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GRIEVANCE REDRESSAL POLICY

Particulars	**Details**
Policy Name	Grievance Redressal Policy
Company Name	Jeena Sikho Lifecare Limited
Version Number	2.0
Effective Date	01st April, 2023
Prepared By	Secretarial Department
Approved By	Board of Directors
Number of Revisions till date	1

Registered Office Address:
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Punjab-140604, 01762-513185
CIN NO.: L52601PB2017PLC046545

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1. Preamble

1.1 Applicability

Jeena Sikho Lifecare Limited ("JSLL" or "the Company") is committed to maintaining the highest standards of corporate governance, transparency, accountability and stakeholder engagement.

The equity shares of the Company are listed on BSE Limited and National Stock Exchange of India Limited. As a listed entity, the Company recognises the importance of maintaining effective communication channels with its shareholders and investors and ensuring timely resolution of their queries, requests and grievances.

This Policy is limited to grievances of shareholders and investors of the Company in their capacity as security holders. Grievances of other stakeholders, including patients, employees, doctors, suppliers and business partners, are governed under the Company's Stakeholder Engagement Policy and, where applicable, the Company's Whistle Blower Policy / Vigil Mechanism.

The shareholders of the Company are entitled to various rights under applicable laws and regulations, including but not limited to:

(i) Issuance of share certificates and processing of requests relating to transmission, sub-division, consolidation, replacement or other shareholder-related services. In accordance with Regulation 40 of the SEBI Listing Regulations, transfer of securities held in physical form is not permitted, and only requests for transmission or transposition of physical securities may be processed;

(ii) Receipt of dividend declared by the Company, subject to applicable laws and regulations;

(iii) Receipt of Annual Reports, Notices of General Meetings and other statutory communications;

(iv) Access to information and disclosures made by the Company in accordance with applicable regulatory requirements;

(v) Nomination in respect of their holdings, and updation of PAN, KYC and bank account details, in accordance with applicable SEBI circulars; and

(vi) Such other rights as may be available to shareholders under applicable laws, rules, regulations and statutory provisions.

With an objective to ensure that shareholders and investors receive efficient, transparent and responsive services across various investor service channels, the Company has formulated this Grievance Redressal Policy ("Policy").

This Policy establishes a structured framework for receiving, recording, monitoring and resolving investor grievances in a timely and effective manner, while ensuring compliance with applicable statutory and regulatory requirements.

The Policy shall apply to all investor-related communications, queries, requests and grievances received by the Company through various channels, including those received through the Registrar and Share Transfer Agent ("RTA"), Stock Exchanges, SEBI Complaints Redress System ("SCORES") and other statutory authorities.

2. Vision and Objectives

The Company strives to uphold the highest standards of corporate governance, transparency and responsible stakeholder engagement. Effective investor servicing is an integral component of good corporate governance practices and plays a significant role in enhancing investor confidence and maintaining long-term stakeholder relationships.

Recognising the importance of prompt and efficient investor service, the Company has established a comprehensive mechanism for handling investor communications and grievances with the following objectives:

Fair and Equitable Treatment of Investors
To ensure that all investors and shareholders are treated fairly, consistently and without discrimination while providing investor-related services.

Accessible Communication Channels
To provide investors with convenient and accessible channels for submitting queries, requests, suggestions, feedback and grievances relating to their shareholding and other investor matters.

Timely Resolution of Investor Grievances
To ensure that investor complaints are duly acknowledged, examined, investigated and resolved within the applicable regulatory timelines.

Transparency in Investor Communication
To maintain transparent and effective communication with investors by providing accurate, complete and timely information relating to the Company's operations, financial performance, statutory disclosures and investor-related matters.

Monitoring and Continuous Improvement

To establish an effective monitoring mechanism for investor grievances and identify opportunities for continuous improvement in investor services and communication processes.

Regulatory Compliance

To ensure compliance with applicable provisions of the Companies Act, 2013 (including Sections 124 and 125 on unpaid/unclaimed dividends and the Investor Education and Protection Fund), the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), the Digital Personal Data Protection Act, 2023, and other applicable laws, rules, regulations, circulars and guidelines issued by regulatory authorities from time to time.

3. Classification of Investor Communication

The Company receives various communications from shareholders and investors relating to shareholding matters, dividend payments, statutory communications, financial information, investor services and other related matters.

Based on the nature of communication and whether any deficiency in service is alleged, investor communications shall broadly be classified into the following categories:

A. General Requests / Queries

General Requests / Queries refer to communications received from shareholders or investors seeking information, clarification, assistance or guidance in relation to investor services, where no deficiency in service, delay or grievance is alleged.

