

## **JEENA SIKHO LIFECARE LIMITED**

### **CODE OF FAIR DISCLOSURE, INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY DESIGNATED PERSONS AND IMMEDIATE RELATIVES OF DESIGNATED PERSONS, AND LEGITIMATE PURPOSE POLICY**

#### **FORWARD**

On January 15, 2015 the Securities Exchange Board of India (“SEBI”) had notified the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time (“Regulations”) which replace the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 with effect from May 15, 2015.

The Regulations inter alia prohibits

- (i) communication of Unpublished Price Sensitive Information,
- (ii) procurement of price sensitive information and
- (iii) trading in securities when in possession of Unpublished Price Sensitive Information. The Regulations requires the Company to enact and adopt a code which lays down the internal procedures for regulating, monitoring and reporting of trading by Designated person(s) and their Immediate Relatives (“Code”).

The Code is enclosed herewith.

## **JEENA SIKHO LIFECARE LIMITED**

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#### **Registered Office Address:**

SCO-11, Kalgidhar Enclave, Baltana, Zirakpur,  
Punjab-140604, 01762-513185  
CIN NO.: L52601PB2017PLC046545

#### **Corporate Office Address:**

B-26, Opp. Metro Pillar No. 223, Rohtak Road,  
New Multan Nagar, Delhi - 110056  
Email ID: cs@jeenasikho.com | www.jeenasikho.com



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## I. OBJECTIVE

This “*Code of Fair Disclosure, Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Designated Persons and Immediate Relatives of Designated Persons, and Legitimate Purpose Policy*” is adopted by *Jeena Sikho Lifecare Limited* (“Company”), pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“SEBI PIT Regulations”).

The object of this Code is to formulate:

- (i) a code of conduct for fair disclosure and
- (ii) an internal code of conduct to regulate, monitor and report trading by the Designated Person(s) and their Immediate Relatives in terms of regulation 8 and 9 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 read with Schedule A and B appended thereto, as amended from time to time. The Code shall also cover Policy on Determining Legitimate Purpose.
- (iii) To lay down general principles and rules for prohibition of insider trading;
- (iv) To ensure fair, accurate, uniform and prompt public disclosure of Unpublished Price Sensitive Information (“UPSI”) and to identify persons authorized to communicate on behalf of the Company;
- (v) To define and determine “legitimate purpose” for which UPSI may be shared by insiders with internal or external stakeholders such as partners, collaborators, lenders, customers, suppliers, bankers, legal advisors, auditors, consultants or other professionals.

## II. DEFINITIONS

“**Applicable Laws**” shall mean SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended from time to time) (hereinafter referred to as “the Regulations”), or any statutes, laws, listing regulations, ordinances, rules, regulations, judgments, orders, decrees, bye laws, clearances, directives, guidelines, policies, requirements, notifications and clarifications, circulars or other governmental instructions and/or mandatory standards and/or guidance notes as may be applicable in the matter of trading by an Insider.

“**Authorised Persons**” are the persons permitted to speak with the media including social media and various members of financial community including investors on behalf of the Company, nominated by the Managing Director or the Chief Financial Officer (CFO) of the Company under this policy.

“**Code**” means this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and shall include **Annexure A**.

“**Chief Investor Relations Officer**” means such senior officer of the Company authorized under this Policy, to deal with dissemination of information and disclosure of UPSI in a fair and unbiased manner.

For the purpose of this Code, the Managing Director and in his absence, the Chief Financial Officer, and in his absence, the Company Secretary, is designated as the Chief Investor Relations Officer to deal with the dissemination of information and disclosure of UPSI.

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“Insider” means any person who is:

- a) a Connected Person; or
- b) in possession of or having access to UPSI, or Words and expressions used and not defined in this Code shall have the same meaning assigned to them in the Regulations, including Company’s Code of Conduct for Regulating, Monitoring and Reporting Trading by Designated Persons, the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder, to the extent relevant in connection with this Code, as the case may be or in any amendment thereto.

### III. BACKGROUND

#### (i) General Rules for Prohibition of Insider Trading

The SEBI PIT Regulations prohibit:

- Communication of UPSI to any person except in compliance with applicable law. Further, trading (directly or indirectly through other persons) in the securities of any company when in possession UPSI is also prohibited under law.
- Any violation of these regulations may result in severe penalties including monetary penalties, disgorgement of profits, and imprisonment, as prescribed under law.

