



**NORBEXI INDUSTRIES**

Limited

CIN - U55101MH2016PTC273960

[www.norbexi.com](http://www.norbexi.com)

***NORBEXI INDUSTRIES LIMITED  
POLICY ON IDENTIFICATION OF MATERIAL  
CREDITORS AND MATERIAL LITIGATIONS***

NORBEXI



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## 1. Introduction

This Policy is made in accordance with the requirements of the **SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018**.

The purpose of this Policy is to decide:

- Which creditors are considered “material”
- Which litigations (legal cases) are considered “material”

Such information will be disclosed in the Company’s Offer Documents (Prospectus) at the time of public issue of shares.

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## 2. Objective of the Policy

This Policy helps the Company:

- Identify important (material) creditors
- Identify important (material) legal cases
- Ensure proper disclosure in the Offer Documents
- Comply with applicable SEBI regulations

This Policy is effective from the date it is approved by the Board of Directors.

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# PART A – IDENTIFICATION OF MATERIAL CREDITORS

## 3. Who is a Material Creditor?

A creditor will be considered “material” if:

- The amount payable to that creditor is more than **10% of the total trade payables** of the Company
- The calculation will be based on the latest audited financial statements



## 4. Disclosure of Material Creditors

In the Offer Documents:

- The total number of material creditors and the total amount payable to them will be disclosed
- Complete details (name and amount due) of each material creditor will be placed on the Company's website
- A web link to such details will be provided in the Offer Documents

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## 5. Disclosure of MSME Creditors

The Company will also disclose:

- Total amount due to Micro, Small and Medium Enterprises (MSMEs)
- Total number of such MSME creditors

This information will be based on records available with the Company and as relied upon by the statutory auditors.

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# PART B – IDENTIFICATION OF MATERIAL LITIGATIONS

## 6. Litigations that Must Always Be Disclosed

The following cases must be disclosed in the Offer Documents:

- All criminal cases
- All cases initiated by statutory or regulatory authorities
- All tax-related matters (direct and indirect taxes), showing number of cases and total amount involved



## 7. Other Material Litigations

Apart from the above, any other litigation involving the Company, its Directors, or Joint Ventures will be considered “material” if:

### (a) Monetary Threshold

The claim amount is:

- 10% or more of the Company’s consolidated revenue, OR
- 25% or more of the Company’s profit before tax,

(Whichever is lower, based on latest audited financial statements)

### (b) Similar Cases

Even if one case is below the above limits, it will be considered material if:

- There are multiple similar cases, and
- The total amount of all such cases together exceeds the above limits

### (c) Significant Impact

Any case that may:

- Adversely affect the Company’s operations, OR
- Adversely affect the financial position of the Company

Even if it does not meet the monetary limit, it may still be treated as material.

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## 8. Group Company Litigations

Any litigation involving Group Companies that may have a material impact on the Company will also be disclosed based on the above criteria.

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## 9. Review and Amendment

The Chairman & Managing Director has the power to:

- Amend this Policy
- Replace any provision
- Revise the Policy as required

This Policy will be reviewed from time to time and updated as per changes in law or regulations.

