

SUSTAINABLE PROCUREMENT POLICY

Particulars	Details
Policy Name	Sustainable Procurement Policy
Company Name	Jeena Sikho Lifecare Limited
Version Number	0.2
Effective Date	01st April, 2023
Prepared By	Himanshi Thakur
Approved By	Mukesh Grover and Sahil Jain
Review Frequency	Periodically or as required
Number of revisions	1

JEENA SIKHO LIFECARE LIMITED

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1. Preamble

Jeena Sikho Lifecare Limited ("JSLL" or "the Company") is committed to conducting its business operations in a responsible, ethical and sustainable manner. The Company recognises that procurement activities play an important role in creating long-term value while influencing environmental sustainability, social responsibility and ethical business practices across the value chain.

The Company believes that sustainable procurement is not limited to obtaining goods and services at competitive prices but also involves responsible sourcing, ethical supplier relationships, environmental protection, compliance with applicable laws and consideration of social impact.

This Sustainable Procurement Policy ("Policy") establishes the principles and framework to guide procurement decisions of the Company and encourages suppliers, vendors, contractors and business partners to adopt responsible and sustainable practices.

The Policy aims to integrate Environmental, Social and Governance ("ESG") considerations into procurement processes and strengthen the Company's commitment towards responsible growth and sustainable development.

2. Objectives

The objectives of this Policy are as follows:

1. To establish a responsible, transparent and sustainable procurement framework across the Company.
2. To incorporate environmental, social and ethical considerations into procurement decisions.
3. To promote responsible sourcing practices and encourage suppliers to comply with applicable laws, regulations and ethical standards.
4. To develop long-term relationships with suppliers based on trust, fairness, transparency and mutual value creation.
5. To minimise environmental impact through efficient resource utilisation, responsible consumption and sustainable sourcing practices.
6. To promote respect for human rights, fair labour practices and safe working conditions throughout the supply chain.
7. To encourage inclusive procurement practices and support local and responsible suppliers wherever feasible, including local suppliers and Micro, Small and Medium Enterprises (MSMEs).

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8. To continuously improve procurement practices in alignment with evolving sustainability standards and stakeholder expectations.

3. Scope and Applicability

This Policy shall apply to all procurement activities undertaken by Jeena Sikho Lifecare Limited, including procurement of goods, services, materials, equipment, products and other requirements necessary for the Company's operations, across its hospitals and healthcare centres, Ayurveda and wellness centres, pharmacies, diagnostic facilities, subsidiaries and controlled entities, wherever applicable.

For operational purposes, the Company's procurement is organised into the following categories, the detailed workflow for each of which is set out in the Company's Procurement Process SOP: Panchkarma medicines and treatment materials (including churna, kwath, oils and bhasma); Panchkarma disposables; fixed assets (including furniture, office equipment, air conditioners, electrical items and other capital assets); and branch operational purchases (including fruits, vegetables, grocery and other routine requirements).

The principles and guidelines contained in this Policy shall be applicable to:

- Employees involved directly or indirectly in procurement activities;
- Procurement and administrative functions;
- Suppliers and vendors;
- Contractors and service providers;
- Business partners;
- Consultants and other third parties associated with the Company's supply chain.

The Company expects its suppliers and business partners to adopt responsible procurement practices and ensure compliance with applicable laws, regulations and ethical standards throughout their respective operations and supply chains.

4. Regulatory and Framework Alignment

This Policy has been developed considering applicable principles, laws and guidelines, including:

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- SEBI Business Responsibility and Sustainability Reporting (BRSR) Framework, in particular the National Guidelines on Responsible Business Conduct (NGRBC) Principles on Product Responsibility, Human Rights and Environment;

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- Companies Act, 2013 and applicable rules;
- ISO 20400 Guidance on Sustainable Procurement;
- Biological Diversity Act, 2002 and the guidelines of the National Medicinal Plants Board, insofar as they apply to the sourcing of herbal and botanical raw materials;
- Drugs and Cosmetics Act, 1940 and applicable AYUSH quality and regulatory requirements; and
- Plastic Waste Management Rules and applicable Extended Producer Responsibility (EPR) obligations.

5. Definitions

5.1 Supplier

Any vendor, contractor, service provider, business partner or other third party that supplies goods, services, materials or works to the Company.

