

Date: May 29, 2026

To, The Manager Listing Department Bombay Stock Exchange (BSE) Phiroze Jeejeebhoy Towers Dalal Street Mumbai - 400 001 Scrip Code: 544235	To, The Manager Listing Department National Stock Exchange (NSE) Exchange Plaza, 5th Floor Plot No. C/1, G-Block Bandra-Kurla Complex Bandra (E), Mumbai - 400 051 Symbol: ORIENTTECH
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Subject: Annual Secretarial Compliance Report for the year ended 31st March 2026 under Regulation 24A of SEBI (LODR) Regulations, 2015.

Dear Sir/Ma'am,

Pursuant to Regulation 24A (2) of SEBI (LODR) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report issued by M/s Alwyn Jay & Co. (FRN- P2010MH021500) for the year ended 31st March, 2026.

Thanking you,

For ORIENT TECHNOLOGIES LIMITED

Ajay Baliram Sawant
Chairman and Managing Director
DIN:00111001



Alwyn Jay & Co. Company Secretaries

[Firm Registration No: P2010MH021500] [Peer Review Certificate No.5936/2024]

Annex-103, Dimple Arcade, Asha Nagar, Kandivali (East), Mumbai 400101.

Branch Office: B-002, Gr. Floor, Shreepati-2, Royal Complex, Behind Olympia Tower, Mira Road (E), Thane-401107 ; Tel: 022-79629822 ; Mob: 09820465195; 09819334743

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Secretarial Compliance Report of Orient Technologies Limited (CIN - L64200MH1997PLC109219) for the Financial Year ended 31st March, 2026

We have examined:

- (a) all the documents and records made available to us and explanations provided by **Orient Technologies Limited** (hereinafter called "the Company"),
- (b) the fillings/submissions made by the Company to the stock exchanges,
- (c) Website of the Company.
- (d) Any other relevant documents/filing, as may be relevant, which has been relied upon to make this Report,

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

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and Regulations, circulars, guidelines issued thereunder and,

(b) the Securities Contract (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, as amended from time to time, whose provisions and the circulars/guidelines issued thereunder, have been examined, include:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulation 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not Applicable as there was no reportable event during the review period;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 - **Not Applicable as there was no reportable event during the review period;**
- (f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 - **Not Applicable as there was no reportable event during the review period.**
- (g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025 regarding the Companies Act and dealing with client - **Not Applicable to the Company during the Review Period;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation 2015;
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021- **Not Applicable to the Company during the Review Period;**

(j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and other relevant circulars/guidelines issued thereunder;

and based on the above examination, we hereby report that, during the Review Period:

(a) The Company has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder except in respect of the matters specified below:

Sr. No.	Compliance Requirement (Regulations / Circulars /Guidelines including specific clause)	Regulation /Circular	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary	Management Response	Remarks
					Advisory/ Clarification/ Fine/Show Cause Notice/ Warning etc.					
1.	Investigation in the matter of alleged insider trading in the scrip of the Company	Information sought by SEBI under the provisions of Sections 11 (2) (ia) of the SEBI Act, 1992 in the matter of alleged insider trading in the Scrips of the Company by the persons including	Alleged insider trading in the scrip of the Company by the persons having access to or in possession of the UPSI with respect to audited financial results for the quarter ended September 30,	SEBI	An Email received by the Company on 31/12/2025, 28/02/2026 and 02/03/2026 from Investigation Department	Alleged insider trading in the scrip of the Company by the persons having access to or in possession of the UPSI with respect to audited	NIL	The Company has received an email from the Investigation Department of SEBI on 31/12/2025, 28/02/2026 and 02/03/2026 pertaining to the information	The Company has submitted the information and details sought by SEBI from time to time, including its reply dated March 06, 2026, and is awaiting further	The Company is awaiting further communication from SEBI's Investigation Department.

