

May 22, 2026

To, BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai – 400 001 BSE Scrip Code: 543954	To, National Stock Exchange of India Limited Exchange Plaza, C-1, Block G Bandra Kurla Complex, Bandra (East), Mumbai – 400 051 NSE Symbol: ATL
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Dear Sir/Madam,

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended March 31, 2026, under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, attached herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2026, issued by Mr Pramod S Shah (Membership No FCS 334 and CP No 3804) of M/s Pramod S. Shah & Associates, Practising Company Secretaries on May 21, 2026.

The aforesaid information shall be made available on the Company's website at www.allcargoterminals.com.

Kindly take the above on records.

Thanking you,

Yours faithfully,
For **Allcargo Terminals Limited**

Malav Talati
Company Secretary & Compliance Officer
Membership No: A59947

Place: Mumbai

Encl: a/a

Pramod S. Shah & Associates

Practising Company Secretaries

3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P. D' Mello Road, Opp. St. George Hospital, Near CST, Mumbai - 400 001.
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SECRETARIAL COMPLIANCE REPORT OF ALLCARGO TERMINALS LIMITED FOR THE YEAR ENDED MARCH 31, 2026

(Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Allcargo Terminals Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at 4th Floor, A Wing, Allcargo House, CST Road, Kalina, Santacruz (East), Vidyanagari, Mumbai - 400098, Maharashtra. 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, disclosures 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 Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31st, 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:

We, Pramod S. Shah & Associates, Practising Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by **Allcargo Terminals 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 certification;

for the 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, to the extent applicable to the Company; 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"); to the extent applicable to the Company

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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (**Not Applicable to the Company during the Audit Period**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (**Not Applicable to the Company during the Audit Period**);
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;
- (i) Any other regulations and circulars / guidelines issued thereunder; as may be applicable to the Company.



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/Fin e/Show Cause Notice/ Warning, etc	Details of Violation	Fine Amount	Observation /Remarks of the Practicing Company Secretary	Management Response	Remarks
1	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 29(2) /29(3)	Non-compliance with Regulation 29(2)/29(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	BSE & NSE	Fine Levied	Non-compliance with Regulation 29(2)/29(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Rs. 10,000 each.	Fine levied by BSE & NSE	The Stock Exchanges levied a fine on December 15, 2025, for non-compliance with Regulation 29(2)/29(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The fine levied by the Stock Exchanges was duly paid by the Company on December 24, 2025. Subsequently, the Company	-



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Practising Company Secretaries

									applied for a waiver with NSE and BSE on January 09, 2026; however, the waiver application was not accepted by the Stock Exchanges.
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b. The listed entity has taken the following actions to comply with the observations made in the previous reports:

Sr. No	Observations/Remarks of the Practising Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2025	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	Non-compliance with the requirement to appoint a qualified Company Secretary as Compliance Officer within prescribed timeline. The deviation was inadvertent, with no malafide intent or material impact	Non-compliance with the requirement to appoint a qualified Company Secretary as Compliance Officer within prescribed timeline. The deviation was inadvertent, with no malafide intent or material impact	Regulation 6 of SEBI (Listing Obligations and Disclosure Requirements), 2015- Appointment of a qualified Company Secretary as Compliance Officer	Non-compliance with the requirement to appoint a qualified Company Secretary as Compliance Officer within prescribed timeline. Fine levied of Rs. 50,000 (Rs. 25,000 each by BSE and NSE) plus GST	The non-compliance was inadvertent, and a penalty of Rs.25,000 each plus GST was paid to BSE and NSE on November 25, 2024. The payment details have been duly disclosed on Stock Exchanges, and the requisite disclosure has also been made in this regard. The Company is committed to ensuring timely compliance going forward and has already taken corrective actions.	The deviation was inadvertent, with no malafide intent or material impact.



- c. We hereby report that, during the review period the compliance status of the listed entity is appended as below:

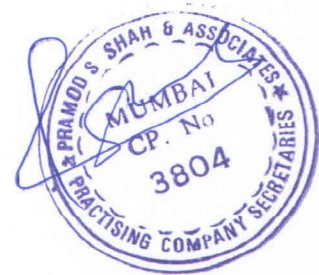
Sr. No.	Particulars	Compliance Status (Yes / No / NA)	Observations/Remarks by Practising Company Secretary
1	<p><u>Secretarial Standards:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	Yes	NIL
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 listed entities• All the policies are in conformity with SEBI Regulations and have been reviewed and updated on time as per the regulations/circulars/guidelines issued by SEBI	Yes	NIL



3	<p><u>Maintenance and disclosures on Website:</u></p> <ul style="list-style-type: none">• 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	NIL
4	<p><u>Disqualification of Director:</u></p> <ul style="list-style-type: none">• None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	NIL
5	<p><u>Details related to Subsidiaries of listed entities have been examined w.r.t.:</u></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	Yes	NIL



6	<p><u>Preservation of Documents:</u></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>	Yes	NIL
7	<p><u>Performance Evaluation:</u></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>	Yes	NIL



8	<p><u>Related Party Transactions:</u></p> <p>a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</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 by the Audit committee.</p>	Yes	NIL
9	<p><u>Disclosure of events or information:</u></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>	Yes	NIL
10	<p><u>Prohibition of Insider Trading:</u></p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	NIL

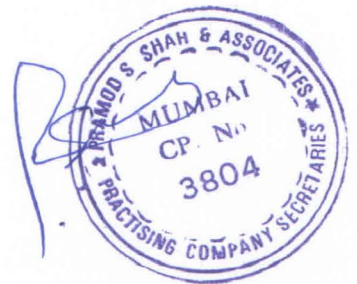


11	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u>	Yes	During the year, BSE Limited ("BSE") and the National Stock Exchange of India Limited ("NSE") levied a fine on December 15, 2025, for non-compliance with Regulation 29(2)/29(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The fine levied by the Stock Exchanges was duly paid by the Company on December 24, 2025. Subsequently, the Company applied for a waiver with NSE and BSE on January 09, 2026; however, the waiver application was not accepted by the Stock Exchanges.
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.	NA	There was no event of resignation of Statutory Auditor.



13	<u>Additional Non-compliances, if any:</u> No additional non-compliance observed for all SEBI regulation/circular/guidance note etc	NA	NIL
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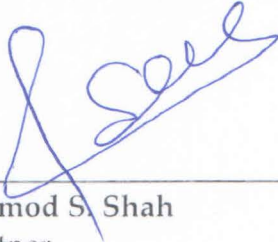
We further, report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.



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 **Pramod S. Shah & Associates**
Practising Company Secretaries



Pramod S. Shah
Partner
Membership No.: FCS 334
COP No.: 3804
UDIN: F000334H000426463



Date: 21st May, 2026
Place: Mumbai