Illustrative examples include:

- Requests for copies of Annual Reports, Notices of General Meetings, financial statements or other statutory documents;
- Requests for change or updation of address, bank details, Permanent Account Number ("PAN"), email address, contact details or other shareholder information;
- Requests seeking information regarding procedures, documentation requirements and timelines relating to transmission, transposition, dematerialisation, rematerialisation or other shareholder-related services;
- General queries or clarifications relating to shareholder services, investor procedures, corporate actions and Company disclosures.

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Such requests shall be handled through the appropriate investor service channels and resolved in accordance with applicable procedures and timelines.

B. Investor Complaints

Investor Complaints refer to communications received from shareholders or investors wherein a deficiency in service, delay, non-response, improper handling or unsatisfactory resolution is alleged against the Company or its Registrar and Share Transfer Agent.

Illustrative examples include:

- Non-receipt or delay in payment of dividend declared by the Company;
- Delay or failure in processing requests relating to transmission, transposition, dematerialisation, rematerialisation or other shareholder services;
- Non-receipt of Annual Reports, Notices of General Meetings or other statutory communications despite entitlement;
- Delay or non-response to investor requests, queries or correspondence within applicable timelines;
- Any grievance received through regulatory platforms or authorities such as SEBI, Stock Exchanges or other statutory authorities;
- Difficulty in claiming unpaid or unclaimed dividend, or shares, transferred to the Investor Education and Protection Fund ("IEPF");
- Grievances relating to non-updation of PAN, KYC details, bank account details, specimen signature or nomination for shares held in physical form.

The Company shall maintain appropriate records of all investor communications, including details of complaints received, actions initiated, correspondence exchanged, resolution provided and closure status, in accordance with applicable regulatory requirements.

4. Regulatory Timelines for Resolution of Investor Grievances

Investor complaints shall be resolved within the following statutory and regulatory timelines:

- The Company shall resolve a complaint received through SCORES and upload the Action Taken Report ("ATR") within 21 (twenty-one) calendar days of receipt of the complaint, in accordance with SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023. Where the complainant is not satisfied with the ATR, the complainant may seek a first-level review within 15 (fifteen) calendar days of receipt of the ATR, and, if

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still unsatisfied, a second-level review within a further 15 (fifteen) calendar days, in accordance with the SCORES framework;

- SEBI's SCORES platform was upgraded to SCORES 2.0 with effect from April 2024; the earlier version of the platform ceased to accept new complaints with effect from March 28, 2024;
- In accordance with Regulation 13(3) of the SEBI Listing Regulations, the Company shall file with the Stock Exchanges, on a quarterly basis and within 21 (twenty-one) days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, received during the quarter, disposed of during the quarter, and remaining unresolved at the end of the quarter; and
- General requests and queries, and service requests processed through the RTA, shall be handled within the timelines prescribed under the SEBI Listing Regulations and applicable SEBI master circulars for Registrars to an Issue and Share Transfer Agents, as amended from time to time.

5. Investor Grievance Redressal Mechanism

The Company has established a structured mechanism for receiving, monitoring and resolving investor grievances in a timely, transparent and effective manner. The mechanism ensures coordination between the Company, its Registrar and Share Transfer Agent ("RTA"), internal departments and regulatory authorities, wherever applicable.

The Company shall endeavour to resolve investor grievances in accordance with the applicable provisions of the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") and other applicable regulatory requirements.

5.1 Stakeholders Relationship Committee

The Stakeholders Relationship Committee ("SRC") of the Board of Directors shall oversee the investor grievance redressal mechanism of the Company. In accordance with Regulation 20 of the SEBI Listing Regulations, the SRC shall comprise at least three directors, with a majority being non-executive directors and at least one being an independent director, and shall be chaired by a non-executive director.

The SRC shall review the status of investor complaints, evaluate the effectiveness of investor service mechanisms and provide guidance for improving shareholder services.

5.2 Role of Registrar and Share Transfer Agent

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The Company has appointed M/s Skyline Financial Services Private Limited as its Registrar and Share Transfer Agent ("RTA").

The RTA shall assist in handling investor service matters, including share transmission, transposition, dematerialisation/rematerialisation, dividend-related matters, updation of investor records and other shareholder-related services.]

The RTA shall coordinate with the Company for timely resolution of investor grievances.

5.3 Role of Compliance Officer

The Company Secretary of the Company has been appointed as the Compliance Officer pursuant to Regulation 6 of the SEBI Listing Regulations.

The Compliance Officer shall be responsible for:

- Monitoring investor complaints received through various channels;
- Coordinating with the RTA and internal departments for resolution of grievances;
- Ensuring timely submission of responses and Action Taken Reports ("ATR"), and the quarterly statement of investor complaints to the Stock Exchanges under Regulation 13(3), wherever applicable; and
- Maintaining records of investor complaints and reporting the status of grievances to the SRC and Board of Directors, wherever applicable.

