

SUPPLIER CODE OF CONDUCT

Particulars	Details
Policy Name	Supplier Code of Conduct
Company Name	Jeena Sikho Lifecare Limited
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Prepared By	Himanshi Thakur
Approved By	Mukesh Grover and Sahil Jain
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JEENA SIKHO LIFECARE LIMITED

120* AYURVEDA CLINICS & HOSPITALS | FREEDOM FROM 2D DISEASES & DRUGS

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,
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Email ID.: cs@jeenasikho.com | www.jeenasikho.com

1. Introduction

Jeena Sikho Lifecare Limited ("JSLL" or "the Company") is committed to conducting its business operations with the highest standards of integrity, ethics, transparency and responsibility. The Company believes that its suppliers, vendors, contractors, service providers and business partners are integral stakeholders in achieving sustainable growth and creating long-term value.

The Company recognises that a responsible and sustainable supply chain plays a significant role in supporting ethical business practices, quality healthcare services, environmental protection, social responsibility and stakeholder trust.

This Supplier Code of Conduct ("Code") establishes the principles and standards expected from all suppliers and business partners associated with JSLL. The Code provides guidance on ethical conduct, labour and human rights, environmental responsibility, health and safety, information security, compliance with applicable laws and responsible business practices.

This Code should be read together with the Company's Sustainable Procurement Policy, which sets out the Company's own procurement principles, due diligence expectations and the corrective action framework applicable to suppliers.

JSLL expects its suppliers to adopt similar principles within their own organisations and ensure that these standards are extended throughout their respective supply chains.

This Code shall be reviewed periodically to ensure alignment with applicable laws, regulatory requirements, sustainability objectives and evolving industry best practices.

2. Applicability and Scope

This Supplier Code of Conduct applies to all suppliers, vendors, contractors, consultants, service providers, manufacturers, distributors, agents, intermediaries, business partners and other third parties providing goods or services to Jeena Sikho Lifecare Limited.

The suppliers shall ensure compliance with all applicable laws, regulations and contractual obligations while conducting business with the Company.

Suppliers are expected to implement appropriate policies, procedures and controls within their organisations to ensure adherence to the principles contained in this Code and promote responsible practices throughout their supply chain.

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3. Definitions

"**Supplier**" means any vendor, contractor, consultant, service provider, manufacturer, distributor, agent, intermediary or other third party providing goods or services to the Company.

"**Business Partner**" means any franchise partner, joint venture partner or other third party with whom the Company has a formal business relationship other than as a direct supplier.

"**Subcontractor**" means any third party engaged by a Supplier to perform any part of the Supplier's obligations to the Company.

4. Supplier Conduct Principles

JSLI expects its suppliers to conduct business in accordance with the following fundamental principles:

4.1 Principle 1: Ethics, Integrity and Transparency

JSLI believes that ethical conduct and transparency are essential elements of sustainable business relationships.

Suppliers shall conduct all business dealings with honesty, fairness and integrity and shall maintain accurate records relating to their business activities, transactions, compliance practices and operational matters.

Suppliers shall:

- Conduct business in an ethical and transparent manner;
- Maintain accurate and complete records and documentation;
- Avoid fraudulent activities, misrepresentation or unethical practices;
- Comply with all applicable laws, regulations and contractual obligations;
- Avoid conflicts of interest that may adversely affect business decisions;
- Ensure fair and responsible dealings with employees, customers, suppliers and other stakeholders; and
- Refrain from any anti-competitive practice, including price-fixing, bid-rigging, cartelisation or market allocation, in violation of the Competition Act, 2002.

Suppliers shall promptly disclose any actual or potential conflict of interest that may arise during their association with JSLI.

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4.2 Principle 2: Labour Practices and Human Rights

JSLI respects human rights and is committed to promoting dignity, equality, fairness and respect for all individuals associated with its operations and supply chain.

Suppliers shall ensure that their workplace practices comply with applicable labour laws and internationally recognised human rights principles, including the Code on Wages, 2019, the Industrial Relations Code, 2020, the Code on Social Security, 2020, and the Occupational Safety, Health and Working Conditions Code, 2020 (together, the "Labour Codes"), which were notified with effect from November 21, 2025 and consolidate 29 erstwhile central labour statutes.

4.2.1 Prohibition of Child Labour

Suppliers shall strictly prohibit the employment or engagement of child labour in any form.

