POLICY ON IDENTIFICATION OF MATERIAL GROUP COMPANIES, MATERIAL CREDITORS AND MATERIAL LITIGATIONS

A. INTRODUCTION

This Policy has been formulated to define the materiality for identification of material group companies, outstanding material litigation and outstanding dues to material creditors in respect of **Oremet Alloys and Castings Limited** and its Directors (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 Regulation").**

B. APPLICABILITY AND OBJECTIVE

This policy shall be called the **'Policy on Identification of Material Group Companies, Material Creditors and Material Litigations' ("Policy").**

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

In this Policy, the term **"Offer Documents"** shall mean the Draft Prospectus and the Prospectus to 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, Kolkata, West Bengal ("ROC") and stock exchanges where the equity shares of the Company are proposed to be listed, as applicable.

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

In this 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 GROUP COMPANIES MATERIAL CREDITORS AND MATERIAL LITIGATIONS

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

Identification of Material Group Companies:

Requirement:

As per the requirements of the SEBI ICDR Regulations, Group Companies include such companies as covered under the applicable accounting standards (i.e. Indian Accounting Standard 24 ("Ind AS 24"), as applicable) as per the restated financial statements for three (3) financial years and any subsequent stub period preceding the date of the Offer Document, which is included in such Offer Document and also any other companies as considered material by the board of directors of the Company.

Policy on Materiality:

Group companies of the Company shall include such companies (other than subsidiary/ subsidiaries) (a) is a member of the Promoter Group; (b) has entered into one or more transactions with the Company during the most recent Financial Year any included in the Restated Financial Statements, that which individually or cumulatively exceed 5% of the revenue of the Company derived from the Restated Financial Information of the last completed full financial year, and (c) other companies as 'material' by the Board.

Identification of Material Creditors:

Requirement:

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 number of creditors and the aggregate amount involved;

(ii) 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 exceeds 5% of the total trade payables of the Company as per the latest restated financial statements of the Company, as disclosed in the Offer Documents.

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 number of creditors and amount involved on an aggregate basis, as of the date of the latest restated financial statements included in the Offer Documents.

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.

(ii) as on the date of the latest restated financial statements 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 group companies, its promoters and directors related to:

(i) All criminal proceedings;

(ii) All actions by statutory / regulatory authorities;

(iii) Claims related to direct and indirect taxes, in a consolidated manner giving details of number of cases

and total amount; and

(iv) Other material pending litigations - as per policy of materiality defined by the Board and disclosed in the 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 Offer Documents if: -

(i). Any outstanding litigation / arbitration proceedings involving the Company, Subsidiaries, Promoters and Directors shall be considered "material" for the purposes of disclosure in this Draft Red Herring Prospectus, if:

(a) The monetary amount of claim made by or against the entity or person in any such pending proceeding exceeds one per cent of the revenue from operations of the Company as per the Restated Financial Statements for March 31, 2026;

(b) wherein a monetary liability is not quantifiable for any other outstanding proceeding, or which does not fulfil the financial threshold as specified in (a) above, but the outcome of which could, nonetheless, have a material adverse effect on the business, operations, performance, prospects or reputation of the Company.

(ii). All pre-litigation notices received by the Company, Subsidiaries, Promoters and Directors (excluding those notices issued by statutory, regulatory or tax authorities), unless otherwise decided by the Board, are not evaluated for materiality until such time that such parties are impleaded as defendants in litigation proceedings before any judicial forum. However, we have disclosed all outstanding litigations involving the Company, Subsidiaries, Promoters and Directors. In case of pending civil litigation proceedings wherein the monetary amount involved is not quantifiable, such litigation has been considered 'material' only in the event that the outcome of such litigation has a bearing on the operations or performance of the Company.

(iii). All pending litigations involving the Company, Promoter or Director, as the case may be, other than criminal proceedings, statutory or regulatory actions and taxation matters, would be considered 'material' where the monetary liability is not quantifiable, each such case involving the Company, Promoter or Director, or whose outcome would have a bearing on the business operations, prospects or reputation of the Company:

(iv). All pending litigations involving the Group Companies whose outcome would have material impact on the business operations, prospects or reputation of the Company

(v). Notices received by the Company, Promoter or Director, as the case may be, from third parties (excluding statutory/regulatory authorities or notices threatening criminal action) shall, in any event, not be evaluated for materiality until such time that the Company or Promoter or Director, as the case may be, are impleaded as parties in proceedings before any judicial forum.

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.

Yasa Dardar Reddy

Oremet Alloys And Castings Limited
Date: 20.04.2026