

**Date: 24.08.2021**

To,  
**National Stock Exchange of India Limited**  
Exchange Plaza, 5th Floor,  
Plot No. C/1, G Block,  
Bandra Kurla Complex, Bandra (East),  
Mumbai - 400 051  
Symbol: ATALREAL

**Sub.: Submission of Annual Report pursuant to Reg. 34 of SEBI (Listing Disclosure & Requirements) Regulations, 2015**

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**Sir/ Madam,**

Pursuant to the requirements of Regulation 34 of the SEBI Listing Regulations, 2015, we wish to submit copy of Annual Report along with Notice of Annual General Meeting scheduled to be held on 7<sup>th</sup> September, 2021 at 3.00 p.m. at Registered Office of the company.

Pursuant to the provisions of the Companies Act, 2013 (the Act) read with the Rules framed thereunder and Green Initiative in Corporate Governance started by The MCA and SEBI Circular Dated 15.01.2021, which provides for paperless compliances by companies through electronic mode, the Notice of the AGM along with Annual Report for the Financial Year 2020-2021 is being sent through e-mail to the members who have registered their e-mail with the Company/Depository Participant(s).

Inadvertently, there has been delay in submission, kindly condone the same. Kindly take on record and display the same on website.

Thanking you,

**For Atal Realtech Limited**

**Sd/-**  
**Vijaygopal Atal**  
*Managing Director*  
DIN: 00126667  
Add: Nashik

**Atal Realtech Limited**  
***ANNUAL REPORT***  
**2020-21**

[www.atalrealtech.com](http://www.atalrealtech.com)

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## Corporate Information

Board of Directors	
Vijaygopal Parasram Atal	Managing Director
Nishit Vijaygopal Atal	Non-Executive Director
Kuntal Manoj Badiyani	Independent Director
Sharanya Shashikanth Shetty	Independent Director

Committees of Board	
Audit Committee	<ol style="list-style-type: none"> <li>1. Sharanya Shashikanth Shetty - Chairman</li> <li>2. Kuntal Manoj Badiyani - Member</li> <li>3. Vijaygopal Parasram Atal -Member</li> </ol>
Nomination and Remuneration Committee	<ol style="list-style-type: none"> <li>1. Sharanya Shashikanth Shetty - Chairman</li> <li>2. Kuntal Manoj Badiyani -Member</li> <li>3. Nishit Vijaygopal Atal - Member</li> </ol>
Stakeholders Relationship Committee	<ol style="list-style-type: none"> <li>1. Kuntal Manoj Badiyani - Chairman</li> <li>2. Sharanya Shashikanth Shetty -Member</li> <li>3. Vijaygopal Parasram Atal - Member</li> </ol>

Key Managerial Personnel	
Uday Laxman Satve	Chief Financial Officer
Alok Singh	Company Secretary & Compliance Officer

Auditors	
M/s. A. S. Bedmutha & Co.	2020-2021

Secretarial Auditor	
Jagruti Bedmutha & Co.	2020-21

Registered Office	
Shop No. 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002	
Investor Queries: <a href="mailto:info@atalrealtech.com">info@atalrealtech.com</a>	

## **NOTICE**

**NOTICE** is hereby given that the **Nineth Annual General Meeting** of the Members of **Atal Realtech Limited** will be held on **Tuesday, 7<sup>th</sup> September , 2021 at 3:00 P.M.** at Registered Office of company Shop No. 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002 to transact the following business:

### **ORDINARY BUSINESS:**

1. To receive, consider and adopt the Audited Financial Statements of the Company for the financial year ended March 31, 2021 including audited Balance Sheet as at March 31, 2021 and the Statement of Profit and Loss for the year ended on that date and the Reports of the Board of Directors and Auditors thereon.
2. To appoint a Director in place of Mr. Nishit Atal (DIN: 05179430) who retires by rotation and being eligible, offers himself for re-appointment.

By the order of the Board of Directors  
**For Atal Realtech Limited**

Sd/-

**Alok Singh**

Company Secretary & Compliance Officer

Date:13.08.2021

### **NOTES:**

1. The Statement pursuant to Section 102 of the Companies Act, 2013 (Act) and Details of directors to be re-appointed, in respect of the business as set out in the Notice is annexed hereto.
2. This Notice is being to members of the Company as appearing in Register of Members.
3. **A MEMBER ENTITLED TO ATTEND AND VOTE AT ANNUAL GENERAL MEETING (AGM) IS ENTITLED TO APPOINT A PROXY TO ATTEND AND VOTE INSTEAD OF HIMSELF AND THE PROXY NEED NOT BE A MEMBER OF THE COMPANY. THE INSTRUMENT APPOINTING PROXY, IN ORDER TO BE EFFECTIVE, MUST BE DEPOSITED AT THE COMPANY'S REGISTRTERED OFFICE, DULY COMPLETED AND SIGNED, NOT LESS THAN FORTYEIGHT HOURS BEFORE THE COMMENCEMENT OF THE MEETING. PROXIES SUBMITTED ON BEHALF OF LIMITED COMPANIES, SOCIETIES, ETC., MUST BE SUPPORTED BY APPROPRIATE RESOLUTIONS / AUTHORITY, AS APPLICABLE. A**

**PERSON CAN ACT AS PROXY ON BEHALF OF MEMBERS NOT EXCEEDING FIFTY (50) AND HOLDING IN THE AGGREGATE NOT MORE THAN 10% OF THE TOTAL SHARE CAPITAL OF THE COMPANY. IN CASE A PROXY IS PROPOSED TO BE APPOINTED BY A MEMBER HOLDING MORE THAN 10% OF TOTAL SHARE CAPITAL OF THE COMPANY CARRYING VOTING RIGHTS, THEN SUCH PROXY SHALL NOT ACT AS A PROXY FOR ANY OTHER PERSON OR SHAREHOLDER. THE BLANK PROXY FORM IS ENCLOSED.**

4. Members/Proxy holder/Authorized Representative are requested to bring duly filled Attendance Slip enclosed herewith along with their copy of the Notice to attend the Meeting.
5. Electronic copy of the Notice of the Annual General Meeting of the Company inter alia indicating the process and manner of e-voting along with the Attendance Slip and Proxy Form are being sent to all the members whose email IDs are registered with the Company / Depository Participant(s) for communication purposes unless any member has requested for a physical copy of the same. For members who have not registered their email address, physical copies of the aforesaid documents are being sent in the permitted mode.
6. In case of joint holders attending the Meeting, the first holder as per the Register of Members of the Company will be entitled to vote.
7. Corporate Members are requested to send a duly certified copy of the Board Resolution authorizing their representative(s) to attend and vote on their behalf at the Meeting.
8. Relevant documents referred to in the Notice, statutory registers will be available for inspection by the members at the Registered Office of the Company during normal business hours on working days. Members desiring to seek information with respect to the businesses in this notice are requested to send their queries at least Seven days before the date of the meeting so that the information can be made available at the meeting.
9. A route map showing directions to reach the venue of the meeting is given in this Notice.
10. Once the vote on a resolution is cast by the member, the member shall not allow changing it subsequently. Further, members who have casted their vote electronically shall not vote by way of poll, if held at the meeting. To provide an opportunity to vote at the meeting to the shareholders, who have not exercised the remote e-voting facility, shall be provided ballot papers before the commencement of the meeting. Any person who is not a member as on the cut-off date should treat this notice for information purpose only.
11. Member holding shares in electronic form are requested to intimate immediately any change in their address or bank mandates to their Depository Participants with whom they are maintaining their Demat Accounts. Members holding shares in physical form are requested to advise any change in their address or bank mandates immediately to

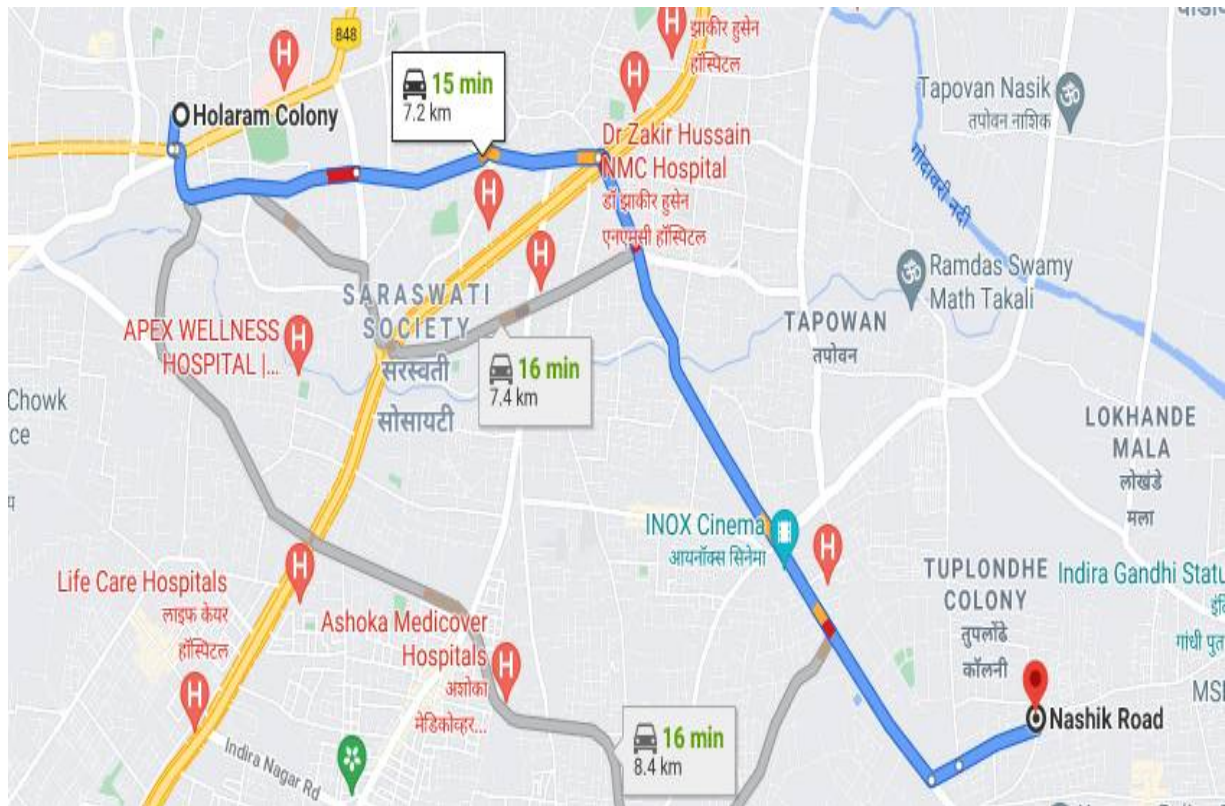
- the Company / RTA viz. Adroit Corporate Services Private Limited.
12. SEBI has mandated the submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in electronic form, are therefore, requested to submit their PAN to their Depository Participants with whom they maintain their Demat Accounts. Members holding shares in physical form and submit their PAN to the Company/ RTA viz. Adroit Corporate Services Private Limited.
  13. The Register of Members and Share Transfer Books of the Company will remain closed from **September 4, 2021 to September 7, 2021**.
  14. A person, whose name is recorded in the register of members or in the register of beneficial owners maintained by the depositories as on the cut-off date only shall be entitled to voting at the AGM through ballot paper.
  15. Ms. Jagruti Bedmutha, Practicing Company Secretary (C.P. No.: 23122) has been appointed for as the Scrutinizer for providing facility to the members of the Company to scrutinize the voting in a fair and transparent manner.
  16. The Chairman shall, at the AGM, at the end of discussion on the resolutions on which voting is to be held, allow voting with the assistance of scrutinizer, by use of "Ballot Paper" for all those members who are present at the AGM.
  17. The Scrutinizer shall after the conclusion of voting at the general meeting, not later than three days of the conclusion of the AGM, a scrutinizer's report of the total votes cast in favour or against, if any, to the Chairman or a person authorized by him in writing, who shall countersign the same and declare the result of the voting forthwith.
  18. The Results declared along with the report of the Scrutinizer shall be placed on the website of the Company immediately after the declaration of result by the Chairman or a person authorized by him in writing. The results shall also be immediately forwarded to the National Stock Exchange, Mumbai.
  19. GREEN INTIATIVE  
As a responsible corporate citizen, the Company welcomes and supports the 'Green Initiative' initiated by the Ministry of Corporate Affairs, Government of India (MCA), by its recent circulars, enabling electronic delivery of documents including the annual reports, notices, circulars to shareholders at their e-mail address previously registered with the depository participants (DPs)/company/registrars and share transfer agents. Shareholders who have not registered their e-mail addresses so far are requested to register their e-mail addresses to help us in the endeavour to save trees and protect the planet. Those holding shares in demat form can register their email address with their concerned DP. Those shareholders who hold shares in physical form are requested to register their e-mail addresses with our registrar,

**ANNEXURE TO THE NOTICE:****Details of Mr. Nishit Atal, the Director retiring by rotation, regularizing at the ensuing Annual General Meeting**

S. N.	Particulars	Details of Directors
1.	Name of Director	Mr. Nishit Atal
2.	DIN	05179430
3.	Qualifications	B. Com
4.	Experience	Mr. Nishit Atal is a Commerce Graduate. He has a vast experience in the field of Construction and Civil Engineering Works. He is a hardcore Businessman and having years of hands on experience in Quality Control Supervision, implementation of construction strategies, Budget and Schedule Constraints of Project.
5.	Details of remuneration to be paid, if any	NIL
6.	Date of first appointment to the Board	11/01/2018
7.	Shareholding in the Company	1,97,200
8.	Relationship with other Directors / KMPs	Vijaygopal Atal (Father)
9.	No. of meetings attended during the year	The details have been given in Director's Report



## ROUTE MAP TO THE 9<sup>TH</sup> ANNUAL GENERAL MEETING



**Venue: Registered Office**  
**Shop No. 1, Sumangal Builder House,**  
**Holaram Colony, Sadhu Vaswani Road,**  
**Nashik, 422002**

## Directors' Report

To,

The Members,

Your Directors take pleasure in presenting their Ninth Annual Report on the Business and Operations of the Company and the Accounts for the Financial Year ended 31st March, 2021 (period under review).

### 1. FINANCIAL PERFORMANCE OF THE COMPANY:

The summary of consolidated and standalone financial highlights for the financial year ended March 31, 2021 and previous financial year ended March 31, 2020 is given below:

#### Standalone Financial Performance (Rs. In Lakhs)

Particulars	31-Mar-2021	31-Mar-2020
<b>Total Income</b>	<b>4,365.82</b>	<b>5,869.23</b>
Less: Expenditure	(4,016.33)	(5,494.29)
<b>Profit before Depreciation</b>	<b>349.49</b>	<b>374.94</b>
Less: Depreciation	(67.92)	(53.28)
<b>Profit before Tax</b>	<b>281.57</b>	<b>321.66</b>
Provision for Taxation	(72.00)	(81.76)
<b>Profit after Tax</b>	<b>209.57</b>	<b>239.90</b>
<b>Other Comprehensive Income</b>	-	-
<b>Total Comprehensive Income</b>	<b>209.57</b>	<b>239.90</b>
<b>Earning Per Share (Face Value of ₹10)</b>		
<b>Basic</b>	4.25	5.18
<b>Diluted</b>	4.25	5.18

## **FINANCIAL PERFORMANCE:**

Standalone:

The Total Income of the Company stood at Rs. 4,365.82 Lakhs for the year ended March 31, 2021 as against Rs. 5,869.23 Lakhs in the previous year. The Company made a Net Profit of Rs. 209.57 lakhs for the year ended March 31, 2021 as compared to the Net Profit of Rs. 239.90 lakhs in the previous year.

### **2. DIVIDEND:**

The dividend policy for the year under review has been formulated taking into consideration of growth of the company and to conserve resources, the Directors do not recommend any dividend for year ended March 31, 2021.

### **3. STATE OF AFFAIRS OF THE COMPANY:**

Information on the operations and financial performance, among others for the period under review, is given in the Management Discussion and Analysis Report which is annexed to this Report and is in accordance with the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.

