



POLICY ON IDENTIFICATION OF MATERIAL LITIGATIONS

A. INTRODUCTION

This Policy has been formulated to define the materiality for identification of outstanding material litigation in respect of Stallion India Fluorochemical

s 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 Litigations**’ (“**Policy**”).

The Board of Directors of the Company (“**Board**”) at their meeting held on 16th October, 2023 discussed and approved this Policy. This Policy shall be effective from the date of approval by the Board.

The Company has adopted this Policy for identification and determination of material litigations pursuant to the provisions of SEBI ICDR Regulations, details of which shall be disclosed in the Draft Offer Document/offer documents.

In this Policy, the term “**Draft Offer Document/offer documents**” shall mean the Draft Red Herring and Red Herring Prospectus/Prospectus be filed by the Company in connection with the proposed initial public offering of its equity shares with the Securities and Exchange Board of India, Registrar of Companies, Mumbai (“**RoC**”) and stock exchanges where the equity shares of the Company are proposed to be listed, as applicable.

All other capitalised terms not specifically defined in this Policy shall have the same meanings ascribed to such terms in the Draft Offer Document/offer documents.

In this Policy, unless the context otherwise requires:

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

C. POLICY PERTAINING TO THE IDENTIFICATION OF MATERIAL LITIGATIONS

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

Identification of Material Litigation



POLICY ON IDENTIFICATION OF MATERIAL LITIGATIONS

Requirement:

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

- (i) All criminal proceedings

All actions by statutory / regulatory authorities;

- (ii) Claims related to direct and indirect taxes, in a consolidated manner giving details of number of cases and total amount; and
- (iii) Other material pending litigations - as per policy of materiality defined by the Board and disclosed in the Draft Offer Document/offer documents.

Additionally, in terms of the SEBI ICDR Regulations, the Company is required to disclose any outstanding litigation involving the group companies, which may have a material impact on the Company. For the purposes of determining the outstanding litigation involving the group companies, which may have a material impact on the Company, the criteria specified under "Policy on materiality" herein below shall apply.

Policy on materiality:

For the purpose of point no (iv) above, any other pending litigation involving the Company, its promoters, directors, Subsidiaries and group companies shall be considered "material" for the purpose of disclosure in the Draft Offer Document/offer documents if:-

- (a) the monetary amount of claim by or against the Company, Subsidiary, Promoter and Directors in any such pending litigation is individually in excess of 10% of the consolidated net worth of the Company as per the latest period of Restated Consolidated Financial Information or 10% of the consolidated revenue of the Company (whichever is lower) as per the latest annual restated consolidated financial statements of the Company, or
- (b) such pending litigation that is material from the perspective of Company's business, operations, financial results, prospectus or reputation irrespective of the amount involved in such litigation.

D. AMENDMENT

The Managing Director of the Company shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. This Policy shall be subject to review/changes as may be deemed necessary and in accordance with regulatory amendments from time to time.



POLICY ON IDENTIFICATION OF MATERIAL LITIGATIONS



POLICY ON IDENTIFICATION OF MATERIAL LITIGATIONS



POLICY ON IDENTIFICATION OF MATERIAL LITIGATIONS