

To,  
Department of Corporate Services,  
BSE Limited,  
Floor 25, P.J. Towers,  
Dalal Street,  
Mumbai-400 001

Date: 15<sup>th</sup> November, 2022

Scrip Code: 522105

Dear Sir/ Madam,

**Sub: Application under Regulation 37 of the SEBI (Listing Obligations and Disclosure Requirements). Regulations. 2015 and Master Circular on Scheme of Arrangement by Listed Entities SEBI/HO/CFD/DIL1/CIR/P/2021/0000000665 November 23, 2021 for the proposed Scheme of Arrangement between Birla Precision Technologies Limited ("the Demerged Company" or "BPT Limited ") and Birla Accucast Private Limited ("the Resulting Company" or "BAPL") and their respective shareholders ("the Scheme")**

This is in continuation to your queries raised on 09<sup>th</sup> November, 2022 with reference to application filed under Regulation 37 of the SEBI (Listing Obligations and Disclosure Requirements). Regulations. 2015 on 23<sup>rd</sup> September, 2022. We have responded to the queries as raised by your good office and attached required Annexures. Hope you find it satisfactory

1. Shareholding pattern of all the companies pre and post Amalgamation / Arrangement as per the format provided under Regulation 31 of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 (with PAN & without PAN Nos.): Initial Tables missing. -

**Reply: - We are resubmitting the Shareholding Pattern as per Regulation 31 with PAN and without PAN.**

2. Detailed Compliance Report as per the format specified in Annexure IV of SEBI circular dated March 10, 2017 duly certified by the Company Secretary, Chief Financial Officer and the Managing Director, confirming compliance with various regulatory requirements specified for schemes of arrangement and all accounting standards (format attached as Annexure VI): Incorporate the status as on date of the compliance and provide clarification as to why MD has not certified the same.

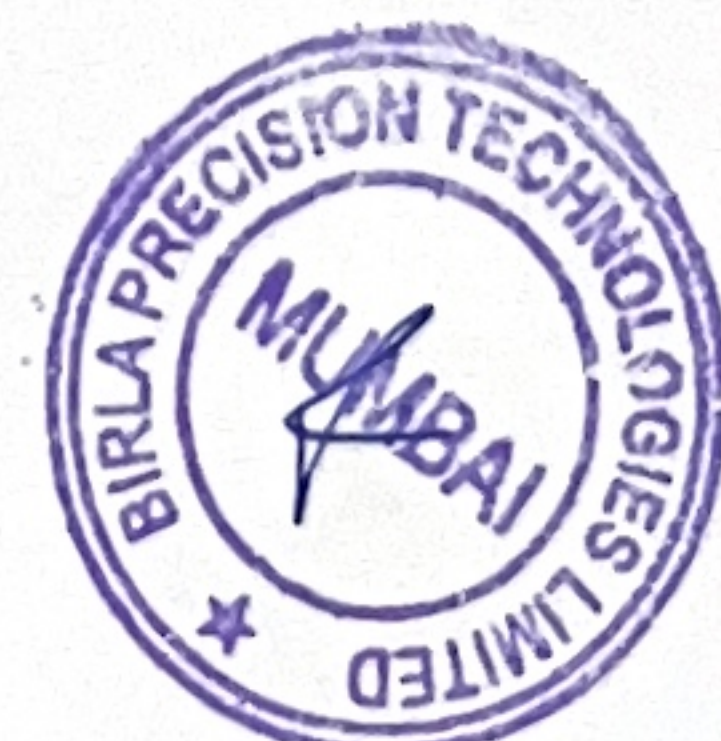
**Reply- We were under the impression that that Annexure signed by the ED would suffice, but we had rectified our submission as we had already submitted the one signed by the Managing Director in our response dated 07/10/2022.**

3. Incorporate all the details for both the companies in Brief particulars- Annexure VIII.

**Reply- The details of both the Companies has been incorporated in the attached Annexure VIII**

4. Net worth certificate (excluding Revaluation Reserve) together with related workings pre and post scheme for the transferee and / or resulting company.

**Reply- We are submitting Net Worth Certificate with related workings for PRE/POST Demerger for the Resulting Company.**



**Birla Precision Technologies Limited**

Regd. Office : 23 Birla Mansion No. 2, 1st Floor, D. D. Sathe Marg, Prathana Samaj, Mumbai - 400 004.  
Tel. No.: +91 022-23825060

E-mail : info@birlaprecision.com Website :www.birlaprecision.com  
An ISO 9001:2000 & ISO 14001:2004 Company CIN: L29220MH1986PLC041214

5. Provide the link of the website in Confirmation by the Managing Director/ Company Secretary as per format enclosed as Annexure XI.

Reply- We have mentioned the required website link displaying all the documents uploaded on Company's website in Annexure XI.

6. No clause regarding fractional entitlement is found in the draft scheme: Not included in the draft scheme.

Reply- Please herein find the required fractional entitlement clause in the draft scheme under point 11.10.

7. Confirmation from the Managing Director/ Company Secretary: Reason for its non-applicability: Additional documents for demerger: Signed by Director and not MD or CS.

Reply- As required we are resubmitting the required Annexure XIII, as were under the impression, the Managing Director has also signed the Annexure, as we were earlier under the impression that, either of the Managing Director or Company Secretary can sign the annexure.

8. Undertaking that the transferee entity will not issue/reissue shares not covered under the draft scheme.: To be confirmed by Listed company. (ii) Undertaking that as on date of application there are no outstanding Warrants/instruments/agreements which give right to any person to take the equity shares in the transferee entity at any future date: To be confirmed by listed company.

Reply- We are submitting Annexure XXIV as a confirmation by the Listed Company stating that there are no outstanding warrants/instruments/agreements.

Hope the above documents are as per the requirement.

If any further information is required, please let us know:

<b>Details of Authorized Person:</b>	
Mr. Parth Matolia	Contact No.+91-9833186025
Designation: Company Secretary	Email ID: cs@birlaprecision.com

Please consider the above facts and grant us No objection letter

For, Birla Precision Technologies Limited

  
  
**Parth Matolia**  
**Company Secretary & Compliance Officer**