5.2 Sustainable Procurement

Procurement carried out in a manner that integrates environmental, social and governance considerations alongside price, quality, reliability and delivery performance.

5.3 Responsible Sourcing

Sourcing carried out in a manner that respects human rights, environmental protection and ethical business conduct, and, in the case of herbal, botanical and other natural raw materials, sustainable harvesting and biodiversity-compliant practices.

5.4 Value Chain Partner

A supplier, contractor or business partner engaged in the Company's upstream supply chain.

5.5 Approved Vendor

A supplier who has completed the Company's vendor approval process, including the due diligence set out in Section 13 of this Policy, and has been included on the Company's Approved Vendor List maintained pursuant to the Procurement Process SOP.

6. Sustainable Procurement Principles

The Company's procurement practices shall be guided by the principles of transparency, fairness, accountability, ethical conduct and sustainability. The Company believes that

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responsible procurement decisions contribute towards long-term business resilience and strengthen relationships with suppliers and stakeholders.

6.1 Transparency and Ethical Conduct

The Company shall ensure that procurement activities are conducted in a fair, transparent and ethical manner. Procurement decisions shall be based on objective evaluation criteria, business requirements, quality standards, cost effectiveness, reliability and sustainability considerations.

The Company shall promote responsible decision-making and ensure that procurement activities are undertaken in compliance with applicable laws, regulations and internal procedures. The Company shall maintain high standards of integrity and expects employees, suppliers and business partners involved in procurement activities to avoid conflicts of interest, unethical practices and any conduct that may adversely affect the Company's reputation.

6.2 Responsible Supplier Selection and Evaluation

The Company shall endeavour to engage suppliers who demonstrate commitment towards quality, reliability, regulatory compliance, ethical business practices, environmental responsibility, workplace safety and respect for human rights.

Supplier selection and evaluation processes may consider various factors, including the quality of products and services, delivery capability, cost effectiveness, sustainability practices, compliance standards, operational capability and overall business conduct.

Suppliers for recurring procurement categories, such as Panchkarma medicines, treatment materials and disposables, shall be evaluated and included on the Company's Approved Vendor List in accordance with the Procurement Process SOP; once so approved, repeated quotation comparison shall not be required for each subsequent purchase order from such vendor. Purchases of fixed assets, and branch operational purchases above the value thresholds prescribed under the Procurement Process SOP, shall require competitive quotations to be obtained and evaluated prior to vendor selection.

The Company believes that suppliers are important partners in achieving sustainability objectives and shall encourage continuous improvement in supplier performance through engagement, evaluation and collaboration.

6.3 Anti-Bribery, Gifts and Hospitality

No employee involved in procurement shall solicit or accept, and no supplier or business partner shall offer, any gift, hospitality, commission or benefit intended or likely to influence a procurement decision, except nominal business courtesies permitted under, and within the

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limits prescribed by, the Company's Anti-Bribery and Anti-Corruption Policy and applicable Gifts and Hospitality guidelines.

Employees involved in procurement decisions shall disclose to the Compliance function any conflict of interest, including any personal or financial relationship with a prospective or existing supplier, prior to participating in the relevant procurement decision.

6.4 Procurement Governance, Approval Authority and Segregation of Duties

The Company maintains a segregated approval structure for procurement transactions, as set out in detail in the Procurement Process SOP, under which:

- the Branch Manager and the concerned Head of Department / Panchkarma Head are responsible for raising and verifying the requirement, quantity and operational necessity of a purchase request;
- the Procurement Team / Head Office is responsible for preparing the Purchase Order and coordinating with vendors;
- the Head of Department is responsible for verifying and approving the Purchase Order prior to its release to the vendor, and no Purchase Order shall be issued without such approval;
- the Area Manager is responsible for verifying and approving branch operational purchase requirements; and
- the Accounts Department is responsible for processing vendor payments only upon receipt of an approved payment request from the procurement/purchase function, and, for credit-term vendors, only after the branch has confirmed receipt of the material.

This segregation between requisition, approval, procurement execution and payment is intended to reinforce the ethical conduct, anti-bribery and internal control objectives set out in Sections 6.1 and 6.3 of this Policy.

