

Policy for Identification of 'Material' Outstanding Dues to Creditors

In terms of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended (“**SEBI ICDR Regulations**”), the Company shall make relevant disclosures in the Offer Documents for (i) outstanding dues to creditors based on the policy on materiality of the Board, which would be disclosed in the Offer Documents; and (ii) consolidated information on outstanding dues to small scale undertakings and other creditors, separately giving details of number of cases and amount involved.

In this regard, the Company shall make relevant disclosures in the Offer Documents for such creditors as referred to herein under;

- Complete details (names and outstanding amount as at the end of Fiscal 2020) about outstanding dues to small scale undertakings and other creditors which will be considered ‘*material*’ if the amount due to any one of them exceeds 5% of trade payables as per the last audited financial statements of the Company.
- The details of outstanding dues to such small scale undertaking and other creditors shall be uploaded on the website of the Company as required under SEBI ICDR Regulations.

In this Policy the term:

1. Company means Aruna Hotels Limited.
2. Promoter Group means Aruna Hotels Limited.
3. Offer Documents means Draft Letter of Offer and Letter of Offer.

The above policy was adopted in the BM dt 26.08.2020