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CIN No. U67110GJ2000PTC121951

CORPORATE SOCIAL RESPONSIBILITY POLICY

(Approved by the Board of Directors on 27th July, 2026)

1. INTRODUCTION

This policy aims to contribute towards the sustainable development of society and the environment to make the planet a better place for future generations. As an integral part of our commitment to Good Corporate Citizenship, we believe in actively assisting in the improvement of the quality of life of people in communities, giving preference to local areas around our business operations in association with eligible Implementing Agencies registered with the Ministry of Corporate Affairs. Company's CSR efforts shall focus on education for all, thereby promoting education and giving preference to the needy and deserving ones.

This Corporate Social Responsibility Policy ("CSR Policy") has been framed in accordance with the provisions of Section 135 of the Companies Act, 2013, read with Schedule VII thereto and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time, including the latest amendments notified by the Ministry of Corporate Affairs.

The Company is committed to conducting its business in a socially responsible, ethical and sustainable manner and to contributing towards the economic, environmental and social development of the communities in which it operates.

2. DEFINITIONS

- ✓ "Act" means the Companies Act, 2013.
- ✓ "Board of Directors" or "Board" means the collective body of the directors of the company.
- ✓ "Company" means "Millennium Stock Broking Private Limited".
- ✓ "CSR Committee" means Corporate Social Responsibility Committee constituted by the Board of Directors of the Company.
- ✓ "CSR Policy" means CSR policy of Millennium Stock Broking Private Limited.
- ✓ "CSR Rules" mean the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.
- ✓ "Implementing Agency" means any entity registered with the Ministry of Corporate Affairs for undertaking CSR projects, which is engaged by the company to implement various projects in pursuance of CSR policy.

Any term used in this policy but not defined herein shall have the same meaning assigned to it under the Act and CSR Rules as applicable to the company.

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3. OBJECTIVES

The main objectives of the Company's CSR policy are:

- ✓ To comply with the provisions of Section 135 of the Companies Act, 2013;
- ✓ To undertake CSR activities in accordance with Schedule VII of the Act;
- ✓ To lay down guidelines to make CSR a key business process for sustainable development of the society;
- ✓ To directly/indirectly undertake projects/programs, which will enhance the quality of life and economic well-being of the communities in and around our sites and society at large;
- ✓ To generate goodwill and recognition among all stakeholders of the company;
- ✓ To promote a unified approach to CSR by identifying select causes to work with, thereby ensuring a high social impact.

4. CSR COMMITTEE AND GOVERNANCE

Constitution of CSR Committee under section 135(1) is not applicable in our company as the CSR amount to be spent under section 135(5) does not exceed Rs. 50 Lakhs in a financial year. Therefore, the functions of the CSR Committee shall be discharged by the Board of Directors of the Company under section 135(9) of the Companies Act, 2013.

The following are the functions of the CSR Committee to be discharged by the Board of Directors:

a) To formulate and recommend a CSR policy indicating the activities to be undertaken by the company in areas or subjects specified in Schedule VII to the Act;
b) To recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
c) To formulate and recommend an annual action plan in pursuance of CSR policy covering the following aspects:
    - the list of approved CSR projects or programs to be undertaken in areas or subjects specified in Schedule VII to the Act;
    - the manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules;
    - the modalities of utilization of funds and implementation schedules for the projects or programs;
    - monitoring and reporting mechanism for the project or programs; and
    - details of need and impact assessment, if any, for the projects undertaken by the company;
d) Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.
e) To monitor the CSR policy as approved by the Board from time to time.
f) Formulating and recommending to the Board the CSR policy and a CSR annual action plan, provided that the Board may alter such plan at any time during the financial year based on reasonable justification to that effect.

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5. CSR ACTIVITIES

The Company shall undertake CSR activities for development of the Society and the environment, particularly in the vicinity of the areas where the facilities of the Company are located. It shall undertake such activities which are broadly related to any of the following:

- ✓ Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation
- ✓ Promoting education, including special education and employment enhancing vocation skills especially among children, women, the elderly and the differently abled and livelihood enhancement projects.
- ✓ Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- ✓ Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water.
- ✓ Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- ✓ Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- ✓ Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports
- ✓ Rural development projects
- ✓ Development of area declared as "slum area" by the Government or Competent Authority.
- ✓ Disaster management, including relief, rehabilitation and reconstruction activities.

The Company may also contribute to the following funds as part of CSR activities:

- ✓ Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- ✓ Clean Ganga Fund set up by the Central Government for rejuvenation of river Ganga;
- ✓ Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the scheduled caste, tribes, other backward classes, minorities and women;
- ✓ Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government;
- ✓ Contributions to public-funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST);

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Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

The above areas as enshrined in Schedule VII to the Act and included in this policy, aim to provide macro areas in which CSR projects should be undertaken by the Company. The Company should consider details of CSR projects as elaborated in the annual action plan for each financial year.

Any CSR activity proposed to be undertaken as a CSR initiative, but not specifically covered in the aforesaid, may be undertaken only with the prior approval of the Board.

