

Secretarial Compliance Report of TwentyFirst Century Management Services Limited for the
financial year ended 31st March 2026.

We, Lakshmi Subramanian and Associates, have examined:

(a) all the documents and records made available to us and the explanation provided by **TwentyFirst Century Management Services 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 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"), rules made thereunder and the regulations, circulars, guidelines issued thereunder by the 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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

(d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

(e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable for the year under review)

(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 (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable during the review period)

(h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable during the review period)

(i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable during the review period)



(j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (Not applicable during the review period)

(k) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable during the review period)

(l) Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003

(m) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009.

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, except in respect of matters specified below:

S No	Compliance Requirement (Regulations / Circulars/guidelines, including specific clause)	Regulation/Circular No	Deviations	Action taken by	Type of Action	Details of the violation	Fine amount	Observations / Remarks of Practicing Company Secretaries	Management Response	Remarks
1.	The listed entity shall publish an advertisement in the newspaper, within forty-eight hours of conclusion of the meeting of board of directors at which the financial results were approved, containing a Quick Response code and the details of the webpage where complete financial results of the listed entity, as specified in regulation 33 of SEBI(LODR) Regulation, 2015.	regulation 47(1) of SEBI(LODR) Regulation, 2015 and as per FAQ dated 23 rd April 2025	QR Code was not published in the newspaper advertisement for financial results in terms of 47(1) of the LODR Regulations.	-	-	QR Code was not published in the newspaper advertisement for financial results in terms of 47(1) of the LODR Regulations.	NIL	QR Code was not published in the newspaper advertisement for financial results in terms of 47(1) of the LODR Regulations	-	-



2.	Outcome of the Board Meeting along with Financial Results in PDF mode, to be submitted within the prescribed timelines of 30 mins or 3 hours, as may be applicable, on the below path: BSE Listing Centre > Listing Compliance → Corporate Announcement → Outcome of Board Meeting And BSE Listing Centre > Listing Compliance → Corporate Announcement → Results	BSE Notice date 02 nd April 2025	Outcome of the Board Meeting along with Financial Results in PDF mode were not submitted on both paths	-	-	Outcome of the Board Meeting along with Financial Results in PDF mode were not submitted on both paths.	NIL	Outcome of the Board Meeting along with Financial Results in PDF mode were not submitted on both paths.	-	-
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(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 (PCS) in the previous reports)	Observations made in the Secretarial Compliance report for the year ended 31 st March 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.	Yearly disclosure under Regulation 31(4) of SEBI (SAST) Regulations, 2011 has not been submitted to the Stock exchanges within the time prescribed for the year under review.	Yearly disclosure under Regulation 31(4) of SEBI (SAST) Regulations, 2011 has not been submitted to the Stock exchanges	Regulation 31(4) & 31(5) of SEBI (SAST) Regulations, 2011.	The declaration was not made within seven working days from the end of each financial year	Complied for the Financial Year 2025-26.	Nil



		within the time prescribed for the year under review.				
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We 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.	<u>Secretarial Standard:</u> The compliances of listed entities are in accordance with the Applicable Secretarial Standards issued by ICSI.	Yes	Nil
2.	<u>Adoption and timely updation of the Policies:</u> • 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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI.	Yes, partly complied.	RPT Policy has been reviewed but not timely updated as per the regulations/circulars/guidelines issued by SEBI.
3.	<u>Maintenance and disclosures on the Website:</u> • The listed entity is maintaining a functional website- YES • Timely dissemination of the documents/ information under a separate section on the website- YES • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific, which redirect to the relevant document(s)/ section of the website- NO	Yes, partly complied.	A few information are yet to be updated on the Website.
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of the Companies Act, 2013	Yes	Nil
5.	<u>To examine details related to the Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies.	Yes, Twentyfirst Century Shares and Securities Limited	Nil



	(b) Requirements with respect to disclosure of material as well as other subsidiaries.		
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 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 the Audit Committee for all Related party transactions.</p>	Yes	Nil
	<p>(b) In case no prior approval is obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.</p>	NA	Nil
9.	<p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosures (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>		
11	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>No Actions 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</p>	Yes	Nil
12.	<p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></p> <p>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</p>	NA	There has been no resignation of statutory auditors during the review period for the listed entity and its subsidiaries.



	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.		
13.	<u>Additional non-compliances, if any:</u> No additional non-compliances observed for any SEBI regulation/circular/guidance note, etc., except as reported above.	No	Nil

We further report that the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations is Not Applicable (NA) to the listed entity during the review period.

Assumptions & limitations 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 account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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 **LAKSHMMI SUBRAMANIAN & ASSOCIATES**
PRACTICING COMPANY SECRETARIES

Date: 16.05.2026

Place: Chennai



S. VASUDEVAN
Partner

FCS No: 9495

CP No: 27636

Peer Review No: 6608/2025

UDIN: F009495H000380558