APOLLO FINVEST (INDIA) LTD.

CIN: L51900MH1985PLC036991
REGISTERED OFFICE: 301, Plot No. B-27, Commerce Centre, Off New Link Road Near Morya House, Andheri West, Mumbai, Maharashtra 400053
Email Id: info@apollofinvest.com
Contact No. 7700986861
Website: www.apollofinvest.com

May 29, 2026

To,
BSE Limited,
25th Floor,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai 400 001

BSE Scrip Code: 512437

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

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of Apollo Finvest (India) Limited for the financial year ended March 31, 2026 issued by M/s. SGGS & Associates, Secretarial Auditor of the Company.

We request you to take the above information on record.

Thanking You,
For Apollo Finvest (India) Limited

MIKHIL RAMESH INNANI
Digitally signed by MIKHIL RAMESH INNANI
Date: 2026.05.29 18:39:49 +05'30'

Mikhil Innani
Managing Director & CEO
DIN: 02710749
Encl.: As above

Secretarial Compliance Report of Apollo Finvest (India) Limited for the financial 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 Apollo Finvest (India) Limited (hereinafter referred as 'the listed entity'/ 'the Company'), having CIN: L51900MH1985PLC036991 and registered Office at 301, Plot No. B-27, Commerce Centre, Off New Link Road, Near Morya House, Andheri West, Mumbai, Maharashtra 400053, India. Secretarial Review was conducted in a manner that provided us 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 and subject to the reporting made hereinafter:

We, SGGS & Associates, have examined:

(a) all the documents and records made available to us, and explanation provided by the Company;
(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; 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, ('SEBI Listing Regulations');
(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;

(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;

(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 ('SEBI PIT Regulations');

(h) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

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

I. (a) The Company 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/ guide- lines 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
Not Applicable										

(b) The Company has taken the following actions to comply with the observations made in previous report issued by us, secretarial auditor of the Company for FY 2024-25:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guide- lines 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	Pursuant to Regulation 30 read with Schedule III Part A Para A of SEBI Listing Regulations: The audio recordings shall be promptly made available on the website and in any case, before the next trading day or within twenty-four hours from the conclusion of	Regulation 30 read with Schedule III Part A Para A	During the FY 2024-25, the intimation regarding the audio recording of the analyst and/or institutional investors meet held on June 6,	NA	NA	Refer observation of Practicing Company Secretary	NA	During the FY 2024-25, the intimation regarding the audio recording of the analyst and/or institutional investors meet held on June 6, 2024 was not given to the Stock Exchange.	The Company has given disclosure to Stock Exchange on same day under outcome of investors call; however, an incorrect file was inadvertently attached. This was purely unintentional and not aimed to withholding any information. The correct audio recording was subsequently uploaded on the Company's website. We have taken steps to strengthen internal checks to avoid such errors in the future.	-