The Company has framed a **Code of Conduct for Prohibition of Insider Trading**, which shall be read in conjunction with this Policy.

### IV. PUBLIC DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

#### (ii) Fair and Prompt Public Disclosure of UPSI

a) Once the UPSI has become credible and concrete, disclosure/dissemination of any UPSI shall be done promptly but not later than 24 hours or within such timeline, as is statutorily prescribed, from:

- receipt of approval of Board of Directors or
- on happening of such event which attracts a disclosure statutorily by

intimating to the Stock Exchanges and/or posting of the said information on the website of the Company and/ or otherwise making it generally available.

b) The Company shall ensure that uniform and universal dissemination of UPSI is made to avoid selective disclosure. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

c) No UPSI shall be shared with any person except for legitimate purpose unless the information is made generally available i.e. only public information can be shared.

d) Subject to Applicable Law methods of public disclosure of information to ensure uniform distribution shall include either of the following-

- Distributing through Press Releases in newspapers or media including electronic media;
- Filing with the Stock Exchanges;
- Any other method that ensures wide distribution of the news such as webcasts and webinars;
- Uploading the information on the website of the Company.

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**(iii) Legitimate Purpose**

UPSI is in the nature of information relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delisting's, disposals and expansion of business and such other transactions;
- changes in key managerial personnel.

b) UPSI shall be handled on a “need to know” basis. UPSI shall be disclosed only to those persons where such communication is in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations. For the purposes of this Code, “need to know” basis will mean UPSI should be disclosed only to those within the Company who need the information to discharge their role and perform their duty and discharge of legal obligations. All Insiders shall adhere to the conditions of strict confidentiality and shall not share any UPSI except for the aforesaid purposes.

c) Notwithstanding anything contained in this Code, UPSI may be shared only for legitimate purpose(s), performance of duties or discharge of legal obligations which shall include the following:

- Sharing of UPSI in the ordinary course of business by an Insider, Designated Person or by any Authorised Person with existing or proposed partners, collaborators, lenders, customers, suppliers, consultants, advisors engaged by the Company in relation to the subject matter of the proposed deal/ assignment in relation to UPSI;
- Sharing of relevant UPSI with intermediaries/ fiduciaries viz. legal advisors, auditors, insolvency professionals or other advisors or consultants, investment bankers, accountants etc. in order to avail professional services from them in relation to the subject matter of the UPSI;
- Sharing of relevant UPSI in case mandatory for performance of duties or discharge of legal obligations.

d) Before sharing of UPSI, the concerned person sharing such UPSI shall comply with the requirements in relation to circumstances and procedure for bringing people ‘insider’ as provided in Code of Conduct for Prohibition of Insider Trading and such notice shall be given to the recipient of UPSI by the person making communication of UPSI in order;

- To make recipient aware that the information shared is or would be UPSI;
- To make recipient aware of his duties and responsibilities attached to the receipt of such UPSI and the liability attached to misuse or unwarranted use of UPSI;
- To instruct recipient to maintain confidentiality of such UPSI in compliance with the Code of Conduct for Prevention of Insider Trading and the other applicable laws; and

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iv) To advise recipient to be in compliance with applicable provisions of PIT Regulations.

e) Responsibilities of the recipient of UPSI:

- To maintain and keep secret and confidential the information received;
- To use the confidential information only for the legitimate purpose;
- To disclose the confidential information with any other person strictly on a need to know basis;
- To safeguard the UPSI with the same degree of care to avoid unauthorised disclosure as the receiving party uses to protect its own confidential information, but in no case less than reasonable care; and
- v) To ensure compliance with applicable provisions of PIT Regulations. The Heads of the departments / functions and / or Designated Persons who share UPSI for legitimate purposes will be responsible for reporting the aforementioned details as per Insider Trading Regulations from time to time, in the Digital Database to the CIRO or in any other manner.

f) Such Heads of the departments / functions and / or Designated Persons shall also by 31st December each year give a confirmation to CIRO that they have complied with the requirements laid down in this Code.

#### **(iv) Other Relevant Policies**

This Policy is in addition to the Company's policy for Determining Materiality for Disclosures, which has been adopted pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), and the Companies act, 2013. The said policy defines material events/information, and the criteria to determine the same as required under the law. When a material event or information triggers disclosure, the Company shall promptly make disclosures to the stock exchanges as per law.

