



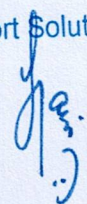
POLICY FOR PRESERVATION OF DOCUMENTS

OF

VARDHMAN AIRPORT SOLUTIONS LIMITED

Pursuant to the provisions of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

For Vardhman Airport Solutions Ltd.

 Director

POLICY FOR PRESERVATION OF DOCUMENTS

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PREAMBLE

The Securities and Exchange Board of India (SEBI) has notified the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Regulations"), which are applicable to listed entities including companies proposed to be listed on the SME Platform. The Board of Directors of the Company has approved this Policy for Preservation of Documents to ensure systematic retention of records in compliance with applicable laws and to safeguard the interests of the Company and its Promoters.

OBJECTIVE

The objective of this Policy is to ensure that documents and records of the Company are preserved in an orderly manner to meet statutory, regulatory, operational, litigation and capital market requirements, including those arising in connection with the Company's proposed SME Initial Public Offering ("IPO").

DEFINITIONS

Terms not defined herein shall have the same meaning as assigned to them under the Companies Act, 2013 and the SEBI Listing Regulations.

POLICY FOR PRESERVATION OF DOCUMENTS

Documents shall be classified into the following categories:

1. Documents to be preserved permanently.
2. Documents to be preserved for a minimum period of eight (8) years after completion of the relevant transaction.

Notwithstanding the above, documents relating to the SME IPO, offer documents, promoter disclosures, material contracts, litigations, investigations, inspections or regulatory proceedings shall be preserved for such longer period as may be required under applicable law or until final closure of such proceedings, whichever is later.

No document shall be destroyed if it relates to any ongoing or reasonably anticipated litigation, inquiry, inspection, investigation or regulatory proceeding, notwithstanding the expiry of the prescribed retention period.

For Vardhman Airport Solutions Ltd.

Director

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The custody of statutory and listing-related documents shall be with the Company Secretary. Documents may be maintained in physical or electronic form, subject to adequate security, access control and audit trail.

DESTRUCTION OF DOCUMENTS

Documents eligible for destruction under this Policy shall be destroyed only with prior approval of the Company Secretary and after recording the details in a Register of Documents Destroyed.

SAFE HARBOUR

Promoters, Directors and employees shall be entitled to rely on this Policy as approved by the Board for the purpose of compliance with document preservation requirements.

COMMUNICATION OF THE POLICY

This Policy shall be communicated to all Directors and employees and shall be made available on the website of the Company.

AMENDMENT

The Board of Directors may amend this Policy from time to time in line with changes in applicable law or regulatory requirements.

ANNEXURE A – PERMANENT PRESERVATION

- Certificate of Incorporation and statutory licenses
- Memorandum and Articles of Association
- Minutes of Board, Committee and General Meetings
- Statutory Registers
- Offer Documents (DRHP, RHP, Prospectus) and SEBI correspondence
- Promoter declarations, undertakings and disclosures
- Insider Trading structured digital database
- Material contracts disclosed in the Offer Documents
- Litigation and regulatory records

ANNEXURE B – PRESERVATION UP TO 8 YEARS

- Annual Returns
- Financial statements and books of accounts
- Board agendas and supporting papers
- Attendance registers
- Share transfer and investor grievance records

For Vardhman Airport Solutions Ltd.

 Director
