

# CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Formulated pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 and Schedule A thereto

## 1. Preamble

ShinzoX Group Limited is committed to the fair and timely disclosure of material information that may affect the price of its securities. This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Fair Disclosure Code") has been formulated in accordance with Schedule A to the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations") and shall be administered by the Chief Investor Relations Officer ("CIRO") designated by the Board.

## 2. Definitions

"UPSI" means Unpublished Price Sensitive Information as defined under the PIT Regulations — any information relating to the Company or its securities that is not generally available and which upon becoming generally available, is likely to materially affect the price of the Company's securities

"Generally Available Information" means information that is accessible to the public on a non-discriminatory basis

"Designated Persons" means directors, KMPs, and such other connected persons designated by the Company as being in possession of UPSI

## 3. Principles of Fair Disclosure

In order to adhere to principles of fair disclosure, ShinzoX Group Limited shall:

Promptly disclose any UPSI that would impact price discovery as soon as it becomes credible and concrete, so that such information is generally available

Uniformly and universally disseminate UPSI through stock exchange filings, press releases, and Company website updates — not through selective disclosure to particular investors or analysts

Develop best practices for public announcements with particular reference to new developments, including plans, proposed transactions, financial results, and litigation that may materially affect the Company

Ensure that information shared with research analysts, institutional investors, or media is not selective and is simultaneously made available to all stakeholders

Respond to market rumours publicly only to the extent required by applicable regulation

## 4. Chief Investor Relations Officer

The Board of Directors of ShinzoX Group Limited has designated Vaibhav Pratap as the Chief Investor Relations Officer (CIRO). The CIRO shall be responsible for:

Overseeing the implementation of this Fair Disclosure Code

Handling investor relations and ensuring fair disclosure

Reporting to the Board on matters relating to UPSI and insider trading compliance

Maintaining a structured digital database of Designated Persons and UPSI

## 5. Trading Window

The Company shall maintain a Trading Window that shall be closed for Designated Persons during periods when UPSI is unpublished. The Compliance Officer shall notify Designated Persons of closure and opening of the Trading Window. All transactions during open window periods shall comply with the PIT Regulations.

## **6. Pre-Clearance**

Designated Persons shall obtain pre-clearance from the Compliance Officer before executing any trade in the Company's securities exceeding such threshold as specified under the PIT Regulations, even during open window periods.

## **7. Disclosure of Trades**

Designated Persons shall disclose all trades in the Company's securities to the Compliance Officer within 2 trading days of execution. Transactions exceeding prescribed thresholds shall be reported to the stock exchanges within 2 trading days.

## **8. Amendments**

This Code shall be amended as and when required by changes in applicable law or Company structure and shall be made available on the Company's website at [www.shinox.com](http://www.shinox.com).