

# POLICY ON DETERMINATION AND DISCLOSURE OF MATERIALITY OF EVENTS AND INFORMATION AND WEB ARCHIVAL POLICY

Formulated pursuant to SEBI (LODR) Regulations, 2015 — Regulation 30

## Part A: Policy on Determination and Disclosure of Materiality

### 1. Objective

This Policy has been formulated to determine the materiality of events and information relating to Shinox Group Limited ("Company") and to ensure timely, accurate, and adequate disclosure to stock exchanges, shareholders, and the public, in compliance with Regulation 30 and Schedule III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

### 2. Criteria for Determination of Materiality

An event or information shall be considered material if it is likely to:

- Have a bearing on the performance, operations, or financials of the Company
- Affect the price of the Company's securities
- Be considered important by a reasonable investor in making investment decisions

In addition, all events and information listed in Schedule III Part A (para A) of the SEBI LODR, which are required to be disclosed without any application of the materiality threshold, shall be disclosed forthwith.

### 3. Threshold for Materiality

The following thresholds shall be applied for determining materiality of events not specifically listed in Schedule III:

- Any event involving value exceeding 10% of the total turnover or 10% of the net worth of the Company on a standalone basis, as per the most recent audited financials
- Any event that the Board or the MD considers material based on its potential impact on investors' decision-making

### 4. Authorised Personnel for Disclosure

The following persons are authorised to determine materiality and make disclosures to stock exchanges on behalf of the Company:

- Virendra Pratap Singh, Chairman & Managing Director
- Vaibhav Pratap, Company Secretary & Compliance Officer

### 5. Timeline for Disclosure

Disclosures shall be made within 24 hours of the occurrence of the event, or within 30 minutes where the event occurs during market hours, or as stipulated under SEBI LODR from time to time.

## Part B: Web Archival Policy

### 6. Website Disclosures

The Company shall maintain a functional website at [www.shinox.com](http://www.shinox.com) with a dedicated investor relations section disclosing:

- Financial results, annual reports, and shareholding patterns

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Board and Committee composition and charters  
All policies as required under SEBI LODR  
Material events disclosed to stock exchanges  
Contact details of the Compliance Officer

## **7. Archival Period**

All information hosted on the website shall be maintained as follows:

Minimum 5 years for all financial and material disclosures

Minimum 3 years for press releases, investor presentations, and media releases

Permanently for Memorandum and Articles of Association, corporate governance policies

After the prescribed period, archived data may be maintained in a non-live but retrievable format.