

ARTEMIS MEDICARE SERVICES LIMITED

CODE OF CONDUCT

TO REGULATE, MONITOR AND REPORT TRADING IN THE SECURITIES OF THE COMPANY BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES

(In terms of Securities and Exchange Board India (Prohibition of Insider Trading) Regulations, 2015)

INTRODUCTION:

Insider trading means trading in Securities of a company by its Directors, Employees or other connected persons when in possession of Unpublished Price Sensitive Information (“UPSI”). Such trading by Insiders erode the investors’ confidence in the integrity of the management and is unhealthy for the capital markets.

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated the SEBI (Prohibition of Insider Trading) Regulations, 1992 in terms of the SEBI Act, 1992, and the same were made applicable to companies whose shares are listed or proposed to be listed on Indian stock exchanges.

To strengthen these regulations and to create a framework for prevention of insider trading to facilitate legitimate business transactions, Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as ‘the Regulations’) were notified by SEBI on January 15, 2015 with effect from May 14, 2015. Subsequently, SEBI made comprehensive amendments to the Regulations. The Regulations not only regulate access to or communication of, price sensitive information but also seek to prohibit insider trading.

The relevant extract of Regulations 3(1), 3(2) and 4(1) of the Regulations, which prohibit communication of UPSI and insider trading, is quoted below:

“3(1) No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.”

“3(2) No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.”

“4(1) No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information....”

It is mandatory in terms of the Regulations for every listed company to formulate a Code of Conduct for Prevention of Insider Trading to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons.

A designated employee of Artemis company and his/ her immediate relatives shall not derive any benefit or counsel, or assist others to derive any benefit, from access to and possession of information about the company or Group or its clients or suppliers that is not in the public domain and, thus, constitutes UPSI.

A designated employee of Artemis company shall not use or proliferate information that is not available to the investing public and which therefore constitutes insider information for making or giving advice on investment decisions about the securities of the respective Artemis company, Group, client or

supplier on which such insider information has been obtained.

In all its public appearance with respect to disclosing company and business information such as the media, the financial community, employees, shareholders, agents, franchisees, dealers, distributors, the Company shall be represented only by specifically authorised directors and employees. It shall be the sole responsibility of these authorised representatives to ensure that the Regulations are not violated.

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In order to comply with the mandatory requirement of the Regulations, this Code is framed.

The Code is based on the principle that designated persons of Artemis Company owe a fiduciary duty to, among others, the shareholders of the Company to place the interest of the shareholders above their own and conduct their personal securities transactions in a manner that does not violate the Regulations.

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

1. DEFINITIONS:

As used in this Code:

- (a) **“Audit Committee”** shall mean the Audit Committee constituted by the Board of Directors of the Company
 - (b) **“Board”** or **“Board of Directors”** means the Board of Directors of the Company.
 - (c) **“Code”** means this Code of Conduct for Prevention of Insider Trading including modifications made thereto from time-to-time.
 - (d) **“Company”** or **“AMSL”** means Artemis Medicare Services Limited.
 - (e) **“Compliance Officer”** means the company secretary or any other senior officer as may be appointed by the Board of Directors, and who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Insider Trading Regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of Trades and implementation of the codes specified under the Insider Trading Regulations under the overall supervision of the Board.
 - (f) **“Connected Person”** shall have the meaning given to it under Regulation 2(d) of the Regulations.
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(g) **“Designated Persons”** means: -

- All promoters of the Company and promoters who are individuals or investment companies for intermediaries or fiduciaries
- All the Directors of the Company and its Subsidiaries;
- Chief Executive Officer /Managing Director and Employees up to two levels below Chief Executive Officer /Managing Director, intermediary, fiduciary and its material subsidiaries
- Key managerial Personnel of the Company;
- Such other employees and connected Persons (including representatives of the auditors, accountancy firms, law firms, analysts, consultants, etc.) who may access UPSI, as identified by the Compliance Officer in consultation with the Managing Director of the Company

(h) **“Director”** means a member of the Board of Directors of the Company.

(i) **“Employee”** means every employee of the Company (whether working in India or abroad, temporary or permanent) including the directors in the employment of the Company.

(j) **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis, such as information published on websites of stock exchanges.

(k) **“Immediate Relative”** means the spouse of the Designated Person, and includes parent, sibling and child of such Designated Person or of the spouse, who are either financially dependent on the Designated Person or consults the Designated Person in taking decisions relating to trading in securities.

