

## AKSHAY R. BIRLA AND ASSOCIATES

### Practicing Company Secretaries

**Office Add:** Off. No. 23, 3<sup>rd</sup> Floor, Mansing Market, Jalgaon - 425001 (MH)

**Cell:** +91-9028110641, 9067890641

**Email id:** [csakshaybirla@gmail.com](mailto:csakshaybirla@gmail.com)

### Secretarial Compliance Report of Atal Realtech Limited for the Financial year ended 31<sup>st</sup> March, 2023

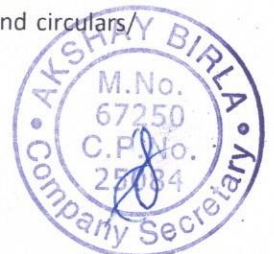
To,  
The Board of Directors  
Atal Realtech Limited  
CIN: L45400MH2012PLC234941  
Unit No. 301 and 302,  
ABH Developers Town Square,  
S No. 744, Nashik -422002

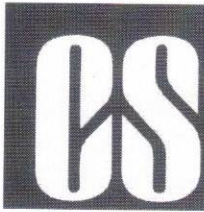
I/We Akshay R. Birla and Associates, have examined:

- 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 31<sup>st</sup> March, 2023 ("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 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;





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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: -

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
	NA	NA	NA	NA	NA

Details of violation	Fine amount	Observations/ remark of the PCS	Management response	Remarks
7	8	9	10	11
NA	NA	NA	NA	NA

- 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	Details of violation	Fine amount	Observations / remark of the PCS	Management response	Remarks
	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

- c) Additional affirmations:

Sr. no	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1	<u>Secretarial Standards:</u> 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	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity</li><li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations /circulars /guidelines issued by SEBI.</li></ul>	Yes	None
3	<u>Maintenance and disclosure on website</u> <ul style="list-style-type: none"><li>The listed entity is maintaining a functional website.</li></ul>	Yes	None







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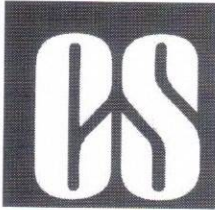
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	<ul style="list-style-type: none"><li>• Timely dissemination of the documents/ information under a separate section on the website.</li><li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li></ul>		
4	<u>Disqualification of Director</u> None of the Director of the Company are disqualified under section 164 of the Companies Act, 2013	Yes	None
5	<u>To examine details related to Subsidiaries of the listed entity:</u> a. Identification of material subsidiary companies b. Requirements with respect to disclosure of material as well as other subsidiaries	N.A.	None
6	<u>Preservation of Documents:</u> 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	<u>Performance Evaluation</u> 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	<u>Related Party Transactions</u> a. The listed entity has obtained prior approval of Audit Committee for all related party transaction 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	Yes	None
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	None
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	Yes	None





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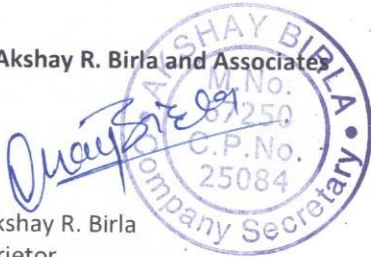
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12	<b>Additional Non-Compliances, if any:</b> No. any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc	Yes	None
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Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019: There was no change in the Statutory Auditors during the Reporting period.

For, Akshay R. Birla and Associates



CS Akshay R. Birla

Proprietor

ACS No.: 67250

CP No.: 25084

PR No.: 2761/2022

UDIN: A067250E000309030

Date: 15/05/2023

Place: Jalgaon