# POLICY FOR IDENTIFICATION OF MATERIAL LITIGATIONS

*[For the purpose of disclosures in offer documents under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018]*

## 1. PURPOSE

In terms of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (the "ICDR Regulations"), Aqylon Nexus Limited (formerly known as Sri Adhikari Brothers Television Network Limited) (the "Company" or the "Issuer") is required to disclose, in its offer documents, all outstanding litigation involving the Company, its directors, promoters and subsidiaries, relating to:

(i) all criminal proceedings;

(ii) all actions by statutory / regulatory authorities;

(iii) disciplinary actions, including penalties imposed by SEBI or the stock exchanges against the promoters in the last five financial years, including outstanding actions;

(iv) claims related to direct and indirect taxes, disclosed separately in a consolidated manner giving the number of cases and the total amount involved; and

(v) other pending litigation that is material as per the policy of materiality defined by the Board of Directors of the Company and disclosed in the offer document.

In addition, outstanding litigation involving the group companies of the Company which may have a material impact on the Company shall be disclosed.

This Policy sets out the materiality threshold approved by the Board for the purpose of item (v) above.

## 2. MATERIALITY THRESHOLD

All pending litigation involving the Company, its directors, promoters and subsidiaries, other than criminal proceedings, actions by statutory or regulatory authorities, disciplinary actions and taxation matters, shall be considered "material" for the purpose of disclosure in the offer documents if:

(a) the monetary amount of the claim by or against the entity or person in any such pending matter exceeds the higher of (i) Rs. 2 crore (Rupees Two Crore only); and (ii) five per cent of the profit after tax of the Company as per the last audited consolidated financial statements included in the offer document;

(b) the decision in one litigation is likely to affect the decision in similar litigations, even though the amount involved in such individual litigation may not exceed the threshold in (a) above, if the similar litigations put together collectively exceed such threshold; or

(c) the monetary liability is not quantifiable, or does not exceed the threshold in (a) above, but the outcome of such litigation could, in the opinion of the Board, have a material adverse effect on the business, operations, financial position, prospects or reputation of the Company.



Aqylon Nexus Limited
(Formerly known as Sri Adhikari Brothers Television Network Limited)
6th Floor, Adhikari Chambers, Oberoi Complex, New Link Road, Andheri (West), Mumbai-400 053.
+91 91679 99964 info@aqylonnexuslimited.com compliance@aqylonnexuslimited.com CIN No. : L62090MH1994PLC083853

### 3. OUTSTANDING DUES TO CREDITORS

For the purpose of disclosure in the offer documents, creditors of the Company to whom an amount exceeding five per cent of the total trade payables of the Company, as per the last audited consolidated financial statements included in the offer document, is outstanding shall be considered material creditors, and outstanding dues to micro, small and medium enterprises shall be disclosed as required under the ICDR Regulations.

### 4. PRE-LITIGATION NOTICES

Pre-litigation notices received by the Company, its directors, promoters or subsidiaries from third parties (other than notices from statutory or regulatory authorities or notices threatening criminal action) shall not be considered as litigation until such time as the Company, its directors, promoters or subsidiaries, as the case may be, are impleaded as defendants in litigation proceedings before any judicial forum.

### 5. REVIEW

The Board or any committee thereof shall have the power and authority to review and determine suitable materiality thresholds for subsequent periods on the aforesaid basis or any other basis, as may be determined by the Board or such committee, in accordance with the ICDR Regulations as amended from time to time.



Aqylon Nexus Limited
(Formerly known as Sri Adhikari Brothers Television Network Limited)
6th Floor, Adhikari Chambers, Oberoi Complex, New Link Road, Andheri (West), Mumbai-400 053.
+91 91679 99964 info@aqylonnexuslimited.com compliance@aqylonnexuslimited.com CIN No. : L62090MH1994PLC083853