ZINEMA MEDIA AND ENTERTAINMENT LIMITED

CIN: L93190TN1984PLC096136

Registered Office – New Door Number 57, Old Door No.57, Sathya dev Avenue MRC Nagar, Raja Annamalaipuram, Chennai: 600028

POLICY FOR DISCLOSURE OF EVENT/ INFORMATION AND DETERMINATION OF THE MATERIALITY

Last Amended on: May 30, 2026

POLICY FOR DISCLOSURE OF EVENT/ INFORMATION AND DETERMINATION OF THE MATERIALITY

1. INTRODUCTION: -

In terms of Regulation 30 Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulations, 2015 (hereinafter referred to as 'SEBI Listing Regulations') as amended by SEBI's Notification bearing No. SEBI/LAD-NRO/GN/2024/218 dated Thursday, December 12, 2024, the Board of Directors of every listed entity shall frame a policy for disclosure of events/information and determination of materiality ("Policy") based on criteria specified in the SEBI Listing Regulations. This Policy will be hosted on the website of the Company. The Board of Directors of Zinema Media and Entertainment Limited (the "Company"), at its meeting held on May 30, 2026 approved this amended Policy with regard to disclosure of material events or information which are price sensitive and/ or may have bearing on the performance or operation of the Company, thereby necessitating disclosure to the Stock Exchange where the equity shares of the Company are listed.

This document embodies the policy known as the "Policy for Disclosure of Events/Information and Determining of Materiality".

2. OBJECTIVES: -

The Objectives of this Policy are as follows: -

a. To ascertain the requirement for disclosure of events/information to the Stock Exchanges;

b. To determine the materiality of events or information of the Company based on criteria specified under Regulation 30 read with Schedule III [Part A – Para A, B, C, D] of the SEBI Listing Regulations and to ensure that such information is adequately disseminated to the Stock Exchange;

c. To ensure good corporate governance;

d. To ensure that the information disclosed by the Company is timely, transparent and continuous till the termination of the specific event or information;

e. To protect the confidentiality of Material/Price sensitive information within the context of the Company's disclosure obligations.

3. DEFINITIONS: -

In this policy, unless the context otherwise requires, the terms defined herein shall bear the meanings assigned to them below, and shall be construed accordingly: -

- "Board" means the Board of Directors of the Company.

- "Compliance Officer" means Compliance Officer of the Company appointed under SEBI Listing Regulations.

- "Key Managerial Personnel" means Key Managerial Personnel as defined under Section 2(51) of the Companies Act, 2013.

- "Subsidiary" means a subsidiary as defined under Section 2(87) of the Companies Act, 2013.

All other words and expressions used but not defined in this Policy, but defined in the SEBI Act, 1992, SEBI Listing Regulations, Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re- enactment thereto, as the case may be.

4. GUIDELINES FOR DETERMINING MATERIALITY

The Board shall, as per the guidelines prescribed in Regulation 30 read with Schedule III [Part A - Para A, B, C, D] of the SEBI Listing Regulations, make disclosures of any events or information which, in the opinion of the Board, are material or events or information which may affect the performance or the share price of the Company, to the Stock Exchange within the time limit as prescribed under the SEBI Listing Regulations.

5. DISCLOSURE OF EVENTS OR INFORMATION: -

Any transaction, event or information relating to the Company that might fall within the scope, as specified above, is required to be reported immediately by the employees of the Company to the Directors, Chief Executive Officer, Chief Financial Officer, Company Secretary and Compliance Officer, Authorized Person(s) who are severally authorized by the Board for the purpose of determining materiality of an event or information and for the purpose of making disclosures to Stock Exchange.

The Transaction, Event or Information relating to the Company that required to be reported to Authorized Person(s) or any Queries or Clarifications should be referred at the below contact details:

Designated Person	1. Compliance Officer, 2. Managing Director in event office of Compliance Officer is vacant
Phone No.(s)	044-48679669
E-Mail Address	trivikramaindustries@gmail.com

In case the relevant Authorized Person(s) is not certain regarding the materiality of an event or any information, he/she may seek external legal advice.

The relevant Authorized Person(s) would follow the disclosure process and timelines as provided in Regulation 30 and Para A, B, C, D of Part A of Schedule III of the SEBI Listing Regulations for disclosure of the material event or information, i.e. the disclosure(s) as required under the SEBI Listing Regulations shall be made:

(i). if the Board meeting ends before closure of normal trading hours or within three hours before the next trading day begins, the Company has to disclose any decision made, within 30 minutes of conclusion of the board meeting.

Provided that in case a board meeting ends after regular trading hours but more than three hours before the next trading day begins, the Company must disclose any decisions made within three hours of the meeting's closure.

Provided further that in case the meeting of the board of directors is being held for more than one day, the financial results shall be disclosed within thirty minutes or three hours, as applicable, from closure of such meeting for the day on which it has been considered.

(ii). within twelve hours from the occurrence of the event or information, in case the event or information is emanating from within the listed entity.

(iii). within twenty four hours from the occurrence of the event or information, in case the event or information is not emanating from within the listed entity.

Provided that if all the relevant information, in respect of claims which are made against the listed entity under any litigation or dispute, other than tax litigation or dispute, in terms of sub-paragraph 8 of paragraph B of Part A of Schedule III, is maintained in the structured digital database of the listed entity in terms of provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the disclosure with respect to such claims shall be made to the stock exchange(s) within seventy-two hours of receipt of the notice by the listed entity.

In case of any delay in making disclosure within the above stated timeline, the Company shall, along with such disclosure provide the explanation for the delay.

The Company will, with respect to disclosures referred to in this Policy, make disclosures updating material developments on a regular basis, till such time the event is resolved or closed, with relevant explanations.

Contact details of Key Managerial Personnel who is severally authorized to determine materiality of an event or information and make disclosure to the Stock Exchange(s) pursuant to Regulation 30(5) of SEBI Listing Regulations.

Person Authorised	1. Company Secretary, 2. Chief Financial Officer 3. Chief Executive Officer
Phone No.(s)	044-48679669
E-Mail Address	trivikramaindustries@gmail.com

6. POLICY REVIEW, LIMITATION & AMENDMENT: -

The right to interpret / amend / modify this policy vests in the Board of Directors of the Company.

In the event of any conflict between the provisions of this Policy and the SEBI Listing Regulations or any other statutory enactments or rules, the provisions of SEBI Listing Regulations or statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

Any Amendment to SEBI Listing Regulations or any other statutory enactments or rules, same shall mutatis mutandis be deemed to have been incorporated in this Policy.

7. RETENTION OF DOCUMENTS

The Company will disclose on its website all such events or information which have been disclosed to Stock Exchanges and such disclosures will be available on the website for a minimum period of five years, and thereafter as per the archival policy of the Company.

8. DISCLOSURE OF POLICY: -

This Policy shall be disclosed on the website of the Company and a copy of the Policy shall also be circulated to the Directors, employees, functional heads, head of Departments, Vice Presidents of the Company.

9. AMENDMENT: -

The Board reserves its right to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever. However, no such amendment or modification shall be inconsistent with the applicable provisions of the Act or Applicable Law.

10. INTERPRETATION: -

In any circumstance where the terms of this Policy differ from any Applicable Law governing the Company, such Applicable Law will take precedence over this Policy and the procedures there under until such time as this Policy is modified in conformity with the Applicable Law.

By the Board of Directors,
Zinema Media and Entertainment Limited.