5.4 Investor Grievance Channels

Investors may submit their queries, requests and grievances through:

- Email: investor@jeenasikho.com
- The Registrar and Share Transfer Agent, M/s Skyline Financial Services Private Limited; and
- SEBI's SCORES platform at https://scores.sebi.gov.in, Stock Exchanges, or other statutory authorities, wherever applicable.

The Company shall ensure that investor grievances received through these channels are appropriately recorded, monitored and resolved within applicable timelines.

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6. Process for Handling Investor Grievances

Step 1: Receipt of Complaint

Investor complaints may be received through the Company's designated investor grievance email, RTA, Stock Exchanges, SEBI SCORES platform or any other statutory authority.

All complaints shall be promptly recorded and taken up for resolution.

Step 2: Registration and Acknowledgement

The details of the complaint, including the date of receipt, nature of grievance, investor details, supporting documents and action taken shall be recorded for monitoring and resolution purposes.

An acknowledgement shall be provided to the investor, wherever applicable.

Step 3: Review and Investigation

The Secretarial Department, in coordination with the RTA and concerned departments, shall review the grievance, verify relevant facts and obtain necessary information or documents, wherever required.

Step 4: Resolution and Communication

The Company shall undertake necessary action and communicate the resolution, clarification or status update to the investor within applicable regulatory timelines set out in Section 4 of this Policy.

Step 5: Closure and Record Maintenance

The grievance shall be treated as closed upon providing an appropriate resolution or response to the investor.

Records relating to complaints received, actions taken and closure status shall be maintained for compliance and future reference.

Step 6: Monitoring and Reporting

The Compliance Officer shall periodically review the status of investor grievances and report significant matters and grievance status to the Stakeholders Relationship Committee and Board of Directors, wherever applicable.

7. SEBI's Investor Grievance Redressal Framework

SEBI has established a comprehensive investor grievance redressal framework to facilitate transparent, efficient and time-bound resolution of investor concerns. Investors have access to various mechanisms, including the SEBI Complaints Redress System ("SCORES"), Stock Exchange grievance redressal mechanisms and the Online Dispute Resolution ("ODR") Mechanism.

7.1 SEBI Complaints Redress System ("SCORES")

SCORES is a centralised online platform established by SEBI for facilitating resolution of investor grievances against listed companies, SEBI-registered intermediaries and Market Infrastructure Institutions. SEBI upgraded the platform to SCORES 2.0 with effect from April 2024, and complaints are now automatically routed to the concerned entity.

Investors are required to first approach the concerned entity through its designated grievance redressal mechanism. In case the grievance remains unresolved or the investor is not satisfied with the response, the investor may approach SEBI through the SCORES platform.

Complaints registered on SCORES require relevant details, including investor particulars, nature of grievance, entity details and supporting documents, wherever applicable.

As set out in Section 4 of this Policy, the Company shall resolve investor complaints and submit the necessary Action Taken Report on the SCORES platform within 21 calendar days of receipt, and shall respond to any first-level or second-level review sought by the complainant within the timelines stipulated by SEBI or the Designated Body, as applicable.

Failure to resolve investor complaints within prescribed timelines may result in regulatory action by Stock Exchanges in accordance with applicable SEBI regulations and circulars.

7.2 Investor Grievance Redressal Mechanism of Stock Exchanges

Stock Exchanges have established Investor Services Cells to facilitate resolution of investor grievances relating to listed entities and market participants.

Investors may submit their grievances through the designated platforms or investor service centres of the respective Stock Exchanges.

The Stock Exchanges facilitate resolution of complaints in accordance with their applicable grievance redressal procedures and timelines.

7.3 Online Dispute Resolution ("ODR") Mechanism

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SEBI introduced the Online Dispute Resolution ("ODR") Mechanism to provide investors and market participants with an efficient, technology-enabled and time-bound mechanism for resolution of disputes.

The ODR framework facilitates online conciliation and arbitration through independent ODR institutions empanelled under the supervision of Market Infrastructure Institutions.

Investors may access the ODR mechanism where:

- The grievance has not been satisfactorily resolved through SCORES; or
- The grievance has not been resolved through the Investor Grievance Redressal Mechanism of Stock Exchanges.

The ODR process involves:

Online Conciliation: An independent conciliator facilitates amicable settlement between the parties within the prescribed timelines.

Online Arbitration: Where conciliation does not result in settlement, the dispute may proceed for online arbitration before an independent arbitrator or arbitral tribunal, as applicable.

The ODR mechanism strengthens investor protection by providing a structured, transparent and accessible dispute resolution framework.

8. Investor Engagement and Communication

Jeena Sikho Lifecare Limited believes in maintaining transparent, timely and effective communication with its investors and stakeholders.

