POLICY ON IDENTIFICATIONOF GROUP COMPANIES, MATERIAL CREDITORS AND MATERIAL LITIGATIONS

A. INTRODUCTION

This Policy has been formulated to define the materiality for identification of Group companies, Material Creditors and Material Litigations in respect of Carver Roboweld Limited (the "Company"), pursuant to the disclosure requirements under Schedule VI of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, asamended from time to time ("SEBI ICDR Regulations").

This Policy has been adopted by the Board at its meeting held on December 18, 2025 and has come into effect on December 18, 2025.

B. APPLICABILITY AND OBJECTIVE

This policy shall be called the **'Policy on Identification of Group Companies, Material litigations and Material creditors** ("Policy"). The Policy shall come into effect from the date of its approval by our Board.

C. INTERPRETATION

In this Policy, unless the context otherwise requires:

(i) words denoting the singular shall include the plural and vice versa.
(ii) references to the words "include" or "including" shall be construed without limitation.

D. POLICY PERTAINING TO THE IDENTIFICATION OF GROUP COMPANIES

The policy with respect to the identification of the group companies of our Company shall be as follows:

Our Company is required to disclose certain matters in relation to its "group companies" in the Draft Red Herring Prospectus/ Red Herring Prospectus / Prospectus. The SEBI Regulations define "group companies" as:

"Group companies", shall include such companies (other than promoter(s) and subsidiary/subsidiaries) with which there were related party transactions, during the period for which financial information is disclosed, as covered under the applicable accounting standards, and also other companies as considered material by the board of the issuer.

Policy on Materiality:

In our Board opinion a company shall be considered as Group Company only if: -

(i) Those companies which are identified as companies, with which there were related party transactions, during the period for which financial information is disclosed, as covered under the applicable accounting standards.

(ii) All companies which are considered material by the Board of Directors.

E. IDENTIFICATION OF MATERIAL CREDITORS

Our Company is required to disclose in the Draft Red Herring Prospectus/ Red Herring Prospectus / Prospectus, the details on materiality for outstanding dues to creditors and all other such transactions as the Board may deem fit.

Policy on Materiality:

Our Board has formed the following policy on determination of material Creditors. The policy as approved by

the Board is: -

All outstanding dues owed by Company to small scale undertaking and other creditors exceeding 10% of the trade payables of our Company as per the audited previous full year financial statements shall be considered as material by our Board and the same will be disclosed in the Annual report of the Company. The Board is authorized to display the details of such creditors on the website of our company.

The Company shall make relevant disclosures before the Audit Committee/ Board of directorsas required by applicable law from time to time.

The Board is authorized to display the details of such creditors on the website of our company.

F. IDENTIFICATION OF MATERIAL LITIGATION

Our Company is required to disclose in the Draft Red Herring Prospectus/ Red Herring Prospectus / Prospectus all outstanding:

(i) criminal proceedings;
(ii) actions by statutory or regulatory authorities;
(iii) taxation matters (indirect and direct taxes); and
(iv) other pending material litigation, involving our Company, our directors, our promoters and our group companies.

Policy on Materiality:

Our Board has formed the following policy on determination of material Litigation. The policy as approved by the Board is :-

i. All litigations pertaining to the company, its directors/ promoters/ group companies/ subsidiaries which are in the nature of criminal, statutory/ regulatory disciplinary actionsincluding penalty imposed by SEBI or stock exchanges, claims related to direct and indirect taxes are deemed material by the Board.

ii. Further the Board considers all other litigation pertaining to the company, its directors/promoters/ group companies/ subsidiaries which exceeds 10% of the revenue of our Company as per the audited previous full year financial statements shall be considered as material.

Further, for the purposes of determining material litigation(s) involving our Directors, the Board shall consider all outstanding litigation involving each Director and it believes that if any such litigation has an adverse outcome and therefore, would materially and adversely affect the reputation, operations or financial position of our Company, it shall be considered as material litigation and accordingly, each of our directors shall identify and provide information relating to such outstanding litigation involving themselves.

G. AMENDMENT

The Board (including its duly constituted committees wherever permissible), shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a newprovision or replace this Policy entirely with a new Policy. This Policy shall automatically standamended to reflect any changes to the SEBI Regulations, to the extent the same is the subject matter of this Policy.

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