### **4. DIRECTORS AND KEY MANAGERIAL PERSONNEL:**

The current Management of the Company is as follows:

Sr. No.	Name	DIN/PAN	Designation
1.	Mr. Vijaygopal Parasram Atal	00126667	Managing Director
2.	Mr. Nishit Vijaygopal Atal	05179430	Non-Executive Director
3.	Mr. Kuntal Manoj Badiyani	07646960	Independent Director
4.	Mrs. Sharanya Shashikanth Shetty	08572805	Independent Director
5.	Mr. Alok Singh	BMQPS9514N	Company Secretary
6.	Mr. Uday Laxman Satve	ATOPS3589F	Chief Financial Officer

#### **(A) Appointment:**

During the year under report, Mr. Alok Singh was appointed as the Company Secretary and Compliance Officer of the Company w.e.f. November 12, 2020.

#### **(C) Cessation:**

During the year under report, Mr. Sushil Ladda resigned from the position of Company Secretary and Compliance Officer w.e.f. November 10, 2020.

## **5. MEETINGS:**

During the year, Nine Board Meetings were convened and duly held. The details of which are given in the Corporate Governance Report, which forms part of this report. The intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013.

## **6. AUDIT COMMITTEE:**

The Audit Committee comprises of Mrs. Sharanya Shetty (Chairman), Mr. Kuntal Badiyani (Member) and Mr. Vijaygopal Atal (Member). Powers and role of the Audit Committee are included in the Corporate Governance Report. All the recommendation made by the Audit Committee was accepted by the Board of Directors.

## **7. BOARD EVALUATION:**

Your Board has devised an Evaluation Policy for evaluating the performance of the Board, its Committees, Executive Directors, Independent Directors. Based on the same, the performance was evaluated for the financial year ended March 31, 2021. As part of the evaluation process, the performance of Non- Independent Directors, the Chairman and the Board was conducted by the Independent Directors. The performance evaluation of the respective Committees and that of Independent and Non- Independent Directors was done by the Board excluding the Director being evaluated.

The policy inter alia provides the criteria for performance evaluation such as Board effectiveness, quality of discussion, contribution at the meetings, business acumen, strategic thinking, time commitment, and relationship with the stakeholders, corporate governance practices, contribution of the committees to the Board in discharging its functions etc.

The Board carried out formal annual evaluation of its own performance and that of its Committees viz., the Audit Committee, Stakeholders' Relationship Committee, Nomination and Remuneration Committee (NRC). The Board also carried out the performance evaluation of all the individual directors including the Chairman of the Company. Additionally, NRC also carried out the evaluation of the performance of all the individual directors and Chairman of the Company. The performance evaluation was carried out by way of obtaining feedback from the Directors through a structured questionnaire prepared in accordance with the policy adopted by the Board and after taking into consideration the Guidance Note on Board Evaluation issued by Securities and Exchange Board of India.

The feedback received from the Directors through the above questionnaire was reviewed by the Chairman of the Board and the Chairman of the NRC and then discussed the same at the meetings of the Board and NRC respectively. The performance evaluation of the Chairman, Whole Time Director and the Board as a whole was carried out by the Independent Directors at their separate meeting.

## **8. EXTRACT OF ANNUAL RETURN:**

As required pursuant to section 92(3) of the Companies Act, 2013 and Rule 12(1) of the Companies (Management and Administration) Rules, 2014, an extract of Annual Return in MGT-9 is annexed as a part of this Annual Report as "Annexure II".

## **9. REMUNERATION POLICY:**

The Company has framed a Nomination and Remuneration Policy pursuant to Section 178 of the Companies Act, 2013 and SEBI (LODR) Regulations, 2015. The Policy is provided in available on website of company [www.atalrealtech.com](http://www.atalrealtech.com).

## **10. AUDITORS:**

### **i. Statutory Auditors:**

M/s. A S Bedmutha & Co. were appointed as the Statutory Auditor of the company for term of 5 years from Financial Year 2018-19. There are no qualifications in the Audit Report for FY 2020-21, the report is annexed with Report and is self explanatory.

### **ii. Secretarial Auditor:**

Pursuant to the provisions of Section 204 of the Companies Act, 2013 and The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, the Company has appointed Jagruti Bedmutha & Co., Company Secretaries in Practice (CP No. 23112), to undertake the Secretarial Audit of the Company for the F.Y. 2020-21. The Secretarial Audit Report for F.Y. 2020-21 is annexed herewith as "Annexure III".

### **iii. Cost Auditor:**

Your Company is principally engaged into Construction Activity. Therefore, Section 148 of the Companies Act, 2013 is not applicable to the Company.

## **11. AUDITOR'S REPORT:**

The Auditor's Report and Secretarial Auditor's Report does not contain any qualifications, reservations or adverse remarks. Report of the Secretarial Auditor is given as an Annexure, which forms part of this report.

## **12. VIGIL MECHANISM:**

In pursuance of the provisions of section 177(9) & (10) of the Companies Act, 2013, a Vigil Mechanism for Directors and Employees to report genuine concerns has been established. The Vigil Mechanism Policy has been uploaded on the website of the Company.

## **13. INTERNAL AUDIT & CONTROLS:**

Pursuant to provisions of Section 138 read with rules made there under, the Board has appointed Sharp Aarth & Co., Chartered Accountants, as an Internal Auditors of the Company to check the internal controls and functioning of the activities and recommend ways of improvement. The Internal Audit is carried out quarterly basis; the report is placed in the Audit Committee Meeting and the Board Meeting for their consideration and direction.

The Internal Financial Controls with reference to financial statements as designed and implemented by the Company are adequate. During the year under review, no material or serious observation has been received from the Internal Auditors of the Company for inefficiency or inadequacy of such controls.

#### **14. RISK ASSESSMENT AND MANAGEMENT:**

Your Company has been on a continuous basis reviewing and streamlining its various operational and business risks involved in its business as part of its risk management policy. Your Company also takes all efforts to train its employees from time to time to handle and minimize these risks.

#### **15. LISTING WITH STOCK EXCHANGES:**

During the year under report, the Company listed its shares on NSE Emerge Platform on October 15, 2020 and continues to be listed on NSE- Emerge. It has paid the Annual Listing Fees for the year 2020-21 to BSE Limited.

#### **16. SUBSIDIARY COMPANIES AND CONSOLIDATED FINANCIAL STATEMENT:**

As on March 31, 2021, your Company does not have any subsidiaries.

#### **17. COMPLIANCE WITH SECRETARIAL STANDARDS:**

The Company is fully compliant with the applicable Secretarial Standards (SS) viz. SS-1 & SS-2 on Meetings of the Board of Directors and General Meetings respectively.

#### **18. CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO:**

##### **1. Conservation Of Energy, Technology Absorption, Foreign Exchange Earnings And Outgo:**

##### **A. CONSERVATION OF ENERGY:**

Particulars of Conservation of Energy are not given as the company is not covered by the Schedule of Industries which requires furnishing of information in Form A of total consumption of energy & per unit of consumption.

- a) Steps taken or impact on conservation of energy: **NIL**
- b) The Step taken by the company for utilizing alternate sources of energy: **NIL**
- c) The Capital investment on energy conservation equipment: **NIL**

**B. TECHNOLOGY ABSORPTION: NIL**

**C. FOREIGN EXCHANGE EARNINGS AND OUTGO:**

There were no foreign exchange earnings or outgo during the year under review.

**19. PARTICULARS OF LOANS, INVESTMENTS AND GUARANTEES:**

Particulars of loans given, investments made, guarantees given and securities provided are provided in the financial statements.

**20. PARTICULARS OF CONTRACTS OR ARRANGEMENTS WITH RELATED PARTIES:**

The details of the related party transactions in Form AOC-2 annexed as Annexure- III

**21. DEPOSITS:**

Your Company did not accept / hold any deposits from public / shareholders during the year under review.

**22. SIGNIFICANT AND MATERIAL ORDERS:**

There are no significant and material orders passed by the Regulators or Courts or Tribunals impacting the going concern status and Company's operations in future.

**23. OBLIGATION OF COMPANY UNDER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013:**

In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made there under, the Company has framed and adopted the policy for Prevention of Sexual Harassment at Workplace. Company was not in receipt of any complaint of sexual harassment.

**24. HUMAN RESOURCES:**

Your Company considers people as its biggest assets and 'Believing in People' is at the heart of its human resource strategy. It has put concerted efforts in talent management and succession planning practices, strong performance management and learning and training initiatives to ensure that your Company consistently develops inspiring, strong and credible leadership.

**Disclosures pertaining to remuneration of directors as required under Schedule V to the Companies Act, 2013.**

The Company has paid managerial remuneration in accordance with the requisite approval mandated by the provisions of Section 197 read with Schedule V of the Companies Act, 2013. The details of remuneration paid during the financial year under is given below:

Name of the Director	Salary (Rs.)	Retirement benefits (Rs.)	Gratuity (Rs.)	Bonus / Commission / Stock options	Total (Rs.)	Service Contract	Notice Period
Mr. Vijaygopal Atal (Managing Director)	18,00,000/-  (1,50,000 p.m. from April 2020 to March 2021)	NIL	NIL	1,50,000	19,50,000/-	5 years	-

## 25. CORPORATE GOVERNANCE:

Pursuant to SEBI (LODR) Regulations, 2015, the report on Corporate Governance during the period under review with the Certificate issued by M/s Jagruti Bedmutha & Co., Practicing Company Secretaries, on compliance in this regards forms part of this Annual Report.

## 26. DIRECTORS' RESPONSIBILITY STATEMENT:

Pursuant to Section 134(5) of the Companies Act, 2013, the board of directors, to the best of their knowledge and ability, confirm that:

- In the preparation of the annual accounts, the applicable accounting standards have been followed and there are no material departures.
- They have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year and of the profit of the Company for that period.
- They have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities.
- They have prepared the annual accounts on a going concern basis.
- They have laid down internal financial controls to be followed by the Company and such internal financial controls are adequate and operating effectively.
- They have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.



Based on the framework of internal financial controls and compliance systems established and maintained by the Company, work performed by the internal, statutory and secretarial auditors and external consultants and the reviews performed by management and the relevant board committees, including the audit committee, the board is of the opinion that the Company's internal financial controls were adequate and effective during the financial year 2020-21.

#### **27. CAUTIONARY STATEMENTS:**

Statements in this Annual Report, particularly those which relate to Management Discussion and Analysis as explained in the Corporate Governance Report, describing the Company's objectives, projections, estimates and expectations may constitute 'forward looking statements' within the meaning of applicable laws and regulations. Actual results might differ materially from those either expressed or implied in the statement depending on the circumstances.

#### **28. ACKNOWLEDGEMENTS:**

Your Directors would like to express deep sense of appreciation for the assistance and co-operation received from the Financial Institutions, Banks, Government Authorities and Shareholders and for the devoted service by the Executives, staff and workers of the Company. The Directors express their gratitude towards each one of them.

**For & on behalf of the Board of Directors of  
Atal Realtech Limited**

**Sd/-**

**Vijaygopal Atal**

**Managing Director**

**DIN: 00126667**

**Sd/-**

**Nishit Atal**

**Director**

**DIN: 05179430**

**Place: Nashik**

**Date: August 13, 2021**

**ANNEXURE-II**

**FORM NO. MGT 9 - EXTRACT OF ANNUAL RETURN  
AS ON FINANCIAL YEAR ENDED ON 31<sup>ST</sup> MARCH 2021**

**[Pursuant to Section 92(3) of Companies Act, 2013 and Rule 12(1) of the Company (Management & Administration) Rules, 2014]**

**I. REGISTRATION & OTHER DETAILS:**

1	CIN	U45400MH2012PLC234941
2	Registration Date	25 <sup>th</sup> August, 2012
3	Name of the Company	<b>ATAL REALTECH LIMITED</b>
4	Category/Sub-category of the Company	Company limited by shares
5	Address of the Registered office & contact details	Shop No. 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002
6	Whether listed company (Yes / No)	Yes National Stock Exchange of India Limited Exchange Plaza, BKC, Mumbai
7	Name, Address & contact details of the Registrar & Transfer Agent, if any.	<b>BIGSHARE SERVICES PRIVATE LIMITED</b> (CIN: U99999MH1994PTC076534) 1 <sup>st</sup> Floor, Bharat Tin Works Building, Opp. Vasant Oasis, Makwana Road, Marol, Andheri East, Mumbai – 400 059 Tel.: 022-62638200

**II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY** (All the business activities contributing 10% or more of the total turnover of the company shall be stated) –

Sr. No.	Name and Description of main products / services	NIC Code of the Product / Service	% to total turnover of the company
1.	Construction of Building	410	100.00

### III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

No.	Name and Address of the Company	CIN/GLN	Holding / Subsidiary / Associate	% of shares held as at the end of the year	Applicable Section
-	-	-	-	-	-

Note: The Company does not have any holding, subsidiary or associate companies.

### IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of total equity)

#### (i) Category-wise shareholding

SR NO		No. of Shares held at the beginning of the year: 31/03/2020				No. of Shares held at the end of the year :31/03/2021				
	Category of Shareholder	Demat	Physical	Total Shares	Total %	Demat	Physical	Total Shares	Total %	% Change
	(A) Shareholding of Promoter and Promoter Group2									
1	Indian									
a)	INDIVIDUAL / HUF	37,91,800	0	37,91,800	81.90	25,91,800	0	25,91,800	52.53	(29.37)
b)	Central / State government(s)	0	0	0	0.00	0	0	0	0.00	0.00
c)	BODIES CORPORATE	0	0	0	0.00	0	0	0	0.00	0.00
d)	FINANCIAL INSTITUTIONS / BANKS	0	0	0	0.00	0	0	0	0.00	0.00
e)	ANY OTHERS (Specify)									
1	GROUP	0	0	0	0.00	0	0	0	0.00	0.00

	COMPANIES									
2	TRUSTS	0	0	0	0.00	0	0	0	0.00	0.00
3	DIRECTORS RELATIVES	8,38,200	0	8,38,200	18.10	8,38,200	0	8,38,200	16.99	(1.12)
	SUB TOTAL :	46,30,000	0	46,30,000	100	34,30,000	0	34,30,000	69.52	(30.48)
(A) Shareholding of Promoter and Promoter Group2										
2	Foreign									
a)	BODIES CORPORATE	0	0	0	0.00	0	0	0	0.00	0.00
b)	INDIVIDUAL	0	0	0	0.00	0	0	0	0.00	0.00
c)	INSTITUTIONS	0	0	0	0.00	0	0	0	0.00	0.00
d)	QUALIFIED FOREIGN INVESTOR	0	0	0	0.00	0	0	0	0.00	0.00
e)	ANY OTHERS (Specify)	0	0	0	0.00	0	0	0	0.00	0.00
	SUB TOTAL :	0	0	0	0.00	0	0	0	0.00	0.00
	Total Public Shareholding	46,30,000	0	46,30,000	100	34,30,000	0	34,30,000	69.52	(30.48)
(B) Public shareholding										
3	Institutions									
a)	Central / State government(s)	0	0	0	0.00	0	0	0	0.00	0.00
b)	FINANCIAL INSTITUTIONS /	0	0	0	0.00	0	0	0	0.00	0.00

	<b>BANKS</b>									
c)	<b>MUTUAL FUNDS / UTI</b>	0	0	0	0.00	0	0	0	0.00	0.00
d)	<b>VENTUR E CAPITAL FUNDS</b>	0	0	0	0.00	0	0	0	0.00	0.00
e)	<b>INSURA NCE COMPA NIES</b>	0	0	0	0.00	0	0	0	0.00	0.00
f)	<b>FII'S</b>	0	0	0	0.00	0	0	0	0.00	0.00
g)	<b>FOREIGN VENTUR E CAPITAL INVESTO RS</b>	0	0	0	0.00	0	0	0	0.00	0.00
h)	<b>QUALIFI ED FOREIGN INVESTO R</b>	0	0	0	0.00	0	0	0	0.00	0.00
i)	<b>ANY OTHERS (Specify)</b>	0	0	0	0.00	0	0	0	0.00	0.00
j)	<b>FOREIGN PORTFO LIO INVESTO R</b>	0	0	0	0.00	0	0	0	0.00	0.00
k)	<b>ALTERN ATE INVEST MENT FUND</b>	0	0	0	0.00	0	0	0	0.00	0.00
	<b>SUB TOTAL :</b>	0	0	0	0.00	0	0	0	0.00	0.00
	<b>(B) Public shareholding</b>									
4	<b>Non-institutions</b>									
a)	<b>BODIES</b>	0	0	0	0.00	5,64,800	0	5,64,	11.45	11.45

