DDB & CO.
Company Secretaries

SECRETARIAL COMPLIANCE REPORT
OF
ALICON CASTALLOY LIMITED
[CIN: L99999PN1990PLC059487]
FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2026

We have examined:

(a) All the documents and records made available to us and explanation provided by ALICON CASTALLOY 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 year ended 31st March, 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') and 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 - **There was no reportable event 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 (Buy-back of Securities) Regulations, 2018 – **There was no reportable event during the Review Period**;

(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;

DDB & CO. COMPANY SECRETARIES AHMEDABAD M No. F10562 C.P. No. 14265

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(f) Securities and Exchange Board of India (Issue and Listing of Non-convertible Securities) Regulations, 2021 - **There was no reportable event during the Review Period;**

(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) Other regulations as applicable - **There was no reportable event during the Review Period under any specific regulation other than those mentioned above;**

and circulars/ guidelines issued thereunder;

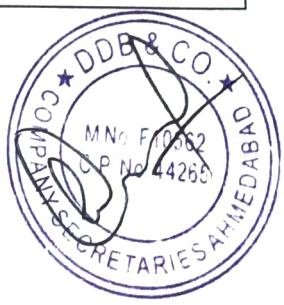
and based on the above examination, I hereby report that during the Review Period;

(a) The listed entity has complied with the provisions of the above regulations and circulars/ guidelines issued thereunder, except in respect of matter 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	Obser-vations/ remarks of the PCS	Manage-ment res-ponse	Remarks
- Annexure- I -										

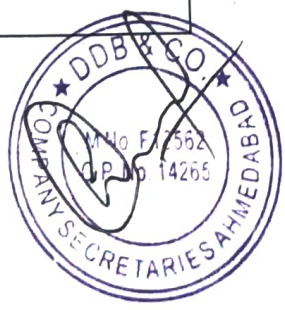
(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations/ remarks of the Practising Company Secretary in the previous report.	Observations made in the Secretarial Compliance Report for the year ended 31/03/202.5	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
	- Annexure- II -					

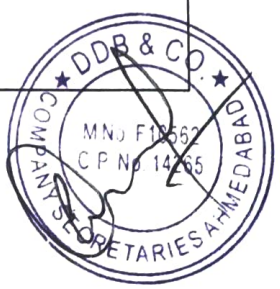


(c) I hereby report that during the review period, the compliance status of the listed entity with the following requirements:

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 of 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 entity. • 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 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 documents/ section of the website.	Yes Yes Yes	
4)	**Disqualification of Directors:** None of the Directors of the Company is disqualified under Section 164 of the Companies Act, 2013.	Yes	



5)	**Details related to subsidiaries of listed entity:** (a) Identification of material subsidiary companies. (b) Requirements with respect to disclosure of material as well as other subsidiaries.	Yes Yes	Company did not have material subsidiary during FY 2025-26, but has Material Subsidiary Policy. Co. has overseas subsidiary companies.
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 Committees at the start of every 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.	Yes NA	Please refer point 8(a)
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) 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 last Column.	NA Yes	Listed entity had received a notice from NSE & BSE for delay caused in appointing Company Secretary & Compliance Officer as required under Regulation 6 of SEBI LODR. Listed entity paid penalty.
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 entity.	NA	There was no such resignation from statutory auditor.
13)	**No Additional Non-compliances observed:** No additional non-compliance observed for any of the SEBI regulation/circular/guidance note etc. except as reported above.	Yes	

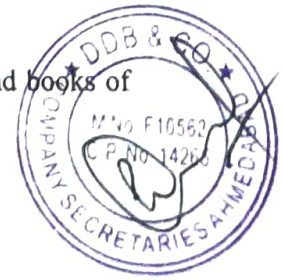
We further report that the listed entity is in compliance~~/ not in compliance~~ with the disclosure requirements of Employee Benefit Scheme Documents in terms of Regulation 46(2)(za) of the LODR Regulations.

Assumptions and 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 certify based upon my 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.

UDIN: **F010562H000406309**
Peer Review Certificate No. 6180/2024
Place: Ahmedabad
Date: 19/05/2026

(DHRUVALKUMAR D BALADHA)
COMPANY SECRETARY
FCS: 10562/CP: 14265

ANNEXURE – I

(a) The listed entity has complied with the provisions of the above regulations and circulars/ guidelines issued thereunder, except in respect of matter 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 (Rs.)	Observations/ remarks of the PCS	Management response	Remarks
1	2	3	4	5	6	7	8	9	10	11
1)	Appointment of Company Secretary and Compliance Officer	Regulation 6 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	There was a delay of 141 days in appointment of a Company Secretary & Compliance Officer.	BSE Ltd. & National Stock Exchange of India Ltd. (NSE)	Penalty levied	Same as Col. 4	June,2025- Rs. 10,620/- Sept.,2025- Rs. 1,08,560/- & Dec., 2025- Rs.47,200/-	Company Secretary & Compliance Officer resigned from the listed entity immediately after her resuming from her maternity leave on 22/03/2025. Various endeavours were being made to search a suitable candidate by NRC. The newly appointed CS & Compliance Officer joined on 10/11/2025 thereby causing a delay of 141 days.	The vacancy in the office of the Compliance Officer occurred unexpectedly and the company undertook all necessary efforts to identify and appoint a suitable replacement.	Listed entity has paid the penalty.

DDB & CO. COMPANY SECRETARIES AHMEDABAD M No. F10562 C P No. 14268

ANNEXURE - II

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	2	3	4	5	6	7
1)	--	The listed entity should have intimated the stock exchanges the date of Board meeting seven days in advance. However, the listed entity delayed in intimating the date of the Board meeting to stock exchanges.	Prior intimation about the meeting of Board of directors required under Regulation 29 (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Short notice of one day was given for board meeting. Penalty of Rs. 11,800/- was imposed by BSE and NSE.	The Company Secretary of the listed entity was on maternity leave. The listed entity intimated stock exchange immediately upon realizing the delay.	Listed entity has paid the penalty.