(l) **“Insider”** means any person who is a Connected Person or in possession of or having access to Unpublished Price Sensitive Information.

(m) **“Key Managerial Personnel”** shall have the same meaning as per Companies Act, 2013 and include:

- i. the Chief Executive Officer or the Managing Director or the Manager;
- ii. the Company Secretary;
- iii. the Whole-time Director;
- iv. the Chief Financial Officer;
- v. such other officer, not more than one level below the directors who is in whole-time employment, designated as key managerial personnel by the Board and such other officer as may be prescribed under the Companies Act, 2013, from time to time.

(n) **“Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.

(o) **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.

(p) **“Trading Day”** means a day on which the recognized stock exchanges are open for trading.

(q) **“Trading in Securities”** means and includes an act of subscribing to, buying, selling, dealing or agreeing to subscribe to, buy, sell or deal in any Securities of the Company and trade shall be construed accordingly.

(r) **“Unpublished Price Sensitive Information” (“UPSI”)** means any information, relating to a 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 Securities of the Company and shall, ordinarily include but not be restricted to, information relating to the following: _____

- financial results;
- Dividends;
- Change in capital structure;
- Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- Changes in key managerial personnel;
- New product introductions or developments;
- Asset revaluations, investment decisions/ plans;
- Restructuring plans, major supply and delivery agreements;
- Raising of finances;
- such other information as determined by the Board of Directors/Chief Executive Officer /Chief Financial Officer from time to time; and

(s) “**Material Subsidiary**” shall have same meaning as assigned in the ‘Policy for determining material subsidiaries’ adopted by the Board of Directors of the Company in accordance with SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 as amended from time to time

(t) “**Material financial relationship**” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

Words and expressions used and not defined in this Code but defined in the Regulations or Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

2. **COMPLIANCE OFFICER:**

The Board may appoint any person as it deemed fit as Compliance Officer to ensure compliance and for effective implementation of the Regulations and also this Code.

The Compliance Officer shall report to the Board.

In order to discharge his functions effectively, the Compliance Officer shall be adequately empowered and provided with adequate manpower and infrastructure to effectively discharge his/her function. In the performance of his/her duties, the Compliance Officer shall have access to all information and documents relating to the Securities of the Company.

The Compliance Officer shall act as the focal point in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

a) **Duties of the compliance officer:**

The Compliance Officer shall be responsible for:

- Setting forth policies and procedures in relation to the implementation of the Code and the Regulations in consultation with the Board/Audit Committee.
 - Prescribing procedures for various activities referred to in the Code.
 - Maintenance of records in terms of the regulations and the Code.
 - Ensuring compliance with the policies and procedures referred hereinabove.
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- Monitoring adherence to the rules for the preservation of UPSI.
- Grant of pre-trading approvals to the Designated Persons for trading in the Company's Securities by them / their Immediate Relatives and monitoring of such trading.
- Approving and reporting of trading plan to stock exchanges where the securities of the company are listed.
- The Compliance Officer shall place:
 - (i) a yearly report on insider trading to the Board and
 - (ii) a quarterly report on insider trading to the Chairman of the Audit Committee and to the Board.

The yearly report shall be placed in the Audit Committee Meeting and the Board Meeting held after the Closure of Financial Year of the Company for consideration of yearly audited financial results of the Company and quarterly report shall be placed before the Chairperson of the Audit Committee and before the Board Meeting to be held for approval of quarterly financial results of the Company each quarter.
- Implementation of this Code under the general supervision of the Audit Committee and the overall supervision of the Board.
- The Compliance Officer shall maintain a record in electronic form of the Designated Persons and their Immediate Relatives (**see Annexure-1**) and changes thereto from time-to-time.
- The Compliance Officer shall assist all the Designated Persons in addressing any clarifications regarding the Regulations and this Code.