	CORPORATE							800		
b)	INDIVIDUAL									
1	(CAPITAL UPTO TO Rs. 1 Lakh)	0	0	0	0	1,24,800	0	1,24,800	2.53	2.53
c)										
1	(CAPITAL GREATER THAN Rs. 1 Lakh)					4,92,800	0	4,92,800	9.99	9.99
d)	ANY OTHERS (Specify)									
1	HINDU UNDIVIDED FAMILY	0	0	0	0.00	3,15,200	0	3,15,200	6.39	6.39
2	TRUSTS	0	0	0	0.00	0	0	0	0.00	0.00
3	CLEARING MEMBER	0	0	0	0.00	1,600	0	1,600	0.03	0.00
4	NON RESIDENT INDIANS (NRI)	0	0	0	0.00	4,800	0	4,800	0.10	0.00
5	DIRECTORS RELATIVES	0	0	0	0.00	0	0	0	0.00	0.00
6	EMPLOYEE	0	0	0	0.00	0	0	0	0.00	0.00
7	OVERSEAS BODIES CORPORATES	0	0	0	0.00	0	0	0	0.00	0.00

8	UNCLAIMED MED SUSPENSE ACCOUNT	0	0	0	0.00	0	0	0	0.00	0.00
9	IEPF	0	0	0	0.00	0	0	0	0.00	0.00
e)	QUALIFIED FOREIGN INVESTOR	0	0	0	0.00	0	0	0	0.00	0.00
	SUB TOTAL :	0	0	0	0	15,04,000	0	15,04,000	30.48	30.48
	Total Public Shareholding	46,30,000	0	46,30,000	100	49,34,000	0	49,34,000	100	0
(C) Shares held by Custodians and against which Depository Receipts have been issued										
5										
f)	SHARES HELD BY CUSTODIANS	0	0	0	0.00	0	0	0	0.00	0.00
10	Promoter and Promoter Group	0	0	0	0.00	0	0	0	0.00	0.00
11	Public	0	0	0	0.00	0	0	0	0.00	0.00
	SUB TOTAL :	0	0	0	0.00	0	0	0	0.00	0.00
	Total Public Shareholding	0	0	0	0.00	0	0	0	0.00	0.00
	GRAND TOTAL	46,30,000	0	46,30,000	100	49,34,000	0	49,34,000	100	0
NOTES :										
1) NAME, NUMBER OF SHARES HELD & PERCENTAGE OF ENTITIES / PERSONS HOLDING MORE THAN 1% OF THE TOTAL SHARES OF THE COMPANY IS AS PER ANNEXURE										

**(ii) Shareholding of Promoters and Promoter Group**

SL No	Shareholder's Name	Shareholding at beginning of the year 31/03/2020			Shareholding at the end of the year 31/03/2021			
		No of Shares	% of total Shares of the Company	% of Shares pledged/encumbered to total Shares	No of Shares	% of total Shares of the Company	% of Shares pledged/encumbered to total Shares	% Change
1	UDAY LAXMAN SATVE	100	0.0022	0.0022	100	0.0022	0.0000	-0.0002
2	TANVI VIJAYG OPAL ATAL	1,23,250	2.6620	2.6620	1,23,250	2.6620	0.0000	-0.1640
3	SUJATA VIJAYG OPAL ATAL	1,23,250	2.6620	2.6620	1,23,250	2.6620	0.0000	-0.1640
4	PAWAN KUMAR SUBHAS HCHANDRA ATAL	1,97,200	4.2592	0.0000	1,97,200	3.9968	0.0000	-0.2624
5	AMIT SURESH CHANDRA ATAL	1,97,200	4.2592	0.0000	1,97,200	3.9968	0.0000	-0.2624
6	NISHIT VIJAYG OPAL ATAL	1,97,200	4.2592	0.0000	1,97,200	3.9968	0.0000	-0.2624
7	VIJAYG OPAL PARASRAM ATAL	37,91,800	81.8963	0.0000	37,91,800	52.5294	0.0000	-0.2624



TO TA L		46,3 0,00 0	100	0.0 000	34,3 0,00 0	69.517 8	0.0000	- 29.3668
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(iii) Change in Promoters' and Promoter Groups Shareholding (please specify, if there is no change)

SR NO	Name	Shareholding			Increase/D ecrease in Sharehold ing	Re as on	Cumulative Shareholding during the year	
		No. of Shares At the Beginning (31/03/2020)/ end of the year (31/03/2021)	% total Shares of the Compnay				No of Shares	% total Shares of the Compnay
1	Vijaygopal Parasram Atal	37,91,800	76.8504	31-Mar-2020			3791800	76.85
			52.5294	25-Sep-2020	-12,00,000	Se ll	2591800	52.53
			0.0000	12-Oct-2020	-25,91,800	Se ll	0	0.00
			52.5294	13-10-2020	25,91,800	Bu y	2591800	52.53
			0.0000	15-10-2020	-25,91,800	Se ll	0	0.00
			52.5294	16-10-2020	25,91,800	Bu y	2591800	52.53
			52.5294	31-Mar-2021	25,91,800		2591800	52.53
		25,91,800	52.5294	31-Mar-2020			4055649	70.76
2	Nishit Vijaygopal Atal	1,97,200	4.00	31-Mar-2020			197200	4.00
			0.00	12-Oct-2020	-197,200	Se ll	0	0.00
			4.00	13-Oct-2020	197,200	Bu y	197,200	4.00
			0.00	15-Oct-2020	-197,200	Se ll	0	0.00
			4.00	31-Mar-2021	197,200	Bu y	197,200	4.00
		1,97,200	4.00	31-Mar-2021			197200	4.00
3	AMIT SURESHCHA NDRA ATAL	197200	4.00	31-Mar-2020			197200	4.00

			0.00	12-Oct-2020	-197,200	Se ll	0	0.00
			4.00	13-Oct-2020	197,200	Bu y	197,200	4.00
			0.00	15-Oct-2020	-197,200	Se ll	0	0.00
			4.00	16-Oct-2020	197,200	Bu y	197,200	4.00
		197200	0.00	31-Mar-2020			100	0.00
4	PAWANKU MAR SUBHASHCH ANDRA ATAL	197200	4.00	31-Mar-2020			197200	4.00
			0.00	12-Oct-2020	-197,200	Se ll	0	0.00
			4.00	13-Oct-2020	197,200	Bu y	197,200	4.00
			0.00	15-Oct-2020	-197,200	Se ll	0	0.00
			4.00	16-Oct-2020	197,200	Bu y	197,200	4.00
		197200	0.00	31-Mar-2020			197,200	4.00
5	TANVI VIJAYGOPAL ATAL	123250	2.50	31-Mar-2020			123250	2.50
			0.00	12-Oct-2020	-123250	Se ll	0	0.00
			2.50	13-Oct-2020	123250	Bu y	123250	2.50
			0.00	15-Oct-2020	-123250	Se ll	0	0.00
			2.50	16-Oct-2020	123250	Bu y	123250	2.50
		123250	2.50	31-Mar-2020			123250	2.50
6	SUJATA VIJAYGOPAL ATAL	123250	2.50	31-Mar-2020			123250	2.50
			0.00	12-Oct-2020	-123250	Se ll	0	0.00
			2.50	13-Oct-2020	123250	Bu y	123250	2.50
			0.00	15-Oct-2020	-123250	Se ll	0	0.00
			2.50	16-Oct-2020	123250	Bu y	123250	2.50

		123250	2.50	31-Mar-2020			123250	2.50
7	UDAY LAXMAN SATVE	100	0.00	31-Mar-2020			100	0.00
			0.00	12-Oct-2020	-100	Se ll	0	0.00
			0.00	13-Oct-2020	100	Bu y	100	0.00
			0.00	15-Oct-2020	-100	Se ll	0	0.00
			0.00	16-Oct-2020	100	Bu y	100	0.00
		100	0.00	31-Mar-2020			100	0.00

(iv) Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holders of GDRs and ADRs)

SR NO	Name	Shareholding		Date	Increase/Decrease in Shareholding	Reason	Cumulative Shareholding during the year	
		No. of Shares At the Beginni ng (31/03/ 2020)/ end of the year (31/03/ 2021)	% total Shares of the Compnay				No of Shares	% total Shares of the Compnay
1	JIGNES H AMRUT LAL THOBH ANI	0	0.00	31- Mar- 2020		Sell	0	0.00
			8.76	12- Oct- 2020	432000	Buy	432000	8.76
			4.38	14- Oct- 2020	-216000	Sell	216000	4.38

		216000	4.38	31-Mar-2020	0		216000	4.38
2	TIA ENTERPRISES PRIVATE LIMITED	0	0.00	31-Mar-2020		Sell	0	0.00
			7.52	12-Oct-2020	371200	Buy	371200	7.52
			3.76	14-Oct-2020	-185600	Sell	185600	3.76
			4.80	23-Oct-2020	51200	Buy	236800	4.80
			3.96	26-Mar-2021	-41600	Sell	195200	3.96
		195200	3.96	31-Mar-2021	0		195200	3.96
3	SHIELD FINANCE PRIVATE	0	0.00	31-Mar-2020		Sell	0	0.00
			7.52	12-Oct-2020	371200	Buy	371200	7.52
			3.76	14-Oct-2020	-185600	Sell	185600	3.76
		185600	3.76	31-Mar-2021	0		185600	3.76
4	NOPEA CAPITAL	0	0.00	31-Mar-2020		Sell	0	0.00

	SERVIC ES PRIVAT E LIMITE D							
			2.56	31- Mar- 2021	126400	Buy	126400	2.56
		126400	2.56	31- Mar- 2021	0		126400	2.56
5	VANITA SANJAY BANSAL	0	0.00	31- Mar- 2020	0	Sell	0	0.00
			5.06	12- Oct- 2020	249600	Buy	249600	5.06
			2.53	14- Oct- 2020	-124800	Sell	124800	2.53
		124800	2.53	31- Mar- 2021	0		124800	2.53
6	SANDIP BHASKER RAI PANDYA	0	0.00	31- Mar- 2020		Sell	0	0.00
			3.83	12- Oct- 2020	188800	Buy	188800	3.83
			1.91	14- Oct- 2020	-94400	Sell	94400	1.91
		94400	1.91	31- Mar- 2021	0		94400	1.91
7	JATIN NAGIN DAS MEHTA	0	0.00	31- Mar- 2020	0	Sell	0	0.00

			4.99	12-Oct-2020	246400	Buy	246400	4.99
			2.50	14-Oct-2020	-123200	Sell	123200	2.50
		123200	2.50	31-Mar-2021			123200	2.50
8	RISHAB H J MEHTA HUF	0	0.00	31-Mar-2020		Sell	0	0.00
			3.83	12-Oct-2020	188800	Buy	188800	3.83
			1.91	14-Oct-2020	-94400	Sell	94400	1.91
		94400	1.91	31-Mar-2021	0		94400	1.91
9	SANJAY N BANSAL HUF	0	0.00	31-Mar-2020	0	Sell	0	0.00
			3.83	12-Oct-2020	188800	Buy	188800	3.83
			1.91	14-Oct-2020	-94400	Sell	94400	1.91
			1.56	19-Mar-2021	-17600	Sell	94400	1.91
		76800	1.56	31-Mar-2021	0			
10	ARYAM AN CAPITAL	0		31-Mar-2020		Sell	0	0.00

	<b>MARKE TS LIMITE D</b>							
			3.11	12- Oct- 2020	153600	Buy	153600	3.11
			1.56	14- Oct- 2020	-76800	Sell	76800	1.56
			2.17	23- Oct- 2020	30400	Buy	107200	2.17
			2.30	30- Oct- 2020	6400	Buy	113600	2.30
			2.33	06- Nov- 2020	1600	Buy	115200	2.33
			2.37	27- Nov- 2020	1600	Buy	116800	2.37
			2.43	11- Dec- 2020	3200	Buy	120000	2.43
			2.46	31- Dec- 2020	1600	Buy	121600	2.46
			2.56	15- Jan- 2021	4800	Buy	126400	2.56
			2.53	05- Feb- 2021	-1600	Sell	124800	2.53
			2.50	26- Feb- 2021	-1600	Sell	123200	2.50
			2.53	05- Mar- 2021	1600	Buy	124800	2.53
			2.89	26- Mar-	17600	Buy	142400	2.89

				2021				
			1.17	31-Mar-2021	-84800	Sell	57600	1.17
			1.17	31-Mar-2021	0		57600	1.17

**(v) Shareholding of Directors and Key Managerial Personnel**

Sr. No.	For each of the Directors and Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total Shares
1.	Mr. Vijaygopal Atal	37,91,800	81.89	25,91,800	52.52
2.	Mr. Nishit Atal	1,97,200	4.25	1,97,200	3.99
3.	Mr. Kuntal Badiyani	-	-	-	-
4.	Ms. Sharanya Shetty	-	-	-	-
5.	Mr. Uday Satve	100	0.0022	100	0.0020
6.	Mr. Alok Singh	-	-	-	-
	<b>Total</b>	<b>39,89,100</b>	<b>86.14</b>	<b>27,81,900</b>	<b>56.51</b>

**V. INDEBTEDNESS**– The Indebtedness of the Company including interest outstanding/accrued but not due for payment is as under:

Particulars	Secured Loans (Rs.)	Unsecured Loans (Rs.)	Deposits (Rs.)	Total Indebtedness (Rs.)
<b>Indebtedness at the beginning of the financial year</b>	-	-	-	-
i) Principal Amount	1503.62	-	-	1503.62
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	30.43	-	-	30.43
<b>Total (i+ii+iii)</b>	<b>1534.05</b>	<b>-</b>	<b>-</b>	<b>1534.05</b>
<b>Change in Indebtedness during the financial year</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
* Addition	-	-	-	-
* Reduction	(508.11)	-	-	(508.11)
<b>Net Change</b>	<b>(508.11)</b>	<b>-</b>	<b>-</b>	<b>(508.11)</b>
<b>Indebtedness at the end of the financial year</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>



Particulars	Secured Loans (Rs.)	Unsecured Loans (Rs.)	Deposits (Rs.)	Total Indebtedness (Rs.)
i) Principal Amount	1000.85	-	-	1000.85
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	25.09	-	-	25.09
<b>Total (i+ii+iii)</b>	<b>1025.94</b>	<b>-</b>	<b>-</b>	<b>1025.94</b>

## VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

**A. Remuneration Managing Director, Whole-time Directors and/or Manager:** - The details of remuneration paid to Managing Director during the financial year under review is given in the table below:

Sr. No.	Particulars of Remuneration	Name of director	Total Amount
		Managing Director - Mr. Vijaygopal Atal	
1.	Gross salary		
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 (Rs.)	18.00	18.00
	(b) Value of perquisites u/s 17(2) of Income-tax Act, 1961 (Rs.)	-	-
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961 (Rs.)	-	-
2.	Stock Option (live as on date) (Nos.)		
3.	Sweat Equity (Nos.)		
4.	Commission (Rs.)		
	- as % of profit		
	- others, specify		
5.	Others, please specify		
	<b>Total (A) (Rs.)</b>	<b>1.5</b>	<b>1.5</b>
	Ceiling as per the Act	<b>19.5</b>	<b>19.5</b>

**B. Remuneration to other directors:** The Company does not pay any remuneration to any of its Directors. Hence, the information as per below table is not applicable for the financial year under review.

