

Date: May 30, 2026

To,
Department of Corporate Services,
BSE Limited
25th Floor, P. J. Tower,
Dalal Street, Fort,
Mumbai - 400 001.

Symbol: 544224

Dear Sir / Ma'am,

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

Please find enclosed the Annual Secretarial Compliance Report of Afcom Holdings Limited for the financial year ended March 31, 2026 issued by Ms. Sri Vidhya Kumar, Partner, S.A.E. & Associates LLP, Company Secretaries pursuant to regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Request you to take the same on record.

Thanking you.

For **AFCOM HOLDINGS LIMITED**

Name : Ajith Kumar
Designation : Company Secretary and Compliance Officer

AFCOM HOLDINGS LIMITED

📍 **Regd. Office :**

No.2, LIC Colony, Dr.Radhakrishnan
Nagar, Thiruvanimiyur,
Chennai - 600041, India.

📍 **Corporate Office :**

3rd Floor, IndiQube Palmyra
Plot No. 16 (NP), SIDCO Industrial Estate,
Ekkattuthangal, Guindy, Chennai - 600032, India.

📍 **Airport Office :**

Integrated Air Cargo Complex,
Phase-III, 2nd Floor, Meenambakkam,
Chennai – 600027, India.

CIN : L51201TN2013PLC089652
GSTIN : 33AALCA3603M1ZQ

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Secretarial Compliance Report of

Afcom Holdings Limited for the financial year ended March 31, 2026

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

To

Afcom Holdings Limited (CIN: L51201TN2013PLC089652)

2, LIC Colony Dr. Radhakrishnan Nagar, Thiruvanmiyur

Chennai - 600041

Tamil Nadu

We, S.A.E. & Associates LLP, Company Secretaries have conducted a review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Afcom Holdings Limited (hereinafter referred as 'the Listed entity'), having its registered office at 2, LIC Colony Dr. Radhakrishnan Nagar, Thiruvanmiyur, Chennai – 600041, Tamil Nadu. Secretarial Review was conducted in a manner that provided us with a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations 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 review, we hereby report that the Listed entity has, during the review period covering the financial year ended on March 31, 2026 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We, S.A.E & Associates LLP, Company Secretaries, have examined:

- (a) all the documents and records made available to us, and explanation provided by the Listed entity,
- (b) the filings/ submissions made by the Listed entity to BSE Limited (BSE), where its equity shares are listed ("hereinafter referred to as the Stock exchange"),
- (c) website of the Listed entity (<https://afcomcargo.com>),



(d) other relevant documents/filings which have been relied upon to make this report,

for the financial year ended March 31, 2026, (hereinafter referred to as “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, includes:

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR), as amended from time to time;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended from time to time;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 as amended from time to time; **(Not applicable to the Listed entity during the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 as amended from time to time; **(Not applicable to the Listed entity during the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 as amended from time to time; **(Not applicable to the Listed entity during the Review Period)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, as amended from time to time;

and circulars/guidelines issued thereunder



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 **save** in respect of matters specified below.

Table 1

Sr No.	Compliance Requirement (Regulations /circulars/ guidelines including (A)	Regulation /Circular No. (B)	Deviations (C)	Action Taken by (D)	Type of Action (E)	Details of Violation (F)	Fine Amount (G)	Observations/Remarks of the Practising Company Secretary (H)	Management Response (I)	Remarks (J)
1	Circular Compliance Requirement: Listed entities shall enrol on the ODR Portal	SEBI /HO/ OIAE /OIA E_IA D-1/P/ CIR/ 2023 /131 dated 31 st July 2023	The Listed Entity has not yet enabled the ODR portal	PCS	Advisory	As mentioned in Column C	NA	As mentioned in Column C	The Listed entity is taking necessary steps to enrol with ODR Portal.	-
2	Securities and Exchange Board of India (LODR) Regulations, 2015. Compliance requirement: The Listed Entity shall obtain prior	23	Related party transaction entered during the Review Period were placed before the audit committee at the end of the financial year and the same were ratified.	PCS	Advisory	As mentioned in Column C	NA	As mentioned in Column C	The Listed Entity has ratified its related party transaction in its meeting held on 28 th May 2026. However, the Listed Entity shall take all necessary	-



Sr No.	Compliance Requirement (Regulations /circulars/ guidelines including (A)	Regulation /Circular No. (B)	Deviations (C)	Action Taken by (D)	Type of Action (E)	Details of Violation (F)	Fine Amount (G)	Observations/Remarks of the Practising Company Secretary (H)	Management Response (I)	Remarks (J)
	approval of the audit committee for entering into related party transaction / ratify the transaction within three months if the value of the transaction does not exceed Rs. 1 crore.								steps to obtain prior approval going forward	
3	Securities and Exchange Board of India (LODR) Regulations, 2015. Compliance requirement: The company has to intimate appointment of secretarial auditor to stock exchange	30	The company has intimated appointment of secretarial auditor to the stock exchange in the outcome of the board meeting, however, the same was not intimated under change in management in PDF and XBRL mode.	PCS	Advisory	As mentioned in Column C	NA	As mentioned in Column C	Going forward the company will be ensure timely disclosures to stock exchange	