3. RESTRICTION ON COMMUNICATION AND TRADING BY INSIDERS

- a) No insider shall communicate, provide or allow access to any UPSI relating to the company or securities listed or proposed to be listed, to any person including the other insider except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
 - b) No person shall procure from or cause the communication by any insider of UPSI, relating to the company or securities listed or proposed to be listed except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
 - c) UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
 - an obligation to make an open offer under the takeover regulations where the Board is of informed opinion that the proposed transaction is in the best interests of the Company; or
 - not attracting the obligation to make an open offer under the takeover regulations but where the Board is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board may determine.
 - d) The Company shall require the parties or person who have contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the company and are required to handle UPSI:
 - to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties; and
 - such persons or parties shall keep information so received confidential, except for the purpose as mentioned above or except in furtherance of the legitimate purposes, performance of duties or discharge of his legal obligations and shall not otherwise trade in securities of the Company when in possession of UPSI.
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- e) The Company while dealing with any market intermediary, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants or any other person, who are required to Handle UPSI shall ensure that such person has formulated a code of conduct as per the requirements of the Regulations.
- f) The Board shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom UPSI is shared along with the Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available. The Compliance Officer shall prepare and maintain the adequate internal controls and checks to ensure non-tampering of the database and periodically confirm to the Board about the maintenance of the said Digital Data.

Such a data base may include the following information:

- i. Name of the person/ organization with whom UPSI has been shared;
- ii. PAN No. of person/ Organization with whom UPSI shared or any other Identifier;
- iii. Brief Details of UPSI Shared;
- iv. Date when any Confidentiality agreement has been signed with such person/ organization;
- v. Name of the Official of the Company who share such information;
- vi. Frequency of sharing of Information.

- g) Trade in securities when in possession of Unpublished Price Sensitive Information:
 - No insider shall either on his own behalf or on behalf of any other person, trade in securities of the Company that are listed or proposed to be listed when in possession of any unpublished price sensitive information except otherwise stated in this code or the Regulations.
 - The onus of establishing that they were not in possession of any unpublished price sensitive information shall be on the Insider.
 - Designated persons and their immediate relatives shall be governed by this Code of Conduct.

4. NEED TO KNOW:

All information shall be handled within the organization on a need-to-know basis. The Designated persons, who are privy to UPSI, shall handle the same strictly on a “Need to Know” basis. This means the UPSI shall be disclosed only to those persons who need to know the same in furtherance of a legitimate purpose, performance or discharge of their duty and whose possession of UPSI will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.

Limited access to confidential information:

Designated Persons privy to confidential information shall, in preserving the confidentiality of information, and to prevent its wrongful dissemination, adopt among others, the following safeguards:

- Files containing confidential information shall be kept secure.
 - Computer files must have adequate security of login through a password.
 - Files containing confidential information should be deleted/ destroyed after its use.
 - Follow the guidelines for maintenance of electronic records and systems.
 - Such other safeguards as maybe prescribed by the Compliance Officer from time-to-time in consultation with the person in charge of the information technology function.
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5. CHINESE WALL

To prevent the misuse of UPSI, the Company has adopted a “Chinese Wall” policy which separates those departments which routinely have access to UPSI, considered inside areas from those departments which deal with sale/marketing or other departments providing support services, considered “public areas”.

As per the said policy:

- The Employees in the inside areas are not allowed to communicate any UPSI to anyone in the public areas.
- The Employees in inside area may be physically separated from the Employees in public area.
- The demarcation of various departments as inside area shall be determined by the Compliance Officers in consultation with the Board.
- Only in exceptional circumstances, Employees from the public areas are brought “over the wall” and given UPSI on the basis of “need to know” criteria, under intimation to the Compliance Officer.

6. INSTITUTIONAL MECHANISM FOR PREVENTION OF INSIDER TRADING

The Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider trading.

The internal controls shall include the following:

- a) All employees who have access to UPSI are identified;
- b) All the UPSI shall be identified and its confidentiality shall be maintained as per the requirements of these regulations;
- c) Adequate restrictions shall be placed on communication or procurement of UPSI as required by these regulations;
- d) Lists of all employees and other persons with whom UPSI is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons. Such a person shall be made aware of his responsibility for maintaining Insider UPSI. Such person shall be made aware of the duties and responsibilities attached to the receipt of UPSI, and the liability that is attached for misuse or unwarranted use of such UPSI;
- e) Other relevant requirements specified under the regulations shall be complied with;
- f) Disclosure and Tracking of Shareholding of the Designated person in the Company;
- g) Periodic process review to evaluate effectiveness of such internal controls.

The Chief Executive Officer/ Whole-Time Director and Compliance Officer of the Company shall ensure adequacy and effectiveness of said internal controls.

7. TRADING BY DESIGNATED PERSONS AND/ OR THEIR IMMEDIATE RELATIVES

No Designated Person and/or their Immediate Relatives shall trade in Securities of the Company that are listed or proposed to be listed on a stock exchange when in possession of UPSI.