Sr.	Name of Directors	Particulars of Remuneration
-----	-------------------	-----------------------------

No.		Fee for attending board / committee meetings (Rs.)	Commission (Rs.)	Others, please specify	Total Amount (Rs.)
1.	<b>Independent Directors</b>	-	-	-	-
	Total (1)	-	-	-	-
2.	<b>Other Non-Executive Directors:</b>	-	-	-	-
	Total (2)	-	-	-	-
	<b>Total (B) = (1+2)</b>	-	-	-	-
	<b>Total Managerial Remuneration Total (A) + (B)</b>	-	-	-	-
	Overall Ceiling as per the Act	-	-	-	-

**C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD / MANAGER / WTD** – The details of remuneration paid to Chief Financial Officer and Company Secretary during the financial year under review are given in the table below:

Sr. No.	Particulars of Remuneration	Key Managerial Personnel				
		CEO	CFO – Mr. Uday Satve	CS- Mr. Sushil Ladda	CS –Mr. Alok Singh	Total
1.	Gross salary					
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 (Rs.)	N.A.	5.77	1.97	0.92	<b>8.66</b>
	(b) Value of perquisites u/s 17(2) of Income-tax Act, 1961 (Rs.)	N.A.				
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961 (Rs.)	N.A.				
2.	Stock Option (live as on date)	N.A.				
3.	Sweat Equity (Nos.)	N.A.				
4.	Commission (Rs.)	N.A.				
	- as % of profit	N.A.				
	- others, specify	N.A.				
5.	Others, please specify	N.A.				
	<b>Total (Rs.)</b>	<b>N.A.</b>	<b>5.77</b>	<b>1.97</b>	<b>0.92</b>	<b>8.66</b>

## VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES

Type	Section of the Companies Act	Brief / description	Details of Penalty / Punishment / Compounding fees imposed	Authority [RD/NCLT/Court]	Appeal made, if any (give details)
<b>A. COMPANY</b>	There were no penalties, punishment or compounding of offences during the financial year under review.	Penalty			
Punishment					
Compounding					
<b>B. DIRECTORS</b>					
Penalty					
Punishment					
Compounding					
<b>C. OTHER OFFICERS IN DEFAULT</b>					
Penalty					
Punishment					
Compounding					

For & on behalf of the Board of Directors of  
Atal Realtech Limited

Place: Nashik  
Date: August 13, 2021

Sd/-  
Vijaygopal Atal  
Managing Director  
DIN: 00126667

Sd/-  
Nishit Atal  
Director  
DIN: 05179430

### Annexure-III

#### FORM AOC-2

(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014)

Form for Disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub section (1) of section 188 of the Companies Act, 2013 including certain arm's length transaction under third proviso is given below:

#### 1. Details of contracts or arrangements or transactions not at Arm's length basis:

Sr.No.	Particulars	Details
1	Name of the Related Party & Nature of Relationship	NIL
2	Nature of contracts/arrangements/transaction	NIL
3	Duration of the contracts/arrangements /transaction	NIL
4	Salient terms of the contracts or arrangements or transaction including the value, if any	NIL
5	Justification for entering into such contracts or arrangements or transactions	NIL
6	Date of approval by the Board	NIL
7	Amount paid as advances, if any	NIL
8	Date on which the special resolution was passed in General meeting as required under the proviso to Section 188	NIL

#### 2. Details of contracts or arrangements or transactions at Arm's Length basis:

Sr. No.	Particulars	Details		
1	Name(s) of the related party	Mr. Vijaygopal Atal		
2	Nature of relationship	Director		
3	Nature of contracts/ arrangements/ transactions	Rent Paid	Loan Taken	Loan Repaid
4	Duration of contracts/ arrangements or transactions	One Time	One Time	One Time
5	Salient terms of contracts or arrangements or transactions	Rs. 9,17,400/-	Rs. 1,25,30,135/-	Rs. 1,25,30,135/-
6	Date of approval by the Board	20/05/2020	20/05/2020	20/05/2020
7	Amount paid as advance, if any	-	-	-

Sr. No.	Particulars	Details		
1	Name(s) of the related party	<b>Mr. Nishit Atal</b>		
2	Nature of relationship	<b>Director</b>		
3	Nature of contracts/ arrangements/ transactions	Loan Taken	Hiring and Professional Charges	Loan Repaid
4	Duration of contracts/ arrangements or transactions	One Time	One Time	One Time
5	Salient terms of contracts or arrangements or transactions	Rs. 1,08,45,927/-	Rs. 23,618/-	Rs. 1,08,45,927/-
6	Date of approval by the Board	20/05/2020	20/05/2020	20/05/2020
7	Amount paid as advance, if any	-	-	-

Sr. No.	Particulars	Details	
1	Name(s) of the related party	<b>Mrs. Sujata Atal</b>	
2	Nature of relationship	<b>Relative of Director</b>	
3	Nature of contracts/ arrangements/ transactions	Hiring and Professional Charges	Salary & Remuneration Paid
4	Duration of contracts/ arrangements or transactions	One Time	One Time
5	Salient terms of contracts or arrangements or transactions	Rs. 2,14,200/-	Rs. 15,55,200
6	Date of approval by the Board	20/05/2020	20/05/2020
7	Amount paid as advance, if any		-

Sr. No.	Particulars	Details
1	Name(s) of the related party	M/s. Tanu Reality LLP
2	Nature of relationship	Director
3	Nature of contracts/ arrangements/ transactions	Business Advances received back
4	Duration of contracts/ arrangements or transactions	One Time
5	Salient terms of contracts or arrangements or transactions	Rs. 5,25,42,000/-
6	Date of approval by the Board	20/05/2020
7	Amount paid as advance, if any	-

Annexure IV

**Form No. MR-3**

**Secretarial Audit Report for the Financial Year ended March 2021**

[Pursuant to section 204(1) of the Companies Act, 2013 and Rule No.9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014]

To,  
The Members,  
**Atal Realtech Limited**  
Shop No. 1, Sumangal Builder House,  
Holaram Colony, Sadhu Vaswani Road,  
Nashik, 422002

I have conducted the secretarial audit of the compliances of applicable statutory provisions and the adherence to good corporate practices by **ATAL REALTECH LIMITED** (hereinafter called 'the Company'). Secretarial audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the Financial year ended on 31st March, 2021, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March, 2021 according to the provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- (iii) The Depositories Act, 1996 and the Regulations and Byelaws framed thereunder;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings; (Not applicable to the Company during the Audit Period)

(v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):

- a. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- b. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- c. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009
- d. The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999; (Not applicable to the Company during the Audit Period)
- e. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company during the Audit Period)
- f. The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- g. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; (Not applicable to the Company during the Audit Period) and
- h. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998; (Not applicable to the Company during the Audit Period)
- i. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
- j. I further report that based on the explanation given by the management of the Company, even though being in Construction Business there are no other laws that are specifically applicable to the Company since it has subcontracted its existing business contracts to other parties for execution.

I have also examined compliance with the applicable clauses of the following:

(i) Secretarial Standards issued by The Institute of Company Secretaries of India.

(ii) The SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015;

**I further report that:**



The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Adequate notice is given to all the directors to schedule the Board Meeting, agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarification on the agenda items before the meeting and for meaningful participation at the meeting.

Majority decisions of the Board and committee meetings are carried out unanimously as recorded in the minutes of the meeting of the board of directors or committees thereof as the case may be. There were no dissenting views of any member of the Board or committees thereof during the period under review.

**I further report that** there are adequate systems and processes in the company commensurate with the size and operations of the company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

I further report that during the audit period the company has made an Initial Public Offer of 15,04,000 Equity Shares of the face value of Rs.10/- each at a price of Rs.72/- per Equity Share consisting of fresh Issue of 3,04,000 Equity Shares by the company and 12,00,000 Equity Shares by the Promoter selling shareholder.

Except this there were no specific events / actions having a major bearing on the affairs of the Company in pursuance of the above referred laws, rules, regulations, guidelines, standards, etc.

For Jagruti Bedmutha & Co,  
Company Secretaries

Sd/-  
Jagruti A. Bedmutha  
Proprietor  
ACS No: 44134  
COP No: 23122  
Place : Nashik  
Date : August 14, 2021  
UDIN: A044134C000786755

Note: This report is to be read with our letter of even date which is annexed as 'ANNEXURE - A' and forms an integral part of this report.

## **ANNEXURE-A**

To,  
The Members,  
**Atal Realtech Limited**

My report of even date is to be read along with this letter:

1. Maintenance of secretarial record is the responsibility of the management of the company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for our opinion.
3. I have not verified the correctness and appropriateness of financial records and books of accounts of the Company.
4. Where ever required, I have obtained the management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of corporate and other applicable laws, rules, regulations, standards are the responsibility of management. My examination was limited to the verification of procedures on test basis.
6. The secretarial audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.
7. Due to prevailing circumstances of CoVid-19 pandemic, the audit was conducted based on the verification of the Company's books, papers, minutes books, forms and returns filed, documents and other records furnished by/ obtained from the Company electronically and also the information provided by the Company and its officers by audio and visual means.

For Jagruti Bedmutha & Co,  
Company Secretaries  
Sd/-  
Jagruti A. Bedmutha  
Proprietor  
ACS No: 44134  
COP No: 23122  
Place : Nashik  
Date : August 14, 2021  
UDIN: A044134C000786755

## Corporate Governance Report

The Directors present the Company's Report on Corporate Governance pursuant to the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the SEBI Listing Regulations) for the financial year ended 31<sup>st</sup> March 2021.

### 1. COMPANY'S PHILOSOPHY ON CODE OF GOVERNANCE:

The purpose of Code of Governance (hereinafter referred to as "Code" or "ARL – Code of Governance") is to conduct the business of the Company in accordance with the applicable laws, rules, and regulations and with the highest standard of ethics and values. The matters covered in this Code are of utmost importance to the Company, shareholders and other stakeholders. Each and every Director and Officer shall be duty-bound to follow the provisions of the Code in letter and spirit. Any instance of non-compliance of any of the provisions shall be a breach of ethical conduct and shall be viewed seriously by the Company. Accordingly, the Directors and Officers are expected to read and understand the Code and uphold these standards in their business dealings and activities. This model code of governance is a guide to help Directors on the Board & Senior Management team of the Company to live up to the companies ethical standards.

The prime purpose of the Code of Governance is to create an environment where all the Directors and Officers of the Company maintain an ethical standard and compliance to the ethical standards. The code of governance will act as guideline to all to:

- Promote honest and ethical conduct.
- Maintain a corporate climate in which the integrity and dignity of each individual is valued and promoted.
- Assure compliance with laws, rules and regulations that govern the Company's business activities; and
- Assure the proper use of the Company's assets.
- The Code does not specifically address every potential form of unacceptable conduct, and it is expected that the Directors and Officers of the Company will exercise good judgment in compliance with the principles set out in this Code. The Directors and Officers of the Company have a duty to avoid any circumstance that would violate the letter or spirit of this Code.

The Company is in compliance with the requirements stipulated under Regulation 17 to 27 read with Schedule V and clauses (b) to (i) of sub-regulation (2) of Regulation 46 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), as applicable, with regard to corporate governance.

The Company has adopted a Code of Conduct for its employees including the Managing Director. In addition, the Company has adopted a Code of Conduct for its non-executive directors which includes Code of Conduct for Independent Directors which suitably incorporates the duties of Independent Directors as laid down in the Companies Act, 2013 ("the Act").

Details of board structure and the various committees that constitute the governance structure of the organization are covered in detail in this report.

## 2. BOARD OF DIRECTORS

The Board of Directors ('the Board') is responsible for and committed to sound principles of Corporate Governance in the Company. The Board plays a crucial role in overseeing how the management serves the short and long term interests of shareholders and other stakeholders. This belief is reflected in our governance practices, under which we strive to maintain an effective, informed and independent Board.

The Board of Directors is entrusted with the ultimate responsibility of the management, general affairs, direction and performance of the Company and has been vested with requisite powers, authorities and duties.

### Composition

The Board of Directors along with its Committees provide leadership and guidance to the Company's management and direct, supervises and controls the performance of the Company. The present strength of Board of Directors is 4 (Four), whose composition and category is given below:

One - Managing Director

Three - Non-Executive Directors out of which Two are Independent Directors

Independent Directors including One Woman Director

The composition of the Board also complies with the provisions of the Companies Act, 2013 and SEBI (LODR) Regulations, 2015. The composition of the Board represents an optimal mix of professionalism, knowledge and experience and enables the Board to discharge its responsibilities and provide effective leadership to the business.

### **A) Composition and Directorship(s) / Committee Membership(s) / Chairmanship(s) as on 31st March 2021**

Sr · N o.	Directors	Category	Date of joining the Board/ Reappoint ment	Director ship in Other Compan ies <sup>#</sup>	No. of Committee positions held in other companies		No. of Committee positions held in Our company	
					Mem ber	Chair man	Mem ber	Chair man
1	Mr. Vijaygopal Parasram Atal	Managing Director	23.09.201 9	0	0	0	2	0
2	Mr. Nishit Atal	Non-Executive Director	30.08.201 9	0	0	0	1	0
3	Mr. Kuntal Badiyani	Independent Director	30.09.201 9	0	0	0	3	1

Sr. No.	Directors	Category	Date of joining the Board/ Reappointment	Directorship in Other Companies <sup>#</sup>	No. of Committee positions held in other companies		No. of Committee positions held in Our company	
					Member	Chairman	Member	Chairman
4	Ms. Sharanya Shetty	Independent Director	30.09.2019	0	0	0	3	1

*# Excluding Private Limited Companies, Foreign Companies, Section 8 Companies and Alternate Directorships.*

None of the Directors hold directorship in more than 20 Companies nor is a member in more than ten committees or acts as chairman of more than 5 committees across all the companies in which they are Directors. Hence the number of Directorships, Committee Membership(s) / Chairmanship(s) of all Directors is within respective limits prescribed under the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as Listing Regulations).

#### **B) Appointment and Tenure**

The Directors of the Company are appointed by Members at the General Meetings. The Managing Director of the Company is appointed for a term of five years as per the requirement of the statute. The Executive Directors on the Board have been appointed as per the provisions of the Companies Act, 2013 and serve in accordance with the terms of their contract of service with the Company.

As regards the appointment and tenure of Independent Directors, following is the policy adopted by the Board:

- The Company has adopted the provisions with respect to appointment and tenure of Independent Directors which are consistent with the Companies Act, 2013 and Listing Regulations.

The Company would not have any upper age limit of retirement of Independent Directors from the Board and their appointment and tenure will be governed by provisions of the Companies Act, 2013 and Listing Regulations.

#### **C) Board Meetings**

The Board meets at regular intervals to discuss and decide on Company / business policy and strategy apart from other Board business. The notice of Board meeting is given well in advance to all the Directors. Meetings of the Board are held in Nashik. The Agenda of the Board / Committee meetings is set by the Managing Director of the Company. The Agenda is circulated a week prior to the date of the meeting. The Agenda for the Board and Committee meetings cover items set out as per the guidelines in Listing Regulations to the extent it is relevant and applicable. The Agenda for the Board and Committee

meetings include detailed notes on the items to be discussed at the meeting to enable the Directors to take an informed decision.

During the financial year ended 31<sup>st</sup> March, 2021, Nine Board meetings were held on 20.05.2020, 30.05.2020, 19.09.2020, 22.09.2020, 14.10.2020, 18.11.2020, 10.11.2020, 12.11.2020, and 10.03.2021. The maximum interval between any two meetings was well within the maximum allowed gap of 120 days.

**Attendance of each Director at the Board Meetings and the last Annual General Meeting:**

Sr. No.	Name of the Directors	Category of Directorship	No. of Board Meeting Attended in the FY 2020-21	Attendance at the Last AGM held on 30.09.2020
1.	Mr. Vijaygopal Atal	Managing Director	9	Present
2.	Mr. Nishit Atal	Non-Executive Director	9	Present
3.	Mr. Kuntal Badiyani	Independent Director	9	Present
4.	Ms. Sharanya Shetty	Independent Director	9	Present

**C) Board Procedure**

The Companies Act, 2013 read with the relevant rules made there under, now facilitates the participation of a Director in Board / Committee Meetings through video conferencing or other audio visual mode. Accordingly, the option to participate in the Meeting through video conferencing was made available for the Directors except in respect of such Meetings/Items which are not permitted to be transacted through video conferencing.

**D) Directors' Induction and Familiarization**

At the time of appointing a Director, a formal letter of appointment is given. The Directors are familiarized with the History, Vision and Mission of the Company and also explained in details the compliances required from them under Companies Act, 2013, SEBI (LODR) Regulations, 2015 and other relevant regulations. The Managing Director also has a one-to-one discussion with the newly appointed Director. The above initiative helps the Director to understand the Company, its business and the

regulatory framework in which the Company operates and equips them to effectively fulfill his role as a Director of the Company.

#### **E) Reappointment of Directors:**

Mr. Nishit Atal, Non-Executive Director retires at the ensuing Annual General Meeting and is being eligible to offer herself for re-appointment at the ensuing Annual General Meeting.

### **3. COMMITTEES OF THE BOARD:**

The Board Committees play a crucial role in the governance structure of the Company and have been constituted to deal with specific areas / activities which concern the Company and need a closer review. The Board Committees are set up under the formal approval of the Board to carry out clearly defined roles which are considered to be performed by members of the Board, as a part of good governance practice. The Board supervises the execution of its responsibilities by the Committees and is responsible for their action. The Chairman of the respective Committee informs the Board about the summary of the discussions held in the Committee Meetings. The minutes of the meetings of all Committees are placed before the Board for review. The Board Committees can request special invitees to join the meeting, as appropriate.