	such calls, whichever is earlier;.		2024 was not given to the Stock Exchange.							
2	Pursuant to Regulation 10(1A) of SEBI Listing Regulations read with SEBI Circular no. SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024: The listed entity is required to submit Integrated Filing (Financials) with effect from quarter ended December 31, 2024, within 45 days from the end of the quarter, other than the last quarter, and 60 days from the end of the last quarter and the financial year.	Regulation 10(1A) of SEBI Listing Regulations read with SEBI Circular no. SEBI/HO/CFD/CFD-PoD-2/CIR/P/2024/185 dated December 31, 2024	During FY 2024-25, the Company did not file Integrated Filing (Financials) with the Stock Exchange for the quarter ended December 31, 2024.	NA	NA	Refer observation of Practicing Company Secretary	NA	During FY 2024-25, the Company did not file Integrated Filing (Financials) with the Stock Exchange for the quarter ended December 31, 2024.	The Company has disclosed the Financial Results for the quarter ended December 31, 2024 to the Stock Exchange on February 6, 2025 i.e. within prescribed timeline. The non-filing of the financials in Integrated filing (Financials) was inadvertent and unintentional due to a difference in interpretation of the applicable circular. Based on our understanding at the time, it was interpreted that only the Integrated Governance Report was required to be filed. The Company regrets the oversight and affirms that there was no mala fide intention to withhold any information from the Stock Exchange or stakeholders.	
3	Regulation 3(5) and 3(6) of SEBI PIT Regulations: The Board of Directors or the head(s) of the listed entity of every person required to handle unpublished price sensitive information, must ensure the maintenance of a structured digital database that includes the required details and is retained for the duration, specified in the aforementioned regulations.	Regulation 3(5) and 3(6) of SEBI PIT Regulations	During FY 2024-25 , it was observed that the Company did not have the records of entries that are mandatorily required to be maintained in the Structured Digital Database (SDD). The absence of such records indicates non-compliance with the regulatory requirement to digitally log and retain details of persons with whom unpublished price sensitive information (UPSI) has been shared.	NA	NA	Refer observation of Practicing Company Secretary	NA	During FY 2024-25, it was observed that the Company did not have the records of entries that are mandatorily required to be maintained in the Structured Digital Database (SDD). The absence of such records indicates non-compliance with the regulatory requirement to digitally log and retain details of persons with whom unpublished price sensitive information (UPSI) has been shared. Corrective actions were taken by the Company in FY 2025-26 to ensure compliance.	The Company acknowledged the observation regarding the unavailability of records in the Structured Digital Database (SDD) during the Review Period. This lapse occurred primarily due to the transition of the Company's registered office, which impacted access to certain digital tools and records maintained by the Company. Additionally, during this period, there were technical issues encountered with the tool provider, resulting in the loss of some historical entry logs. The Company has since coordinated with the service provider to identify the root cause and is working towards retrieving any recoverable data. We wish to emphasize that there was no intentional breach of regulatory requirements. The Company is committed to full compliance with SEBI PIT Regulations and has taken corrective steps, including enhanced coordination with the SDD service provider, internal process reviews, and strengthening data backup protocols to ensure such issues do not recur in the future.	

II. 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 Practicing Company Secretary*
1.	**Secretarial Standards:** The compliances of the listed entity are in accordance with the Secretarial Standards issued by the Institute of Company Secretaries India (ICSI)	Yes	None
2.	**Adoption and timely updation of the Policies:** (a) All applicable policies under SEBI Regulations are adopted with the approval of the Board of Directors of the listed entity. (b) 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.	**Maintenance and disclosures on Website:** (a) The Listed entity is maintaining a functional website (b) Timely dissemination of the documents/ information under a separate section on the website. (c) 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	None
4.	**Disqualification of Director:** None of the Director(s) of the listed entity are disqualified under Section 164 of Companies Act, 2013.	Yes	None

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	NA	The Company does not have any subsidiary Company.
6.	**Preservation of Documents:** As per confirmations received from the listed entity, and on my test check basis it 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 Listing Regulations.	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 has been obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.	Yes	None
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 Listing Regulations 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	Please refer clause I(b) above.
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 except as provided in the last column.	Yes	No actions were taken by SEBI or by the Stock Exchanges during the Review Period including under the Standard Operating Procedures issued by SEBI through various circulars
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 SEBI Listing Regulations by listed entities.	NA	There were no resignations of the Statutory Auditors of the Company during the review period.
13.	**Additional Non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	No non-compliance has been observed during the Review Period.

**Observations/remarks by PCS are mandatory if the Companies status is provided as 'No' or 'NA'.*

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 SEBI Listing Regulations.

Assumptions & Limitation of scope and review:

1. Compliance with 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 certify 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 the 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 SGGS & Associates
ICSI Unique Code: P2021MH086900

Gaurav Sainani

Digitally signed by Gaurav Sainani
Date: 2026.05.29 18:25:42 +05'30'

Gaurav Sainani
Partner
Membership No.: A36600
Certificate of Practice No.: 24482
UDIN: A036600H000531809
Peer Review Certificate No.: 5721/2024

Place: Delhi
Date: May 29, 2026