



BPTL/ Sec/08/2026-27

May 30, 2026

To,
The Manager
BSE Limited
P.J. Towers, Dalal Street,
Mumbai-400001

Scrip Code-522105

Sub: Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2026

Dear Sir/Ma'am,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended March 31, 2026. The same is also available on the website of the Company i.e. www.birlaprecision.com
You are requested to take the above information on record.

Thanking you,

Yours faithfully,
For Birla Precision Technologies Limited

Sweta Gupta
Company Secretary & Compliance Officer

Encl: A/a

Birla Precision Technologies Limited

Regd. Office: Dalamal House, First Floor, Jamnalal Bajaj Marg, Nariman Point, Mumbai 400 021

Tel.: +91 022-66168400

E-mail : info@birlaprecision.com **Website :** www.birlaprecision.com

An ISO 9001:2000 & ISO 14001:2004 **Company CIN:** L29220MH1986PLC041214

AVS & ASSOCIATES

Company Secretaries

(Peer-Reviewed Firm)

Regd. Office: 305, 3rd Floor, Sector 1, Building No.2, Millennium Business Park, Mahape, Navi
Mumbai - 400710, Maharashtra, India

Email: info@avsassociates.co.in

Tel: 022-48012494

Annual Secretarial Compliance Report
Birla Precision Technologies Limited for the year ended March 31, 2026

We, **AVS & Associates, Practising Company Secretaries**, have examined:

- (a) All the documents and records made available to us and the explanation provided by Birla Precision Technologies Limited (**"the Company or Listed Entity"**);
- (a) The filings/submissions made by the listed entity to the Stock Exchange, i.e. BSE Limited (**"BSE"**);
- (b) Website of the Listed Entity;
- (c) Any other document/filing, as may be relevant, which has been relied upon to make this Report;

for the financial year ended March 31, 2026 (**"Review Period"**) in respect of compliance with the provisions of:

- (b) The Securities and Exchange Board of India Act, 1992 (**"SEBI Act"**) and the Regulations, circulars, and guidelines issued thereunder; and
- (c) The Securities Contracts (Regulation) Act, 1956 (**"SCRA"**), rules made thereunder and the Regulations, circulars, and 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**'SEBI (LODR) Regulations, 2015'**);
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (**'SEBI (ICDR) Regulations, 2018'**);
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (**Not applicable to the Company during the review period**);
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (**Not applicable to the Company during the review period**);
- (f) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (**Not applicable to the Company during the review period**);

- (g) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(Not applicable to the Company during the review period)**;
- (h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 **(‘SEBI (PIT) Regulations, 2015’)**;
- (i) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and circulars/guidelines issued thereunder applicable to the listed entity.

and based on the above examination, we 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.	01
Compliance Requirement (Regulations/circulars/ guidelines including specific clauses)	As per Regulation 6(1) & 6(1A) of the SEBI (LODR) Regulations, 2015, every listed entity is required to appoint a qualified Company Secretary (CS) as the Compliance Officer and fill any vacancy in the office of the Compliance Officer at the earliest and in any case not later than three months from the date of such vacancy.
Regulation / Circular No.	Regulation 6 (1) & 6(1A) of the SEBI (LODR) Regulations, 2015
Deviations	The vacancy in the office of Compliance Officer was filled with a delay of 61 days, as the appointment of a qualified CS was not made within the prescribed timeline.
Action Taken by	BSE.
Type of Action	Imposition of Fine
Details of Violation	Non-compliance with the requirement to appoint a qualified CS as Compliance Officer under 6(1) & 6(1A) of SEBI (LODR), Regulations, 2015.
Fine Amount	Rs. 61,000/- excluding GST
Observations/Remarks of the Practicing Company Secretary	There was a delay of 61 days in the appointment of a qualified Company Secretary as the Compliance Officer of the Company, as required under Regulations 6(1) and 6(1A) of the SEBI (LODR) Regulations, 2015.
Management Response	The delay was due to practical challenges in identifying a suitable candidate. The Company has since appointed a qualified Company Secretary as Compliance Officer and duly paid the fine to the stock exchange.
Remarks	-

Sr. No.	02	
Compliance Requirement (Regulations/circulars/ including specific clauses)	Requirement guidelines	As per Regulation 162 of the SEBI (ICDR) Regulations,2018, the tenure of convertible securities shall not exceed eighteen (18) months from the date of allotment. Upon exercise of the conversion option by the allottee within such tenure, the issuer shall complete allotment of equity shares within fifteen (15) days from the date of such exercise.
Regulation / Circular No.		Regulation 162 of the SEBI (ICDR) Regulations,2018, read with SEBI Circular SEBI/HO/CFD/PoD-2/P/CIR/2023/00094 dated June 21, 2023.
Deviations		The conversion of warrants into equity shares and the subsequent allotment were not completed within the prescribed timeline.
Action Taken by		BSE.
Type of Action		Imposition of Fine
Details of Violation		Non-compliance with Regulation 162 of SEBI (ICDR) Regulations,2018 read with SEBI Circular SEBI/HO/CFD/PoD-2/P/CIR/2023/00094 dated June 21, 2023 with respect to the conversion of warrants into equity shares within a period of 18 months
Fine Amount		Rs. 40,000/- excluding GST
Observations/Remarks of the Practicing Company Secretary		The Company has not adhered to the prescribed timeline for conversion of warrants into equity shares and the consequent allotment of such equity shares, resulting in a delay of 2 days.
Management Response		The delay was due to an interpretational issue. Consequently, the Company has paid the fine imposed by the stock exchange.
Remarks		-

