Corporate Social Responsibility

1. Introduction:

Twin City Fan India Private Limited (the "Company") is committed to implementing a programme that helps the community to generate good will for the Company as a good corporate citizen of the Country.

The objective of Corporate Social Responsibility (CSR) is to benefit the society by improving the quality of individuals, their families and local community at large.

The Company through its CSR activities intends to participate in the overall development of the society and encourage alignment with Social Development Goals (SDGs) related to eradicating hunger, poverty and malnutrition and making available safe drinking water; promoting education, and slum area development.

This Policy is effective from December 1, 2025, as amended from time to time.

This Policy lays down the guidelines and mechanism for undertaking socially useful programs for welfare and sustainable development of the community at large. The Company's CSR policy has been framed in accordance with Section 135 of the Companies Act, 2013 and the rules framed thereunder. This Policy covers all the internal dimensions of the CSR structure and further captures and sets out the process of implementation of the CSR related activities.

2. Purpose of CSR:

i. To ensure that the Company is committed to operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interests of all its stakeholders.
ii. To take up programmes that benefit the communities in and around its work centres and over a period of time, results in enhancing the quality of life of the people in the area of its business operations.
iii. To generate a community goodwill for the Company and help reinforce a positive and socially responsible image of Company as a good corporate citizen of the Country.

3. Key Focus Areas:

While the Company may undertake CSR activities which the Corporate Social Responsibility Committee of the Board ("CSR Committee") may decide from time to time, in accordance with the requirements under the Companies Act, 2013 (the "Act") and the rules / regulations framed thereunder the Company's activities, within the ambit of Schedule VII of the Companies Act, 2013; amongst others, will focus on:

(i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water.
(ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
(iii) slum area development.

4. Monitoring Bodies:

Board of Directors - At the helm of the governance mechanism is the Board of Directors who shall have the overall responsibility to ensure that the funds disbursed towards CSR activities have been utilized for such purposes and in the manner as approved by the Board. Corporate Social Responsibility Committee.

CSR Committee - The CSR initiatives/activities of the Company will be identified and initiated by the CSR Committee comprising of three (3) or more Directors out of which at least one Director shall be an Independent Director. The CSR Committee comprises of the following independent directors:

(i) Michael Barry
(ii) Ronald Barry

The Committee will recommend the Annual CSR Action Plan to the Board for its approval. The plan will inter alia include resource requirements and allocation across CSR activities.

5. Resources for CSR

The Company will utilize 2% of the average net profits of the Company made during three immediately preceding Financial Years. The overall amount to be committed towards CSR will be approved by the Board, upon recommendation of the CSR Committee, as a part of its Annual Action Plan.

Note:

i. Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same/similar program and spent in pursuance of CSR Policy and annual action plan of the Company.
ii. The Company endeavours to fulfil its CSR obligations in a timely manner. However, in the circumstances beyond the Company's control, if the required amount to be spent by the Company may not be expended in its entirety in the relevant financial year, the Company shall ensure due compliance with the necessary provisions under the Act including reclassification of the project as ongoing project.
iii. If CSR contribution made for creation or acquisition of a capital asset in pursuance of its CSR projects/ initiatives, the same shall be held in the manner prescribed under the Act.

6. Implementation of CSR

We will implement our CSR activities in a number of ways:

i. Directly
ii. Through NGOs
iii. Participatory Approach involving beneficiaries
iv. Involving experts

Each of our CSR projects and programmes would have clearly defined output, outcome and process indicators which will have to be reported on a periodic basis. All projects and programmes will be primarily monitored by the Internal CSR team of the Company, based on the reports and field visits and be reported

to the CSR Committee. The CSR Committee will receive periodical progress reports of all CSR activities of the company. The Company may also collaborate with other companies for undertaking projects or CSR activities.

7. Monitoring of CSR Activities:

The CSR activities of the Company will be duly monitored. The monitoring process adopted by the Company may include obtaining of reports of different kind, self-declaration, On-site visit, pictures or videos of project sites, etc. Further, the monitoring process may involve

(i) periodic reporting; and

(ii) periodic review and assurance visits of the CSR projects:

Periodic reporting: The implementing agency will be required to submit project fund utilization statement on a periodic basis and the audited financial statement, utilization statement, etc. on a yearly basis

Periodic review and assurance visits: The Company will be permitted to undertake field visits, review calls, conduct independent assurance or evaluation visits to assess the project implementation including key milestones or key performance indicator, fund utilization and usage of capital assets, etc.

Notwithstanding the aforesaid, The Company may determine any specific review and reporting requirement including third party audits or evaluation by external agencies depending on the nature of implementing agency and the project involved.

8. Annual Action Plan:

All the guiding principles as required to be followed for implementing and monitoring the CSR Activities shall also be followed while formulating the Annual Action Plan. The Annual Action plan shall be simple, action oriented, measurable and time bound.

9. Disclosure and Transparency:

CSR Policy, composition of the CSR Committee and the projects approved by the Board are displayed on the website of the Company.

10. General:

Any or all provisions of this CSR Policy will be subject to revision / amendment in accordance with the amendments in the Companies Act, 2013 or Companies (Corporate Social Responsibility Policy) Rules, 2014 and any guidelines on the subject as may be issued from Government from time to time. The Board reserves the right to amend, modify, cancel, add, or alter any provisions of this Policy.