		<p>promoters/ director/ KMPs/ designated persons/consultants and/or any other persons (whether connected to company or not) who were involved in the process of/ having access to and/ or in possession of the Unpublished Price Sensitive Information (UPSI) at each stage in sequential order with respect to audited financial results for the quarter ended September 30, 2024</p>	2024		<p>of SEBI with respect to the Investigation in the matter of alleged insider trading in the scrip of the Company</p>	<p>financial results for the quarter ended September 30, 2024</p>		<p>sought in respect of an investigation in the matter of alleged insider trading in the scrip of the Company by the persons having access to or in possession of the UPSI with respect to audited financial results for the quarter ended September 30, 2024. In this connection, the Company has submitted the reply on March 06, 2026 along with required documents and information.</p>	<p>communication from SEBI in this regard. SEBI has also issued warning letters to the insiders concerned for the violations.</p>	
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(b) The Company has taken the following actions to comply with the observation made in previous reports:

Sr. No.	Observations/ Remarks of the Practicing Company Secretary (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended March 31, 2025 (The years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / Deviations and actions taken penalty imposed, if any, on the Company	Remedial actions, if any, taken by the Company	Comments of the PCS on the actions taken by the Company
1.	The Company has failed to file the disclosure of related party transactions on consolidated basis to BSE Limited (BSE) and National Stock Exchange of India Limited (NSE) for the Half-Year ended 30 th September 2024 within the prescribed time-lines.	The Company has failed to file the disclosure of related party transactions on consolidated basis to BSE and NSE for the Half-Year ended 30 th September 2024 within the time-lines as prescribed under Regulation 23 (9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation 2015	Regulation 23 (9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation 2015 – Submission of disclosure of related party transactions on consolidated basis.	Fine of Rs. 80,000/plus GST imposed by BSE and NSE each for the Delay in filing disclosure of related party transactions on consolidated basis with the Stock Exchanges by 3 days.	The Company has paid the penalty and Steps are being taken to ensure timely communication and filings in the future.	The Company has paid the penalty and Steps are being taken to ensure timely communication and filings in the future.

We hereby report that, during the review period the compliance status of the Company with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1.	<p><u>Secretarial Standards:</u></p> <p>The compliances of the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).</p>	Yes	None
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company. • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/ guidelines issued by SEBI. 	Yes	None
3.	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none"> • The Company is maintaining a functional website • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate 	Yes	None

	governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website.		
4.	<u>Disqualification of Director:</u> None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Company.	Yes	None
5.	<u>Details related to Subsidiaries of the Company have been examined w.r.t.:</u> (a) Identification of material subsidiary companies. (b) Requirements with respect to disclosure of material as well as other subsidiaries.	Not Applicable	The Company does not have a material subsidiary.
6.	<u>Preservation of Documents:</u> The Company 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.	Yes	None
7.	<u>Performance Evaluation:</u> The Company has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations.	Yes	None

8.	<u>Related Party Transactions:</u> (a) The Company has obtained prior approval of Audit Committee for all Related party transactions (b) In case no prior approval obtained, the Company shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee.	Yes	None
9.	<u>Disclosure of events or information:</u> The Company 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.	Yes (subject to deviation mentioned in the report)	None
10.	<u>Prohibition of Insider Trading:</u> The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u> No Actions taken against the Company/ 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 (subject to deviation mentioned in the report)	Please refer to point (a) above

12	<u>Resignation of Statutory Auditors from the Company or its Material Subsidiaries</u> case of resignation of statutory auditor from the Company or any of its material subsidiaries during the financial year, the Company 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 Company.	Not Applicable, as no reportable event during the review period	None
13.	<u>Additional non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.	Not Applicable	Not Applicable

We further, report that the Company is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations – **Not Applicable**.

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 Company.
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 Company.

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 Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Place : Mumbai

Date : 22nd May, 2026

ALWYN JAY & Co.

Company Secretaries

Office Address :

Annex-103, Dimple Arcade,
Asha Nagar, Kandivali (East),
Mumbai 400101.

[Jay D'Souza FCS.3058]

(Partner)

[Certificate of Practice No.6915]

[UDIN: F003058H000447073]