



SKY ALLOYS AND POWER LIMITED

POLICY FOR IDENTIFICATION OF MATERIALITY OF OUTSTANDING LITIGATIONS INVOLVING COMPANY, ITS SUBSIDIARIES, DIRECTORS, PROMOTERS AND OTHER GROUP COMPANIES

1. PREAMBLE

This Policy has been formulated to define the materiality for outstanding litigations in respect of Sky Alloys and Power Limited (the “Company”), pursuant to the disclosure requirements under the provisions of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time (“SEBI ICDR Regulations”).

2. APPLICABILITY AND OBJECTIVE

The Company has adopted this Policy for the identification and determination of material litigations involving the Company, its subsidiaries, Directors, Promoters and other Group Companies pursuant to the provisions of SEBI ICDR Regulations, 2018, details of which shall be disclosed in Offer Documents. “Offer Documents” means 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 Registrar of Companies, Chhattisgarh (“RoC”), National Stock Exchange of India (NSE) Limited, and Bombay Stock Exchange (BSE) Limited, where the equity shares of the Company are proposed to be listed, as applicable. All capitalised terms not specifically defined in this Policy shall have the same meanings ascribed to such terms in the Offer Documents.

3. IDENTIFICATION OF MATERIAL LITIGATIONS

As per the requirements of SEBI ICDR Regulations, the Company shall disclose all the litigation involving the Company, its subsidiaries, joint ventures, directors and group companies 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; and

IV. Other pending litigations - as per policy of materiality defined by the Board and disclosed in the Offer Documents.

Other than litigations I to III. mentioned above, in view of the nature and extent of operations of the Company, its directors, its promoters and its group companies, the outstanding litigations involving the Company, its directors, its promoters and group companies shall be considered material:

- (i) the claim/ dispute amount, to the extent quantifiable, exceeds the amount equivalent to 10% of the average of absolute value of profit or loss after tax, as per the Restated Consolidated Financial Statements of the Company; or
- (ii) where monetary liability is not quantifiable or does not exceed the threshold mentioned in point (i) above, the outcome of any such pending proceedings may have a material bearing on the business, operations, performance, prospects, financial position or reputation of the Company; or

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SKY ALLOYS AND POWER LIMITED

- (iii) any claim/dispute involving the Relevant Parties where the decision in one litigation is likely to affect the decision in similar litigations, even though the amount involved in an individual litigation may not exceed the amount equivalent to 10% of the average of absolute value of profit or loss after tax, as per the Restated Consolidated Financial Statements of the Company for the last three Fiscals.

It is clarified that apart from as set forth in this paragraph, the disclosures on outstanding litigation in the Offer Documents will also include disclosures as specified in the Companies Act, 2013 and rules made thereunder. Further, pre-litigation notices received by the Company, its promoters, directors, its subsidiaries and its group companies, unless otherwise decided by the Board of Directors of the Company, shall not be evaluated for materiality until such time that the Company, its directors, its promoters, its subsidiaries or its group companies are impleaded as defendants in litigation proceedings before any judicial forum.

4. AMENDMENTS

The Board may subject to applicable laws, amend any provision / substitute any provision with the new provision / replace the policy entirely with the new policy, based on the recommendations of the Committee.

5. SCOPE AND LIMITATION

In the event of any conflict between the provisions of this Policy, and the provisions of the Companies Act, 2013 / applicable SEBI Regulations / any other statutory enactment, the provisions of latter shall prevail over the policy.

6. DISSEMINATION

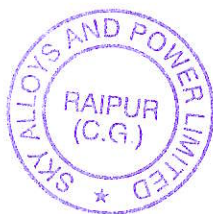
This Policy shall be disclosed as may be required under the provisions of the Companies Act, 2013, and any other SEBI Regulations or Circulars, subject to applicability from time to time

7. EFFECTIVE DATE

This Policy shall come into force with immediate effect.

SKY ALLOYS AND POWER LIMITED

Ravi Singhal
Managing Director
DIN: 01197349



Date: 18.09.2025

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