

CODE OF CONDUCT

Adopted pursuant to SEBI (LODR) Regulations, 2015 — Regulation 17(5)

1. Preamble

Shinox Group Limited is committed to conducting its business with the highest standards of integrity, transparency, and accountability. This Code of Conduct ("Code") applies to all members of the Board of Directors and Senior Management Personnel of the Company. It reflects our core values: integrity, excellence, collaboration, respect, and responsibility.

2. Applicability

This Code applies to:

- All Directors of the Company (Executive, Non-Executive, and Independent)
- Key Managerial Personnel (KMP)
- Senior Management Personnel as defined by the Board

3. Compliance with Laws and Regulations

All persons covered by this Code shall comply with all applicable laws, rules, regulations, and guidelines including the Companies Act, 2013, SEBI regulations, and all other applicable statutes. No covered person shall engage in any activity that violates applicable law, even if directed to do so.

4. Conflict of Interest

Covered persons shall avoid situations where personal interests may conflict, or appear to conflict, with the interests of the Company. Any potential conflict of interest must be disclosed promptly to the Chairman or the Audit Committee. Covered persons shall not:

- Use Company resources, information, or position for personal gain
- Accept gifts, payments, or benefits that could influence business decisions
- Have undisclosed financial interests in competitors, suppliers, or customers

5. Confidentiality

Covered persons shall maintain strict confidentiality of all non-public information relating to the Company, its clients, partners, and stakeholders. Confidential information shall not be disclosed to unauthorised parties or used for personal benefit. This obligation continues even after separation from the Company.

6. Fair Dealing

Every covered person shall deal fairly with shareholders, customers, suppliers, employees, and all other stakeholders. No one shall take unfair advantage through manipulation, concealment, misrepresentation, or any other form of unfair dealing.

7. Protection of Company Assets

Company assets, including intellectual property, data, physical resources, and brand, shall be used solely for legitimate business purposes. Covered persons shall protect these assets from misuse, theft, or damage.

8. Insider Trading

Covered persons shall strictly comply with the Company's Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and the SEBI (Prohibition of Insider Trading) Regulations, 2015. Trading in securities of the Company or any related entity while in possession of unpublished price sensitive information is strictly prohibited.

9. Health, Safety and Environment

The Company is committed to providing a safe, healthy, and environmentally responsible workplace. All covered persons shall adhere to applicable health, safety, and environmental standards and shall promptly report any unsafe condition or practice.

10. Reporting Violations

Any covered person who becomes aware of a violation of this Code or any applicable law shall report it through the Company's Vigil Mechanism. The Company prohibits retaliation against anyone who in good faith reports a concern.

11. Annual Affirmation

All Directors and Senior Management Personnel shall affirm compliance with this Code on an annual basis. The Managing Director shall make a declaration to this effect in the Annual Report.

12. Administration

The Board of Directors shall oversee compliance with this Code. Queries regarding interpretation may be addressed to the Company Secretary: Vaibhav Pratap. Violations of this Code may result in disciplinary action including dismissal or termination.