Sr No.	Compliance Requirement (Regulations /circulars/ guidelines including)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary	Management Response	Remarks
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	
4	Securities and Exchange Board of India (LODR) Regulations, 2015. Compliance requirement: Listed Entity to provide Compliance certificate from either the auditors or practicing company secretaries regarding compliance of conditions of corporate governance and the same shall be annexed with the directors' report	Schedule V Part E	The report is not applicable, however in the annual report is mentioned that the same is given by S.A.E. & Associates LLP	PCS	Advisory	As mentioned in Column C	NA	As mentioned in Column C	The Listed Entity has inadvertently mentioned the same in the annual report.	

(b) The Listed entity has taken the following actions to comply with the observations made in previous report presented for the financial year ended March 31, 2025 – **not applicable as this is the first year of applicability of reporting under regulation 24A since listing of the company.**



(c) We hereby report the compliance status of the Listed Entity with the following requirements during the Review Period:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	<u>Secretarial Standards:</u> The compliances of the Listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI)	Yes	None
2.	<u>Adoption and timely updation of the Policies:</u> <ul style="list-style-type: none">• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Listed entity• All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	None
3.	<u>Maintenance and disclosures on Website:</u> <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 redirects to the relevant document(s)/ section of the website	No	The Listed Entity is yet to integrate with the SMART ODR platform.
4.	<u>Disqualification of Director:</u> None of the Director of the Listed entity are disqualified under section 164 of Companies Act, 2013 as confirmed by the Listed entity	Yes	None
5.	<u>Details related to Subsidiaries of the Listed entity have been examined w.r.t:</u> <ul style="list-style-type: none">• Identification of material subsidiary companies• Disclosure requirements of material as well as other subsidiaries	NA	The Listed Entity is in the process of incorporation of a subsidiary in UAE



Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
6.	<u>Preservation of Documents:</u> 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.	<u>Performance Evaluation:</u> The Listed entity 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> <ul style="list-style-type: none">• The Listed entity has obtained prior approval of Audit Committee for all related party transactions• In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit committee	No	Refer point 2 in Table 1 above.
9.	<u>Disclosure of events or information:</u> 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.	No	Refer point 3 in Table 1 above.
10.	<u>Prohibition of Insider Trading:</u> The Listed entity is in compliance with Regulation 3(5) & 3(6) of 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 Listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by	No	"During the Review Period, the company was levied a SOP fine of INR 5900/- (inclusive of GST) by the stock



Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
	Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued thereunder		exchange for delayed compliance in filing Related Party Transaction disclosures under Regulation 23(9) of the SEBI (LODR) Regulations,
12	<u>Resignation of statutory auditors from the Listed entity or its material subsidiaries:</u> In case of resignation of statutory auditor from the Listed entity or any of its material subsidiaries during the financial year, the Listed entity has 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 the listed entity.	NA	NA
13.	<u>Additional Non-compliances, if any:</u> No additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	No	Refer Table 1

We further, report that the Listed entity does not have any Employee Benefit Scheme and hence compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations is not applicable to the Listed entity.

Place : Chennai
Date : May 30, 2026

For S.A.E. & Associates LLP
Company Secretaries

SRIVIDHYA
AKUMAR

Digitally signed by
SRIVIDHYAKUMAR
Date: 2026.05.30
19:22:21 +05'30'

Sri Vidhya Kumar, Partner
M.No: F11114; COP.No. 20181
FRN: L2018TN004700
Peer review Certificate No: 2822/2022
UDIN: F011114H000554901



To

Afcom Holdings Limited (CIN: L51201TN2013PLC089652)
2, LIC Colony Dr. Radhakrishnan Nagar, Thiruvanmiyur
Chennai - 600041
Tamil Nadu

Our Secretarial Compliance Report of even date is to be read along with this letter.

1. It is the Management's Responsibility to maintain secretarial records, to devise proper systems to ensure compliance with the provisions of all applicable laws and regulations, to ensure that the systems are adequate and operate effectively and ensure that the documents and information furnished are authentic.
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, as they are subject to audit by the financial auditors of the Listed entity appointed under section 139 of Companies Act, 2013.
4. Wherever required, we have obtained the management's representation about the compliance of laws, rules and regulations and happening of events etc.
5. This Secretarial Compliance 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.

Place : Chennai
Date : May 30, 2026

For S.A.E. & Associates LLP
Company Secretaries

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SRIVIDHYAKUMAR
AKUMAR Date: 2026.05.30
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Sri Vidhya Kumar, Partner
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