

# SANJAY VARDHAN

Address: 1101-B, Omvikas Tower, Walkeshwar Road, Mumbai

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To,  
The Board of Directors,  
**VCU Data Management Limited**  
Office No. 721 Metroplex 14 B Wing,  
Ijmima. Opp Sony Tv Building, Link Road,  
Malad (W), Mumbai 400064.

**Sub:** Application for removal of my name from Promoter of the Company

**Ref:** Reg. 31A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir,

With reference to the above subject, I would like to inform that at present I am holding 13,55,100 equity share out of the total paid up equity share capital of VCU Data Management Limited (hereinafter referred as "The Company") and have been classified by the "Company" under Promoter Category in the Shareholding Pattern filled by the Company with the Stock Exchanges and other regulatory authorities.

In respect to the aforesaid matter, I wish to inform you that since now I am not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control, over the affairs or the decision making process of the Company whatsoever including by virtue of our shareholding. None of our act would impact the decision taken by the Company.

Further in accordance with the provisions of Regulation 31A of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015, I hereby undertake as follows:

1.
  - I. I, along with the Persons Acting in Concert together, do not hold more than ten percent of the total voting rights in the Company;
  - II. I do not exercise control over the affairs of the Company whether directly or indirectly
  - III. I am not having any special rights with respect to the Company through formal and informal arrangements including through any shareholder agreements.
  - IV. I do not represent on the Board of Directors (including not having a nominee Director) of the Company.
  - V. I do not act as a Key Managerial Person in the Company.
  - VI. I am not a willful defaulter as per the Reserve Bank of India Guidelines.
  - VII. I am not a fugitive economic offender.



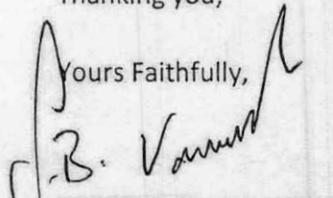
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2. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter of the Company.
3. I shall comply with the conditions mentioned in the sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter of the company.

In light of foregoing, I request the Board of Directors of the Company to consider and approve the request of reclassification from 'promoter' category to 'public' category shareholders, place the same before the members of the Company, if required and make requisite application to the Stock Exchange in accordance with Regulation 31A of the SEBI (LODR) Regulations, 2015.

Thanking you,

Yours Faithfully,  
  
Sanjay Vardhan  
Date: 11/7/25



Date: 11/07/25  
09:02 pm

Annexure III  
Undertaking from promoter(s) seeking reclassification

To,  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24th Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having a nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Yours faithfully



Sanjay Vardhan

Date: 11/7/25



Date: 11/07/25  
04:02 PM