



LE TRAVENUES TECHNOLOGY LIMITED

**POLICY ON MATERIALITY FOR DISCLOSURE IN
OFFER DOCUMENTS**

MATERIALITY POLICY FOR DISCLOSURE IN OFFER DOCUMENTS

INTRODUCTION

This policy (“**Policy**”) has been formulated to define the respective materiality policies in respect of Le Travenues Technology Limited (the “**Company**”), pursuant to the disclosure requirements under Schedule VI of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (as amended from time to time) (“**SEBI ICDR Regulations**”), in respect of the following:

- A. identification of material companies to be disclosed as group companies;
- B. identification of ‘material’ litigation (excluding criminal proceedings, statutory/regulatory actions and taxation matters); and
- C. identification of ‘material’ creditors.

APPLICABILITY

The board of directors of the Company (the “**Board**”) at its meeting held August 06, 2021, discussed, and approved this Policy. This Policy shall be effective from the date of approval of policy by the Board.

“**Offer Documents**” means the draft red herring prospectus, the red herring prospectus, and the prospectus (together with any addenda or corrigenda thereto) 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, the Registrar of Companies, Delhi and Haryana and/or the 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 Offer Documents.

A. Identification of material companies to be disclosed as group companies

As per the requirements of the SEBI ICDR Regulations, group companies of an issuer company include such companies (other than the promoters and subsidiaries of such issuer company) with which there were related party transactions, during the period for which financial information is disclosed in the Offer Documents, as covered under the applicable accounting standards, and also other companies as considered material by the board of directors of the issuer company.

For the purpose of disclosure in the Offer Documents, the following shall be considered group companies of the Company:

- (i) such companies (other than any subsidiaries) with which there were related party transactions, during the period for which financial information is disclosed in the Offer Document(s), as covered under Ind AS 24; and
- (ii) any other companies as may be identified as material by the Board.

B. Identification of 'material' litigation (excluding criminal proceedings, statutory/regulatory actions, and taxation matters)

As per the requirements of SEBI ICDR Regulations, the Company shall disclose the following pending litigation involving the Company, its Directors and Subsidiaries (collectively "**Relevant Parties**"):

- (i) all criminal proceedings;
- (ii) all actions by regulatory authorities and statutory authorities;
- (iii) claims related to direct and indirect taxes, in a consolidated manner, giving the number of cases and total amount; and
- (iv) other than litigations mentioned in points (i) to (iii) above, any other pending litigation involving the Relevant Parties would be considered 'material' for the purpose of disclosure in the Offer Documents, if:
 - (a) the monetary amount of claim by or against the Relevant Parties in any such pending proceeding is in excess of 1% of the revenue of the Company on a consolidated basis, as per the last full year restated consolidated financial statements included in the Offer Documents; or
 - (b) where the monetary impact is not quantifiable, but an outcome in any such litigation would materially and adversely affect the Company's business, prospects, operations, financial position or reputation.

Pre-litigation notices received by the Relevant Parties from third parties (excluding statutory or regulatory authorities or notices threatening criminal action) shall, in any event, not be considered as litigation until such time that Relevant Parties are impleaded as defendants in litigation proceedings before any judicial forum.

Further, as per the requirements of SEBI ICDR Regulations, the Company shall also disclose such outstanding litigation involving any group companies, which has a material impact on the Company.

C. Identification of 'material' creditors

As per the requirements of the SEBI ICDR Regulations, the Company shall make relevant disclosures in the Offer Documents and on the website of the Company for outstanding dues to creditors as follows:

- (i) based on the policy on materiality defined by the Board, details of the creditors which include the consolidated number of creditors and the aggregate amount involved, will be disclosed in the Offer Documents;
- (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 will be disclosed in the Offer Documents; and
- (iii) complete details about outstanding 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.

For identification of material creditors, 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 on a consolidated basis, as at the end of the latest period included in the restated consolidated financial statements included in the Offer Documents.

GENERAL

This policy shall be subject to review/changes as may be deemed necessary and in accordance with regulatory amendments from time to time.