7. Stakeholder Engagement

The Company recognises that effective stakeholder engagement is essential for developing a responsible and sustainable procurement framework. Employees, suppliers, customers, service providers and other stakeholders provide valuable insights that assist the Company in improving procurement practices and strengthening supply chain sustainability.

JSLI shall encourage constructive and transparent engagement with stakeholders to understand their expectations, address concerns and identify opportunities for improvement. The Company shall maintain open communication channels with suppliers and relevant stakeholders and shall

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encourage feedback and suggestions relating to procurement processes and sustainability initiatives.

The Company shall endeavour to build long-term relationships based on trust, mutual respect and shared objectives. Stakeholder inputs shall be considered wherever appropriate while developing and enhancing sustainable procurement practices.

The Company shall periodically review stakeholder expectations and incorporate relevant improvements into its procurement framework to ensure continuous improvement and alignment with sustainability objectives.

8. Product Responsibility

The Company is committed to procuring products and services that meet appropriate standards of quality, safety, reliability and sustainability.

The Company shall endeavour to:

- Ensure compliance with applicable quality and safety requirements;
- Consider sustainability factors during procurement decisions;
- Encourage suppliers to adopt responsible sourcing practices;
- Promote efficient use of resources and reduction of environmental impact; and
- Continuously improve product and service quality.

Suppliers shall be encouraged to provide products and services that align with the Company's sustainability objectives, including responsible sourcing, reduced environmental footprint and, where applicable, compliance with quality standards relevant to healthcare and Ayurvedic products.

9. Sustainable Supply Chain and Responsible Sourcing

The Company recognises that a sustainable supply chain is essential for business continuity and long-term value creation. JSLL is committed to promoting responsible sourcing practices and encouraging suppliers to adopt ethical, environmental and socially responsible approaches.

The Company shall endeavour to identify potential environmental, social and ethical risks associated with its supply chain and take appropriate measures to mitigate such risks.

The Company shall encourage engagement with suppliers who demonstrate responsible business practices, compliance with applicable laws, commitment towards environmental protection, ethical labour practices and sustainable operations.

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The Company Reserves the Rights to undertake supplier assessments, reviews or evaluations to understand supplier performance and encourage continuous improvement. Where necessary, the Company may recommend corrective actions to address identified concerns.

9.1 Sourcing of Ayurvedic and Herbal Raw Materials

Given the Company's engagement in Ayurveda and integrated healthcare, the Company recognises particular sustainability risks associated with the sourcing of herbal, botanical and other natural raw materials, including risks of over-harvesting, loss of biodiversity, and non-compliance with wildlife and biodiversity protection norms. In relation to such raw materials, the Company shall endeavour to:

- source herbal and botanical raw materials from suppliers who comply with the Biological Diversity Act, 2002, applicable State Biodiversity Board requirements and the guidelines of the National Medicinal Plants Board;
- prefer cultivated and sustainably wild-harvested sources over unsustainable wild harvesting, particularly for at-risk or endangered plant species; and
- require raw material suppliers to demonstrate traceability and, where applicable, compliance with Good Agricultural and Collection Practices (GACP) and applicable AYUSH quality standards.

The requirements set out in this Section shall be applied at the stage of Approved Vendor List evaluation for suppliers of Panchkarma medicines and treatment materials (including churna, kwath, oils and bhasma) under the Procurement Process SOP, so that biodiversity and quality compliance is assessed before, rather than after, a vendor is approved for recurring procurement.

10. Human Rights, Child Labour and Forced Labour

Jeena Sikho Lifecare Limited is committed to respecting human rights and promoting ethical employment practices throughout its operations and supply chain.

The Company strictly prohibits child labour, forced labour, bonded labour, involuntary labour and any form of exploitation or violation of human rights.

The Company expects suppliers, vendors and business partners to comply with applicable labour laws, provide safe working conditions, respect employee rights, ensure equal opportunities and maintain a workplace environment based on dignity and respect.

Any identified violation of human rights principles may result in appropriate corrective action, in accordance with the framework set out in Section 15, including review or discontinuation of

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business relationships, depending upon the nature and severity of the concern. Workers in the Company's supply chain may raise concerns through the channels set out in Section 14.