The Board has established the following statutory and non-statutory Committees.

#### **a) Audit Committee:**

The composition, quorum, powers, role and scope are in accordance with Section 177 of the Companies Act, 2013 and the provisions of SEBI (LODR) Regulations, 2015. The Audit Committee of the Company acts as a supervisor to the Accounting system of the Company which it reports to the Board of Directors of the Company.

<b>Name of Director</b>	<b>Designation in Committee</b>	<b>Nature of Directorship</b>	<b>Total Meetings Held during the Year</b>	<b>Meetings Attended by the Member</b>
Ms. Sharanya Shetty	Chairman	Non-Executive and Independent	4	4
Mr. Kuntal Badiyani	Member	Non-Executive and Independent	4	4
Mr. Vijaygopal Atal	Member	Managing Director	4	4

During the year ended 31st March, 2021, 4 Audit Committee Meeting was held on the following dates: 30.05.2020, 19.09.2020, 22.09.2020 and 22.01.2021.

Frequency and quorum at these meetings were in conformity with the provisions of the Companies Act, 2013, Listing Agreement and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 entered into by the company with the Stock Exchanges.

**Terms of reference of the audit committee are broadly defined as under:**

The composition, quorum, powers, role and scope are in accordance with Section 177 of the Companies Act, 2013 and the provisions of SEBI (LODR) Regulations, 2015. The Committee is governed by the terms of reference which are in line with the regulatory requirements mandated by the Act and Listing Regulations.

The Audit Committee ensures that it has reviewed each area that it is required to review under its terms of reference and under applicable legislation or by way of good practice. This periodic review ensures that all areas within the scope of the Committee are reviewed.

**b) Nomination & Remuneration Committee**

As per Section 178 (1) of the Companies Act, 2013, Our Company has constituted a Nomination & Remuneration Committee. The members of the said committee are:

Name of Director	Designation in Committee	Nature of Directorship	Total Meetings Held during the Year	Meetings Attended by the Member
Ms. Sharanya Shetty	Chairman	Non-Executive and Independent	2	2
Mr. Kuntal Badiyani	Member	Non-Executive and Independent	2	2
Mr. Nishit Atal	Member	Non-Executive Director	2	2

**Terms of reference of the Nomination & Remuneration Committees are broadly defined as under:**

To formulate a criteria for determining qualifications, positive attributes and independence of a Director.

2. Formulate criteria for evaluation of Independent Directors and the Board.

3. Identify persons who are qualified to become Directors and who may be appointed in Senior Management in accordance with the criteria laid down in this policy.

4. To carry out evaluation of every Director's performance.

5. To recommend to the Board the appointment and removal of Directors and Senior Management.

6. To recommend to the Board policy relating to remuneration for Directors, Key Managerial Personnel and Senior Management.

7. Ensure that level and composition of remuneration is reasonable and sufficient, relationship of remuneration to performance is clear and meets appropriate performance benchmarks Atal Realtech Limited



8. To devise a policy on Board diversity.
9. Identify persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down, and recommend to the Board their appointment and removal
10. Recommend to the Board, remuneration including salary, perquisite and commission to be paid to the Company's Executive Directors on an annual basis or as may be permissible by laws applicable.
11. Recommend to the Board, the Sitting Fees payable for attending the meetings of the Board/Committee thereof, and, any other benefits such as Commission, if any, payable to the Non Executive Directors.
12. Setting the overall Remuneration Policy and other terms of employment of Directors, wherever required.
13. Removal should be strictly in terms of the applicable law/s and in compliance of principles of natural justice
14. To carry out any other function as is mandated by the Board from time to time and / or enforced by any statutory notification, amendment or modification, as may be applicable.
15. To perform such other functions as may be necessary or appropriate for the performance of its duties.

During the year ended 31st March, 2021, 2 Nomination & Remuneration Committee Meetings were held on 21.06.2020 and 12.11.2020.

#### **c) Stakeholders Relationship Committee**

The Stakeholders Relationship Committee is entrusted with the responsibility of addressing the shareholders/ investors complaints with respect to transfer of shares, non-receipt of Annual Report, non-receipt of dividend, etc.

Members of the committee as on March 31, 2021 are as under:

<b>Name of Director</b>	<b>Designation in Committee</b>	<b>Nature of Directorship</b>	<b>Total Meetings Held during the Year</b>	<b>Meetings Attended by the Member</b>
Mr. Kuntal Badiyani	Chairman	Non-Executive and Independent	1	1
Ms. Sharanya Shetty	Member	Non-Executive and Independent	1	1
Mr. Vijaygopal Atal	Member	Managing Director	1	1

The Stakeholders Relationship Committee met 2 times during the financial year ended 23.12.2020.

**Terms of reference of the Stakeholders Relationship Committee are broadly defined as under:**

To resolve the complaints and grievances of the investors/stakeholders and to function in an efficient manner that all issues / concerns of stakeholders are addressed / resolved promptly.

**Name, Designation and address of the Compliance Officer:**

**Mr. Alok Singh**

Shop No. 1, Sumangal Builder House, Holaram Colony,  
Sadhu Vaswani Road, Nashik, 422002

Email: [info@atalrealtech.com](mailto:info@atalrealtech.com), Website: [www.atalrealtech.com](http://www.atalrealtech.com)

*\*Appointed on 12.11.2020*

**Details of Shareholders' / Investors' Complaints during the FY ended 31<sup>st</sup> March 2021.**

Number of Shareholders' Complaints received during the year	Nil
Number of Shareholders' Complaints resolved during the year	Nil
Number of Shareholders' Complaints Pending at the end of the year	Nil

**d) Risk Management Committee**

Constituting Risk Management Committee is not applicable to our Company.

**e) Policy on material subsidiary**

Not Applicable.

**f) Policy on Related party transactions**

Not Applicable.

**g) Independent Directors' Meeting**

During the year under review, the Independent Directors met on March 31, 2021, inter alia, to discuss and review:

- Evaluation of the performance of Non-independent Directors and the Board of Directors as a whole.
- Evaluation of the quality, content and timelines of flow of information between the Management and the Board that is necessary for the Board to effectively and reasonably perform its duties.

**4. POLICY ON DISCLOSURE AND INTERNAL PROCEDURE FOR PREVENTION OF INSIDER TRADING**

Mr. Alok Singh, Compliance Officer is responsible for setting forth policies, procedures, monitoring and adherence to the rules for the preservation of price sensitive information and the implementation of the code of conduct under the overall supervision of the Board.

## 5. SHAREHOLDER INFORMATION

### A. Annual General Meetings:

The details of date, time and location of annual general meetings of last two years are as under:

Year	Date of AGM	Time	Venue
2019-20	30.09.2020	11.00 A.M.	Shop No. 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002
2018-19	30.09.2019	11.00 A.M.	Shop No. 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002

### B. Postal Ballot

No resolution was passed through the postal ballot during F. Y. 2020-21.

### C. Annual General Meeting for the financial year 2020-21

**Date** September 7, 2021

**Venue** Shop No. 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002

**Time** 3.00 P.M.

### D. Calendar of financial year ended 31st March, 2021

The Company follows April-March as the financial year. The meetings of Board of Directors for approval of quarterly financial results during the financial year ended 31st March, 2021 were held on the following dates:

**Half Yearly** NA

**Yearly** 29.06.2021

### E. Bifurcation of shares held in physical and demat form as on 31st March, 2021

Particulars	No. of Shares	%
Physical Shares	0	0
<b>Demat Shares</b>		
NSDL (A)	88000	1.78
CDSL (B)	4846000	98.22
Total (A+B)	4934000	100.00
<b>TOTAL</b>	<b>4934000</b>	<b>100.00</b>

### F. Listing Details

Name and Address of Stock Exchange	Stock Code
National Stock Exchange of India Limited (NSE) Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex Bandra (E) Mumbai - 400 051	

ISIN : INE0ALR01011

The listing fee for the financial year 2020-21 has been paid to the above Stock Exchanges.

#### G. Share Price Data

The monthly high and low prices and volumes of shares of the Company at NSE for the year ended 31st March, 2021 are as under: (Prices from month of October 2019 as company got listed in the same month)

Month	NSE		Shares Volume
	High Price	Low Price	
Oct-20	70.2	53.85	1,37,600
Nov-20	51	45	9600
Dec-20	44.6	38.25	17,600
Jan-21	38.25	33.7	14,400
Feb-21	39	37	3200
Mar-21	37	34.6	1,66,400

#### H. Share holding pattern of the Company as on 31.03.2021:

Sr.	Category	No. of Shares	% (Percentage)
1.	Promoters	25,91,800	52.53
2.	Director Relatives	8,38,200	16.99
3.	Bodies Corporate	5,64,800	11.45
4.	Public	9,39,200	19.03
	TOTAL	49,34,000	100.00

#### I. Distribution of Shareholding as on 31.03.2021:

No. of Shares held	No. of Shareholders	%	No. of Shares	% of Total Capital
1 to 500	1	0.9252	100	0.0020
1001 to 2000	85	78.7037	1,36,000	2.7564
3001 to 4000	2	1.8519	56047050	97.80
4001 to 5000	2	1.8519	9600	0.1946
10001 to 999999999	18	16.6667	4781900	96.9173
Total	108	100%	4934000	100%

**J. Share Transfer System:**

Trading in Equity Shares of the Company is permitted only in dematerialized form as per notification issued by the Securities & Exchange Board of India (SEBI). Bigshare Services Private Limited Handles both Demat and Physical Shares Transfers.

The Share Transfers which are received in physical form are processed and the share certificates are returned within 21 days from the date of receipt, subject to Documents being valid and complete in all respects.

**K. Outstanding GDRs/ ADRs/ Warrants or any convertible instruments, conversion dates and likely impact on equity. :-**

Nil

**L. ADDRESS FOR CORRESPONDENCE :-**

**Atal Realtech Limited**

Shop No. 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002

Tel: +91 –8530604666;

Email: [info@atalrealtech.com](mailto:info@atalrealtech.com) ; Website: [www.atalrealtech.com](http://www.atalrealtech.com)

**REGISTRAR AND SHARE TRANSFER AGENT:**

**Bigshare Services Private Limited**

1st Floor, Bharat Tin Works Building,  
Opp. Vasant Oasis, Makwana Road, Marol,  
Andheri East, Mumbai - 400 059.

Tel: +91 – 22 – 4043 0200; Fax: +91 – 22 – 2847 5207

Email: [ipo@bigshareonline.com](mailto:ipo@bigshareonline.com); Website: [www.bigshareonline.com](http://www.bigshareonline.com)

**M. DISCLOSURES:**

**a) Related Party Transaction:**

Details are as mentioned in Notes to Accounts which forms part of Financials.

**b) Statutory Compliance, Penalties and Strictures:**

The Company has complied with all the requirements of the listing agreements with the stock exchanges as well as regulations and guidelines of SEBI. No penalties have been imposed or stricture has been issued by SEBI, stock exchanges or any Statutory Authorities on matters relating to capital markets during the last three years.

The Company has followed all relevant accounting standards notified by the Companies Accounting Standards Rules 2006 and relevant provisions of the Companies Act, 2013 while preparing its financial statements.

**c) Whistle Blower Policy:**

The Company promotes ethical behaviour in all its business activities and has put in place a mechanism for reporting illegal or unethical behaviour. The Company has a Vigil mechanism and Whistle blower policy under which the employees are free to report violations of applicable laws and regulations and the Code of Conduct. The reportable matters may be disclosed to the Ethics and Compliance Task Force which operates under the supervision of the Audit Committee. Employees may also report to the Chairman of the Audit Committee. During the year under review, no employee was denied access to the Audit Committee.

**d) Reconciliation of Share Capital Audit:**

In line with the requirements stipulated by Securities and Exchange Board of India (SEBI), Reconciliation of Share Capital Audit is carried out on a quarterly basis by a Practicing Company Secretary to confirm that the aggregate number of equity shares of the Company held in National Securities Depository Limited (NSDL), Central Depository Services (India) Limited (CDSL) and in physical form tally with the total number of issued, paid-up, listed and admitted capital of the Company.

**e) CEO / CFO CERTIFICATE:**

Appropriate certification as required under Regulation 17(8) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 has been made to the Board of Directors by the CEO/CFO which has been taken note of by the Board.

**f) Means of Communication**

Quarterly, and Annual results of the Company are promptly submitted to the NSE. The Company's results and press releases are available on the Company's website [www.atalrealtech.com](http://www.atalrealtech.com)

**g) Disclosure of Risk Management**

Our risk management process is overseen by the Board of Directors. Our risk management approach and practices continued to focus on minimizing the adverse impact of risks on our business objectives and to enable the Company to leverage market opportunities based on risk-return parity.

**For & on behalf of the Board of Directors of  
Atal Realtech Limited**

**Sd/-  
Vijaygopal Atal  
Managing Director  
DIN: 00126667**

**Sd/-  
Nishit Atal  
Director  
DIN: 05179430**

**CEO / CFO certification for Preparation of Financial Statements on Standalone Basis  
[Regulation 17(8) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015]**

**To,  
The Board of Directors,  
Atal Realtech Limited**

We, the undersigned, in our respective capacities as Managing Director and Chief Financial Officer of Atal Realtech Limited ('the Company'), to the best of our knowledge and belief certify that:

- a) We have reviewed financial statements and the cash flow statement prepared for the financial year ended on 31<sup>st</sup> March, 2021 and that to the best of our knowledge and belief:
  - i. These statements do not contain any materially untrue statement or omit any material fact or contain statements that might be misleading;
  - ii. These statements together present a true and fair view of the company's affairs and are in compliance with existing accounting standards, applicable laws and regulations.
- b) We further state to the best of our knowledge and belief, no transactions entered into by the company during the year which are fraudulent, illegal or violative of the company's code of conduct.
- c) We hereby declare that all the members of the Board of Directors and Management Committee have confirmed compliance with the Code of Conduct as adopted by the Company.
- d) We are responsible for establishing and maintaining internal controls for financial reporting and that we have evaluated the effectiveness of internal control systems of the company pertaining to financial reporting and we have disclosed to the auditors and the Audit Committee, deficiencies in the design or operation of such internal controls, if any, of which we are aware and the steps we have taken or propose to take to rectify these deficiencies.
- e) We have indicated, based on our most recent evaluation, wherever applicable, to the Auditors and Audit Committee:
  - (i) There are no significant changes in internal control over financial reporting during the year;
  - (ii) There are no changes in accounting policies during the year requiring disclosure in the notes to financial statements; and
  - (iii) There are no instances of significant fraud in the company's internal control system over financial reporting.

**For Atal Realtech limited**

**Sd/-  
Mr. Vijaygopal Atal  
Managing Director**

**Sd/-  
Mr. Uday Satve  
Chief Financial Officer**

## **INDEPENDENT AUDITORS CERTIFICATE ON CORPORATE GOVERNANCE**

### **To the Members of Atal Realtech Limited**

We, have examined the compliance of conditions of Corporate Governance by Atal Realtech Limited ("the Company"), for the year ended on 31<sup>st</sup> March, 2021, as stipulated in Regulations 17 to 27 and clauses (b) to (i) of Regulation 46(2) and para C and D of Schedule V to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations").

#### **Managements' Responsibility**

The compliance of conditions of Corporate Governance is the responsibility of the Management. This responsibility includes the design, implementation and maintenance of internal control and procedures to ensure compliance with the conditions of the Corporate Governance stipulated in the Listing Regulations.

#### **Auditor's Responsibility**

Our responsibility is limited to examining the procedures and implementation thereof, adopted by the Company for ensuring compliance with the conditions of the Corporate Governance. It is neither an audit nor an expression of opinion on the financial statements of the Company.

We have examined the books of account and other relevant records and documents maintained by the Company for the purposes of providing reasonable assurance on the compliance with Corporate Governance requirements by the Company. We have carried out an examination of the relevant records of the Company in accordance with the Guidance Note on Certification of Corporate Governance issued by the Institute of the Chartered Accountants of India (the "ICAI"), the Standards on Auditing specified under Section 143(10) of the Companies Act 2013, in so far as applicable for the purpose of this certificate and as per the Guidance Note on Reports or Certificates for Special Purposes issued by the ICAI which requires that we comply with the ethical requirements of the Code of Ethics issued by the ICAI.

