Touchwood Entertainment Limited
Corporate Social Responsibility
(CSR) Policy

Corporate Social Responsibility Policy

This Corporate Social Responsibility Policy ("the CSR Policy") has been framed by Touchwood Entertainment Ltd ("the Company") in accordance with Section 135, Schedule VII of the Companies Act, 2013 and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014.

1. Company Philosophy for CSR Policy

Touchwood Entertainment Ltd recognizes its responsibility as a leading event management company to contribute towards inclusive growth and sustainable development. We are committed to conducting our business in a socially responsible and ethical manner that enhances the quality of life of our workforce, their families, the local community, and society at large. We appreciate the CSR mandate introduced under the Companies Act, 2013 and aim to channel our efforts in a structured and impactful manner for community development.

2. Definitions

In this Policy unless the context otherwise requires:

a) 'Act' means Companies Act, 2013;

b) 'Administrative Overheads' means the expenses incurred by the Company for 'general management and administration' of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;

c) 'Rules' means Companies (Corporate Social Responsibility Policy) Rules, 2014 and amendments thereto;

d) 'Corporate Social Responsibility' means Corporate Social Responsibility (CSR) as defined in Section 135 of the Companies Act 2013 read with the Companies (Corporate Social Responsibility Policy) Rules 2014 and amendments thereto;

e) 'Ministry' means the Ministry of Corporate Affairs

f) 'Net Profit' means net profit as defined in Section 135 of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014 and amendments thereto, as set out below:
Net Profit as per financial statements prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:

(i) any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and

(ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act.

g) Words and expressions used in this CSR Policy and not defined herein but defined in the Act and Rules shall have the meaning respectively assigned to them in the Act and Rules.

3. Corporate Social Responsibility Committee

The Company has constituted the Corporate Social Responsibility Committee ("the Committee") comprising the following Directors:

- Mr. Manjeet Singh Saini - Chairman
- Ms. Jaswinder Kaur – Member
- Ms. Priyanka Arora – Member

The Board of Directors may re-constitute the Committee as and when required in accordance with applicable rules and regulations issued by the Ministry of Corporate Affairs.

4. CSR Activities

Pursuant to Schedule VII of the Companies Act, 2013, the Company may undertake the following activities as part of its CSR initiatives:

- Promoting education, including vocational skills especially in areas relevant to event management, hospitality, and media.
- Supporting preventive healthcare and sanitation drives during events and festivals.
- Promoting gender equality and empowering women through employment training in event services.
- Environmental sustainability initiatives at event venues including waste management and reducing carbon footprint.
- Contributions to national relief efforts and disaster management.
- Supporting traditional art, crafts, and cultural performances at Company events.
- Collaborations with NGOs, academic institutions, and government bodies for aligned initiatives.
- Other CSR activities permitted under Schedule VII of the Companies Act, 2013.

5. CSR Budget & Expenses

CSR Amount:

1. As per the Act, the Company will set aside, for annual CSR activities, an amount equal to 2% of the average Net Profits of the Company made during the three immediately preceding financial years.
2. Any amount remaining unspent pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by a company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the Company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the Company shall transfer the same to a Fund specified in point no. 3 below, within a period of thirty days from the date of completion of the third financial year.

3. Until a fund is specified in Schedule VII of the Act for the purposes of unspent amount as per sub-sections (5) and (6) of section 135 of the Act, such unspent CSR amount, if any, shall be transferred by the Company to any fund specified in schedule VII of the Act within six months of the end of the financial year.
4. In case of excess amount spent by the Company, such excess amount may be set off against the requirement to spend the amount in pursuance of CSR policy up to immediate three financial years subject to the conditions that:
   - the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any; and
   - the Board resolution shall be passed to that effect.

   Provided that all reasonable efforts will be made to ensure that the annual CSR allocation is fully utilized in the respective year. However, if the Company fails to spend such amount, the Board of Directors shall additionally, in its report under clause (o) of sub-section (3) of section 134 of the Act, shall specify the reasons for not spending the amount.

5. The CSR amount may be spent by the Company for creation or acquisition of a capital asset, which shall be held by:
   a. a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number; or
   b. beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
   c. a public authority.
6. The approved projects shall contain the details of the proposed expenditure for respective Financial Year, towards CSR activities. The same shall be amended annually according to the Financial Year after the review by the Committee or at such time, as the Committee may deem fit.
7. Tax treatment of CSR spend will be in accordance with the Income Tax Act, 1961 as may be notified by Central Board of Direct Taxes (CBDT).

6. Identification of Activities/Projects

The CSR Committee shall prioritize projects based on need assessments in communities where the Company operates or conducts events. Factors such as community welfare, education, health, and sustainability will be considered in project selection.

7. Implementation Process

The Committee shall finalize the execution plan and monitor its progress. Implementing teams from internal departments or external partners may be appointed to execute CSR initiatives efficiently.

8. Organizational Responsibility

The CSR Committee may assign implementation responsibility to specific teams within the organization. These teams shall track execution and report progress quarterly to the Committee.

9. Monitoring by the Board

The Board shall receive quarterly reports from the CSR Committee detailing the implementation, performance, and financials of ongoing projects and make necessary recommendations.

10. Compliance and Reporting

The Committee shall ensure full compliance with applicable laws and submit annual CSR reports detailing activities undertaken, outcomes, and expenditure to the Board. These will also be included in the Company's Annual Report as per statutory requirements.

11. Management Commitment

Touchwood Entertainment Ltd, through its Board and Management, reaffirms its commitment to sustainable and inclusive growth. We aim to integrate social responsibility into our core operations and uphold the highest standards of community engagement and ethical conduct.

12. Display of CSR Activities on the Website

The Composition of the CSR Committee, and CSR Policy and Projects approved by the Board shall be disclosed on the website of the Company for public access.

13. Amendments to the Policy

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy, as per the requirements as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Regulations on the subject as may be issued from relevant statutory authorities, from time to time.

As approved by the Board of Directors of the Company in their meeting held on 20th May, 2025.

Sd/-
Mr. Manjit Singh
Managing Director