May 25, 2026

To,

The National Stock Exchange of India Limited
Exchange Plaza", 5th Floor,
Plot No. C/1, G Block,
Bandra-Kurla Complex, Bandra (East),
Mumbai – 400 051

NSE Symbol: APOLLOPIPE

Department of Corporate Services/Listing
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001

SCRIP Code: 531761

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

Dear Sir/Madam,

Pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with relevant circulars, we are enclosing herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2026.

The above information is also being uploaded on the Company's website at www.apollopipes.com.

Kindly take the same on your records.

Thanking you.

Yours faithfully,

For Apollo Pipes Limited

GOURAB KUMAR NAYAK
Digitally signed by GOURAB KUMAR NAYAK
Date: 2026.05.25 18:38:22 +05'30'

Gourab Kumar Nayak
Company Secretary & Compliance Officer

Encl: a/a

Anjali Yadav & Associates
COMPANY SECRETARIES

Registered Address
B-6/32, Sector-15, Rohini, New Delhi-110085
Website: www.csanjali.com
Fixed Line: 011-47067659
E Mail: Anjaliyadav.associates@gmail.com
Anjaliyadavpcs@gmail.com

To,

The Board of Directors
Apollo Pipes Limited
37, Hargobind Enclave, Vikas Marg,
Delhi- 110092

Dear Sir(s),

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

We have been engaged by **Apollo Pipes Limited** whose equity shares are listed on BSE Limited [Security Code: 531761] and National Stock Exchange of India Limited [NSE Symbol: APOLLOPIPE] to conduct an audit and issue Annual Secretarial Compliance Report in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended from time to time) and in accordance with the various circulars issued by SEBI and Stock Exchanges from time to time.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the company with the provisions of all applicable SEBI Regulations and circulars/guidelines issued there under from time to time and issue a report thereon.

The Audit was conducted in accordance with the Guidance Note on Secretarial Compliance Report issued by The Institute of Company Secretaries of India "ICSI". The Annual Secretarial Compliance Report is enclosed herewith.

Place: New Delhi
Date: 21st May, 2026

For Anjali Yadav & Associates
Company Secretaries

ANJALI YADAV
Digitally signed by ANJALI YADAV
Date: 2026.05.21 12:08:38 +05'30'

Anjali Yadav
Proprietor
FCS No.: 6628
CP No.: 7257
UDIN:F006628H000426509
PR Unique Code: S2006DE715800PR
Certificate No.: 6384/2025

Annual Secretarial Compliance Report of Apollo Pipes Limited for the financial year ended March 31, 2026

We, Anjali Yadav & Associates, a firm of Practicing Company Secretaries, New Delhi, have examined:

(a) all the documents and records made available to us and explanation provided by **Apollo Pipes 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 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) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI Listing Regulations) as amended;

(b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended;

(c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended;

(d) SEBI (Buyback of Securities) Regulations, 2018 as amended**: Not Applicable to the Company during the review period;**

(e) SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 as amended;

(f) SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021 as amended**;**

(g) SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended;

(h) (Other regulations as applicable) and circulars/ guidelines issued thereunder:

a) SEBI (Prohibition of Fraudulent and Unfair Trade Practices related to Securities Market), Regulations 2003 as amended;

b) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 as amended;

c) SEBI (Depositories and Participants) Regulations, 2018

and based on our examination and verification of the documents and records produced to us and according to the information and explanations given to us by the Company, we hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified in **"Annexure A".**

(b) The listed entity has taken the following actions to comply with the observations made in previous reports in respect of the matters specified in **"Annexure B".**

I. 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 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	-
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	-
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	-
4.	**Disqualification of Director:** None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	-
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.	(a) Yes (b) Yes	Kisan Mouldings Limited ("KML") has been identified as a material subsidiary as it meets the criteria prescribed under SEBI (LODR) Regulations.
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	-
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	-
8.	**Related Party Transactions:** (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; (b) 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.	(a) Yes (b) NA	As the company has obtained prior approval of Audit Committee for all related party transactions so point 8(b) is not applicable
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	-
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	-

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.	NA NA	-
12.	**Resignation of statutory auditors from listed entities or their 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 resignation of the Statutory Auditors of the Company or its Material Subsidiaries during the year under review. Further, upon completion of the tenure of the existing Statutory Auditors of the Company, M/s. VAPS & Co., Chartered Accountants (Firm Registration No. 003612N), M/s. AKGVG & Associates, Chartered Accountants (Firm Registration No. 018598N), were appointed as the Statutory Auditors of the Company for a term of five consecutive years, to hold office from the conclusion of the 39th Annual General Meeting ("AGM") held on 26th September, 2025 until the conclusion of the 44th AGM of the Company to be held in the year 2030.
13.	**Additional non-compliances, if any:** No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	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 LODR Regulations.

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.

Place: New Delhi
Date: 21st May, 2026

For Anjali Yadav & Associates
Company Secretaries

ANJALI YADAV
Digitally signed by ANJALI YADAV
Date: 2026.05.21 12:09:11 +05'30'

Anjali Yadav
Proprietor
FCS No.: 6628
CP No.: 7257
UDIN:F006628H000426509
PR Unique Code: S2006DE715800
PR Certificate No.: 6384/2025

Annexure 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:

S.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 (PCS)	Management Response-	Remarks
NOT APPLICABLE										

Place: New Delhi
Date: 21st May, 2026

For Anjali Yadav & Associates
Company Secretaries

ANJALI YADAV
Digitally signed by ANJALI YADAV
Date: 2026.05.21 12:09:43 +05'30'

Anjali Yadav
Proprietor
FCS No.: 6628
CP No.: 7257
UDIN: F006628H000426509
PR Unique Code: S2006DE715800
PR Certificate No.: 6384/2025

Annexure B

The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No	Observations/ Remarks of the Practicing Company Secretary in the previous reports (PCS)	Observations made in the secretarial compliance report for the year ended ---(the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guide-lines including specific clause)	Details of Violation/deviations and action 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
NOT APPLICABLE						

Place: New Delhi
Date: 21st May, 2026

For Anjali Yadav & Associates
Company Secretaries

ANJALI YADAV
Digitally signed by ANJALI YADAV
Date: 2026.05.21 12:10:56 +05'30'

Anjali Yadav
Proprietor
FCS No.: 6628
CP No.: 7257
UDIN: F006628H000426509
PR Unique Code: S2006DE715800
PR Certificate No.: 6384/2025