

ROCKINGDEALS CIRCULAR ECONOMY LIMITED

(Formerly known as TECHNIX ELECTRONICS LIMITED)

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Delhi, DL- 110030

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Haryana-121003

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POLICY PERTAINING TO THE IDENTIFICATION OF MATERIAL CREDITORS AND MATERIAL LITIGATIONS

This Policy has been formulated to define the materiality for identification of outstanding material litigation and outstanding dues to material creditors in respect of Rockingdeals Circular Economy Limited and its Directors (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, as may be amended from time to time ("SEBI ICDR Regulations").

APPLICABILITY AND OBJECTIVE

This policy shall be called the 'Policy on Identification of Material Creditors and Material Litigations' ("Materiality Policy").

The Board of Directors of the Company ("Board") at their meeting held on 17.08.2023 discussed and approved this Materiality Policy. This Materiality Policy shall be effective from the date of approval of this Materiality Policy by the Board.

The Company has adopted this Materiality Policy for identification and determination of: (i) material creditors; and (ii) material litigations pursuant to the provisions of SEBI ICDR Regulations, details of which shall be disclosed in the offer documents.

All other capitalised terms not specifically defined in this Materiality Policy shall have the same meanings ascribed to such terms in the Offer Documents.
The Materiality Policy with respect to the identification of the material creditors and material litigation shall be as follows:

Identification of Material Creditors

As per the requirements of SEBI ICDR Regulations, the Company shall make relevant disclosures in the Offer Documents for outstanding dues to creditors.

- (i) Based on the policy on materiality defined by the Board of Directors of the Company and as disclosed in the Offer Document disclosure for such creditors which include the consolidated number of creditors and the aggregate amount involved;
- (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; and
- (iii) Complete details about outstanding over 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.



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Policy on materiality:

For identification of material creditors, in terms of point (i) above, 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 exceed 10% of the total consolidated trade payables of the Company as per the latest audited financial statements of the Company, as disclosed in the Offer Documents.

Disclosures in the Offer Documents regarding material creditors:

- i. For creditors identified as 'material' based on the above mentioned Policy information on outstanding dues to such material creditors shall be disclosed in the Offer Documents along with the details of the material creditors, which include the consolidated number of creditors and amount involved on an aggregate basis, as of the date of the latest audited financial statements included in the Offer Documents.
- ii. For outstanding dues to micro, small and medium enterprises ("MSMEs"), the disclosure will be based on information available with the Company regarding the status of the creditors as MSMEs as defined under Section 2 of the Micro, Small and Medium Enterprises Development Act, 2006, as amended, as has been relied upon by the statutory auditors in preparing their audit report. Information for such identified MSMEs creditors shall be provided in the Offer Documents in the following manner:
 - a. aggregate amounts due to such MSME creditors: and
 - b. aggregate number of such MSME creditorsas of the date of the latest audited financial statements included in the Offer Document
- iii. Complete details about outstanding over dues to the 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 in the Offer Documents.

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

Identification of Material Litigation

As per the requirements of SEBI ICDR Regulations, the Company shall disclose all the litigation involving the Company, its joint venture(s) and directors related to:

- All criminal proceedings;
- All actions by statutory / regulatory authorities;
- Claims related to direct and indirect taxes in a consolidated manner giving details of number of cases and total amount: and
- Other material pending litigations - as per policy of materiality defined by the Board and disclosed in the Offer Documents.

Additionally, in terms of the SEBI ICDR Regulations, the Company is required to disclose any outstanding litigation involving the group companies, which may have a material impact on the



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Company. For the purposes of determining the outstanding litigation involving the group companies, which may have a material impact on the Company, the criteria specified under "Policy on materiality" herein below shall apply

Policy on materiality for deciding material litigation

For the purpose of point no (iv) above any other pending litigation involving the Company, its directors and joint venture(s) shall be considered "material" for the purpose of disclosure in the Offer Documents if-

- the monetary amount of the claim made by or against the Company, its joint venture(s) and directors in any such pending litigation is equal to or in excess of 10% of the consolidated revenue of the Company or 25% of the profits before tax of the Company (whichever is lower) as per the last audited financial statements of the Company for a complete financial year, as included in the Offer Documents; or
- where the decision in one case is likely to affect the decision in similar cases, even though the amount involved in an individual litigation does not exceed the amount determined as per clause (a) above, and the amount involved in all of such cases taken together exceeds the amount determined as per clause (a) above; and
- any such litigation which does not meet the criteria set out in (a) above and an adverse outcome in which would materially and adversely affect the operations or financial position of the Company.

AMENDMENT

The Board of Directors of the Company shall have the power to amend any of the provisions of this Materiality Policy, substitute any of the provisions with a new provision or replace this Materiality Policy entirely with a new Policy. This Materiality Policy shall be subject to review /changes as may be deemed necessary and in accordance with regulator) amendments from time to time.

Note: Group Companies are identified as per Regulation 2(t) of the SEBI (ICDR) Regulations 2018 and Accounting Standard (AS-18).



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Annexure-A

Total outstanding dues to 'other creditors' as on 31.03.2023 by the Company are as follows:

Technix Electronics Pvt Ltd HR 2022-23

Sundry Creditors

1-Apr-22 to 31-Mar-23

Particulars of Creditors	Creditors
	Technix Electronics
	1-Apr-22 to 31-Mar-23
	Credit
La-Lagun Apartment Owners Association	9596.18
R.K.Associates	4720.00
AF Enterprises	88200.00
ARMAN POWER	16279.32
ATLETA SPORTSWEAR PVT.LTD.	67760.00
BALAJI VIDEO GAMES	21001.00
HERO FIVER GLASS AND WELDING WORKS	34500.00
KING TOYS AND SPORTS	85389.00



A & M Legal
Advocates & Legal Consultants

MATRIX HOUSEWARES PVT. LTD	128240.00
M/S JAIN & ASSOCIATES	9000.00
SITCOM SOLUTIONS	58484.29
SKN HARYANA CITY GAS DISTRIBUTION PVT.LTD.	10104.00
Grand Total	533273.79

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TOTAL OUTSTANDING DUES TO THE MSME'S & OTHER CREDITORS IN THE NATURE OF MATERIAL DUES TO CREDITORS AS ON 31.03.2023

Particulars	Number of Creditors	March 31, 2023
Trade Payables		
Micro, Small and Medium Enterprises	NIL	NIL
Others*	12	5,33,273/-
Total	12	5,33,273/-