Suppliers shall comply with the Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 and applicable laws relating to minimum age requirements for employment, and ensure that young workers, where legally permitted, are provided with appropriate protection.

4.2.2 Prevention of Forced Labour

Suppliers shall not engage in or support any form of forced labour, bonded labour, slavery, human trafficking or involuntary labour, in compliance with the Bonded Labour System (Abolition) Act, 1976 and other applicable laws.

All employment relationships shall be voluntary, and workers shall be provided with clear terms and conditions of employment.

4.2.3 Equal Opportunity and Non-Discrimination

Suppliers shall provide equal opportunities to employees and shall not discriminate based on factors including but not limited to gender, age, disability, religion, ethnicity, nationality, social background or any other status protected under applicable laws.

Suppliers shall promote an inclusive workplace based on fairness, dignity and mutual respect.

4.2.4 Prevention of Harassment and Workplace Abuse

Suppliers shall maintain a workplace free from harassment, intimidation, violence and any form of physical, verbal, psychological or sexual abuse.

Suppliers with 10 (ten) or more employees shall constitute an Internal Committee in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and shall establish appropriate mechanisms to prevent and address workplace misconduct.

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4.2.5 Fair Wages and Working Conditions

Suppliers shall provide fair wages, statutory benefits and safe working conditions in accordance with the Labour Codes referred to above and other applicable labour laws.

Suppliers shall ensure compliance with regulations relating to working hours, overtime, leave benefits and employee welfare, including provisions relating to social security, provident fund, gratuity and employees' state insurance, as applicable to their establishment.

4.3 Principle 3: Environment, Health and Safety

JSLI is committed to promoting environmentally responsible operations and ensuring safe working conditions throughout its value chain.

Suppliers shall adopt responsible environmental practices and comply with applicable environmental, health and safety laws, including the Environment (Protection) Act, 1986, the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, and, in the case of suppliers handling clinical, pharmaceutical or biomedical waste on behalf of the Company, the Bio-Medical Waste Management Rules, 2016.

Suppliers shall:

- Promote efficient utilisation of natural resources;
- Minimise waste generation and encourage recycling and responsible disposal;
- Prevent pollution and reduce environmental impact;
- Follow applicable environmental regulations;
- Maintain safe and healthy working conditions;
- Provide appropriate safety training and protective measures to employees; and
- Take corrective actions to prevent workplace accidents and incidents.

Suppliers are encouraged to continuously improve their environmental and safety performance through responsible practices and appropriate management systems.

4.4 Principle 4: Anti-Bribery and Anti-Corruption

JSLI follows a zero-tolerance approach towards bribery, corruption and unethical business practices.

Suppliers shall comply with the Prevention of Corruption Act, 1988 (as amended in 2018) and all other applicable anti-corruption and anti-bribery laws, and shall not directly or indirectly offer, provide, solicit or accept any improper payment, benefit or advantage for obtaining business or influencing decisions.

Suppliers shall:

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- Maintain transparent and accurate financial records;
- Avoid facilitation payments, kickbacks or unethical benefits;
- Ensure business transactions are conducted fairly and transparently;
- Avoid offering inappropriate gifts, hospitality or benefits to JSLL employees or representatives; and
- Immediately report any suspected unethical conduct.

4.5 Principle 5: Information Security and Confidentiality

Suppliers may have access to confidential information, business information, personal data or proprietary information of JSLL during their engagement.

Suppliers shall protect such information and shall:

- Maintain confidentiality of information received from JSLL;
- Use information only for authorised business purposes;
- Prevent unauthorised access, disclosure or misuse of information;
- Comply with applicable data protection and privacy laws, including the Digital Personal Data Protection Act, 2023 and the Information Technology Act, 2000; and
- Implement appropriate security measures to safeguard information.

Suppliers shall not disclose JSLL's confidential information to any third party without prior written approval from the Company.

4.6 Principle 6: Quality and Product Responsibility

Suppliers providing goods and services to JSLL shall maintain high standards of quality, reliability and safety.

Suppliers shall ensure that products and services supplied to the Company:

- Meet agreed specifications and quality requirements;
- Comply with applicable laws and regulatory standards, including, as applicable, the Drugs and Cosmetics Act, 1940 and Rules made thereunder, the Medical Device Rules, 2017, applicable AYUSH quality standards, and the Legal Metrology Act, 2009;
- Are safe and fit for intended use;
- Are manufactured and delivered through responsible processes; and
- Support the Company's commitment towards quality healthcare and customer satisfaction.

