
POLICY ON MATERIAL LITIGATION

ADDICTIVE LEARNING TECHNOLOGY LIMITED

1. INTRODUCTION

This Material Litigation Policy has been formulated in accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations"). These regulations require companies to disclose material litigation involving the company, its director or its key management personnel or its senior management or its promoter or its subsidiary.

2. OBJECTIVE

In compliance with the SEBI LODR Regulations, the Board of Directors ("Board") of **Addictive Learning Technology Limited** ("Company") has adopted this Policy to establish a systematic process for identifying and disclosing material litigations.

This Policy shall be referred to as the "**Policy on Identification of Material Litigations.**"

3. IDENTIFICATION OF MATERIAL ACTIONS BY AUTHORITIES

As per **Regulation 30 part A and para A sub para 20** SEBI (LODR) Regulations, the Company shall disclose to the Stock Exchange, all the litigation involving the Company, or its directors, key managerial personnel, senior management, promoter or subsidiary, related to:

Any of the following action(s) taken or orders passed by any regulatory, statutory, enforcement authority or judicial body against the listed entity in relation to any of the following, provided that such actions exceed the Monetary Thresholds listed below:

- (a) suspension;
- (b) imposition of fine or penalty;
- (c) settlement of proceedings;
- (d) debarment;
- (e) disqualification;
- (f) closure of operations;
- (g) sanctions imposed;
- (h) warning or caution; or
- (i) any other similar action(s) by whatever name called;

The disclosure details must include:

- i. name of the authority;
- ii. nature and details of the action(s) taken or order(s) passed;
- iii. date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority;
- iv. details of the violation(s)/contravention(s) committed or alleged to be committed;

v. impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the extent possible.

Monetary Thresholds for Disclosure:

(i) disclosure of fine or penalty of rupees one lakh or more imposed by sectoral regulator or enforcement agency and fine or penalty of rupees ten lakhs or more imposed by other authority or judicial body shall be disclosed within twenty four hours.

(ii) disclosure of fine or penalty imposed which are lower than the monetary thresholds specified in the clause (i) above on a quarterly basis in the format as may be specified.

4. POLICY PERTAINING TO IDENTIFICATION OF MATERIAL LITIGATION

As per **Regulation 30, Part A, Para B, Sub-Para 8** of SEBI LODR Regulations, the Company must notify the stock exchange(s) if it, or any of its directors, key management personnel, senior management, promoters, or subsidiaries become party to any litigation(s) assessment, adjudication, arbitration or dispute in conciliation proceedings or upon institution of any litigation, assessment, adjudication, arbitration or dispute including any ad- interim or interim orders passed against or in favour of the listed entity, the outcome of which can reasonably be expected to have an impact on the Company.

Disclosures Required:

- Any litigation or dispute that could potentially impact the Company must be disclosed promptly.
- In cases where multiple ongoing litigations cumulatively become material, the Company must disclose these to the stock exchange(s).

Criteria for disclosures:

- New tax litigations or disputes within twenty four hours from the receipt of notice by the listed entity.
- Quarterly updates on ongoing tax litigations or disputes in the format as may be specified.

5. REVIEW AND AMENDMENT

The Board (including its duly constituted committees wherever permissible) shall have the power to amend this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy.