



**3C IT SOLUTIONS & TELECOMS (INDIA) LIMITED**  
**(Formerly known as 3C IT SOLUTIONS & TELECOMS (INDIA) PRIVATE LIMITED)**

**POLICY ON IDENTIFICATION OF MATERIAL CREDITORS AND MATERIAL LITIGATIONS**

**A. INTRODUCTION**

This Policy has been formulated to define the materiality for identification of outstanding material litigation and outstanding dues to material creditors in respect of 3C IT Solutions & Telecoms (India) Limited (the “**Company**”), pursuant to the disclosure requirements under Schedule VI of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as may be amended from time to time (“**SEBI ICDR Regulations**”).

**B. APPLICABILITY AND OBJECTIVE**

This policy shall be called the ‘**Policy on Identification of Material Creditors and Material Litigations**’ (“**Materiality Policy**”).

The Board of Directors of the Company (“**Board**”) at their meeting held on October 4, 2023 discussed and approved this Materiality Policy. This Materiality Policy shall be effective from the date of approval of in principal approval by the Bombay Stock Exchange.

The Company has adopted this Materiality Policy for identification and determination of: (i) material creditors; and (ii) material litigations pursuant to the provisions of SEBI ICDR Regulations, details of which shall be disclosed in the offer documents.

In this Materiality Policy, the term “**Offer Documents**” shall mean the draft prospectus, the prospectus to be filed by the Company in connection with the proposed initial public offering of its equity shares with the Stock Exchange where the equity shares of the Company are proposed to be listed, Securities and Exchange Board of India and Registrar of Companies, Pune.

All other capitalized terms not specifically defined in this Materiality Policy shall have the same meanings ascribed to such terms in the Offer Documents.

In this Materiality Policy, unless the context otherwise requires:

- (i) Words denoting the singular shall include the plural and vice versa;
- (ii) References to the words “include” or “including” shall be construed without limitation.

**C. POLICY PERTAINING TO THE IDENTIFICATION OF MATERIAL CREDITORS AND MATERIAL LITIGATIONS**

The Materiality Policy with respect to the identification of the material creditors and material litigation shall be as follows:

**Identification of Material Creditors**

**Requirement:**

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CIN: U72200PN2015PLC154459



As per the requirements of SEBI ICDR Regulations, the Company shall make relevant disclosures in the Offer Documents for outstanding dues to creditors:

- (i) Based on the policy on materiality defined by the Board of Directors of the Company and as disclosed in the Offer Document, disclosure for such creditors which include the consolidated number of creditors and the aggregate amount involved;
- (ii) Consolidated information on outstanding dues to micro, small and medium enterprises and other creditors, separately giving details of number of cases and amount involved; and
- (iii) Complete details about outstanding over dues to material creditors along with the name and amount involved for each such material creditor shall be disclosed on the website of the Company with a web link thereto in the Offer Documents.

**Policy on materiality:**

For identification of material creditors, in terms of point (i) above, a creditor of the Company shall be considered to be material for the purpose of disclosure in the Offer Documents, if amounts due to such creditor exceed 20.00% of the Company's standalone revenue as per the last audited financial statements of the Company

Disclosures in the Offer Documents regarding material creditors

- (i) For creditors identified as 'material' based on the abovementioned Policy, information on outstanding dues to such material creditors shall be disclosed in the Offer Documents along with the details of the material creditors, which include the consolidated number of creditors and amount involved on an aggregate basis, as of the date of the latest audited financial statements included in the Offer Documents.
- (ii) For outstanding dues to micro, small and medium enterprises ("**MSMEs**"), the disclosure will be based on information available with the Company regarding the status of the creditors as MSMEs as defined under Section 2 of the Micro, Small and Medium Enterprises Development Act, 2006, as amended, as has been relied upon by the statutory auditors in preparing their audit report. Information for such identified MSMEs creditors shall be provided in the Offer Documents in the following manner:
  - a. Aggregate amounts due to such MSME creditors; and
  - b. Aggregate number of such MSME creditors;

As per last audited financial statements of the Company included in the Offer Document

- (iii) Complete details about outstanding over dues to the material creditors along with the name and amount involved for each such material creditor shall be disclosed on the website of our Company with a web link in the Offer Documents.

The Company shall make relevant disclosures before the Audit Committee/ Board of Directors as required by applicable law from time to time.

## **Identification of Material Litigation**

Requirement:

As per the requirements of SEBI ICDR Regulations, the Company shall disclose all the litigation involving the Company, its directors, Promoters and Subsidiaries of Company related to:

- (i) All criminal proceedings;
- (ii) All actions by statutory / regulatory authorities;
- (iii) Disciplinary action including penalty imposed by SEBI or stock exchanges against the promoters in the last five financial years including outstanding action.
- (iv) Claims related to direct and indirect taxes, in a consolidated manner giving details of number of cases and total amount; and
- (v) Other material pending litigations - as per policy of materiality defined by the Board and disclosed in the Offer Documents.

### **Policy on materiality:**

A litigation involving the Company, its directors and Promoters shall be considered “material” for the purpose of disclosure in the Offer Documents if:- The monetary amount of claim by or against the entity or person in any such pending litigation matter exceeds 20.00% of the Company’s standalone revenue as per the last audited financial statements.

### **D. AMENDMENT**

The Board or any of its committees shall have power and authority to determine suitable materiality threshold for the subsequent financial year on the aforesaid basis or any basis as may be determined by the Board or any of its committee.