

**TWENTYFIRST CENTURY MANAGEMENT SERVICES LIMITED
CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

INTRODUCTION

This Corporate Social Responsibility (CSR) Policy has been formulated in accordance with the provisions of **Section 135 of the Companies Act, 2013**, the **Companies (Corporate Social Responsibility Policy) Rules, 2014**, and such other regulations, amendments, or circulars issued by the Ministry of Corporate Affairs (MCA) from time to time.

1. Objective

The objective of this Policy is to outline the CSR framework and approach of the Company towards contributing to sustainable social and environmental development in the communities in which it operates.

2. CSR Vision Statement

Our vision is to be a socially responsible corporate, committed to enhancing the quality of life and economic well-being of communities, especially in areas surrounding our business operations, through meaningful CSR initiatives.

3. Applicability

This Policy is applicable to **TWENTYFIRST CENTURY MANAGEMENT SERVICES LIMITED** (hereinafter referred to as "the Company") and applies to all CSR initiatives and activities undertaken by the Company as per Schedule VII of the Companies Act, 2013.

4. CSR Activities

The Company shall undertake CSR activities in accordance with the areas or subjects listed in **Schedule VII of the Companies Act, 2013**, as amended from time to time, including but not limited to:

- Promoting education, including special education and employment-enhancing vocation skills
- Eradicating hunger, poverty, and malnutrition
- Promoting healthcare including preventive healthcare and sanitation
- Ensuring environmental sustainability, ecological balance, conservation of natural resources
- Promoting gender equality and empowering women
- Measures for the benefit of armed forces veterans, war widows and their dependents



- Rural development projects
- Disaster relief and rehabilitation efforts
- Contribution to the Prime Minister's National Relief Fund or other notified funds

Note: Activities undertaken in the normal course of business or those benefitting only employees of the Company shall not qualify as CSR.

5. CSR Committee (if applicable)

In case required under Section 135(1) of the Companies Act, 2013, the Company shall constitute a CSR Committee of the Board. The Committee shall:

- Formulate and recommend a CSR Policy
- Recommend the amount of expenditure to be incurred
- Monitor the CSR Policy and projects from time to time

(If the company is covered under the exemption under Section 135(9), the functions of the CSR Committee shall be discharged by the Board of Directors.)

6. Modes of Implementation

CSR activities shall be implemented through the following modes:

a) Direct Implementation:

By the Company itself, using internal resources or designated teams.

b) Through Implementing Agencies:

The Company may undertake CSR projects through the following implementing agencies, subject to their registration with the Ministry of Corporate Affairs (MCA):

- A company established under Section 8 of the Companies Act, 2013
- A registered public trust or society
- A company or trust established by the Central or State Government
- Any entity (trust, society, or company) having a track record of at least 3 years in similar activities

The Company shall ensure that the implementing agencies are registered with MCA (CSR Form 1) and have a valid CSR Registration Number.

c) Collaboration:

The Company may also collaborate with other companies to undertake CSR projects or programs, provided each company is able to individually report on its CSR expenditures and outcomes.



7. Ongoing Projects – Procedure

An "ongoing project" is a multi-year project with a timeline not exceeding three years, excluding the year of commencement. The following procedure shall be followed:

- i. Approval:**
 - The Board shall identify and approve ongoing projects in the annual CSR plan, based on recommendation (if any) of the CSR Committee.
- ii. Implementation Plan:**
 - The project shall have defined objectives, implementation schedule, budget, and outcome indicators.
- iii. Registration of Implementing Agency:**
 - If implemented through a third-party agency, the agency must be registered with the Ministry of Corporate Affairs portal.
- iv. Monitoring Mechanism:**
 - Periodic progress reports shall be reviewed by the Board or CSR Committee.
 - Annual review and assessment shall be conducted to track deliverables and budget utilization.
- v. Modification or Extension:**
 - The Board may allow extension (within the permissible timeline of 3 years) based on genuine justification.
- vi. Reallocation of Funds:**
 - If an ongoing project is discontinued or funds remain unutilized, reallocation shall be made in compliance with applicable laws and transferred to the Unspent CSR Account, if required.
- vii. Disclosure:**
 - Status of ongoing projects, fund allocation and utilization shall be disclosed in the Annual CSR Report and Board's Report.

8. CSR Budget and Expenditure

- Minimum 2% of average net profits of the past three financial years shall be spent on CSR.
- Any surplus arising out of CSR activities shall not form part of business profits.
- Any unspent amount (other than for ongoing projects) shall be transferred to a Fund specified in Schedule VII within 6 months from the end of the financial year.
- For ongoing projects, unspent funds shall be transferred to a separate "Unspent CSR Account" within 30 days and utilized within 3 years.



9. Monitoring and Reporting

- Progress of CSR initiatives shall be reviewed periodically by the Board or CSR Committee.
- Details of projects, expenditures, and implementing agencies shall be disclosed in the Annual CSR Report and uploaded on the Company's website, if applicable.
- Independent assessments or audits may be conducted, if required, to ensure impact and transparency.

10. Amendment and review

This Policy may be amended at any time by the Board in line with any legislative changes or business needs.

This policy is amended and approved by the Board of Directors at their meeting held on 27.05.2026.