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Suppliers of herbal, botanical or other natural raw materials shall additionally comply with the sourcing requirements set out in Section 9.1 of the Company's Sustainable Procurement Policy, including compliance with the Biological Diversity Act, 2002.

Suppliers shall promptly communicate any quality, safety or compliance concerns relating to products or services supplied to JSLL.

4.7 Principle 7: Sustainable and Responsible Supply Chain

JSLL encourages suppliers to adopt sustainable procurement practices and responsible supply chain management, in line with the Company's Sustainable Procurement Policy.

Suppliers shall endeavour to:

- Promote responsible sourcing practices;
- Assess and manage environmental and social risks;
- Encourage sustainability among their own suppliers;
- Maintain ethical relationships with business partners; and
- Support continuous improvement in sustainability performance.

JSLL may evaluate supplier sustainability practices as part of its supplier selection and review process.

5. Compliance, Representations and Risk Allocation

Suppliers are expected to establish appropriate internal processes and controls to ensure compliance with this Code.

5.1 Sole Responsibility and Self-Certification

Compliance with all applicable laws, regulations and the standards set out in this Code, in respect of a Supplier's own operations, employees, agents, representatives, subcontractors and supply chain, is the sole and exclusive responsibility of the Supplier. This Code communicates JSLL's expectations; it does not transfer, assume, share or reduce, in whole or in part, any statutory, regulatory or legal obligation that otherwise rests with the Supplier.

As a condition of onboarding, and periodically thereafter as JSLL may require, each Supplier shall furnish a written self-certification confirming its compliance with this Code and applicable law, including in respect of child labour, forced labour and other matters covered under Section 4.2. JSLL shall be entitled to rely, in good faith and without independent verification, on such self-certifications and on any other information, licences, records or representations furnished by the Supplier.

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5.2 Representations and Warranties

Each Supplier represents and warrants, on a continuing basis throughout its engagement with JSLL, that:

- it, and its subcontractors, hold all licences, approvals and registrations required under applicable law to carry on its business and to supply goods or services to JSLL;
- neither it nor any of its subcontractors employs or engages child labour, forced labour or bonded labour in any form, and its workplace practices comply with the Labour Codes and other applicable labour and human rights laws referred to in this Code;
- all information, certifications, records and documents furnished to JSLL in connection with this Code are true, complete and not misleading; and
- it will promptly notify JSLL in writing on becoming aware of any actual or suspected breach of the foregoing.

These representations and warranties are made by the Supplier as an inducement to JSLL to engage or continue to engage the Supplier, and JSLL's reliance on them does not create any obligation on JSLL to verify their accuracy.

5.3 Compliance Reviews and Audits

Nothing in this Code, and no review, evaluation, documentation verification or audit that JSLL conducts, does not conduct, or elects to conduct in a limited manner, shall be construed as: (a) creating any duty of care, supervisory obligation or assumption of responsibility on the part of JSLL to identify, monitor, detect, investigate or prevent non-compliance by a Supplier or its subcontractors; (b) constituting a guarantee, endorsement, certification or due diligence sign-off by JSLL as to a Supplier's compliance; or (c) rendering JSLL responsible or liable for any act, omission, or violation of law by a Supplier or its employees, agents, representatives or subcontractors.

Any right of review, evaluation or audit referred to in this Code is a right, and not an obligation, exercisable by JSLL at its sole discretion, and does not derogate from the Supplier's sole responsibility for compliance under Section 5.1.

5.4 Relationship of the Parties

Nothing in this Code creates or shall be construed as creating a partnership, joint venture, agency, franchise or employer-employee relationship between JSLL, on the one hand, and a Supplier or its employees, agents, representatives or subcontractors, on the other. Suppliers, and their respective employees, agents, representatives and subcontractors, are not employees, workers or agents of JSLL and shall not represent or hold themselves out as such.

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Each Supplier is, and shall remain, an independent contractor with sole control over, and sole responsibility for, the recruitment, direction, supervision, working conditions and terms of engagement of its own employees, agents and subcontractors. JSLL exercises no control over these matters and does not, by virtue of this Code or any engagement with a Supplier, become a joint employer or otherwise share in any liability arising from them.

