VARDHMAN

Airport Solutions

ISO 9001:2015 Certified Company

RISK MANAGEMENT POLICY

OF

VARDHMAN AIRPORT SOLUTIONS LIMITED

{Pursuant to Regulation 21 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015}

For Vardhman Airport Solutions Ltd.

Director

RISK MANAGEMENT POLICY

1. PREAMBLE

Vardhman Airport Solutions Limited ("the Company") recognises that effective risk management is a critical component of sound corporate governance. This Risk Management Policy ("Policy") has been framed in accordance with the provisions of the Companies Act, 2013 and applicable regulatory requirements.

This Policy shall be applied with enhanced focus during the period of the Company's proposed SME Initial Public Offering ("IPO") and the post-listing phase, having regard to heightened regulatory, disclosure and reputational sensitivities.

2. OBJECTIVE

The objective of this Policy is to establish a structured framework for identification, assessment, monitoring and mitigation of risks faced by the Company, and to support accurate, adequate and not excessive risk disclosures in offer documents, statutory filings and regulatory communications.

3. APPLICABILITY

This Policy applies to all functions, operations and activities of the Company, including risks arising from:

- strategic and operational decisions;
- financial and commercial activities;
- capital market transactions, including the SME IPO;
- promoter, related party and group entity matters;
- regulatory, legal and compliance obligations.

4. RISK MANAGEMENT FRAMEWORK

The Company shall identify and manage risks through a systematic process involving:

- identification of risks;
- assessment of likelihood and impact;

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- prioritisation based on materiality;
- formulation and implementation of mitigation measures; and
- periodic review and monitoring.

The Company shall focus on material risks that may have a significant impact on its business, financial position, reputation or compliance obligations.

5. TYPES OF RISKS

The risks faced by the Company may include, inter alia:

- Strategic and business risks;
- Operational risks;
- Financial and liquidity risks;
- Regulatory and compliance risks;
- Capital market and listing risks;
- Related party and promoter-related risks;
- Information security, data protection and UPSI-related risks;
- Reputational risks.

6. ROLES AND RESPONSIBILITIES

Board of Directors:
The Board shall have overall responsibility for risk oversight and shall review material risks and mitigation measures periodically.

Audit Committee:
The Audit Committee shall, where applicable, review key financial, compliance and regulatory risks.

Management:
The management shall be responsible for identification, assessment and mitigation of risks within their respective functions and for reporting material risks to the Board or Audit Committee, as appropriate.

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7. DOCUMENTATION AND REVIEW

Material risks identified and mitigation measures adopted shall be documented and reviewed periodically. Such documentation shall be preserved in accordance with the Company's Policy for Preservation of Documents.

8. DISCLOSURE

Risk disclosures shall be aligned with disclosures made in the Company's offer documents, Board's Report and, upon listing, stock exchange filings, as applicable.

9. SAFE HARBOUR

Promoters, Directors and employees shall be entitled to rely on this Policy and risk assessments carried out in good faith under this Policy, as approved by the Board, for governance and regulatory purposes.

10. REVIEW AND AMENDMENT

The Board of Directors may review and amend this Policy from time to time to align with changes in law, regulations or business requirements.

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For Vardhman Airport Solutions Ltd.

Director