11. Environment, Health and Safety

The Company is committed to minimising environmental impact arising from procurement activities and promoting responsible resource utilisation.

The Company encourages sustainable sourcing practices, efficient use of resources, reduction of waste, responsible consumption and compliance with applicable environmental laws and regulations.

Suppliers and business partners are encouraged to adopt environmentally responsible practices, including resource conservation, waste management, pollution prevention and reduction of environmental footprint.

The Company shall continuously explore opportunities to strengthen environmental sustainability within its procurement framework.

Environmental Responsibility

- Sustainable use of resources;
- Reduction of waste;
- Energy efficiency;
- Responsible sourcing; and
- Compliance with environmental regulations.

Health and Safety

Suppliers and contractors are expected to:

- Maintain safe working conditions;
- Follow applicable health and safety requirements;
- Prevent workplace incidents; and
- Take corrective actions where required.

Packaging and Waste

Given the nature of the Company's pharmaceutical, Ayurveda and wellness products, the Company shall encourage suppliers to adopt sustainable packaging practices, minimise the use

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of single-use plastics, and support the Company's compliance with applicable Extended Producer Responsibility (EPR) obligations under the Plastic Waste Management Rules.

The Company encourages reporting of environmental, health and safety concerns and promotes continuous improvement.

12. Inclusive and Preferential Procurement

JSLI believes in promoting inclusive growth through responsible procurement practices.

The Company shall endeavour to provide opportunities to:

- Local suppliers;
- Micro, Small and Medium Enterprises ("MSMEs");
- Responsible and diverse suppliers; and
- Suppliers contributing towards social and economic development.

Where feasible, procurement decisions may consider supplier diversity, sustainability performance and contribution towards inclusive growth. The Company shall work towards increasing the proportion of its overall procurement spend sourced from local suppliers and MSMEs over time, and shall track and periodically review this proportion as part of its sustainability performance monitoring under Section 16.

13. Supplier Due Diligence, Reliance and Risk Allocation

13.1 Expected Standards

The Company expects suppliers, vendors and business partners to maintain high standards of:

- Integrity;
- Ethical conduct;
- Legal compliance;
- Human rights protection;
- Environmental responsibility; and
- Workplace safety.

Suppliers shall ensure that similar principles are followed throughout their own supply chains.

Acknowledgment of, and agreement to comply with, the Company's Supplier Code of Conduct shall be a condition of onboarding for significant suppliers, contractors and business partners. Such acknowledgement shall be obtained at the time a supplier is first added to the Company's

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Approved Vendor List under the Procurement Process SOP, and shall be a pre-condition to that vendor being treated as exempt from repeated quotation comparison under Section 6.2 of this Policy.

13.2 Sole Responsibility of the Supplier

Compliance with applicable law, the Supplier Code of Conduct and this Policy is, at all times, the sole and exclusive responsibility of the supplier, vendor, contractor or business partner concerned, in respect of its own operations, employees, agents, representatives and subcontractors. This Policy sets out the Company's expectations and internal procurement framework; it does not transfer, assume, share or reduce any statutory or legal obligation that otherwise rests with a supplier.

13.3 Self-Certification and Reliance

The Company reserves the right, but not the obligation, to conduct supplier due diligence, including ESG questionnaires, self-certifications and, where warranted and at the Company's sole discretion, on-site or third-party audits. Where a supplier furnishes a self-certification, ESG questionnaire response, licence, or other record to the Company, the Company shall be entitled to rely on it in good faith, without independent verification, for the purpose of the vendor approval and Approved Vendor List process described in Section 6.2 and this Section 13.

13.4 No Duty to Monitor; Due Diligence is Discretionary

Nothing in this Policy, and no due diligence, questionnaire, self-certification review, on-site visit or audit that the Company conducts, does not conduct, or conducts in a limited manner, shall be construed as: (a) creating a duty of care, supervisory obligation or assumption of responsibility on the part of the Company to identify, monitor, detect or prevent non-compliance by any supplier or its subcontractors; (b) constituting a guarantee, certification or endorsement by the Company of a supplier's compliance with applicable law or this Policy; or (c) rendering the Company responsible or liable for any act, omission or violation of law by a supplier or its employees, agents, representatives or subcontractors. Approval of a supplier onto the Approved Vendor List reflects the outcome of the Company's discretionary internal process at a point in time and is not a continuing warranty by the Company as to that supplier's ongoing compliance.