#### **Opinion**

Based on our examination of the relevant records and according to the information and explanations provided to us and the representations provided by the Management, we certify that the Company has complied with the conditions of Corporate Governance as stipulated in Regulations 17 to 27 and clauses (b) to (i) of Regulation 46(2) and para C and D of Schedule V to the Listing Regulations during the year ended 31st March, 2021.



We state that such compliance is neither an assurance as to the future viability of the Company nor the efficiency or effectiveness with which the Management has conducted the affairs of the Company.

**For A. S. Bedmutha & Co.**  
**Chartered Accountants**  
**FRN: 101067W**

**Sd/-**  
**(CA Smruti Dungarwal)**  
**Partner**  
**Mem No. : 144801**  
**August 13, 2021**

## **Management Discussion and Analysis Report**

### **Industry Overview**

The infrastructure sector is a crucial driver for the Indian economy. The industry is highly responsible for propelling India's overall development and enjoys intense focus from the Government for initiating policies that would ensure the country's time-bound creation of world-class infrastructure.

Due to continuous urbanization, upcoming infrastructure projects and a growing population base, the construction industry in India is booming. With huge ongoing project opportunities, it is the third largest contributor to economic growth. Moreover, the industry employs more than 40 million people and has a large pool of low-cost workers. Besides, various governmental flagship programs like 'Smart Cities', 'Housing for All', 'Make in India' and 'Atal Mission for Urban Rejuvenation and Transformation' (AMRUT) will further drive growth. Owing to these efforts and government's will to increase public private partnerships with foreign companies, it is expected to attract more foreign investment.

### **Covid Impact**

For the major part of 2020, the construction sector in India was overcoming the labor shortage and supply chain disruptions of their raw material. The construction sector is one of the largest employers of the workforce in India. COVID crisis-affected this sector adversely. The sector was battling from the liquidity crunch.

Union Government identified the pandemic as a Force Majeure incident. This will help real estate developers to extend the registration and completion date for all registered projects by six months. It will also provide time to developers to raise new financing or debt for completing their pending projects.

### **Our Company**

Our Company was incorporated in the year 2012 for undertaking various construction activities. We are a construction company providing integrated civil works contracting and engineering services for structural construction and infrastructure sector projects and are a registered contractor with the Government of Maharashtra Public Works Department in Class I-A. Our Company engages in contracting and sub-contracting for various government and private projects which includes construction of commercial structures and industrial structures. Our Company is situated at Nashik and many of our project sites are located in the State of Maharashtra, though we have undertaken projects in other parts of India. Majority of the construction activity being undertaken by us includes civil & structural construction and infrastructure contracts under subcontracting by main contractors, who have been allotted the project by a principle employer.

Our Company's revenue model also includes trading of certain construction materials. Besides undertaking contracted and / or sub-contracted projects, our Company is also engaged in trading activities, wherein we supply construction materials to our various clients as per their specific requirements.

The company got listed on NSE Emerge (SME platform of National Stock Exchange of India) on 15<sup>th</sup> October, 2020. We have experienced a steady growth in recent years and expect our businesses to continue to grow significantly. Our future growth is subject to risks arising from a rapid increase in order volume, and inability to retain and recruit skilled staff. Although, we plan to continue to expand our scale of operations through organic growth or investments in other entities, we may not grow at a rate comparable to our growth rate in the past, either in terms of income or profit or work quality.

#### **REVIEW OF OPERATIONS & IMPACT OF COVID-19:**

During F.Y. 2020-21, Company has earned a total income of Rs. 4365.82 lakhs compared to previous year's Rs. 5869.23 lakhs.

Net profit after tax has decreased from Rs. 239.90 lakhs to Rs. 209.57 Lakhs. Consequently, EPS decreased to Rs. 5.18 per share from Rs. 4.25 per share.

#### **INTERNAL CONTROL SYSTEMS AND THEIR ADEQUACY:**

The Company's internal control systems are adequate, operating effectively and commensurate with the size of business. These internal control systems are provided through competent management, implementation of standard policies and processes, maintenance of an appropriate audit programme with an internal control environment, effective risk monitoring and management information systems. Moreover, the Company continuously upgrades these systems in line with the best available practices.

The internal control systems are supplemented by extensive internal audits, regular reviews by the Management and standard policies and guidelines to ensure the reliability of financial and all other records to prepare financial statements and other data. The Company has regular checks and procedures through internal audits conducted by an independent audit firm, periodically. The reports are deliberated and an executive summary of the same along with Action Taken Reports (ATR) and steps taken by the Management to address the issues, are placed before the Audit Committee meeting/ Board meeting for their review. Reports of internal auditors are reviewed by the Audit Committee, and corrective measures, if any, are carried out towards further improvement in systems and procedures in compliance with Internal Control Systems. The Board also recognises the work of the auditors as an independent check on the information received from the Management on the operations and performance of the Company.

#### **Future Projections:**

Construction industry might resume operations by mid-June 2021 as several states started easing COVID-19 related restrictions; the employment-intensive construction industry should witness resumption in operations by the middle of June, though at a curtailed level.

Analysts expect a sharp return to growth in 2021. It is expected that from a slump of nearly 14.9 %, the construction sector will register a formidable growth of 11.6% in 2021. Opportunities look set to emerge.

The Company has established a comprehensive system for risk management and internal controls for all its businesses to manage the risks that it is exposed to. The objective of its risk management framework is to ensure that various risks are identified, measured and mitigated and also that policies, procedures and standards are established to address these risks and ensure a systematic response in the case of crystallisation of such risks.

**CAUTIONARY STATEMENT:**

Statements in the Management Discussion and Analysis describing the company's objectives, projections, estimates, expectations may be forward-looking statements. Actual results may differ materially from those expressed or implied. Important factors that could make difference to the company's operations include economic conditions in which the company operates, change in government regulations, tax laws, statutes and other incidental factors.

**For Atal Realtech limited**

**Sd/-  
Mr. Vijaygopal Atal  
Managing Director**

**Sd/-  
Mr. Uday Satve  
Chief Financial Officer**

## INDEPENDENT AUDITOR'S REPORT

To,  
**The Board of Directors of  
Atal Realtech Limited**

### **Report on the Audit of Financial Statements**

#### **Opinion**

We have audited the accompanying financial statements of **Atal Realtech Limited** ('the Company') (CIN – U45400MH2012PLC234941) which comprise the balance sheet as at 31 March 2021, and the statement of profit and loss, and statement of cash flows for year ended on that date, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the Companies Act, 2013 ('the Act') in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at 31 March 2021, and its financial performance, and its cash flows for the year ended on that date.

#### **Basis for Opinion**

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under Section 143(10) of the Act. Our responsibilities under those standards are further described in the "Auditor's Responsibilities for the Audit of the Financial Statements" section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Act and the rules thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### **Management's Responsibility for the Financial Statements**

The Company's Board of Directors is responsible for the matters stated in Section 134(5) of the Act with respect to the preparation of these financial statements that give a true and fair view of the financial position, financial performance and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014. This responsibility also includes maintenance of adequate accounting records in accordance with the provision of the Act for

safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from materials misstatement, whether due to fraud or error.

In preparing the financial statements, the Board of Directors is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of Directors either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

The Board of Directors are also responsible for overseeing the company's financial reporting process.

### **Auditor's Responsibility**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- i) Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- ii) Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- iii) Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- iv) Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or

conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

v) Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

#### **Report on Other Legal and Regulatory Requirements**

1. As required by the Companies (Auditor's Report) Order 2016 ('the Order'), issued by the Central Government in terms of Section 143(11) of the Act, we give in the "Annexure A" a statement on matters specified in paragraphs 3 and 4 of the Order.
2. As required by Section 143(3) of the Act, we report that:
  - a) we have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit;
  - b) in our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books;
  - c) Company does not have any branch office. Thus, reporting on the accounts of any branch office of the company is not required.
  - d) the balance sheet, the statement of profit and loss and the cash flows dealt with by this report are in agreement with the books of account;
  - e) in our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014;

- f) in our opinion there are no observations or comments on the financial transactions, which may have an adverse effect on the functioning of the Company;
- g) on the basis of the written representations received from the directors as on 31 March 2021 and taken on record by the Board of Directors, none of the directors are disqualified as on 31 March 2021 from being appointed as a director in terms of section 164(2) of the Act;
- h) in our opinion there are no qualification, reservation or adverse remark relating to the maintenance of accounts and other matters connected therewith;
- i) with respect to the adequacy of the internal financial controls over financial reporting of the Company with reference to these financial statements and the operating effectiveness of such controls, refer to our separate Report in "Annexure B" to this report; and
- j) with respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, in our opinion and to the best of our information and according to the explanations given to us:
  - i. the company does not have any pending litigations that will have an impact on its financial position;
  - ii. the Company did not have any long term contracts including derivative contracts for which there were any material foreseeable losses;
  - iii. there were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.

**For A. S. Bedmutha & Co.**

*Chartered Accountants*

FRN: 101067W

Sd/-

**Smruti R. Dungarwal**

Partner

Membership No.: 144801

UDIN: 21144801AAAABN2275

Place: Nashik

Date: June 29, 2021



**Annexure A referred to in paragraph 1 under the heading “Report on Other Legal and Regulatory Requirements” of our report of even date.**

Re: Atal Realtech Limited ('the Company')

- (i)
  - a) The Company has maintained proper records showing full particulars, including quantitative details and situation of fixed assets;
  - b) All fixed assets have not been physically verified by the management during the year but there is a regular programme of verification which, in our opinion, is reasonable having regard to the size of the Company and the nature of its assets. No material discrepancies were noticed on such verification;
  - c) According to the information and explanations given by the management, the title deeds of immovable properties included in fixed assets are held in the name of the Company;
- (ii) The management has conducted physical verification of inventories at reasonable intervals during the period. No material discrepancies were noticed on physical verification of inventories;
- (iii) In our opinion and according to information and explanations given to us, the Company has not granted any loans, secured or unsecured to companies, firms, limited liability partnerships or other parties covered under Section 189 of the Act;
- (iv) In our opinion and according to information and explanations given to us, the Company has not given any loans, guarantees, securities or made investments, and thus provisions of Section 185 and Section 186 of the Act are not applicable;
- (v) In our opinion and according to information and explanations given to us, the Company has not accepted any deposit from the public during the year;
- (vi) The Company is not required to maintain cost records as provided under Section 148 of the Act;
- (vii)
  - a) The Company is generally regular in depositing with appropriate authorities undisputed statutory dues including provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of custom, value added tax, goods and service tax, cess and other statutory dues applicable to it except as mentioned below:

According to the information and explanations given to us and the records of the company examined by us, TDS amounting to Rs. 23,790/- is payable undisputed which were in arrears, as at 31st March 2021 for a period of more than six months from the date they become payable.

- b) According to the records of the Company, there are no dues of income-tax, sales-tax, service tax, customs duty, excise duty and value added tax that are not deposited on account of any dispute;
- (viii) In our opinion and according to the information and explanations given by the management, the Company has not defaulted in repayment of loans or borrowing to banks or financial institutions. The Company did not have any outstanding dues to financial institutions, government or debenture holders.
- (ix) According to the information and explanations given to us, the Company has raised monies by way of initial public offer during the year. The same were applied for the purposes for which those are raised;
- (x) Based upon the audit procedures performed for the purpose of reporting the true and fair view of the financial statements and according to the information and explanations given by the management, we report that no fraud by the Company or no material fraud on the Company by the officers and employees of the Company has been noticed or reported during the year;
- (xi) According to the information and explanations given to us, managerial remuneration has been paid or provided in accordance with the requisite approvals mandated by the provision of Section 197 read with schedule 5 to the Companies Act, 2013
- (xii) In our opinion, the Company is not a Nidhi Company. Therefore, the provisions of clause 3(xii) of the Order are not applicable to the Company and hence not commented upon;
- (xiii) According to the information and explanations given by the management, transactions with the related parties are in compliance with Sections 177 and 188 of the Act where applicable and the details have been disclosed in the notes to the financial statements, as required by the applicable accounting standards;
- (xiv) According to the information and explanations given to us and on an overall examination of the balance sheet, the Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year under review and hence, reporting requirements under clause 3(xiv) of the Order are not applicable to the Company and hence not commented upon;
- (xv) According to the information and explanations given by the management, the Company has not entered into any non-cash transactions with directors or persons connected with them as referred to in section 192 of the Act;

(xvi) According to the information and explanations given to us, the provisions of section 45-IA of the Reserve Bank of India Act, 1934 are not applicable to the Company.

**For A. S. Bedmutha & Co.**

*Chartered Accountants*

FRN: 101067W

**Sd/-**

**Smruti R. Dungarwal**

Partner

Membership No.: 144801

UDIN: 21144801AAAABN2275

Place: Nashik

Date: June 29, 2021

**Annexure B referred to in paragraph 2(i) under the heading “Report on Other Legal and Regulatory Requirements” of our report of even date.**

**Report on the Internal Financial Controls under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 (“the Act”)**

We have audited the internal financial controls over financial reporting of Atal Realtech Limited (‘the Company’) as of March 31, 2021 in conjunction with our audit of the financial statements of the Company for the year ended on that date.

**Management’s Responsibility for Internal Financial Controls**

The Company’s management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India. These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to company’s policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013

**Auditors’ Responsibility**

Our responsibility is to express an opinion on the Company’s internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (‘the Guidance Note’) and the Standards on Auditing (‘the Standards’), issued by ICAI and deemed to be prescribed under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor’s judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.

### **Meaning of Internal Financial Controls Over Financial Reporting**

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that:

- a) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;
- b) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and
- c) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

### **Inherent Limitations of Internal Financial Controls over Financial Reporting**

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting to future periods are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

## **Opinion**

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31 March 2021, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls over Financial Reporting issued by the Institute of Chartered Accountants of India..

**For A. S. Bedmutha & Co.**

Chartered Accountants

FRN: 101067W

**Sd/-**

**Smruti R. Dungarwal**

Partner

Membership No.: 144801

UDIN: 21144801AAAABN2275

Place: Nashik

Date: June 29, 2021

**Atal Realtech Limited**

(All amounts are in Lakhs, unless otherwise stated)

**Balance Sheet as at 31 March 2021**

Particulars	Note	As at 31 March 2021	As at 31 March 2020
<b>I. EQUITY AND LIABILITIES</b>			
<b>(1) Shareholders Funds</b>			
(a) Share Capital	3	493.40	463.00
(b) Reserves and Surplus	4	2,631.10	2,272.10
(c) Money received against share warrants		-	-
<b>(2) Share application money pending allotment</b>			
<b>(3) Non-current liabilities</b>			
(a) Long-Term Borrowings	5	95.83	221.01
(b) Deferred Tax Liabilities (Net)		-	-
(c) Other Long Term Liabilities	6	16.86	19.16
(d) Long-Term Provisions	7	25.49	29.91
<b>(4) Current liabilities</b>			
(a) Short-Term Borrowings	8	905.02	1,282.60
(b) Trade Payables			
(A) Total outstanding dues of micro enterprises and small enterprises; and		-	-
(B) Total outstanding dues of creditors other than micro enterprises and small enterprises		449.27	895.40
(c) Other Current Liabilities	9	114.57	136.60
(d) Short-Term Provisions	10	88.22	93.06
<b>Total</b>		<b>4,819.77</b>	<b>5,412.85</b>
<b>II. ASSETS</b>			
<b>(1) Non-current assets</b>			
(a) Property, Plant & Equipment	11	<b>424.15</b>	<b>480.32</b>
(i) Tangible Assets		424.15	480.32
(ii) Intangible Assets		-	-
(iii) Capital Work -In-Progress		-	-
(iv) Intangible asset under development		-	-
(b) Non-Current Investments	12	8.47	6.05
(c) Deferred Tax Assets (Net)	13	4.83	4.08
(d) Long Term Loans and Advances		745.83	1,271.25
(e) Other Non-Current Assets			
<b>(2) Current assets</b>			
(a) Current Investments	14	571.43	1,140.03
(b) Inventories	15	1,549.08	503.50
(c) Trade Receivables	16	215.52	208.09
(d) Cash and Cash Equivalents	17	1,282.58	1,791.02
(e) Short-Term Loans and Advances	18	17.87	8.50
(f) Other Current Assets			
<b>Total</b>		<b>4,819.77</b>	<b>5,412.85</b>

