

Ref: DIL/SEC/2026-27  
May 27, 2026

The Listing Manager  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai -400001

Scrip Code- 500068  
Name of the Company - DISA India Limited

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2026.**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with relevant SEBI Circulars issued from time to time, please find attached the Annual Secretarial Compliance Report issued by M/s GDR & Partners LLP, Company Secretaries, for the Financial Year ended March 31, 2026.

This is for your information and records.

Yours sincerely,  
**For DISA India Limited,**

Shrithee M S  
Company Secretary & Compliance Officer

Encl: As above

---

#### DISA India Limited

**Registered & Corporate Office:**

6th Floor, S-604, World Trade Center (WTC), Brigade Gateway Campus, 26/1, Dr. Rajkumar Road, Malleswaram-Rajajinagar, Bangalore-560 055, Karnataka, India  
T: +91 80 2249 6700 – 03 | F: +91 80 2249 6750 | E: bangalore@norican.com  
CIN: L85110KA1984PLC006116 | GST: 29AAACG5030F1ZY

**Regional Sales:**

**New Delhi:** delhi@norican.com  
**Kolkata:** kolkata@norican.com  
**Pune:** pune@norican.com  
**Parts & Services:** cdc.india@norican.com

**Manufacturing Facility:**

**Tumkur:** No. 28-32, Satyamangala Industrial Area, Tumkur – 572104, Karnataka, India  
T: +91 816 6602000/01  
E: tumkur@norican.com

**Secretarial Compliance Report of DISA India Limited**  
**for the financial year ended 31<sup>st</sup> March, 2026.**

We **GDR & Partners LLP**, have examined:

- (a) All the documents and records made available to us and explanation provided by **DISA India 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 Report, **for the financial year ended 31<sup>st</sup> 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 [**Not Applicable**];
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; [**Not Applicable**];
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 [**Not Applicable**];
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; [**Not Applicable**];
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 [**Not Applicable**];
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars and guidelines issued thereunder;



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.	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action (Advisory/ Clarification/ Fine/Show Cause Notice /Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
<b>NIL</b>										

(b) The Listed entity has taken the following actions to comply with the observations made in previous reports.

Sr. No.	Observations/ Remarks of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended March 31, 2025	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
<b>NIL</b>						

I. We hereby report that, during the review period the compliance status of the listed entity with the following requirements:



Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations /Remarks by PCS*
1.	<p><b>Secretarial Standards:</b></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).</p>	Yes	-
2.	<p><b>Adoption and timely updation of the Policies:</b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/ circulars/guidelines issued by SEBI.</li> </ul>	Yes  Yes	-  -
3.	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>• The Listed entity is maintaining a functional website</li> <li>• Timely dissemination of the documents/ information under a separate section on the website.</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.</li> </ul>	Yes  Yes  Yes	-  -  -
4.	<p><b>Disqualification of Director(s):</b></p> <p>None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	-



5.	<p><b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b></p> <p>a) Identification of material subsidiary companies.</p> <p>b) Disclosure requirement of material as well as other subsidiaries.</p>	<p>N.A.</p> <p>Yes</p>	<p>The listed entity does not have any material subsidiary companies.</p> <p style="text-align: center;">-</p>
6.	<p><b>Preservation of Documents:</b></p> <p>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 SEBI LODR Regulations, 2015.</p>	<p>Yes</p>	<p style="text-align: center;">-</p>
7.	<p><b>Performance Evaluation:</b></p> <p>The listed entity has conducted 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>	<p>Yes</p>	<p style="text-align: center;">-</p>
8.	<p><b>Related Party Transactions:</b></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved / ratified / rejected by the Audit committee.</p>	<p>Yes</p> <p>Yes</p>	<p>The listed entity has obtained prior approval as well as ratified certain related party transactions subsequently by the Audit Committee.</p>
9.	<p><b>Disclosure of events or information:</b></p> <p>The listed entity has 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>	<p>Yes</p>	<p style="text-align: center;">-</p>



10.	<b>Prohibition of Insider Trading:</b>  The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  No action(s) has been 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.	Yes	-
12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b>  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	-
13.	<b>Additional non-compliances, if any:</b>  No additional non-compliance observed for any SEBI regulation/ circular/guidance note etc. except as reported above.	Yes	-

We further, report that compliance requirements with respect to Employee Benefits Scheme Documents in terms of regulation 46 (2) (za) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 **is not applicable to listed entity**.

Note:

- a. During the year under review, the listed entity has received emails from BSE Limited indicating certain Discrepancies observed in the Integrated Governance Report filed for the quarter ended March 31, 2025 and in website disclosure as per Regulation 46 of SEBI (LODR) Regulations, 2015. The Listed entity has appropriately replied to the above observation.



- b. The Listed entity has filed the revised integrated Consolidated and Standalone Financial Result for the quarter and half year ended September 30, 2025.
- c. SEBI vide their letter dated April 23, 2026, to the listed entity has sent an Administrative Warning letter for non-disclosure of whistle-blower complaints in the Annual Report of Financial year 2023-24 and 2024-25. The Listed entity has replied to the same.

**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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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 GDR & Partners LLP,  
Company Secretaries  
ICSI Firm Registration No: L2024KR016500**



*[Signature]*  
**CS Nagendra D Rao  
Partner**

Membership No. FCS – 5553  
Certificate of Practice – 7731  
Peer Review Certificate: 6014/2024  
UDIN: F005553H000399628

Place: Bengaluru  
Date : May 19, 2026