

TENTY LIMITED

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Tenty

POLICY ON MATERIAL OUTSTANDING DUES TO CREDITORS

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Unit-1: P/67, 68 & 69, Phase-II, Kasba Industrial Estate, Kolkata 700107

Unit-2: Plot No. PPF-19, Poly Park, Dhulagarh, Sankrail, Howrah 711302

Unit-3: Shed No. K/1, Belvedre Mill Complex, Howrah 711313

Unit-4: Vill-Gauripur, PO-College Nagar More, Guwahati 781031

Unit-5: Gate No. 3, Jalan Industrial Complex, NH-6, PS-Domjur, Howrah 711411

Unit-6: Sankrail Industrial Park, Dag No. 65 to 72, L.R. Khatian No. 2840

J.L. No. 7, Vill-Bhagabatipur, PO-Kanduah, PS-Sankrail, Howrah 711313

Unit-7: Shed No. W1 & W2, Belvedre Mill Complex, Sankrail, Howrah 711313

1. INTRODUCTION

This Policy on Material Outstanding Dues to Creditors ("Policy") is formulated in accordance with the requirements of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 ("SEBI ICDR Regulations"), as amended from time to time.

This Policy provides a framework for identification of material outstanding dues owed to creditors of the Company for the purpose of disclosures in offer documents and regulatory filings.

2. OBJECTIVE

The objective of this Policy is to:

- Ensure transparency in disclosure of outstanding dues
- Identify material creditors and dues
- Enable informed decision-making by investors
- Ensure compliance with applicable regulatory requirements

3. APPLICABILITY

This Policy shall apply to:

- The Company
- All outstanding dues to creditors.

4. DEFINITIONS

4.1 "Act" means the Companies Act, 2013 and rules made thereunder.

4.2 "SEBI ICDR Regulations" means SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018.

4.3 "Creditors" shall include:

- Trade creditors
- Supplier Finance Arrangements including liabilities under letter of credit and channel finance facilities.

4.4 "Material Dues" means dues which are significant enough to influence the decision of



investors.

5. CRITERIA FOR IDENTIFICATION OF MATERIAL DUES

The materiality of outstanding dues shall be determined based on:

- Quantitative criteria
- Qualitative criteria

Any dues satisfying either criterion shall be treated as material.

6. QUANTITATIVE CRITERIA

Outstanding dues to a creditor shall be considered material if:

- The amount due exceeds **10% of total outstanding trade payables**;

7. QUALITATIVE CRITERIA

Irrespective of the amount, dues shall be considered material if:

- Default or delay may impact business operations
- It involves disputes or litigation with creditors
- It affects the Company's creditworthiness or reputation
- It involves statutory authorities (e.g., tax, GST, PF dues)
- It may lead to legal proceedings, penalties, or restrictions
- It has potential impact on going concern status

8. AUTHORITY FOR DETERMINATION

Materiality shall be determined by:

- Board of Directors; OR
- Chief Financial Officer (CFO); OR
- Any Key Managerial Personnel authorized by the Board

The decision of the authorized authority shall be final and binding.



9. DISCLOSURE REQUIREMENTS

The Company shall disclose:

- Details of material creditors
- Nature and amount of outstanding dues
- Ageing of dues
- Any defaults or delays

Such disclosures shall be made in:

- Offer documents (IPO / Rights Issue, etc.)
- Financial statements
- Regulatory filings

in accordance with SEBI ICDR Regulations and applicable laws.

10. REVIEW AND AMENDMENTS

This Policy shall be:

- Reviewed periodically by the Board
- Updated in line with regulatory changes

11. INTERPRETATION

- In case of any inconsistency, provisions of applicable laws shall prevail
- The interpretation by the Board shall be final

VERSION HISTORY:

Version	Approved By	Effective Date
1 st Version	Board of Directors	31/03/2026