Significant accounting policies

1 &amp; 2

Other notes to financial statements

*The accompanying notes are an integral part of the financial statements*

In terms of our report attached

**For A. S. Bedmutha & Co**

*Chartered Accountants*

FRN: 101067W

**Smruti R. Dungarwal**

*Partner*

Mem. No.: 144801

Place: Nashik

Date: June 29, 2021

UDIN: 21144801AAAABN2275

**For and on behalf of the Board of Directors of**

**Atal Realtech Limited**

**Sd/-**

**Vijaygopal Atal**

Managing Director

DIN: 00126667

**Sd/-**

**Nishit Atal**

Director

DIN: 05179430

**Sd/-**

**Uday Satve**

Chief Financial Officer

Place: Nashik

Date: June 29, 2021

**Sd/-**

**Alok Singh**

Company Secretary



**Atal Realtech Limited**

(All amounts are in Lakhs, unless otherwise stated)

**Statement of Profit & Loss for the year ended 31 March 2021**

Particulars	Note No	31/Mar/21	31/Mar/20
<b>I Revenue from operations</b>	19	4,351.95	5,814.70
<b>II Other Income</b>	20	13.87	54.53
<b>III Total revenue (I + II)</b>		<b>4,365.82</b>	<b>5,869.23</b>
<b>IV Expenses</b>			
Cost of materials consumed	21	1,979.57	2,730.53
Contract and site expenses	22	1,072.02	2,302.40
Changes in inventories of finished goods, work-in-progress and stock-in-trade	23	567.00	(90.79)
Purchase of stock-in-trade			
Employee benefit expense	24	140.12	173.54
Finance cost	25	192.81	227.88
Depreciation and amortisation expense	10	67.92	53.28
Other expenses	26	64.81	150.72
<b>Total Expenses</b>		<b>4,084.25</b>	<b>5,547.57</b>
<b>V Profit before exceptional and extraordinary items and tax(III-IV)</b>		281.57	321.66
<b>VI Exceptional Items</b>		-	-
<b>VII Profit before extraordinary items and tax (V - VI)VIII</b>		281.57	321.66
<b>Extraordinary items</b>		-	-
<b>IX Profit before tax (VII - VIII)</b>		<b>281.57</b>	<b>321.66</b>
<b>X Tax expense:</b>			
(1) Current tax		74.42	87.14
(2) Deferred tax		(2.43)	(5.37)
<b>XI Profit(Loss) for the period from continuing operations</b>		209.57	239.90
<b>XII Profit/(Loss) for the period</b>		<b>209.57</b>	<b>239.90</b>
<b>XIII Earning per Equity Share:</b>			
Basic	29	4.25	5.18
Diluted	29	4.25	5.18

*The accompanying notes are an integral part of the financial statements*

In terms of our report attached

**For A. S. Bedmutha & Co**

*Chartered Accountants*

FRN: 101067W

**Smruti R. Dungarwal**

*Partner*

Mem. No.: 144801

Place: Nashik

Date: June 29, 2021

UDIN: 21144801AAAABN2275

**For and on behalf of the Board of Directors of**

**Atal Realtech Limited**

**Sd/-**

**Vijaygopal Atal**

Managing Director

DIN: 00126667

**Sd/-**

**Nishit Atal**

Director

DIN: 05179430

**Sd/-**

**Uday Satve**

Chief Financial Officer

Place: Nashik

Date: June 29, 2021

**Sd/-**

**Alok Singh**

Company Secretary

**Atal Realtech Limited**
**(All amounts are in Lakhs, unless otherwise stated)**
**Cash flow statement for the year ended 31 March 2021**

Particulars	31/Mar/21	31/Mar/20
<b>(1) Cash flow from operating activities</b>		
Net Profit / (Loss) before extraordinary items and tax	281.57	321.66
<u>Adjustments for:</u>		
Depreciation and amortisation	67.92	53.28
Finance costs	25.28	33.86
Profit on sale of fixed assets	-	(0.03)
Operating profit / (loss) before working capital changes	374.77	408.78
<u>Changes in working capital:</u>		
Decrease / (Increase) in Inventories	568.60	(47.77)
Decrease / (Increase) in Trade Receivables	(1,045.57)	(70.00)
Decrease / (Increase) in Short-term loans and advances	508.45	(223.18)
Decrease / (Increase) in Other current assets	(9.37)	(3.32)
Decrease / (Increase) in Long-term loans and advances	(0.75)	(1.05)
Increase / (Decrease) in Long-term liabilities	(2.30)	(15.02)
Increase / (Decrease) in Long-term provisions	(4.42)	29.91
Increase / (Decrease) in Short-term borrowings	(377.59)	1.76
Increase / (Decrease) in Trade Payables	(446.13)	10.13
Increase / (Decrease) in Other current liabilities	(22.03)	35.71
Increase / (Decrease) in Short-term provisions	(4.84)	91.92
Cash generated from operations	(461.18)	217.86
Income-tax paid	74.42	87.14
<b>Net cash flow from / (used in) operating activities (A)</b>	<b>(535.60)</b>	<b>130.72</b>
<b>(2) Cash flow from investing activities</b>		
Purchase of fixed assets	(11.75)	(253.03)
Proceeds from sale of fixed assets	-	27.01
Business advances received back	525.42	102.00
<b>Net cash flow from / (used in) investing activities (B)</b>	<b>513.67</b>	<b>(124.02)</b>
<b>(3) Cash flow from financing activities</b>		
Proceeds from issue of equity shares	30.40	-
Proceeds / (Repayment) from long-term borrowings	(125.18)	28.93
Finance cost	(25.28)	(33.86)
Excess Securities premium	149.43	
<b>Net cash flow from / (used in) financing activities (C)</b>	<b>29.37</b>	<b>(4.93)</b>
<b>(4) Net Increase/(Decrease) in cash and cash equivalents (A+B+C)</b>	<b>7.44</b>	<b>1.77</b>
<b>(5) Cash and cash equivalents as at the beginning of period</b>	<b>208.09</b>	<b>206.31</b>
<b>(6) Cash and cash equivalents as at the end of period</b>	<b>215.52</b>	<b>208.09</b>

*The accompanying notes are an integral part of the financial statements*

In terms of our report attached

**For A. S. Bedmutha & Co**  
*Chartered Accountants*

FRN: 101067W

**Smruti R. Dungarwal**  
*Partner*  
Mem. No.: 144801  
Place: Nashik  
Date: June 29, 2021  
UDIN: 21144801AAAABN2275

**For and on behalf of the Board of Directors of  
Atal Realtech Limited**

**Sd/-**  
**Vijaygopal Atal**  
Managing Director  
DIN: 00126667

**Sd/-**  
**Nishit Atal**  
Director  
DIN: 05179430

**Sd/-**  
**Uday Satve**  
Chief Financial Officer  
Place: Nashik  
Date: June 29, 2021

**Sd/-**  
**Alok Singh**  
Company Secretary

**Atal Realtech Limited**

(All amounts are in Lakhs, unless otherwise stated)

**Notes to financial statements for the year ended 31 March 2021****Note 3 Share Capital**

Particulars	As at 31 March 2021		As at 31 March 2020	
	Number	Amount	Number	Amount
<b>Authorised</b> 51,30,000 (PY : 46,30,000) Equity Shares of INR 10 each	51.30	513.00	46.30	463.00
<b>Issued, Subscribed &amp; Paid up</b> 4,934,000 Equity Shares of Rs.10 each	49.34	493.40	46.30	463.00
<b>Total</b>	49.34	493.40	46.30	463.00

**Note 3.1:**

(a) The company has only one class of shares referred to as equity shares having a par value of INR 10 each. Each holder of equity shares is entitled to one vote per share and dividend in Indian rupees, if proposed by the Board of Directors, which is subject to the approval of the shareholders in the ensuing Annual General Meeting.

(b) In the event of liquidation of the company, the holders of equity shares will be entitled to receive any of the remaining assets of the company, after distribution of all preferential amounts. The distribution will be in proportion to the number of equity shares held at the time of commencement of winding-up.

(c) The Shareholders have all other rights as available to equity shareholders as per the provisions of the Companies Act, 2013, read together with the Memorandum of Association and Articles of Association of the Company, as applicable.

(d) The reconciliation of the numbers of shares outstanding and amount of share capital as at year end is set out below:

Particulars	As at 31 March 2021		As at 31 March 2020	
	Equity Shares			
	Number	Rs.	Number	Rs.
Shares outstanding at the beginning of the year	46.30	463.00	35.00	350.00
Shares issued during the year	3.04	30.40	11.30	113.00
Shares bought back during the year	-	-	-	-
Shares outstanding at the end of the year	49.34	493.40	46.30	463.00

(e) Details of Shareholder(s) holding more than 5% shares are as follows:

Name of Shareholder	As at 31 March 2021		As at 31 March 2020	
	No. of Shares held	Holding (%)	No. of Shares held	Holding (%)

Vijaygopal Atal	25.92	52.53%	43.30	93.52%
Sujata Atal	1.23	2.50%	3.00	6.48%

#### Atal Realtech Limited

(All amounts are in Lakhs, unless otherwise stated)

#### Notes to financial statements for the year ended 31 March 2021

##### Note 4 Reserves & Surplus

Particulars		31/Mar/21	31/Mar/20
(a)	Securities premium	1,346.43	1,197.00
(b)	<u>Surplus</u>	-	-
	Opening Balance	1,075.10	835.20
	Add: Profit for the year	209.57	239.90
	Closing Balance	1,284.68	1,075.10
	<b>Closing Balance</b>	<b>2,631.10</b>	<b>2,272.10</b>

##### Note 5 Long Term Borrowings

Particulars		31/Mar/21	31/Mar/20
	<b>Secured</b>		
(a)	<u>Term Loan from others</u>		
	Term Loan facilities from Axis Bank	17.85	33.35
	Term Loan facilities from AU Small Finance Bank	77.98	187.66
	<b>Total</b>	<b>95.83</b>	<b>221.01</b>

##### Note 6 Other Long-term Liabilities

Particulars		31/Mar/21	31/Mar/20
(a)	Retention money payable (security deposits)	16.86	19.16
	<b>Total</b>	<b>16.86</b>	<b>19.16</b>

##### Note 7 Long Term Provisions

Particulars		31/Mar/21	31/Mar/20
(a)	Gratuity Payable	25.49	29.91
	<b>Total</b>	<b>25.49</b>	<b>29.91</b>

**Atal Realtech Limited**

(All amounts are in Lakhs, unless otherwise stated)

**Notes to financial statements for the year ended 31 March 2021 Note 8****Short Term Borrowings**

Particulars		31/Mar/21	31/Mar/20
	<b>Secured Loans</b>		
(a)	<u>Loans repayable on demand from banks</u>		
	Bank Overdraft - State Bank of India	721.16	1,085.70
(b)	<u>Loans repayable on demand from others</u>		
	Raw material assistance scheme - NSIC	183.86	196.91
	<b>Total</b>	<b>905.02</b>	<b>1,282.60</b>

**8.1 Working capital loan from State Bank of India**

Working loan facility from State Bank of India against hypothecation of work-in-progress, stocks, book debts and others collateral securities owned by directors and their relatives and personal guarantees by directors and their relatives.

**8.2 Raw material assistance scheme from NSIC**

Raw material assistance scheme in the form of working capital credit is obtained from National Small Industries Corporation ('NSIC') against bank guarantee of INR 2 crores.

**Note 9 Other Current Liabilities**

Particulars		31/Mar/21	31/Mar/20
(a)	Current maturities of long-term debts	29.39	50.26
(b)	Interest accrued but not due on borrowings	25.10	30.43
(c)	Expenses payable	-	-
(d)	Income received in advance	38.23	29.78
(e)	Salary and wages	10.61	6.55
(f)	<u>Statutory liabilities</u>		
	- Value added tax	-	-
	- Tax deducted at source	10.64	18.86
	- Profession tax	(0.00)	0.08
	- Provident fund	0.46	0.49
	- ESIC	0.15	0.15
	<b>Total</b>	<b>114.57</b>	<b>136.60</b>

**Note 10 Short Term Provisions**

Particulars		31/Mar/21	31/Mar/20
(a)	Audit fees Payable	1.05	0.75
(b)	Expenses	0.92	0.25
(c)	Gratuity Payable	8.90	2.00
(d)	Income Tax	77.35	90.06
<b>Total</b>		<b>88.22</b>	<b>93.06</b>

**2021 Note 11 Property, Plant and Equipment**

Particulars	Gross block (at cost)					Accumulated Depreciation			Net Block		
	Balance on 1/Apr/20	Addition	Deduction / Adjustments	Balance on 31/Mar/21	Depn. Rate %	Balance on 1/Apr/20	Depreciation for the year	Deduction / Adjustments	Balance on 31/Mar/21	As on 31/Mar/21	As on 31/Mar/20
Building	277.49	-	-	277.49	4.87%	28.36	12.13	-	40.50	237.00	249.13
Plant & Machinery	303.36	11.20	-	314.56	11.88%	90.82	50.08	-	140.90	173.66	212.54
Computer & Software	27.39	0.55	-	27.94	31.67%	25.25	1.39	-	26.64	1.30	2.14
Furniture & Fixtures	51.16	-	-	51.16	9.50%	35.08	4.16	-	39.24	11.91	16.08
Vehicles	5.76	-	-	5.76	11.88%	5.32	0.16	-	5.48	0.28	0.44
<b>Total</b>	<b>665.16</b>	<b>11.75</b>	<b>-</b>	<b>676.91</b>	<b>-</b>	<b>184.84</b>	<b>67.92</b>	<b>-</b>	<b>252.76</b>	<b>424.15</b>	<b>480.32</b>

Note : Depreciation is charged on written-down value method considering useful life of assets as prescribed under Schedule II of the Companies Act, 2013.



**Atal Realtech Limited**

(All amounts are in Lakhs, unless otherwise stated)

**Notes to financial statements for the year ended 31 March 2021****Note 12 Deferred tax assets (net)**

Particulars		31/Mar/21	31/Mar/20
	Opening balance	6.05	0.67
	<u>Add:</u>		
	Timing difference due to depreciation	1.80	(1.99)
	Timing difference due to gratuity provision	0.62	7.36
	Closing balance	8.47	6.05
	<b>Total</b>	<b>8.47</b>	<b>6.05</b>

**Note 13 Long term loans and advances**

Particulars		31/Mar/21	31/Mar/20
(a)	<u>Unsecured, considered good</u>		
	Security deposits	4.83	4.08
	<b>Total</b>	<b>4.83</b>	<b>4.08</b>

**Note 14 Inventories**

Particulars		31/Mar/21	31/Mar/20
(a)	Raw material	10.50	12.10
(b)	Work-in-progress	560.93	1,127.93
	<b>Total</b>	<b>571.43</b>	<b>1,140.03</b>

**Note 15 Trade Receivables**

Particulars		31/Mar/21	31/Mar/20
(a)	<u>Unsecured, considered good</u>		
	Trade receivable outstanding for a period not exceeding sixmonths from the date they were due for payment		
	- Debts due from relatives	-	0.20
	- Debts due from others	1,549.08	500.97

(b)	Trade receivable outstanding for a period exceeding six months from the date they were due for payment - <i>Debts due from relatives</i>	-	2.34
<b>Total</b>		<b>1,549.08</b>	<b>503.50</b>

**Atal Realtech Limited**

(All amounts are in Lakhs, unless otherwise stated)

**Notes to financial statements for the year ended 31 March 2021**

**Note 16 Cash and Cash Equivalents**

Particulars		31/Mar/21	31/Mar/20
(a)	Cash on hand	0.37	1.04
(b)	Balance with banks	0.44	1.75
(c)	Others:		
	Bank deposits held as security against guarantees		
	- <i>More than 12 months maturity</i>	214.71	205.29
<b>Total</b>		<b>215.52</b>	<b>208.09</b>

**Note 17 Short term Loans & Advances**

Particulars		31/Mar/21	31/Mar/20
	<b><u>Unsecured, considered good</u></b>		
(a)	<u>Loans and advances to related parties</u>		
	Advance to director	-	-
(b)	<u>Loans and advances to others</u>		
	Advance to Staff	22.41	14.37
	Advance to creditors of raw material, capital goods & others	248.90	348.68
	Advance receivable from LIC Housing Finance Limited	4.36	4.36
	<u>Balance with government authorities:</u>		
	- Income-tax	97.87	115.02
	- Goods and Services Tax	114.54	176.13
	Deposits	794.49	1,132.47
<b>Total</b>		<b>1,282.58</b>	<b>1,791.02</b>

