

Date: May 20, 2026

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

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

Subject: Submission of Annual Secretarial Compliance Report for the Financial year 2025-2026.

Dear Sir/Madam,

Pursuant to provisions of Regulation 24A SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the company hereby submits Annual Secretarial Compliance Report for the Financial year 2025-2026 in the prescribed format.

Kindly take the same on your record.

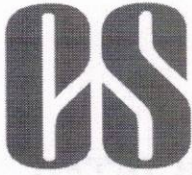
Thanking You,

Yours faithfully,

For Atal Realtech Limited

Mr. Vijaygoopal Parasram Atal
Managing Director
Din: 00126667

Place: Nashik



AKSHAY R. BIRLA AND ASSOCIATES

Practicing Company Secretaries

Office Add: Flat No. 302, Third Floor, Sona Shri Sai Plaza, Near
Bendale Chowk, Bhavani Peth, Jalgaon – 425001 MH IN

Cell: +91-9028110641, 9067890641

Email: csakshaybirla@gmail.com

Secretarial Compliance Report of Atal Realtech Limited for the Financial year ended 31st March, 2026

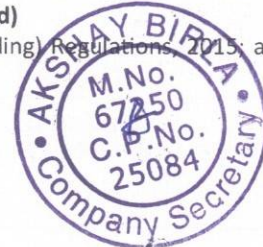
To,
The Board of Directors
Atal Realtech Limited
CIN: L45400MH2012PLC234941
Office No. B 406, Third Floor, ABH Capital,
Opp. Ramayan Bungalow, Sharanpur Road,
Near Rajiv Gandhi Bhavan, H P T College,
Nashik - 422005 Maharashtra India

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

- a) all the documents and records made available to us and explanation provided by Atal Realtech Limited ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2026 ("Review Period") in respect of compliance with the provisions of:
 - a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; During the year, the Company has made preferential allotment of equity shares and Convertible Warrants in compliance with SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 and necessary disclosures have been made to the stock exchanges.
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not Applicable during the Review Period)**
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable during the Review Period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable during the Review Period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable during the Review Period)**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable during the Review Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;





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

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

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ circular no.	Deviations	Action taken by	Type of action
1	2	3	4	5	6
1	Financial Results under Regulation 33 of SEBI (LODR) Regulations 2015 Quarter ended – 30 th September, 2025	Regulation 33 of SEBI (LODR) Regulations 2015	Discrepancies in Financial Results	The Company	Filing of required declaration on receipt of stock exchange query.
2	Maintenance of Functional Website.	Regulation - 46 of SEBI (LODR) Regulations, 2015.	Several mandatory Disclosures prescribed under Regulation -46 were not readily traceable on Company's Website.	The Company	To make Website functional.
3	Shareholding Pattern for the quarter ended 31 st December, 2025.	Regulation - 31 of SEBI (LODR) Regulations, 2015.	Discrepancy in Shareholding Pattern.	The Company	Filing of revised Shareholding Pattern for quarter ended 31 st December, 2025
4	Financial Results under Regulation 33 (2) (b) of SEBI (LODR) Regulations 2015 Quarter Ended – 31 st December 2025	Regulation 33 (2) (b) of SEBI (LODR) Regulations 2015	Discrepancies in Financial Results.	The Company	Filing of financial statements as per the requirement of Regulation 33 on receipt of query of stock exchange.



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



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Discrepancies in Financial Results Quarter ended – 30 th September 2025	None	The Company has failed to comply with the declaration requirements under Regulation of SEBI LODR.	The management made the required compliance.	
Website was not Functioning properly and several disclosures were not traceable.	None	The company has kept its Website Functional and has made available the required information on the website of the company.	The management made the required compliance.	
Mismatch in No. of Demat shares of Promoter's holding.	None	The company is required to clarify the number of demat shares. Company has rectified the same.	The management made the required compliance.	
Discrepancy in Financial results. (In XBRL Financial results -Paid up Equity share capital not given in Lakhs)	None	The Company is required to update the paid-up equity share capital in lakhs (in XBRL utility).	The management made the required compliance.	

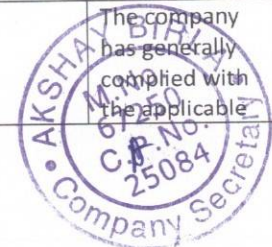
b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ circular no.	Deviations	Action taken by	Type of action
1	2	3	4	5	6
	NA	NA	NA	NA	NA

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

c) Additional affirmations:

Sr. no	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	Yes	The company has generally complied with the applicable





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			secretarial standards issued by the Institute of Company Secretaries of India. Few procedural lapses have been observed in compliance of the same.
2	<u>Adoption and timely updation of the Policies:</u> - All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity - All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations /circulars /guidelines issued by SEBI.	Yes	None
3	<u>Maintenance and disclosure on website</u> - The listed entity is maintaining a functional website. - Timely dissemination of the documents/ information under a separate section on the website. - Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website	Yes	None
4	<u>Disqualification of Director</u> None of the Director of the Company are disqualified under section 164 of the Companies Act, 2013	Yes	None
5	<u>To examine details related to Subsidiaries of the listed entity:</u> a. Identification of material subsidiary companies b. Requirements with respect to disclosure of material as well as other subsidiaries	NA Yes	- The Company has made investment in "Atal Realty Limited" which has become Wholly Owned Subsidiary of Listed entity during the Financial year 2025-2026. However, Atal





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			Realty Limited is not Material Subsidiary.
6	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under the Listing Regulations	Yes	None
7	Performance Evaluation The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	None
8	Related Party Transactions a. The listed entity has obtained prior approval of Audit Committee for all related party transaction b. In case no prior approval obtained, the listed entity shall provide the detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	Yes	None
9	Disclosure of events or information: The listed entity has provided all the required disclosure(s) Yes under Regulation 51 along with Schedule III of Listing Regulations within the time limits prescribed thereunder	Yes	None
10	Prohibition of Insider Trading The listed entity is in compliance with the Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	The entity is in conformity with SEBI (Prohibition of Insider Trading) Regulations, 2015, however the following non-compliance has been observed:- (i) The company has confirmed that SDD Software is functional. However, it has been informed by the company that all





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			disclosures are first prepared in excel format on regular basis and are updated by the company on SDD Software at the end of the year.
11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the listed entity/ its/ promoters/ directors/ subsidiaries either by SEBI or by the stock exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	No	None
12	<u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	Yes	During the financial year, the existing Statutory Auditor of the Company resigned from the office of Statutory Auditor. The Board of Directors, based on the recommendation of the Audit Committee, appointed Sharp Aarth & Co LLP as Statutory Auditors of the Company in accordance with the provisions of the Companies Act, 2013 and applicable rules made thereunder. The Company has complied with all applicable





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			statutory and regulatory requirements in this regard.
13	<u>Additional Non-Compliances, if any:</u> No. any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc	No	None

Assumptions & limitation of scope and review:

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

For, Akshay R. Birla and Associates,

CS Akshay R. Birla

Practicing Company Secretary

M. No.: 67250

CP. No.: 25084

PR No.: 5938/2024

UDIN: A067250H000330876



Date: 11/05/2026.

Place: Jalgaon