The Company is committed to providing relevant, accurate and comprehensive information through appropriate communication channels, including:

- Annual Reports;
- Notices of General Meetings;
- Financial Results and investor presentations;
- Disclosures made to Stock Exchanges;
- Company website;
- Investor meetings and interactions; and
- Corporate announcements and other statutory communications.

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The Company endeavours to provide timely and accurate information to investors to facilitate informed decision-making and enhance transparency, trust and confidence among its investor community.

9. Unclaimed Dividends and Shares — Investor Education and Protection Fund

In accordance with Section 124 of the Companies Act, 2013, any dividend that remains unpaid or unclaimed for a period of seven consecutive years from the date of transfer to the Company's Unpaid Dividend Account shall be transferred, along with any interest accrued thereon, to the Investor Education and Protection Fund ("IEPF") established under Section 125 of the Companies Act, 2013.

Pursuant to Section 124(6) of the Companies Act, 2013 and the Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016, all shares in respect of which dividend has remained unpaid or unclaimed for seven consecutive years or more shall also be transferred to the demat account of the IEPF Authority.

The Company shall, before effecting any such transfer, send individual communications to the concerned shareholders and publish requisite public notices, and shall upload the details of unclaimed dividends and shares due for transfer on the Company's website, in accordance with applicable rules.

Shareholders whose unclaimed dividend or shares have been transferred to the IEPF Authority may claim a refund of the dividend or transfer of the shares by submitting an online application in Form IEPF-5 on the website of the IEPF Authority (www.iepf.gov.in), along with the requisite documents and fees, in accordance with Rule 7 of the aforesaid Rules.

The Company shall provide such assistance as may be required to shareholders in verifying and processing claims made in Form IEPF-5, and grievances relating to unclaimed dividends and shares shall be handled in accordance with the process set out in Section 6 of this Policy.

10. Mandatory KYC, PAN and Nomination for Holders of Physical Securities

In accordance with SEBI Circular No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2023/37 dated March 16, 2023 (as compiled in the SEBI Master Circular for Registrars to an Issue and Share Transfer Agents), all holders of physical securities of the Company are required to furnish their Permanent Account Number ("PAN"), nomination (or a valid declaration opting out of nomination), contact details, bank account details and specimen signature to the RTA.

Pursuant to SEBI's Circular dated November 17, 2023, folios of physical shareholders shall not be frozen for non-furnishing of the above details; however, in accordance with applicable SEBI circulars effective April 1, 2024, any payment due to such shareholders, including dividend, shall be made only through electronic mode and certain investor service requests may not be processed until the requisite PAN, KYC and nomination details are furnished.

The Company shall, through its RTA, continue to communicate with holders of physical securities regarding the requirement to furnish the above details using the prescribed forms (including Forms ISR-1, ISR-2, ISR-3, SH-13 and SH-14), and grievances relating to non-updation of such details shall be handled in accordance with the process set out in Section 6 of this Policy.

11. Data Privacy and Confidentiality

In the course of investor servicing and grievance redressal, the Company and its RTA may collect personal information from shareholders and investors, including PAN, bank account details, contact details, specimen signatures and nomination details. Such information shall be collected, processed, stored and shared strictly in accordance with the Company's Privacy Policy and applicable law, including the Digital Personal Data Protection Act, 2023, and shall be used solely for the purpose of investor servicing, grievance redressal and compliance with applicable law.

12. Stakeholder Concerns

Jeena Sikho Lifecare Limited is committed to maintaining transparent, accessible and responsive communication channels with its investors and stakeholders.

Investors may submit their queries, concerns, suggestions or requests for clarification relating to the Company, its securities or investor services through the channels set out in Section 5.4 of this Policy.

The Company shall endeavour to acknowledge, review and resolve investor concerns through appropriate internal processes within the regulatory timelines set out in Section 4 of this Policy. No investor raising a concern in good faith shall be subject to retaliation or victimisation.

The feedback received from investors shall be considered for continuous improvement of the Company's investor service framework.

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13. Related Policies

This Policy should be read together with the Company's Stakeholder Engagement Policy, Whistle Blower Policy / Vigil Mechanism, Code of Conduct for Prevention of Insider Trading, Privacy Policy, and such other policies of the Company as may be applicable. In the event of any inconsistency between this Policy and a more specific Company policy governing a particular investor matter, the more specific policy shall apply, subject always to compliance with applicable law.

14. Policy Review and Amendment

This Policy shall be reviewed periodically by the Company to ensure alignment with applicable laws, regulations and best practices.

The Board of Directors may approve amendments to this Policy based on recommendations of the Stakeholders Relationship Committee or changes in applicable regulatory requirements.

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