6. FOCUS AREAS

While the company may undertake CSR activities in any areas listed above, the focus areas of CSR activities should be on the following aspects:

- ✓ Education for the underprivileged
- ✓ Safe Drinking Water
- ✓ Eradicating Hunger and Poverty
- ✓ Environment protection
- ✓ Health Camps
- ✓ Empowering Women and Promoting gender equality

7. ANNUAL ACTION PLAN

The Board shall formulate an annual action plan which shall include the following:

- ✓ the list of CSR projects or programmes that are approved and to be undertaken by the company;
- ✓ the manner of execution of such projects or programmes;
- ✓ the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- ✓ monitoring and reporting mechanism for the projects or programmes; and
- ✓ details of need and impact assessment, if any, for the projects undertaken by the company.

The Board of Directors is empowered to alter the annual action plan during the financial year, if so required, based on reasonable justification for such change.

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8. CSR SPEND / SOURCES OF FUNDING

The Company shall endeavour to achieve the objectives of CSR policy and allocate every year at least 2% of the average net profit during the three immediately preceding financial years on CSR activities as enumerated above.

Any surplus arising out of the contribution made for CSR Activities, projects or programmes shall not form part of the business profit of the Company and shall be redeployed for such activities.

All the expenditure relating to CSR shall be pre-approved by the Board. The Board shall monitor the utilisation of funds for the purposes set forth and certify to this effect. Administrative overheads shall not exceed the limits prescribed under the CSR Rules.

Unspent CSR amount, if any, relating to ongoing projects shall be transferred to a separate Unspent CSR Account and any other unspent amount to the funds specified in Schedule VII within the timelines prescribed under Section 135 of the Act.

9. MODE OF IMPLEMENTATION

CSR programs, projects or activities of the Company to be implemented through the following:

- directly by the Company;
- through an eligible Implementing Agency registered with the Ministry of Corporate Affairs by filing Form CSR-1 as per the CSR Annual Action Plan laid out by the Board;
- through a Section 8 Company, Registered Public Trust or Registered Society fulfilling the prescribed conditions;
- through collaborations with other companies, where permitted;
- through eligible government entities;
- through eligible Zero Coupon Zero Principal (ZCZP) Instruments issued by Not-for-Profit Organisations registered on the Social Stock Exchange, in accordance with the applicable CSR Rules and SEBI Regulations.

10. NEED AND IMPACT ASSESSMENT

After one year of completion of the CSR project, the company should consider conducting an impact assessment of the project so completed through an independent agency and place a report for consideration of the Board, if applicable.

A summary of the impact assessment outcome shall be disclosed in the Board's Report if the average CSR obligation of the company in the three immediately preceding financial years is more than ten (10) crore rupees as per section 135(5) of the Companies Act, 2013 and Rule 8 sub-rule 3(a) of the Companies (Corporate Social Responsibility Policy) Rules, 2014.

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11. CAPITAL ASSETS

Capital assets acquired or created by CSR projects should be held by the beneficiaries of the said CSR project or a trust or a public authority for the benefit of all under the Companies (CSR Policy) Rules, 2014.

The Company should take appropriate measures to ensure that such assets are utilised for the purposes it was meant for and should not be transferred or disposed of without prior permission of the Company.

12. EXCLUSION FROM CSR

The following activity shall not form part of the CSR activities of the Company:-

- ✓ The activities undertaken in pursuance of the normal course of business of a company;
- ✓ CSR projects/programs or activities that benefit only the employees of the Company and their families;
- ✓ Any contribution directly/indirectly to a political party or any funds directed towards political parties or political causes;
- ✓ Any CSR projects/programs or activities undertaken outside India except where specifically permitted;
- ✓ Activities not falling within Schedule VII.

13. MONITORING & REPORTING

The Board will be responsible for monitoring CSR activities and shall periodically review:

- ❖ implementation of CSR projects;
- ❖ utilisation of CSR funds;
- ❖ progress reports received from implementing agencies;
- ❖ achievement of intended objectives.

Implementing agencies shall submit utilisation certificates and periodic progress reports.

14. INFORMATION DISSEMINATION AND DISCLOSURES

The Company shall make all disclosures required under the Companies Act, 2013 and the Companies (CSR Policy) Rules, 2014, including:

- ❖ disclosures in the Board's Report;
- ❖ disclosures of the CSR Policy and approved CSR projects on the Company's website, where applicable
- ❖ any other statutory disclosures prescribed from time to time.

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15. AMENDMENT OF POLICY

The Board may amend, modify or replace this policy from time to time to ensure compliance with the Companies Act, 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014, Schedule VII and all statutory amendments issued by the Ministry of Corporate Affairs.

16. EFFECTIVE DATE

This Policy shall come into effect from the date of its approval by the Board of Directors and shall remain in force until amended or replaced.

Certified to be a true CSR Policy of the Company

For MILLENNIUM STOCK BROKING PVT LTD

For MILLENNIUM STOCK BROKING PVT. LTD.

Pawan

Director

Pawan Kumar Daga
Director

For MILLENNIUM STOCK BROKING PVT. LTD.

Kaushik Daga

Director

Kaushik Daga
Director

Date: 30.07.2026
Place: Kolkata