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 27, 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 (In continuation of the disclosure dated November 26, 2026).

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

Dear Sir/Madam,

The details of the aforesaid regulatory action are as follows:

Name of the authority	**Nature and details of the action(s) taken or order(s) passed;**	**Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;**	**Details of the violation(s)/contravention(s) committed or alleged to be committed;**	**Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.**	**Corrective Actions Taken by the Company:**
Securities and Exchange Board of India (SEBI).	SEBI has issued a Warning-cum-Advisory Letter to the Company in relation to the classification of two relatives of the promoters under the Public Shareholder category in the shareholding patterns filed by the Company. As observed by SEBI, Mr. Jay Arvind Bhanushali is the son of the promoters, Mr.	The Company received the Warning-cum-Advisory Letter dated November 9, 2026.	The matter relates to the incorrect classification of the aforesaid individuals under the Public Shareholder category in the quarterly shareholding	The communication is in the nature of a Warning-cum-Advisory Letter. No monetary penalty or fine has been imposed by SEBI under the aforesaid letter. The	Upon receipt of the aforesaid communication, the Company examined the observations made by SEBI and undertook the necessary

	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. SEBI observed that the aforesaid classification was not in accordance with the applicable provisions of Regulation 31(4) read with Regulation 31(1)(b) of the SEBI (LODR) Regulations, 2015.		patterns filed by the Company, resulting in non-compliance with Regulation 31(4) read with Regulation 31(1)(b) of the SEBI (LODR) Regulations, 2015.	matter relates to compliance with the applicable shareholding disclosure requirements and does not involve any direction for suspension or closure of the Company's operations.	corrective measures. Accordingly, the Company has revised the classification of the concerned individuals as follows: a. Mr. Jay Arvind Bhanushali – Reclassified from Public Shareholder to Promoter. b. Mrs. Ruxmani Jayant Bhansali – Reclassified from Public Shareholder to Promoter Group. The Company has accordingly filed the revised shareholding patterns with BSE for the relevant quarters, reflecting the aforesaid reclassificati on, on

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					November 26, 2026.

The Company received the aforesaid Warning-cum-Advisory Letter on November 9, 2026. Upon receipt of the same, the Company took due cognizance of the observations made by SEBI and undertook a detailed examination of the relevant shareholding records and classification of the concerned individuals to ensure appropriate rectification of the matter.

The Company accorded priority to addressing the observations raised by SEBI and undertook the necessary corrective measures. Accordingly, the classification of the concerned individuals was revised and the revised shareholding patterns for the relevant quarters were filed with BSE on November 26, 2026.

The Company respectfully submits that the time taken in making the present disclosure was utilized towards examination of the observations, verification of historical shareholding records and completion of the necessary corrective measures to ensure proper rectification of the matter. The delay was neither deliberate nor with any intention to withhold, suppress or conceal any information from the Stock Exchange.

The Company has acted in good faith and has taken the observations made by SEBI in the right spirit. The Company has also initiated measures to further strengthen its internal compliance, review and verification mechanisms to ensure accuracy and timely reporting of regulatory information and to avoid recurrence of similar instances.

In view of the foregoing, the Company respectfully requests the Stock Exchange to take note of the corrective measures undertaken and the bona fide efforts made by the Company, and to consider the circumstances surrounding the timeline of disclosure favorably.

A copy of the Warning-cum-Advisory Letter dated November 9, 2026, issued by SEBI is enclosed herewith for your kind reference and records.

Kindly take the above information on record.

Thanking You,

For **Aspira Pathlab & Diagnostics Limited**

Nikunj Velji Mange

Digitally signed by Nikunj Velji Mange
Date: 2026.11.27 17:04:54 +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 .