**Note 18 Other Current Assets**

Particulars		31/Mar/21	31/Mar/20
a)	Accrued interest	17.63	7.85
b)	Prepaid expenses	0.25	0.66
<b>Total</b>		<b>17.87</b>	<b>8.50</b>

**Atal Realtech Limited**

(All amounts are in Lakhs, unless otherwise stated)

**Notes to financial statements for the year ended 31 March 2021****Note 19 Revenue from Operations**

Particulars		31/Mar/21	31/Mar/20
(a)	Contract receipts	4,351.95	5,778.70
(b)	Project supplies	-	36.00
	<b>Total</b>	<b>4,351.95</b>	<b>5,814.70</b>

**Note 20 Other Income**

Particulars		31/Mar/21	31/Mar/20
(a)	Interest income	12.58	14.60
(b)	Miscellaneous Income / Write On	0.58	39.89
(c)	Profit on sale of asset	-	0.03
(d)	Discount	0.00	-
(e)	Waiver / Refund	0.01	0.01
(f)	Reimbursement of PF Contribution from PMGKY	0.39	-
(g)	Scaffolding Rent	0.30	-
	<b>Total</b>	<b>13.87</b>	<b>54.53</b>

**Note 21 Cost of Material Consumed**

Particulars		31/Mar/21	31/Mar/20
(a)	Opening stock of raw material	12.10	55.12
	Add: Purchases	1,977.97	2,687.51
		<b>1,990.07</b>	<b>2,742.63</b>
	Less: Closing stock of raw material	10.50	12.10
	<b>Total</b>	<b>1,979.57</b>	<b>2,730.53</b>

**Note 22 Contract and site expenses**

Particulars		31/Mar/21	31/Mar/20
(a)	Labour expenses	1,016.44	2,028.41
(b)	Machinery expenses	13.73	75.47
(c)	Other construction expenses	41.85	198.52
	<b>Total</b>	<b>1,072.02</b>	<b>2,302.40</b>

**Note 23 Changes in Inventories**

Particulars		31/Mar/21	31/Mar/20
	<b>Opening Stock</b>		
	Work-in progress	1,127.93	1,037.14
	<b>Closing Stock</b>		
	Work-in progress	560.93	1,127.93
	<b>Total</b>	<b>567.00</b>	<b>(90.79)</b>

**Note 24 Employee Benefit Expenses**

Particulars		31/Mar/21	31/Mar/20
a)	Salary and wages	135.65	167.66
b)	Contribution to employee benefit fund	1.99	1.65
c)	Gratuity Payable	2.48	4.23
	<b>Total</b>	<b>140.12</b>	<b>173.54</b>

**Note 25 Financial Expenses**

Particulars		31/Mar/21	31/Mar/20
(a)	Interest expense Other borrowing costs	167.43	156.63
(b)		25.38	71.26
	<b>Total</b>	<b>192.81</b>	<b>227.88</b>

**Note 26 Other Expenses**

Particulars		31/Mar/21	31/Mar/20
(a)	Auditor's remuneration	1.05	0.75
(b)	Business promotion expenses	-	0.82
(c)	Hiring charges	6.16	22.29
(d)	Insurance expenses	2.39	14.62
(e)	Interest and late fees on statutory dues	4.54	4.98
(f)	IPO Expenses	-	1.78
(g)	Legal and professional fees	15.07	31.30
(h)	Miscellaneous expenses	7.50	0.51
(i)	Office expenses	2.43	6.03
(j)	Penalty on statutory dues	-	0.03
(k)	Power and fuel	4.51	19.54
(l)	Printing and stationery	1.28	1.04
(m)	Rent charges	9.17	9.17
(n)	Repairs & Maintenance of Machinery	3.10	5.53
(o)	Value Added Tax	3.67	-
(p)	Rates and taxes	0.21	0.32
(q)	Telephone expenses	1.09	1.52
(r)	Tender expenses	1.19	0.18
(s)	Travelling and conveyance	1.44	4.40
(t)	Earlier year's tax	-	5.31
(u)	Prior Period Items	-	20.60
<b>Total</b>		<b>64.81</b>	<b>150.72</b>
<u>Payment to auditor:</u>		<b>1.05</b>	<b>0.75</b>
<i>- as auditor</i>		1.05	0.75

**Note 27 Contingent liabilities not provided for**

Particulars		31/Mar/21	31/Mar/20
(a)	Guarantees and letter of credit given by the Company to suppliers, government bodies and performance guarantee	694.12	684.18
<b>Total</b>		<b>694.12</b>	<b>684.18</b>

**Note 28 Details of dues to Micro and Small Enterprises as defined under the MSMED Act**

There are no Micro and Small Enterprises as defined in the Micro, Small and Medium Enterprises Development Act, 2006 to whom the Company owes dues on account of principal amount together with interest and accordingly, no additional disclosures have been made. The above information regarding Micro and Small Enterprises has been determined to the extent such parties have been identified on the basis of information available with the Company.

**Note 29 Disclosure under accounting standard (AS) - 7 - Construction Contracts**

Particulars		31/Mar/21	31/Mar/20
(a)	Contract revenue recognised as revenue in the period	4,351.95	5,778.70
(b)	For contracts that are in progress:		
	- Aggregate amount of costs incurred upto reporting date	7,647.09	5,817.19
	- Recognised profits (less recognised losses) upto reporting date	679.17	677.62
	- Advances received from customer for contract work		
	- Retention money	382.39	399.99
(c)	Gross amount due from customers for contract work	93.52	93.07
(d)	Gross amount due to customers for contract work	9.79	7.29

**Note 30 Earning per share (EPS)**

Particulars		31/Mar/21	31/Mar/20
(a)	Net profit for calculation of basic EPS (profit after tax)Weighted	209.57	239.90
(b)	average number of equity shares	49.34	46.30
(c)	Basic earning per share Diluted	4.25	5.18
(d)	earning per share	4.25	5.18

**Note 31 Details of transactions in foreign currency**

Particulars		31/Mar/21	31/Mar/20
(a)	Value of imports during the year (C.I.F. basis)Expenditure	-	-
(b)	in foreign currency	-	-
(c)	Earnings in foreign exchange during the year	-	-

**Note 32 Prior Period Items**

Particulars		31/Mar/21	31/Mar/20
(a)	Provision for gratuity of earlier years	-	27.68
(b)	Capital expenditure wrongly treated as revenue in earlieryear		
	Depreciation impact on understated capital expenditureIncome	-	(16.04)
(c)	Tax Provision of earlier years	-	0.95
(d)	Income Tax TDS not claimed in earlier years	-	5.87
(e)		-	2.14
	<b>Total</b>		
		-	<b>20.60</b>

**Note 33 Disclosure pursuant to Accounting Standard (AS) 15 Employees Benefits****i) Defined Contribution Plan**

Employer's contributions to Defined Contribution Plan, recognised as expenses for the year are as under:

Particulars		31/Mar/21	31/Mar/20
(a)	Provident Fund	1.38	1.46
(b)	Administrative charges for Provident fund	0.12	0.11

The above mentioned figures are as complied and reported by the management.

## ii) Defined Benefit Plan (Unfunded)

The present value of obligation for Defined benefit plan is based on the independent actuarial valuation for the year.

The disclosures as required as per the AS-15 are as under:

### a) Actuarial Assumptions:

Particulars		31/Mar/21	31/Mar/20
(i)	Discount Rate p.a.	6.1%	6.3%
(ii)	Rate of increase in Compensation levels p.a.	10%	10%
(iii)	Return on Plan Assets p.a.	Nil	Nil

The estimates of future salary increases, considered in the actuarial valuation take account of inflation, seniority, promotion and other relevant factors such as supply and demand factors in the employee market.

### b) Changes in the present value of obligation

Particulars		31/Mar/21	31/Mar/20
(i)	Present value of obligation as at beginning of the year	31.91	27.68
(ii)	Current Service Cost	4.46	4.53
(iii)	Interest Cost	2.01	1.99
(iv)	Benefits Paid	-	-
(v)	Actuarial Gain / (Loss)	(3.99)	(2.29)
	<b>Present Value of Obligation as at the end of year</b>	<b>34.39</b>	<b>31.91</b>

### c) Expenses recognised in Profit & Loss Account

Particulars		31/Mar/21	31/Mar/20
(i)	Current Service Cost	4.46	4.53
(ii)	Interest Cost	2.01	1.99
(iii)	Actuarial (Gain) / Loss	(3.99)	(2.29)
	<b>Total Expenses recognised in the Profit and Loss Account</b>	<b>2.48</b>	<b>4.23</b>

d) Net Liability / (Asset) recognised in the Balance Sheet

Particulars		31/Mar/21	31/Mar/20
(i)	Present value of obligationFair	34.3	31.91
(ii)	Value of Plan Assets <b>Net</b>	9	
(iii)	<b>Liability / (Asset)</b>		<b>31.91</b>
(iv)	Less: Unrecognised Past Service Cost	34.3	
(v)	<b>Liability / (Asset) recognised in the Balance SheetOf</b>	<b>9</b>	<b>31.91</b>
(vi)	<b>which, Short-term Provision</b>	<b>34.3</b>	<b>2.00</b>
		<b>9</b>	
		<b>8.9</b>	
		<b>0</b>	

**Note 34 Disclosure pursuant to Accounting Standard (AS) 19 Leases:**

The company has entered into cancellable operating leasing arrangements for Office premises.

Particulars		31/Mar/21	31/Mar/20
(i)	Operating lease Expenses recognised in profit and loss account	15.33	31.47

**Note 35 Related party disclosure**

**(a) Name of related party and description of relationship**

(i)	<u>Key Management Personnel</u> - Mr. Vijaygopal Atal - Mr. Nishit Atal
(ii)	<u>Relative of Key Management Personnel</u> - Mrs. Sujata Atal
(ii)	<u>Enterprise over which Key Management Personnel or their relatives have significant influence</u> - M/s Jaikumar Constructions Limited (formerly known as Jaikumar Constructions LLP) - Jaikumar Real Estate Private Limited - Tanu Reality LLP - ABH Developers Pvt. Ltd. - Waterstone LLP



(a) Related parties transactions			
	Particulars	31/Mar/21	31/Mar/20
(i)	<u>Salary and Remuneration paid</u>		
	- Mr. Vijaygopal Atal	19.50	19.50
	- Mr. Nishit Atal	-	5.25
	- Mrs. Sujata Atal	15.55	-
(ii)	<u>Rent paid</u>		
	- Mr. Vijaygopal Atal	9.17	9.17
(iii)	<u>Hiring and professional charges</u>		
	- Mr. Nishit Atal	0.24	7.76
	- Mrs. Sujata Atal	2.14	2.15
(iv)	<u>Other business advances given / (Received back)</u>		
	- M/s Tanu Reality LLP	(525.42)	(102.00)
(v)	<u>Deposit given for rented premises</u>		
	- Mr. Nishit Atal	-	12.46
(vi)	<u>Loan taken</u>		
	- Mr. Vijaygopal Atal	125.30	-
	- Mr. Nishit Atal	108.46	-
(vii)	<u>Loan repaid</u>		
	- Mr. Vijaygopal Atal	125.30	-
	- Mr. Nishit Atal	108.46	-
(ix)	<u>Sale of Fixed Asset</u>		
	- ABH Developers Pvt. Ltd.	-	0.11
	- Waterstone LLP	-	26.91
(x)	<u>Sale of Materials</u>		
	- ABH Developers Pvt. Ltd.	-	0.08
(xi)	<u>Income Received</u>		
	- Waterstone LLP	-	0.28

(a) Related parties balances

Particulars		31/Mar/21	31/Mar/20
(i)	<u>Payable</u>		
	- Mr. Vijaygopal Atal	2.97	-
	- Mr. Nishit Atal	-	-
	- Mrs. Sujata Atal	0.21	-
(ii)	<u>Remuneration Payable</u>		
	- Mr. Vijaygopal Atal	1.20	-
	- Mrs. Sujata Atal	1.00	0.71
(ii)	<u>Receivable</u>		
	- Mr. Vijaygopal Atal - Deposit against rented premises	154.11	154.11
	- Mr. Nishit Atal - Deposit against rented premises	128.65	128.65
	- M/s Jaikumar Constructions Limited	-	0.20
	- Jaikumar Real Estate Private Limited	-	2.34
	- M/s Tanu Reality LLP - Business Advance	745.83	1,373.25
	- Waterstone LLP	-	32.08
	- ABH Developers Pvt. Ltd.	-	0.12

**Note 36 Disclosure pursuant to Accounting Standard (AS) 22 Accounting for Taxes on Income** The company has recognised Net Deferred Tax Asset of Rs. 2,42,804.00 in Profit and Loss Account, the details of which are as under:

Particulars		31/Mar/21	31/Mar/20
(i)	<b>Deferred Tax Liabilities</b>		
	Income tax at the applicable rate on the difference between the aggregate book written down value and tax written down value of property, plant and equipment	-	(1.99)
	<b>TOTAL (A)</b>	-	<b>(1.99)</b>
(ii)	<b>Reversal of Deferred Tax Liabilities</b>		
	Income tax at the applicable rate on the difference between the aggregate book written down value and tax written down value of property, plant and equipment	1.80	-
	<b>TOTAL (B)</b>	<b>1.80</b>	-
(iii)	<b>Deferred Tax Assets</b>		
	Income tax at the applicable rate on the Gratuity Provision	0.62	7.36

		<b>TOTAL (C)</b>		
			<b>0.62</b>	<b>7.36</b>
	<b>Reversal of Deferred Tax Assets</b>			
(iv)	Income tax at the applicable rate on the Gratuity Provision		-	-
		<b>TOTAL (D)</b>		
	<b>Deferred Tax Asset (Net)</b>	<b>(A+B+C+D)</b>	-	-
			<b>2.43</b>	<b>5.37</b>

**Note 37 Previous year's figures**

Previous year's figures have been regrouped / reclassified wherever necessary to correspond with the current

[Pursuant to Section 105(6) of the Companies Act, 2013, and Rule 19(3) of the Companies (Management and Administration) Rules, 2014 -Form No. MGT-11]

ATAL REALTECH LIMITED

Regd. Office: Shop No 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002

CIN: U45400MH2012PLC234941 | Phone: 0253 2312627 | Email: info@atalrealtech.com | Website: www.atalrealtech.com

Name of member(s):	
Registered address:	
Email ID:	
Folio Number/ DP ID-ClientID:	

I / We, being the Member(s) holding shares of Galactico Corporate Services Limited, hereby appoint:

1. Name: Address:	Signature:
,or failing him /her 2. Name: Address:	Signature:

as my / our proxy to attend and vote (on a poll) for me / us and on my / our behalf at the 9th Annual General Meeting of Atal Realtech Limited to be held on Tuesday, September 7, 2021, at 3:00 p.m. at The Exchange, Near Ved Mandir, Tidke Colony, Trimbak Road, Nashik 422002 and at any adjournment(s) thereof, in respect of such resolutions as are indicated below:

## ORDINARY BUSINESS

1. To consider and adopt (a) the audited financial statement of the Company for the financial year ended March 31, 2021 and the reports of the Board of Directors and Auditors thereon; and (b) the audited consolidated financial statement of the Company for the financial year ended March 31, 2021 and the report of Auditors thereon (Ordinary Resolutions).
2. To appoint Mr. Nishit Atal who retires by rotation as a Director (Ordinary Resolution).

Signed this.....day of September, 2021

Signature of Shareholder:.....

Signature of Proxy holder(s):.....

Note: This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company, not less than 48 hours before the commencement of the Meeting.

### ATTENDANCE SLIP

(To be presented at the entrance of the meeting venue)

#### ATAL REALTECH LIMITED

Regd. Office: Shop No 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik,  
422002

CIN: U45400MH2012PLC234941 | Phone: 0253 2312627 | Email: info@atalrealtech.com | Website:  
www.atalrealtech.com

I / We hereby record my / our presence at the 9<sup>th</sup> Annual General Meeting (AGM) of the Company held on Tuesday, September 7<sup>th</sup>, 2021 at 3.00 p.m. at Shop No 1, Sumangal Builder House, Holaram Colony, Sadhu Vaswani Road, Nashik, 422002 and at any adjournment(s) thereof.

Folio No.	
DP ID No.	
Client ID No.	
Name of the Member	
Name of the Proxy holder	
Member's / Proxy's Signature	

#### Notes:

1. Only member / Proxy holder can attend the Meeting. 2. Members are requested to bring their copy of the Annual Report and this Attendance Slip at the AGM.