



ACE FURNACES LTD.

(Formerly known as ACE FURNACES PVT. LTD.)

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ACE FURNACES LIMITED

(FORMERLY KNOWN AS ACE FURNACES PRIVATE LIMITED)

POLICY ON IDENTIFICATION OF MATERIAL CREDITORS

AND MATERIAL LITIGATIONS

Adopted by	Date of Approval
Board of Directors	23 rd September 2026



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CIN : U29242MH2014PLC253538

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 M/s. Ace Furnaces 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 23rd September 2026 discussed and approved this Materiality Policy. This Materiality Policy shall be effective from the date of approval of this Materiality Policy by the Board.

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 Red Herring Prospectus. Red Herring Prospectus and the Prospectus to be filed by the Company in connection with the proposed initial public offering of its equity shares with the BSE Limited ("Stock Exchange"), Registrar of Companies, Mumbai at Maharashtra ("ROC") and stock exchange where the equity shares of the Company are proposed to be listed, as applicable.

All other capitalised 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:

- (1) Words denoting the singular shall include the plural and vice versa
- (2) 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:

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 creditors exceed 5% of the Company's trade payables for the last audited 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 consolidated 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.
- 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.
 - aggregate amounts due to such MSME creditors; and



- aggregate number of such MSME creditors, as of 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 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 material subsidiaries, Promoters, Directors of the Company 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. 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

Further, any outstanding litigation involving the Group Companies, which may have a material impact on the Company, shall be disclosed in the Offer Documents.

In addition to above, with regard to the Key Managerial Personnel and Senior Managerial personnel the company is required to disclose the following outstanding litigations:

- (i) All criminal proceedings.
- (ii) All actions by statutory and/or regulatory authorities (including any notices sent by them);

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 number (iv) above, any other pending litigation involving the Company, Subsidiaries, Promoters and its Directors and shall be considered "material" for the purpose of disclosure in the Offer Documents if:-

- (i) The aggregate amount involved in such individual litigation exceeds 2% of profit after tax of the Company, as per the last audited financial statements for full financial year, OR
- (ii) Litigation where the value or expected impact in terms of value, exceeds the lower of the following:
 - a) Two percent of turnover, as per the latest annual restated financial statements of the offeror; or
 - b) Two percent of net worth, as per the latest annual restated financial statements of the offeror, except in case the arithmetic value of the net worth is negative; or
 - c) Five percent of the average of absolute value of profit or loss after tax, as per the last three annual restated financial statements of the offeror."

In addition to the litigations considered material as referred *ibid*, the following litigations ought also to be considered material:

- a) where the monetary liability is not quantifiable or does not exceed the threshold mentioned in point (i) or (ii) above, such litigations whose outcome would have a bearing on the business operations, prospects or reputation of our Company or
- b) any litigation involving our Group Companies which may have material impact on our Company.

D. AMENDMENT

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

