Aspira Pathlab & Diagnostics Limited
Regd. Office: Flat No. 2, R D Shah Building, Shraddhanand Road, Opp. Railway Station, Ghatkopar (W), Mumbai 400 086
Corporate Office: 6 & 7, Bhaveshwar Arcade, Near Shreyas Junction LBS Marg, Behind Saraswat Bank, Ghatkopar (W), Mumbai-400086
CIN: L85100MH1973PLC289209

Date: November 26, 2026

To,
BSE Limited
Listing Department
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai – 400001

Security Code: 540788
Security ID: ASPIRA

Sub: Disclosure under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 – Receipt of Warning-cum-Advisory Letter from SEBI

Ref: Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we wish to inform you that the Company has received a Warning-cum-Advisory Letter dated November 9, 2026, issued by the Securities and Exchange Board of India (SEBI) in relation to non-compliance with Regulation 31(4) read with Regulation 31(1)(b) of the SEBI (LODR) Regulations, 2015.

The observations made by SEBI, Mr. Jay Arvind Bhanushali is the son of the promoters, Mr. Arvind Karsandas Bhanushali and Mrs. Deepali Arvind Bhanushali, and was reflected under the Public Shareholder category in the shareholding patterns filed with BSE for thirteen consecutive quarters, commencing from the quarter ended March 31, 2023, up to the quarter ended March 31, 2026. Further, Mrs. Ruxmani Jayant Bhansali, being the mother of Mrs. Deepali Arvind Bhanushali, was also reflected under the Public Shareholder category.

In this regard, SEBI has advised the Company to file revised shareholding patterns with BSE from the quarter ended March 31, 2023, up to the quarter ended March 31, 2026.

Corrective Actions Taken by the Company:

The Company has taken note of the observations made by SEBI and has initiated corrective measures. Accordingly, the Company has revised the classification of the aforesaid individuals as follows:

1. **Mr. Jay Arvind Bhanushali** – Reclassified to Promoter.
2. **Mrs. Ruxmani Jayant Bhansali** – Reclassified to Promoter Group.

The Company has undertaken the necessary corrective action by filing revised shareholding patterns with BSE for the relevant quarters, reflecting the aforesaid reclassification.

The aforesaid Warning-cum-Advisory Letter along with the corrective actions taken by the Company will be placed before the Board of Directors at its ensuing meeting for consideration and noting.

A copy of the SEBI letter dated November 9, 2026, is enclosed herewith for your reference and records.

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CIN: L85100MH1973PLC289209

Kindly take the above information on record.

Thanking You,

For **Aspira Pathlab & Diagnostics Limited**

Nikunj Velji Mange

Digitally signed by Nikunj Velji Mange
Date: 2026.11.26 16:37:56 +05'30'

Nikunj Velji Mange
Managing Director
DIN: 08489442

General Manager
Division of Supervision, Enforcement and Complaints - I (SEC-1)
Corporation Finance Department

I/ 25434 / 2026
November 9, 2026

Through E-mail and SPAD

Aspira Pathlab & Diagnostics Limited
Flat No. 2, R D Shah Building, Shraddhanand Road,
Opp. Railway Station, Ghatkopar (West),
Mumbai - 400 086, Maharashtra.

Sub: Warning-cum-Advisory Letter in relation to non-compliance with Regulation 31(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, in the matter of Aspira Pathlab & Diagnostics Limited.

Sir/Madam,

1. As per exchange filings and your communication with stock exchanges, it has been observed that two relatives of the promoters of Aspira Pathlab & Diagnostics Limited ("the Company") were shown under the public category in the shareholding patterns filed by the Company.

2. Under Regulation 31(1)(b) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations"), a listed entity is required to submit its shareholding pattern to the stock exchanges every quarter. Under Regulation 31(4), all entities falling under promoter and promoter group are to be disclosed separately in the shareholding pattern. Under Regulation 2(1)(w) of the LODR Regulations, read with Regulation 2(1)(pp)(ii) of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, the promoter group includes a parent or a child of the promoter.

3. As per the available records, Shri Jay Arvind Bhanushali is the son of the promoters Shri Arvind Karsandas Bhanushali and Smt. Deepali Arvind Bhanushali. He was shown under the public category in the shareholding patterns filed by the Company with BSE Limited ("BSE") for thirteen quarters, from the quarter ended March 31, 2023 to the quarter ended March 31, 2026. Smt. Ruxmani Jayant Bhansali, mother of Smt. Deepali Arvind Bhanushali, was also shown under the public category.

4. In your reply to BSE dated June 29, 2026, it was stated that the two persons were inadvertently so classified. They were shown them under promoter and promoter group

from the quarter ended June 30, 2026. BSE advised the Company to make the appropriate filings for all the relevant periods. As on November 3, 2026, you have not revised the shareholding patterns for the earlier quarters.

5. The Company is, therefore, observed not to have complied with Regulation 31(4) read with Regulation 31(1)(b) of the LODR Regulations.

6. The aforesaid non-compliance has been viewed seriously. The Company is hereby warned to be careful in future and to improve its compliance standards to avoid recurrence of such instances, failing which appropriate enforcement action may be initiated in accordance with the law.

7. The Company is advised to file with BSE, forthwith, revised shareholding patterns for every quarter in which either of the said persons was shown under the public category.

8. The Company is also advised to disclose this letter to the stock exchange under Regulation 30 of the LODR Regulations, and to place it, along with the corrective steps taken, before its Board of Directors at its next meeting.

Yours faithfully,

Sareena P U

The issuance of this document may be verified on the web-page accessible through the QR code printed here or from the link - https://www.sebi.gov.in/sebiweb/dnvs-authentication-v2.html .