

Secretarial compliance report of M/s. Twentyfirst Century Management Services Limited for the year ended 31st March, 2025

We, Lakshmi Subramanian and Associates, have examined all the documents and records made available to us and explanation provided by **M/s Twentyfirst Century management services Limited** ("the listed entity"),

- (i) the filings/ submissions made by the listed entity to the stock exchanges,
- (ii) website of the listed entity,
- (iii) annual returns filed with the Ministry of Corporate Affairs, which has been relied upon to make this certification,
- (iv) Any other documents, as may be relevant, which has been relied upon to make this certification

for the year ended 31st March, 2025 ("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;
- (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 (Buyback of Securities) Regulations, 2018; (Not applicable for the year under review)
- (g) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable for the year under review)



(h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2015; (Not applicable for the year under review)

(i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable preference shares) Regulations, 2013; (Not applicable for the year under review)

(j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; (Not applicable for the year under review)

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

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

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

(a) The listed entity has maintained proper records under the provisions of the above Regulations and Circulars/guidelines issued thereunder in so far as it appears from our examination of those records.

(b) No actions have been taken against the listed entity, its directors either by SEBI or by Stock Exchange under the aforesaid acts/ Regulations/Circulars/Guidelines issued thereunder.

(c) The listed entity has complied with the clauses 6(a) and 6(b) as mentioned in SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 with regard to the Appointment of Statutory Auditors. (Not applicable during the period under review)

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.	<p><u>Secretarial Standard:</u></p> <p>The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3</p>	Yes	Nil
2.	<p><u>Adoption and timely updation of the Policies:</u></p> <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the 	Yes	Nil



	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		
3.	<u>Maintenance and disclosures on Website:</u> • 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	Yes, but partly complied	The Company has maintained and updated all the disclosures on the functional website except the Familiarization Programme details for the year under review.
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	yes	Nil
5.	<u>To examine details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Yes	Nil
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	Nil
7.	<u>Performance Evaluation:</u>	Yes	Nil



	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		
8.	<p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</p> <p>(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</p>	Yes	Nil
9.	<p><u>Disclosure of events or information:</u></p> <p>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.</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>	Yes	Nil
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>	No	Nil
12.	<p><u>Additional Non-compliances, if any:</u></p> <p>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.</p>	NA	No additional non compliances have been observed during the period under review



The listed entity has complied with the provisions of the above Regulations and circulars / guidelines issued thereunder, except in respect of matters specified below:

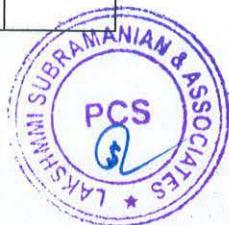
S N o	Compliance Requirement (Regulations / Circulars / guidelines including specific clause)	Regulation/Circular No	Deviations	A c t i o n b y	T y p e o f A c t i o n	Details of violation	F i n e a m o u n t	Observations / Remarks of Practicing Company Secretaries	Management Response	Re m ar ks
1	SEBI (SAST) Regulations	Regulation 31(4)	Yearly disclosure from the Promoter has not been submitted to the Stock exchanges within the time prescribed for the year under review.	N I L	N I L	Yearly disclosure from the Promoter has not been submitted to the Stock exchanges within the time prescribed for the year under review.	N I L	Yearly disclosure from the Promoter has not been submitted to the Stock exchanges within the time prescribed for the year under review.	NIL	N A

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

S N o	Compliance Requirement	Regulation/Circular No	Deviations	Action	Type of	Details of	Fine	Observations /	Management	Remarks
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	ent (Regulations / Circulars / guidelines including specific clause)			ta ke n by	Ac tio n	viola tive	ou nt	Re ma rks of Practi cing Com pa ny Secret aries	Resp onse	
1	SEBI(LO DR)2015	Regulati on 34(1)(a)	The copy of the annual report has not been upload ed in the stock exchan ge within 24 hours from the date of comm encem ent of dispatc h to its shareh olders	NI L	NI L	The copy of the Ann ual Repo rt shoul d be uplo aded in the stock exch ange not later than 24 hour s from the date of dispa tch	NI L	The copy of the Annu al Repor t shoul d be uplo aded in the stock excha nge not later than 24 hours from the date of dispat ch. Howe ver, the Com pany has uplo aded it on a	The Comp any has uploa ded the Annu al report on a later date but befor e the date of AGM	The requi reme nt of Regu ratio n 34(1)(a) has been comp lied by the Com pany for the year undu e revie w.



								later date		
2	SEBI/HO /CFD/CF D-PoD-1/P/CIR /2023/12 3 dated July 13, 2023	Regulati on 30	Procee dings of the Annual General Meeting not uploaded within the prescribed time	BS E NS E	Fi ne	Procedin gs of Annual General Meeting not uploaded within the prescribed time	Rs 23,600	Proceeding s of the Annual General Meeting not uploaded within the prescribed time	Fine amount has been paid by the company to both BSE and NSE	The Company has complied with Regulation 30 of SEBI (LODR) during the year under review.

FOR LAKSHMMI SUBRAMANIAN & ASSOCIATES
PRACTICING COMPANY SECRETARIES

Date: 26-05-2025

Place: Chennai



S. VASUDEVAN

Partner

FCS No.9495

C.P. No. 27636

Peer Review Certificate No: 6608/2025

UDIN:F009495G000429266