Provided that a Designated Person and his Immediate Relative may prove their innocence by demonstrating the circumstances including the following:

- i. that the transaction is an off-market inter se transfer between the Designated Person and their Immediate Relatives who were in possession of the same UPSI without being in breach of the Regulation.

Provided that such UPSI was not obtained under the Regulation 3(3) of the SEBI (Prohibition of Insider Trading) Regulations, 2015

Provided further that such off-market trades shall be reported by the Designated Person to the Company within 2 (*two*) working days. The Company shall notify the particulars of such trades to the stock exchange on which the Securities are listed, within 2 (*two*) Trading Days from receipt of the disclosure or from becoming aware of such information.

- ii. the transaction was carried out through the block deal window mechanism between persons who were in possession of the UPSI without being in breach of Regulation 3 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and both parties had made a conscious and informed trade decision.
- iii. the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.
- iv. the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.
- v. in the case of non-individual insiders: –
 - a) the individuals who were in possession of such UPSI were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such UPSI when they took the decision to trade; and
 - b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no UPSI was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;
- vi. the Trades were pursuant to a trading plan.

8. TRADING WINDOW:

1. All Designated Persons and/or their Immediate Relatives shall execute Trades in the Securities of the Company only in a valid Trading Window prescribed hereunder and shall not execute any trade deal in any transaction involving the purchase or sale of the Company's Securities including position in derivatives during the period when the Trading Window is closed.
 2. Unless otherwise specified by the Compliance Officer, the Trading Window for Trading in Securities of the Company shall be closed for the following purposes: -
 - Declaration of financial results (quarterly, half-yearly and annually).
 - Declaration of dividend (interim/ final).
 - Issue of securities by way of public / rights / bonus etc.
 - Any major expansion plans or execution of new projects.
 - Amalgamation, mergers, acquisitions, takeovers and buy back of shares.
 - Disposal of whole or substantially the whole of the Company.
 - Any changes in policies, plans or operations of the company.
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- Acquisition, de-merger, restructuring, scheme of arrangement, spin-off of divisions etc.
 - Consolidation / splitting of shares.
 - Voluntary de-listing of shares by the company.
 - Forfeiture of shares.
 - ADR / GDR or any other class of securities to be issued abroad.
 - Cancellation of dividend/right/bonus etc.
 - Changes in Key Managerial Personnel.
 - Such other event as may be determined by the Chief Financial Officer and Compliance Officer of the Company.
3. The Trading Window shall be closed when the Compliance Officer determines that Designated Persons or any class of Designated Persons and/or their Immediate Relatives can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such Securities to which such UPSI. Designated Persons and/or their Immediate Relatives shall not Trade in Securities when the Trading Window is closed. In any case, trading restriction shall commence from the end of every quarter till 48 (forty-eight) hours after the declaration of financial results.
 4. Further, care should be taken that the gap between clearance of Financial Statements by Audit Committee and Board of Directors at their respective meetings should be as narrow as possible and preferably on the same day to avoid leakage of UPSI.
 5. The Compliance Officer after taking into account various factors including the UPSI in question becoming Generally Available Information and being capable of assimilation into the market, shall decide the timing for re-opening of the Trading Window, which however shall not in any event be earlier than 48 (forty-eight) hours after the information becoming Generally Available Information.
 6. The aforesaid restrictions on Trading Window shall not be applicable in respect of transactions specified in Paragraph 7 (i) to (iv) and (vi) specified above and also in respect of:
 - i. pledge of shares for bona fide purposes such as raising of funds (subject to pre-clearance by the Compliance Officer and compliance with the respective regulations of SEBI); and
 - ii. transactions which are undertaken in accordance with respective regulations of SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buyback offer, open offer or delisting offer or transactions which are undertaken through such other mechanism as may be specified by SEBI from time to time.
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9. **PRE-CLEARANCE OF DEALS IN SECURITIES:**

a) **Applicability:**

Every Designated Person shall obtain a pre-trading approval as per the procedure set out hereunder for any Trading in the Securities of the Company proposed to be undertaken by such Designated Person / his / her Immediate Relatives. Such pre-trading approval would be necessary, only if the cumulative trading (including trading in derivatives of Securities, if permitted by law) whether in one transaction or a series of transactions in a calendar quarter exceeds Rs. 10 lakhs.

