

Policy on disclosure of material events and information

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POLICY ON DISCLOSURE OF MATERIAL EVENTS AND INFORMATION

1 PREAMBLE:

The Securities and Exchange Board of India (“SEBI”) has mandated listed entities to disclose material events and information promptly to ensure transparency and protect the interests of investors. WeWork India Management Limited (“the Company”) is committed to upholding transparency and ensuring the fair and timely dissemination of information to all stakeholders.

The purpose of this policy is to ascertain the requirement of disclosure of events or information to Stock Exchange(s) and define criteria for determining materiality of events and information in accordance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), together with the amendments that may be made from time to time.

2 DEFINITIONS:

- a) “Board of Directors” shall mean the Board of Directors of WeWork India Management Limited.
- b) “Chief Financial Officer” shall mean the person heading and discharging the finance function of the Company as disclosed by it to the recognised stock exchange(s) in its filing under the Listing Regulations.
- c) “Key Managerial Personnel” or “KMP” means as defined under the Companies Act, 2013.
- d) “Promoter” and “Promoter Group” shall have the same meaning as assigned to them respectively in clauses (oo) and (pp) of regulation 2(1) of the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.
- e) “Subsidiary” means a subsidiary as defined under sub-section (87) of section 2 of the Companies Act, 2013.
- f) “Securities” means the Securities as defined in clause (h) of Section 2 of the Securities Contracts (Regulations) Act, 1956.

3 OBJECTIVES:

The objectives of this Policy are as follows:

- a) To ensure that the Company complies with the disclosure obligations to which it is subject, as a publicly traded company as laid down by the Listing Regulations.
- b) To ensure that the information disclosed by the Company is timely and transparent.
- c) To ensure that corporate documents and public statements are accurate and do not

contain any misrepresentation.

- d) To protect the confidentiality of Material / Price sensitive information within the context of the Company's disclosure obligations.
- e) To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.
- f) To ensure uniformity in the Company's approach to disclosures, raise awareness and reduce the risk of selective disclosures

4 TYPE OF INFORMATION:

The information covered by this Policy shall include “information related to the Company's business, operations, or performance which has a significant effect on investment decisions” (hereinafter referred to as “material information”) that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality.

- A. Events or information specified in Para A of Part A of Schedule III of Regulation 30 of the Listing Regulations will be disclosed without any application of the guidelines for materiality.
- B. Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed based on application of materiality criteria, as specified in Regulation 30(4) of the Listing Regulations.
- C. Without prejudice to the generality of para (A) and (B), the Company may make disclosures of event/information as specified by the Board from time to time.

5 PERSON(S) RESPONSIBLE FOR DISCLOSURE:

The Board of Directors of the Company have authorised the Chief Financial Officer and Company Secretary & Compliance Officer to determine the materiality of an event or information and to make appropriate disclosures on a timely basis. The KMPs are also empowered to seek appropriate counsel or guidance, as and when necessary, from other internal or external stakeholders as they may deem fit.

The contact information of these designated personnel will be disclosed on the Company's website and also provided to the stock exchange(s).

The KMPs shall have the following powers and responsibilities for determining the material events or information:

- a) To review and assess an event or information that may qualify as ‘material’ and may require disclosure, on the basis of facts and circumstances prevailing at a given point in time.
- b) To determine the appropriate time at which the disclosures are to be made to the stock exchanges, based on an assessment of actual time of occurrence of an event or information.

- c) To disclose developments that are material in nature on a regular basis, till such time the event or information is resolved/closed, with relevant explanations.
- d) To consider such other events or information that may require disclosure to be made to the stock exchanges which are not explicitly defined in the Listing Regulations and determine the materiality, appropriate time and contents of disclosure for such matters.
- e) To disclose all events or information with respect to the subsidiaries which are material for the Company.

6 GUIDELINES FOR ASSESSING MATERIALITY:

Materiality will be determined on a case-to-case basis depending on the facts and the circumstances pertaining to the event or information.

The following criteria will be applicable for determining materiality of event or information:

A. The omission of an event or information which is likely to:

- (i) result in discontinuity or alteration of event or information already available publicly;
or
- (ii) result in significant market reaction if the said omission came to light at a later date.

B. The omission of an event or information, whose value or the expected impact in terms of value, exceeds the lower of the following:

- (i) two percent of turnover, as per the last audited consolidated financial statements of the listed entity;
- (ii) two percent of net worth, as per the last audited consolidated financial statements of the listed entity, except in case the arithmetic value of the net worth is negative;
- (iii) five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the listed entity;

C. An event or information which, in the opinion of the Board of Directors of the Company, is considered or treated as material.

7 DISCLOSURE:

The Company shall first disclose to the stock exchange(s) all events or information which are material in terms of the provisions of the Listing Regulations as soon as reasonably possible but not later than the timelines as specified by the Securities and Exchange Board of India in Listing Regulations from time to time.

8 OTHER OBLIGATIONS:

The Company shall, with respect to disclosures referred to in policy and the Listing Regulations, make disclosures updating material developments on a regular basis, till such time the event is resolved/closed.

The Company shall disclose on its website, all such events or information which has been disclosed to stock exchange(s) under regulation 30 of SEBI Listing Regulations, and such disclosures shall be hosted on the website of the Company for a period of five years and thereafter as per the archival policy of the Company.

9 AMENDMENTS AND REVIEW:

In the event of any conflict between the provisions of this Policy and of the applicable laws, including the SEBI Listing Regulations, the provisions of applicable laws shall prevail over this Policy. Any subsequent amendment / modification to the applicable laws shall automatically apply to this Policy.

The Policy shall be reviewed by the Board as and when deemed necessary and may amend the Policy as and when required to align with statutory or regulatory requirements.
