

## 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, 2024

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:

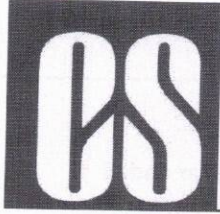
- a) all the documents and records made available to us and explanation provided by Atal Realtech Limited ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31<sup>st</sup> March, 2024 ("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;

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





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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	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 SEBI query.
2	Financial Results under Regulation 33/52 of SEBI (LODR) Regulations 2015 Quarter Ended - December 2023	Regulation 33/52 of SEBI (LODR) Regulations 2015	Discrepancies in Financial Results.	The Company	Reply in this regard to SEBI and filing as required.
3	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/PoD2/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
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 SEBI query	
Discrepancies in Financial Results Quarter Ended - December 2023	None	The Company had failed to comply with the disclosure requirements under Regulation of SEBI LODR	The management made the required compliance on receipt of SEBI query.	





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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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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><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>	Yes	None





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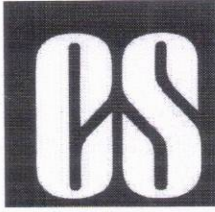
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4	<u>Disqualification of Director</u> None of the Director of the Company are disqualified under section 164 of the Companies Act, 2013	Yes	None
5	<u>To examine details related to Subsidiaries of the listed entity:</u> a. Identification of material 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
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	N.A.	None





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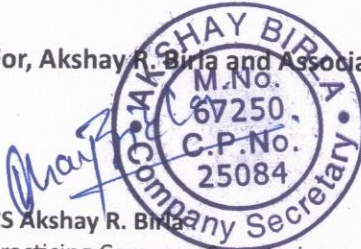
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	6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.		
13	<u>Additional Non-Compliances, if any:</u> No. any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc	Yes	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.: 2761/2022

UDIN: A067250F000486273

Date: 29/05/2024

Place: Jalgaon