



Vardhaman Capital Private Limited

Members : NSE & BSE • DEPOSITORY PARTICIPANT : NSDL • SEBI Regd. No.: INZ000204533



Vardhaman Capital Private Limited

POLICY ON INFORMATION TECHNOLOGY ACT COMPLIANCE

Policy created by	Designated Officer
Policy creation date	10/04/2026
Policy reviewed by	Technology Committee
Previous Review Dates	10/04/2025
Policy reviewed on	17/04/2026
Policy Approved by	Board of Directors
Policy approved on	17/04/2026

Version - 3.0

Introduction

The Information Technology Act, 2000 (IT Act), is India's primary law governing electronic records, electronic signatures, cyber offences, cybersecurity and digital governance. Our organization reaffirms its commitment to complying with the IT Act, 2000, the Information Technology Rules applicable to the organization, CERT-In directions and other applicable regulatory requirements. The organization also recognizes the Digital Personal Data Protection Act, 2023 (DPDP Act) and the Digital Personal Data Protection Rules, 2025 (DPDP Rules), with implementation to be carried out in accordance with their respective commencement provisions.

Key Policies and Provisions

1. Digital Signatures

Our organization recognizes and upholds the legal validity of electronic records and electronic signatures under the IT Act:

- Use digital signatures/electronic signatures for secure and authenticated transactions wherever required or appropriate.
- Engage with Certifying Authorities (CAs) licensed by the Controller of Certifying Authorities (CCA), wherever applicable.
- Ensure secure issuance, use, storage, renewal and revocation of digital certificates and protection of signing credentials from unauthorized access.

2. Electronic Governance

To improve transparency, efficiency, security and compliance with applicable requirements:

- Implement electronic records, electronic signatures and digital workflows for internal and external communications wherever appropriate.
- Maintain appropriate controls for record retention, backup, recovery, integrity, availability and traceability of critical electronic records.

3. Electronic Commerce

Supporting secure digital transactions through:

- Recognition and validation of electronic contracts, records and agreements in accordance with applicable law.
- Secure electronic payment systems and adherence to applicable RBI, SEBI, exchange and IT Act requirements for electronic transactions and fund transfers, wherever applicable.

4. Cybersecurity

In line with the IT Act, applicable CERT-In directions and other regulatory cybersecurity requirements:

- Implement preventive, detective and corrective controls against hacking, malware, phishing, ransomware, unauthorized access, data breaches and other cyber threats.
- Maintain ICT system logs securely for a rolling period of at least 180 days and within India, wherever required under applicable CERT-In requirements.

- Maintain an appropriate incident reporting mechanism and report applicable cyber security incidents to CERT-In within the prescribed timeline, including the applicable six-hour reporting requirement.

5. Data Protection and Privacy

As per the Digital Personal Data Protection Act, 2023 and Digital Personal Data Protection Rules, 2025, as and when the respective provisions become applicable, our organization will:

- Collect and process personal data for lawful purposes with appropriate notice, consent or other permitted grounds, purpose limitation and transparency, as applicable.
- Appoint a Data Protection Officer or other designated function where required under applicable law.
- Implement appropriate technical and organizational measures, including access control, authentication, encryption where appropriate, secure backup, monitoring and periodic risk assessments.
- Maintain a personal data breach response mechanism and make notifications to the Data Protection Board, affected data principals and other authorities where and when legally required.
- Maintain appropriate mechanisms for data principal rights, grievances and other obligations from their respective applicable commencement dates.

6. Intermediary Liability

Where the organization qualifies as an intermediary or other covered entity, it will comply with the applicable provisions of the IT Rules, 2021, as amended:

- Publish and maintain applicable privacy policy, terms and conditions, user rules and grievance redressal mechanisms.
- Act upon valid government or court orders and other legally valid directions within the timelines prescribed under the applicable law.
- Where applicable, comply with enhanced due diligence requirements relating to unlawful content, impersonation, privacy-related content, child sexual abuse material and synthetically generated information.
- Appoint a Grievance Officer, nodal/compliance officer or other designated personnel where required under applicable law.

7. Penalties, Offenses, and Adjudication

We comply with:

- Penal provisions applicable to cyber offences such as unauthorized access, data theft, identity theft, impersonation, cheating by personation, malicious code, denial-of-service attacks and other offences under applicable law.
- Cooperation with adjudicating officers, law enforcement agencies, regulators, CERT-In and competent authorities in accordance with lawful requests.
- Financial penalties, compensation and other consequences under the IT Act, DPDP Act and other applicable laws, wherever applicable.

Amendments and Regulatory Updates

Our organization acknowledges ongoing legal and regulatory developments in the information technology, cybersecurity and data protection space:

- Remain updated with notifications, rules, directions and advisories issued by MeitY, CERT-In, CCA, the Data Protection Board of India, SEBI, stock exchanges and other applicable authorities.
- Modify internal policies, procedures and controls as necessary to reflect changes in statutory and regulatory obligations.
- Conduct regular staff training, cybersecurity awareness, compliance reviews and audits for continuous awareness and accountability.

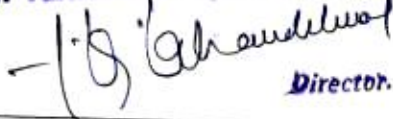
Conclusion

Our organization is dedicated to adhering to the Information Technology Act, 2000, applicable IT Rules, CERT-In directions, the Digital Personal Data Protection Act, 2023 and the Digital Personal Data Protection Rules, 2025, as applicable. We will continuously monitor legal and regulatory updates and adopt necessary changes to our IT governance, cybersecurity, data protection and incident management frameworks.

All employees, officers, and directors are required to comply with this policy. Any applicable changes or updates in law or regulatory requirements will be incorporated by the organization and shall be binding on all concerned.

For Vardhaman Capital Private Limited

For Vardhaman Capital Pvt. Ltd.


Director.

Authorised Signatory