## **V. AUTHORITIES UNDER THE POLICY**

The Company, through the Chief Investor Relations Officer (CIRO), Chief Financial Officer (CFO), or Compliance Officer, shall designate the appropriate authority to make determinations on matters covered under this Policy concerning information disclosed about the Company. The CIRO, CFO, or Compliance Officer shall also ensure that any queries, rumours, or requests from regulatory authorities are addressed in a fair, accurate, and timely manner.

## **VI. WHAT IS UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)**

"**Unpublished Price Sensitive Information**" or "**UPSI**" means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of the Company and shall, ordinarily include but not restricted to, information relating to the following:

- (a) financial results;
- (b) dividends;
- (c) change in capital structure;

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- (d) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business \*[award or termination of order/contracts not in the normal course of business] and such other transactions;
- (e) changes in key managerial personnel \*[other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;
- (f) change in rating(s), other than ESG rating(s);
- (g) fund raising proposed to be undertaken;
- (h) agreements, by whatever name called, which may impact the management or control of the company;
- (i) fraud or defaults by the Company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the Company, whether occurred within India or abroad;
- (j) resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
- (k) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- (l) initiation of forensic audit, by whatever name called, by the Company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and of final forensic audit report;
- (m) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the Company or its directors, key managerial personnel, promoter or subsidiary, in relation to the Company;
- (n) outcome of any litigation(s) or dispute(s) which may have an impact on the Company;
- (o) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
- (p) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

Explanation 1- For the purpose of sub-clause (i):

- a) ‘**Fraud**’ shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.
- b) ‘**Default**’ shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of the Listing Regulations.

**Explanation 2-** For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of Schedule III of the

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Listing Regulations as may be specified by SEBI from time to time and materiality as referred at paragraph B of Part A of Schedule III of the Listing Regulations shall be applicable.

ix. Other terms not specifically defined here shall have the same meaning as assigned under the 'Code of Conduct for Prevention of Insider Trading in Securities of "Jeena Sikho Lifecare Limited" and 'the Insider Trading Regulations'.

The provisions of this Code have to be read along with the Insider Trading Regulations and if there is any inconsistency / contradiction between the two, the provisions of the Insider Trading Regulations shall prevail.

## **VII. GENERAL GUIDELINES ON EXTERNAL COMMUNICATIONS**

Company personnel shall not disclose any internal or unpublished price sensitive information ("UPSI") outside the Company, except in the ordinary course of their duties or as required by law. Any information whose materiality or confidentiality is in doubt should be treated as UPSI, and employees must consult the **CIRO** before disclosure.

Only the **Authorized Spokespersons**—Managing Director/ CFO or Company Secretary, or other officers authorized in writing—may communicate with analysts, investors, shareholders, media, or other market participants.

Selective disclosure of UPSI is prohibited. If UPSI is disclosed to any shareholder or group, the information must be simultaneously made public in accordance with SEBI regulations.

## **VIII. THIRD PARTY DEALINGS**

The Company shall ensure that information shared with analysts and research personnel is not UPSI.

The CIRO shall ensure that best practices of making transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made are developed by the Company. The best practices shall include uploading the

following information on the website of the Company -

- Any Power Point Presentation or similar material used in such analyst meeting on the website of the Company; and/or
- Any earnings guidance or any other similar material distributed during press conference; and/or
- Any material information about business plans of the Company provided in response to analyst queries or during discussions in a meeting or any other information which may lead to price discovery has been shared.

b) The Company shall ensure that unanticipated questions may be taken on notice and a considered response is given later. If the answer includes UPSI, the same shall not be furnished till the UPSI is made public.

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## **IX. GUIDELINES FOR SPECIFIC COMMUNICATIONS**

### **(i) Analyst and Investor Interactions**

All analyst or investor queries shall be routed through authorized persons only. No forward-looking or non-public information shall be disclosed.

### **(ii) Press Releases**

All press releases shall be reviewed and approved by an Authorized Spokesperson before issuance.

### **(iii) Earnings Guidance**

The Company shall issue earnings guidance only through public disclosures such as stock exchange filings, press releases or earnings calls.

### **(iv) Dealing with Rumours**

The Company shall respond to market rumours strictly in accordance with SEBI LODR Regulations and internal materiality policies.

## **X. DETERMINING LEGITIMATE PURPOSE**

Legitimate means anything that is conforming to the laws or rule. Hence, a behaviour, which is in conformance to the laws, is a legitimate act. Any act done with acceptable principles of reasoning or is sensible and valid and can said to be a legitimate act.