5.5 Indemnification

Each Supplier shall indemnify, defend and hold harmless JSLL, its directors, officers, employees and affiliates from and against any and all claims, losses, damages, liabilities, regulatory fines or penalties, and costs and expenses (including reasonable legal fees) arising out of or in connection with: (a) any actual or alleged breach of this Code or applicable law by the Supplier or its subcontractors; (b) any act, omission or misconduct of the Supplier's employees, agents, representatives or subcontractors; or (c) any inaccuracy in a representation, warranty or self-certification furnished under this Code.

This indemnity is in addition to, and not in substitution for, any remedies available to JSLL under the applicable commercial agreement with the Supplier, and survives the termination or expiry of the Supplier's engagement with JSLL.

5.6 Consequences of Non-Compliance

JSLL may, at its sole discretion, assess a Supplier's compliance with this Code through appropriate mechanisms, including reviews, evaluations, requests for information, documentation verification, site visits or audits, as it considers appropriate. Any such review or assessment is conducted solely for JSLL's internal supplier governance purposes and shall not constitute, or be construed as, an assumption by JSLL of any duty to monitor, supervise, investigate, detect or enforce the Supplier's compliance with this Code or applicable law, nor as a representation, certification or warranty of the Supplier's compliance.

The Supplier acknowledges and agrees that it remains solely responsible for ensuring compliance with this Code and all applicable laws and regulations. The conduct, scope, frequency or outcome of any review, evaluation or audit by JSLL, or the decision not to conduct any such review, shall not relieve the Supplier of its responsibilities or create any liability or responsibility on the part of JSLL for any act, omission or non-compliance of the Supplier or its employees, agents, representatives or subcontractors.

Where JSLL determines, in its sole discretion and subject to the applicable contractual terms, that a Supplier has breached this Code, JSLL may require appropriate corrective actions, suspend business engagement, terminate the supplier relationship, or exercise any other rights or remedies available under this Code, the Company's Sustainable Procurement Policy, the applicable agreement or law.

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5.7 Limitation of JSLL's Liability

To the maximum extent permitted by applicable law, JSLL shall not be liable to any Supplier, its subcontractors, or any third party for any loss, claim, liability or reputational harm arising from a Supplier's breach of this Code or applicable law, or from JSLL's exercise, or non-exercise, of any right of review or audit referred to in this Code. Nothing in this Section 5.7 limits JSLL's rights or remedies against a Supplier.

6. Raising Concerns

JSLL encourages suppliers, employees and other stakeholders to report any suspected violations of this Code, unethical practices, misconduct or non-compliance with applicable laws.

Suppliers shall establish appropriate mechanisms within their organisations to enable their own employees and stakeholders to raise concerns without fear of retaliation.

Concerns relating to a Supplier's conduct, or that of its employees or subcontractors, may also be reported directly to JSLL through the Company's designated procurement/compliance contact or through the Company's Whistle Blower Policy / Vigil Mechanism. No individual raising a concern in good faith shall be subject to retaliation or victimisation.

All concerns received shall be reviewed appropriately and handled confidentially in accordance with applicable policies and procedures.

7. Governance and Responsibility

The implementation of this Code shall be led by the Head of Procurement (or equivalent function), in coordination with the Compliance function, who shall be responsible for communicating this Code to suppliers, obtaining supplier acknowledgement, monitoring compliance and escalating significant concerns.

Oversight of supplier compliance with this Code shall rest with the Company's Risk Management / CSR Committee (or such other committee as the Board may designate), consistent with the governance framework set out in the Company's Sustainable Procurement Policy.

8. Related Policies

This Code should be read together with the Company's Sustainable Procurement Policy, Code of Conduct, Anti-Bribery and Anti-Corruption Policy, Whistle Blower Policy / Vigil Mechanism, Corporate Social Responsibility Policy, and such other policies of the Company as may be applicable. In the event of any inconsistency between this Code and a more specific

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Company policy, the more specific policy shall apply, subject always to compliance with applicable law.

9. Accountability and Acknowledgement

Suppliers are responsible for ensuring that their employees, representatives, subcontractors and business partners understand and comply with the principles outlined in this Code.

By entering into a business relationship with Jeena Sikho Lifecare Limited, suppliers acknowledge their commitment to uphold the standards specified in this Supplier Code of Conduct. Acknowledgement of this Code shall be obtained in writing as a condition of onboarding for significant suppliers, in accordance with Section 13 of the Company's Sustainable Procurement Policy.

JSLI believes that responsible partnerships based on integrity, sustainability and mutual respect are essential for building a resilient and ethical supply chain.

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