UNITED DRILLING TOOLS LTD.

CIN : L29199DL1985PLC015796

OIL DRILLING EQUIPMENT MANUFACTURING AND SERVICES

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Please Reply to Head Office
26th Floor, Astralis Tower, Supernova Complex, Sector-94, Noida - 201301, Distt. G B Nagar,Uttar Pradesh, India
E-mail : ENQUIRY@UDTLTD.COM
Website : WWW.UDTLTD.COM

29/05/2026

UDT/SEC/2026-27/BSE-18-NSE-18

To,
Department of Corporate Service
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai- 400001
Security ID - 522014

Listing Compliance Department
National Stock Exchange of India Ltd.
Exchange Plaza, C-1 Block-G,
Bandra Kurla Complex, Bandra (E),
Mumbai – 400051
Security ID - UNIDT

Sub: Annual Secretarial Compliance Report for the FY ended March 31, 2026

Dear Sir/Madam,

Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, enclosed herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2026 issued by M/s Agrawal Manish Kumar & Co., Practicing Company Secretary.

The disclosure is also being disseminated on the Company's website at www.udtltd.com.

This is for your information and record.

Thanking You,

Yours Faithfully,
For United Drilling Tools Limited

ANAND KUMAR MISHRA
Digitally signed by ANAND KUMAR MISHRA
Date: 2026.05.29 16:35:33 +05'30'

United Drilling Tools Ltd. New Delhi CIN:L29199DL1985PLC015796

Anand Kumar Mishra
Company Secretary
M. No. FCS-7207

Secretarial Compliance Report of United Drilling Tools Ltd for the financial year ended 31st March, 2026

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by United Drilling Tools Ltd **(hereinafter referred as 'the listed entity'),** having its Registered Office at **139A, First Floor, Antriksh Bhawan, 22, Kasturba Gandhi Marg, New Delhi -110001.** The Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Compliance Audit, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended March 31, 2026, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I, Manish Kumar Agrawal of M/s Agrawal Manish Kumar & Co., Company Secretaries, have examined:

a) all the documents and records made available to us and explanation provided by **United Drilling Tools Ltd("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 March 31, 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 during the review period;**

c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 **to the extent applicable**;

d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018, **Not Applicable during the review period;**

e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the review period;**

f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable during the review period;**

g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 **to the extent applicable**;

h) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder to the extent of Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 **to the extent applicable**;

i) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client to the extent of securities issued;

j) The Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009

and circulars/ 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	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	SEBI (LODR) Regulations, 2015	Regulation 17(1A)	Non - Compliance	BSE Limited (BSE) and National Stock Exchange of India Limited (NSE) ("Stock Exchanges")	Imposed fine	Delayed in compliance with the provisions of Regulation 17(1A) of SEBI (LODR) Regulations, 2015	Rs. 84,000/-	The Company has received the notice from BSE & NSE through email dated 28th November, 2025 imposed a fine for delayed compliance of Regulation 17(1A) of SEBI (LODR) Regulations, 2015	The Company has received the notice from BSE & NSE through email dated 28th November, 2025 imposed a fine for delayed compliance of Regulation 17(1A) of SEBI (LODR) Regulations, 2015 and the Company had filed a Waiver Application dated 11.12.2025 with BSE Limited and	The Company will file a Review Application against the aforesaid rejection order within the timeline as prescribed by stock Exchanges

									the National Stock Exchange of India Limited ("Stock Exchanges"). The said Waiver Application was rejected by the Stock Exchanges vide their communication email dated 11.05.2026. The Company is currently in the process to file a Review Application against the aforesaid rejection order within the timeline as prescribed by stock Exchanges.	based on the information and explanations provided to us by the Management.

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 (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31st March, 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
1.	The Company has duly filed & submitted the Compliance to both stock exchanges (BSE & NSE) within time limit as specified. However, BSE Ltd. has observed that the Company has not submitted the related party	The Company has duly filed & submitted the Compliance to both stock exchanges (BSE & NSE) within time limit as specified. However, BSE Ltd. has observed that the Company has not submitted the related party	Related Party Transactions for the Qtr ended September, 2022	Regulation 23(9) of SEBI (LODR) Regulations, 2015	The Company had submitted the Compliance again on 14/01/23, submitted the proof of earlier Compliance made within the time limit, along with acknowledgement and requested the BSE Ltd. to withdrawn the notice for purported Non-Compliance and	The Stock Exchange has rejected the waiver application on dated 06/03/2026. The Company is in the process to fie the review application against the rejection order within the time limit

	disclosure on time and not accepting the Compliance made by the Company which is clearly shown on the BSE website under Corporate Announcement.	disclosure on time and not accepting the Compliance made by the Company which is clearly shown on the BSE website under Corporate Announcement.			then filed the waiver application dated 20/01/2023.	as prescribed by the stock exchanges, based on the information and explanations provided to us by the Management.

We, hereby report that, during the Review Period the compliance status of the listed entity with the following requirement:

Sr. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS*
1.	**Secretarial Standards:** The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI),	Yes	None
2.	**Adoption and timely updation of the Policies:** • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • 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 Yes	None None
3.	**Maintenance and disclosures on Website:** • The Listed entity is maintaining a functional website • Timely dissemination of the documents information under a separate section on the website • 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	Yes Yes Yes	None None None
~~4.~~	**Disqualification of Director:** None of the Director(s) of the Company is/ are disqualified under Section 164 of	Yes	None

	Companies Act, 2013 as confirmed by the listed entity		
5.	**Details related to Subsidiaries of listed entities have been examined w.r.t.** a) Identification of material subsidiary companies b) Disclosure requirement of material as well as other subsidiaries (Company is not having any material subsidiaries)	NA Yes	The management had identified that during the period under review, there was no Material Subsidiary Company
6.	**Preservation of Documents:** 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.	Yes	None
7.	**Performance Evaluation:** 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.	Yes	None
8.	**Related Party Transactions:** a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or b) In case no prior approval obtained, he listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved / ratified / rejected by the audit committee.	Yes NA	None NA

9.	**Disclosure of events or information:** 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.	Yes	None
10.	**Prohibition of Insider Trading:** The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11.	**Actions taken by SEBI or Stock Exchange(s), if any:** 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 or The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	No	Except as mentioned in above table w.r.t Regulation 17(1A)
12.	**Resignation of statutory auditors from the listed entity or its material subsidiaries:** 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.	Not Applicable	The Limited Review Report for the quarter ended 30.06.2025 could not be issued by the erstwhile Statutory Auditor prior to resignation, as required under

			Paragraph 6.1 of the applicable Master Circular read with the Listing Regulations, since the said auditor did not possess a valid Peer Review Certificate at the relevant time.
13	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc except as reported above	Yes	No additional Non-compliance observed for all SEBI Regulations / Circulars/ Guidance Note etc.

We further, report that the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations are not applicable to the listed entity.

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 **AGRAWAL MANISH KUMAR & CO**
Company Secretaries

Place: New Delhi
Date: 29/05/2026

MANISH KUMAR AGRAWAL
Digitally signed by MANISH KUMAR AGRAWAL
Date: 2026.05.29 15:57:24 +05'30'

(**MANISH KUMAR AGRAWAL**)
PROPRIETOR
Membership Number – F-9528, C.P. NO. 7057
ICSI Firm Unique Identification Code:
Peer Review Certificate No: 2419 / 2022
UDIN: F009528H000538045