information under a separate section on the website.Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website	Yes	None
4	Disqualification of Director None of the Director of the Company are disqualified under section 164 of the Companies Act, 2013	Yes	None
5	To examine details related to Subsidiaries of the listed entity: <ul style="list-style-type: none">a. Identification of material subsidiary companiesb. Requirements with respect to disclosure of material as well as other subsidiaries	N.A.	None
6	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under the Listing Regulations	Yes	None
7	Performance Evaluation The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	None
8	Related Party Transactions <ul style="list-style-type: none">a. The listed entity has obtained prior approval of Audit Committee for all related party transaction	Yes	None





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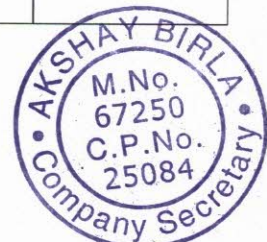
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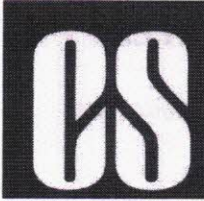
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	b. In case no prior approval obtained, the listed entity shall provide the detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee		
9	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) Yes under Regulation 51 along with Schedule III of Listing Regulations within the time limits prescribed thereunder	Yes	None
10	<u>Prohibition of Insider Trading</u> The listed entity is in compliance with the Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	The entity is in conformity with SEBI (Prohibition of Insider Trading) Regulations, 2015, however the following non-compliance has been observed:- (i) The company has confirmed that SDD Software is functional. However, it has been informed by the company that all disclosures are first prepared in excel format on regular basis and are updated by the company on SDD Software at the end of the year.
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its/ promoters/ directors/ subsidiaries either by SEBI or by the stock exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	No	None





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12	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	N.A.	None
13	<u>Additional Non-Compliances, if any:</u> No. any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc	No	None

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For, Akshay R. Birla and Associates

CS Akshay R. Birla

Practicing Company Secretaries

M. No.: 67250

CP. No.: 25084

PR No.: 5938/2024

UDIN: A067250G000503609



Date: 30/05/2025

Place: Jalgaon