The term “legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions under SEBI PIT Regulations, and provided that such persons have entered in to a Non-Disclosure Agreement with the Company or are otherwise subject to a confidentiality obligation, so that the recipient maintains the confidentiality of (and not inappropriately use) the material non-public information / UPSI.

Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of SEBI PIT Regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with SEBI PIT Regulations.

## **XI. MAINTENANCE OF STRUCTURED DIGITAL DATABASE**

The **Compliance Officer (Company Secretary)**, under the supervision of the Board, shall maintain a digital database recording the nature of UPSI, names of persons sharing it, and names of recipients, along with their PAN or other identifier (not required for statutory requisitions).

The database shall have adequate internal controls, including time-stamping and audit trails, to prevent tampering or leakage. It shall remain confidential. Sharers must log UPSI in the portal, and recipients may log externally received information.

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The **structured digital database** shall be preserved for at least 8 years after relevant transactions or, if required by SEBI, until completion of any investigation or enforcement proceedings.

## **XII. VIOLATION OF THE POLICY**

Any violation of this Policy by an employee, director or independent contractor of the Company or any of its subsidiaries shall be brought to the attention of the MD/CFO and the CS and may constitute grounds for disciplinary action including and up to termination of services.

## **XIII. MISCELLANEOUS**

- i. The Compliance Officer shall maintain (a) updated list of Designated Persons including their immediate relatives, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years (c) a confidential list of any 'restricted securities' to which the Compliance Officer and the Insider Trading Compliance Committee may require Designated Persons to seek pre-clearance before Trading in such 'restricted securities'. (d) any other information that is required pursuant to SEBI Regulations.
- ii. The Company requires all Connected Persons to formulate and adhere to a code of conduct to achieve compliance with these Rules. In case such persons observe that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 and any of the clauses of this Policy, then they shall inform the Board of Directors of the Company promptly.
- iii. The Designated Person including his / her relatives while reporting the trades to the Company shall report on the basis of market rate of the trade and not by subtracting brokerage, commission, taxes etc.
- iv. This policy is only an internal code of conduct and one of the measures to avoid insider trading. Every insider is required to familiarize himself with the SEBI regulation as it will be the responsibility of each insider to ensure compliance of this code, SEBI regulation and other related statutes fully.
- v. Please note that in case the SEBI regulation or any statutory provisions are more stringent than those contained in the code, the SEBI regulations/ statutory provisions will prevail.
- vi. The Compliance Officer shall provide to Audit Committee of the Board, on a yearly basis, update on compliance under this code, any violations of this Code and other matters as may be directed by the Audit Committee from time to time.

## **REVIEW AND AMENDMENT**

In the event of any conflict between the provisions of this Policy and of the SEBI PIT Regulations or any other legal requirement ("Applicable Law"), the provisions of Applicable Law shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Law shall automatically apply to this Policy.

The Board may review and amend this Policy from time to time, as may be deemed necessary.

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**ANNEXURE 1**

**APPLICATION FOR THE APPROVAL OF PRE-CLEARANCE OF TRADES**

To,

The Compliance Officer  
Jeena Sikho Lifecare Limited,  
SCO 11 First Floor, Kalgidhar Enclave,  
Zirakpur, Punjab-140604

**Sub: Application for Pre-dealing approval in securities of the Company.**

Dear Sir/Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time and the Company's Insider Trading Policy and Code of Practices and Procedures for Fair Disclosure of UPSI ("Code"), I seek approval to purchase / sell / subscribe equity shares of the Company as per details given below:

1.	Name of the applicant	
2.	Designation and Relationship with the Company / (Immediate Relative / Trading or dealing decision taker).	
3.	PAN	
4.	Address	
5.	Details (Date, Number / value and Type) of trades / deals done six days before the date of this trading plan application by Designation / Relationship with the Company / Immediate Relative / trading or dealing decision taker	
6.	Number of securities held as on date	
7.	Folio No. / DP ID / Client ID No.	
8.	The proposal is for	<input type="radio"/> Purchase of securities <input type="radio"/> Subscription to securities <input type="radio"/> Sale of securities <input type="radio"/> Pledge of securities <input type="radio"/> Release of securities
9.	Proposed date of trading in securities	
10.	Estimated number of securities proposed to be purchased/subscribed/sold	
11.	Current market price (as on date of application)	
12.	Whether the proposed transaction will be through the stock exchange or off-market trade	
13.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	
14.	Other details, if any	

I enclose herewith the Undertaking signed by me.

Signature:

Date:

Name:

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