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13.5 Relationship of the Parties

Nothing in this Policy creates or shall be construed as creating a partnership, joint venture, agency or employer-employee relationship between the Company and any supplier, vendor, contractor or business partner, or their respective employees, agents or subcontractors. Each supplier is, and remains, an independent contractor with sole control over, and sole responsibility for, its own employees, agents, representatives and subcontractors, and the Company exercises no control over, and assumes no liability arising from, such matters.

13.6 Indemnification and Limitation of Liability

Each supplier shall indemnify, defend and hold harmless the Company, its directors, officers and employees from and against any claims, losses, damages, liabilities, regulatory fines or penalties, and costs (including reasonable legal fees) arising out of or in connection with any breach of this Policy, the Supplier Code of Conduct or applicable law by the supplier or its subcontractors, or any inaccuracy in a self-certification, questionnaire response or record furnished to the Company, subject to and in accordance with the terms of the applicable commercial agreement with that supplier.

To the maximum extent permitted by applicable law, the Company shall not be liable to any supplier, subcontractor or third party for any loss, claim or liability arising from a supplier's breach of applicable law or the standards referred to in this Policy, or from the Company's exercise, or non-exercise, of any due diligence or audit right referred to in this Section 13.

14. Raising Concerns and Grievance Redressal

The Company encourages employees, suppliers and other stakeholders across its value chain to report any concerns relating to unethical practices, non-compliance, misconduct or violation of this Policy.

Concerns may be reported to 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.

The Company shall endeavour to acknowledge a reported concern within a reasonable period and to complete its review within a reasonable timeframe, keeping the reporting party informed of progress to the extent appropriate. All concerns shall be handled responsibly and reviewed in accordance with applicable policies and procedures.

15. Corrective Action Framework

Where a supplier is found to be non-compliant with this Policy or the Supplier Code of Conduct, the Company shall adopt a graduated and proportionate response, which may include:

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- recording the concern and requiring the supplier to submit a corrective action plan within a defined timeframe;
- enhanced monitoring or re-audit of the supplier;
- suspension of new business pending satisfactory remediation; and
- discontinuation of the business relationship in cases of serious, wilful or repeated non-compliance, particularly in relation to human rights, child labour, forced labour or safety violations.

16. Governance and Responsibility

The day-to-day implementation of this Policy shall be carried out by the Procurement Team / Head Office, in accordance with the roles and approval authorities set out in the Company's Procurement Process SOP, including the Branch Manager and concerned Head of Department / Panchkarma Head (requirement generation and verification), the Head of Department (Purchase Order review and approval), the Area Manager (approval of branch operational purchases), the Accounts Department (processing of vendor payments upon approval) and Management / the Authorized Approver (procurement and payment approvals in accordance with the Company's approval authority matrix).

The Company's Procurement Process SOP, as approved by the Chief Operating Officer and amended by the Procurement Department / Head Office from time to time, sets out the detailed operational workflow, approval thresholds and vendor categories applicable to this Policy, and shall be read as forming part of the Company's internal control framework supporting this Policy.

Oversight of the Policy's implementation and periodic review of procurement sustainability performance shall rest with the Company's Risk Management / CSR Committee (or such other committee as the Board may designate), which shall report significant matters to the Board as appropriate.

The procurement team and relevant departments shall be responsible for:

- Implementing sustainable procurement practices;
- Ensuring supplier compliance;
- Maintaining appropriate records; and
- Identifying opportunities for improvement.

The Company may periodically review procurement practices and sustainability performance.

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17. Related Policies

This Policy should be read together with the Company's Code of Conduct, Anti-Bribery and Anti-Corruption Policy, Corporate Social Responsibility Policy, Whistle Blower Policy / Vigil Mechanism, Public Advocacy Policy, Stakeholder Engagement Policy, the Procurement Process SOP, 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 or procedure governing a particular procurement matter, the more specific policy or procedure shall apply, subject always to compliance with applicable law.

18. Policy Review and Amendment

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

The Board of Directors may approve amendments to this Policy based on recommendations from the management or relevant committees.

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