

AARON INDUSTRIES LIMITED

**POLICY ON MATERIALITY FOR THE DISCLOSURES MADE IN THE
OFFER DOCUMENT**

(Effective from June 05, 2018)

**POLICY ON MATERIALITY FOR THE DISCLOSURES
MADE IN THE OFFER DOCUMENT**

[Pursuant to SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009]

A. LITIGATIONS

The Company shall disclose all the litigations involving the issuer/ its directors/ promoters/ group companies/ subsidiaries related to:

- (i) All criminal proceedings;
- (ii) All actions by statutory/regulatory authorities;
- (iii) Taxation - Separate disclosures regarding claims related to direct and indirect taxes, in a consolidated manner giving details of the number of cases and total amount;
- (iv) All other pending litigations filed or pending against the Company where the amount claimed by or against the Company/Promoter/Group Company/Subsidiary exceeds an amount of Rs. 1,00,000/-;

B. GROUP COMPANIES

Group Company(ies) shall be considered to be material if the transaction/transactions to be entered into individually or taken together with previous transactions during a financial year exceeds ten percent of the annual consolidated turnover of the company as per the last audited financial statements of the company. The Company shall make relevant disclosure before the Audit Committee/ Board as required by the applicable law.

C. OUTSTANDING DUES TO CREDITORS

The Company shall make relevant disclosures in the offer document for such creditors as referred hereunder;

- (i) Consolidated information on outstanding dues to small-scale undertakings (SSI) and Micro Small & Medium Enterprises (MSME), separately giving details of the number of cases and amount involved if the same exceeds the threshold limit of Rs. 1 lac and the credit period of 45 days as applicable in the law;
- (ii) Complete details about outstanding dues to other creditors if the amount due to any one of them exceeds 10% of the total outstanding towards creditors of the Company as per the last audited financial statements of the company.