Sr. No.	03	
Compliance Requirement (Regulations/circulars/ including specific clauses)	Requirement guidelines	As per Regulation 26A (2) of the SEBI (LODR) Regulations, 2015, any vacancy in the office of the Chief Financial Officer (“CFO”) of a listed entity shall be filled by the entity at the earliest and in any case not later than three months from the date on which such vacancy arises.
Regulation / Circular No.		Regulation 26A (2) of the SEBI (LODR) Regulations, 2015.
Deviations		The Listed Entity was required to fill the vacancy of CFO within three months from the date of the vacancy but was unable to do so within the prescribed regulatory timeline.
Action Taken by		-
Type of Action		-
Details of Violation		The vacancy arose due to the resignation of the CFO with effect from August 02, 2025. However, the same has not been filled within the prescribed timeline of three months from the date of such vacancy.
Fine Amount		-
Observations/Remarks of the Practicing Company Secretary		The position of CFO has remained vacant since August 02, 2025, beyond the period prescribed under Regulation 26A(2) of the SEBI (LODR) Regulations, 2015.
Management Response		The Company is in the process of appointing a suitable candidate for the said position and is taking necessary steps to ensure continued compliance with applicable regulatory requirements
Remarks		-

Sr. No.	04	
Compliance Requirement (Regulations/circulars/ including specific clauses)	Requirement guidelines	As per Regulation 31 (2) of the SEBI (LODR) Regulations, 2015, the listed entity shall ensure that 100 (hundred) percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the SEBI.
Regulation / Circular No.	Regulation 31 (2) of the SEBI (LODR) Regulations, 2015.	
Deviations	The Company could not achieve complete dematerialisation of the shareholding held by the promoter(s) and promoter group up to March 08, 2026, since some of the shares continued to remain in physical form during the review period.	
Action Taken by	-	
Type of Action	-	
Details of Violation	Mr. Yashovardhan Birla, forming part of the Promoter category of the Listed Entity, was holding 25,851 shares in physical form till March 08, 2026.	
Fine Amount	-	
Observations/Remarks of the Practicing Company Secretary	The shares held by Mr. Yashovardhan Birla, forming part of the Promoter/Promoter Group, remained in physical form up to March 08, 2026 and were dematerialised with effect from March 09, 2026.	
Management Response	The Company is presently in full compliance with the requirement relating to 100% dematerialisation of promoter/promoter group.	
Remarks	-	

(b) The listed entity has taken the following actions to comply with the observations made in the previous report of 31.03.2025

Sr. No.	Not Applicable
Observations/ Remarks of the Practicing Company Secretary in the previous report	
Observations made in the secretarial compliance report for the year ended 31.3.2024	
Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	
Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	
Remedial actions, if any, taken by the listed entity	
Comments of the PCS on the actions taken by the listed entity	

(c) We hereby report that, during the review period, the compliance status of the listed entity with the following requirements:

NO.	PARTICULARS	COMPLIANCE STATUS (YES/NO/NA)	OBSERVATIONS/REMARKS BY PCS
01.	<p>Secretarial Standards:</p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).</p>	YES	-
02.	<p>Adoption and timely updation of the Policies:</p> <p>(a) All applicable policies under SEBI Regulations are adopted with the approval of the board of directors of the listed entities</p> <p>(b) All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.</p>	YES	-
03.	<p>Maintenance and disclosures on the Website:</p> <p>a) The Listed entity is maintaining a functional website</p> <p>b) Timely dissemination of the documents/ information under a separate section on the website</p> <p>c) Web links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/section of the website.</p>	YES	-
04.	<p>Disqualification of Director:</p> <p>None of the Directors (s) of the Company is/ are disqualified under Section 164 of the Companies Act, 2013 as confirmed by the listed entity.</p>	YES	-

05.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	<p>(a) NA</p> <p>(b) YES</p>	<p>(a) During the review period, the Company did not have any material subsidiaries.</p> <p>(b) -</p>
06.	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per the Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	YES	-
07.	<p>Performance Evaluation:</p> <p>The listed entity has conducted a performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	YES	-
08.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of the Audit Committee for all related party transactions; or</p> <p>(b) In case no prior approval is obtained, the listed entity shall provide detailed reasons along with confirmation of whether the transactions were subsequently approved/ratified / rejected by the Audit committee.</p>	<p>(a) YES</p> <p>(b) NA</p>	<p>(a) -</p> <p>(b) Please refer to point no. 8(a)-</p>
09.	<p>Disclosure of events or information:</p> <p>The listed entity has generally provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	YES	-

10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	The Company needs to enhance its procedures and systems to effectively record the flow of UPSI within the SDD system on a timely basis.
11.	Actions taken by SEBI or Stock Exchange(s), if any: No actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder or the actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NO	No actions were taken by SEBI or by the Stock Exchanges during the review period except which is reported in Table (01) and (02) of (a) as mentioned above
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: 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.	NA	No such event of the resignation of a statutory auditor occurred during the review period.
13.	Additional non-compliances, if any: No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.	YES	-

Assumptions and Limitations of the Scope and Review:

- i. Compliance with the applicable laws and ensuring the authenticity of documents and information furnished are the responsibilities of the management of the Listed entity;
- ii. Our responsibility is to report based on our examination of relevant documents and information. This is neither an audit nor an expression of opinion;
- iii. We have not verified the correctness and appropriateness of the financial Records and Books of Accounts of the listed entity;
- iv. 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; and

- v. Accordingly, we do not accept or assume any liability or duty of care for any other purpose or to any other person to whom this report is shown or whose hands it may come without our prior consent in writing.

**For AVS & Associates
Company Secretaries**

**Shashank Ghaisas
Partner
Membership No: F11782
CP No: 16893
Peer Review No: 1451/2021
UDIN: F011782H000528859**

**Place: Navi Mumbai
Date: May 29, 2026**