



Airport Solutions

ISO 9001:2015 Certified Company

CORPORATE SOCIAL RESPONSIBILITY POLICY

OF

VARDHMAN AIRPORT SOLUTIONS LIMITED

**(Pursuant to the provisions of Section 135 of the Companies Act, 2013,
Rule 5 of the Companies (Corporate Social Responsibility) Rules, 2014,)**

For Vardhman Airport Solutions Ltd.

[Signature]
Director

CORPORATE SOCIAL RESPONSIBILITY POLICY

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. INTRODUCTION:

Vardhman Airport Solutions Limited ("the Company") recognises its responsibility towards society and the environment and believes in conducting business in an ethical and sustainable manner. This Corporate Social Responsibility ("CSR") Policy has been framed in accordance with the provisions of Section 135 of the Companies Act, 2013 and the rules made thereunder.

This Policy shall be implemented with due consideration to the Company's financial position and obligations during the proposed SME Initial Public Offering ("IPO") and post-listing phase.

2. APPLICABILITY:

The provisions of this Policy shall apply to the Company where applicable under Section 135 of the Companies Act, 2013 and the rules made thereunder, based on the prescribed financial thresholds.

3. CSR OBJECTIVES:

The objectives of the Company's CSR initiatives, where applicable, shall be to:

- contribute to sustainable development of society;
- promote inclusive growth and social welfare;
- align CSR activities with the Company's values and long-term strategy;
- ensure that CSR initiatives are undertaken in a responsible and transparent manner.

4. CSR ACTIVITIES:

The Company may undertake CSR activities in areas specified under Schedule VII of the Companies Act, 2013, as amended from time to time, subject to approval of the Board and the CSR Committee, where constituted.

5. CSR COMMITTEE:

For Vardhman Airport Solutions Ltd.

Director

The CSR Committee, where applicable, shall be constituted in accordance with the provisions of the Companies Act, 2013. The Committee shall formulate and recommend the CSR Policy, monitor CSR projects and recommend the amount of expenditure to be incurred on CSR activities.

6. IMPLEMENTATION AND MONITORING:

CSR activities may be implemented directly by the Company or through eligible implementing agencies, in accordance with applicable law. The CSR Committee shall monitor the implementation of CSR projects and report to the Board periodically.

Records relating to CSR projects, expenditure and monitoring shall be documented and preserved in accordance with the Company's Policy for Preservation of Documents.

7. CSR EXPENDITURE:

Where applicable, the Company shall endeavour to spend, in every financial year, at least two percent (2%) of the average net profits of the Company made during the three immediately preceding financial years on CSR activities, in accordance with the Companies Act, 2013.

8. SURPLUS AND UNSPENT CSR AMOUNT:

Any surplus arising out of CSR activities shall not form part of the business profit of the Company and shall be dealt with in accordance with the provisions of the Companies Act, 2013 and applicable CSR Rules.

Unspent CSR amounts, where applicable, shall be transferred in accordance with the statutory requirements.

9. ROLES AND RESPONSIBILITIES:

The Board of Directors shall have overall responsibility for CSR initiatives. Directors and Promoters shall be entitled to rely on actions taken in good faith under this Policy, based on information, certifications and recommendations provided by management, professionals and implementing agencies.

For Vardhman Airport Solutions Ltd.


Director

CORPORATE SOCIAL RESPONSIBILITY POLICY

10. DISCLOSURE:

Disclosures relating to CSR shall be made in the Board's Report in accordance with the Companies Act, 2013. Upon listing, disclosures shall also be made in accordance with applicable SEBI Listing Regulations.

11. REVIEW AND AMENDMENT:

The Board of Directors may review and amend this Policy from time to time to ensure compliance with applicable law, regulations and business requirements.

For Vardhman Airport Solutions Ltd.


Director

CORPORATE SOCIAL RESPONSIBILITY POLICY