b) **Pre-trading Procedure:**

For the purpose of obtaining a pre-trading approval, the concerned Designated Person shall make an application in the form (see **Annexure 2**) to the Compliance Officer. Such application should be complete and correct in all respects and should be accompanied by such undertakings and declaration (see **Annexure 3**) indemnity bonds and other documents/papers as may be prescribed by the Compliance Officer from time-to-time. Such application for pre-trading approval with enclosures may preferably be sent through electronic mail followed by hard copies of all the documents. The e-mail for this purpose should be sent to the address specifically dedicated for this purpose i.e. shilpa.budhia@artemishospitals.com. No Designated Person shall apply for pre-trading approval if such person is in possession of UPSI, even if the Trading Window is not closed.

c) **Approval:**

- The Compliance Officer shall consider the application made as above and shall approve it forthwith preferably on the same Trading Day but not later than the next Trading Day unless he is of the opinion that grant of such an approval would result in a breach of the provisions of this Code, or the Regulations. Such approval/rejection may preferably be conveyed through electronic mail and if no such approval / intimation of rejection is received within a period of 2 (two) Trading Days, the applicant can presume that the approval is deemed to be given. While considering the application, the Compliance Officer shall have due regard to whether the declaration provided in **Annexure 3** is reasonably capable of being rendered inaccurate.
- Every approval letter shall be issued in such format (see **Annexure 4**). Every approval shall be dated and shall be valid for a period of 7 (seven) Trading Days from the date of approval.
- In the absence of the Compliance Officer due to leave etc., the Employee designated by him/her from time-to-time, not being below the level of Management and part of the Finance or Compliance Department shall discharge the function referred to in (a) above.

d) **Completion of Pre-Cleared Trading:**

- All the Designated Persons shall ensure that they / their Immediate Relatives complete execution of every pre-cleared deal in the Company's Securities as prescribed above no later than 7 (seven) Trading Days from the date of the approval. The Designated Person shall file within 2 (two) Trading Days of the execution of the deal, the details of such deal, with the Compliance Officer in the prescribed form (see **Annexure 5**). In case the transaction is not undertaken, a report to that effect shall be filed (see **Annexure 5**).
 - If a deal is not executed by the concerned Designated Person / Immediate Relatives pursuant to the approval granted by the Compliance Officer within 7 (seven) Trading Days, the Designated Person shall apply once again to the Compliance Officer for pre clearance of the trades covered
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under the said approval.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

10. TRADING PLANS:

An insider may formulate a Trading Plan ('TP') and the same shall be approved by the compliance officer after evaluation with regard to the regulations and shall be notified to the stock exchange(s). By virtue of the pre-planned trading plan, an insider can plan for trades to be executed by him/her in future. By doing so, the possession of UPSI when a trade under a trading plan is actually executed would not prohibit the execution of such trades that he had pre-decided even before the unpublished price sensitive information came into being. There are following stages for the implementation of the trading plan:

A. Requisites of Trading Plan

- a) Any trading (as per the trading plan) shall only be executed on expiry of six months from the date of public disclosure of the said plan.
- b) Trading, as per the Trading plan, to take place between 20 trading days prior to the last day of the financial period for which the results are required to be announced by the Company and 2 trading days after the disclosure of such financial results.
- c) Insider can give one trading plan at a time and the same should not be for less than 12 months, i.e. there cannot be any overlapping of trading plans.
- d) Any Trading Plan should set out either the value of trades or the number of securities to be traded, along with specific dates and time intervals.
- e) Trading on the basis of such a trading plan should not lead to market abuse. If any manipulative activity is detected, it would be open to initiate proceedings for alleged breach of SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to the Securities market) Regulations, 2003.

B. Approval of Trading Plan

- a) An insider shall submit the Trading Plan as per (Annexure 6) to the Compliance Officer for approval and public disclosure, pursuant to which trades may be carried out on his behalf in accordance with such plan.
- b) The Compliance Officer shall review the Trading Plan.
- c) The Compliance Officer shall assess that the trading plan made by the Insider is not in violation of the said regulations.
- d) The Insider shall provide the undertaking that he is not in possession of UPSI or that he would ensure that any UPSI in his possession becomes generally available before he commences executing his trades and such other information or clarification as the Compliance officer may require.
- e) The Compliance Officer shall approve the Trading Plan as he/she may deem fit as per (Annexure 7)

C. Execution of Trading Plan

- a) The trading plan once approved shall be irrevocable and the Insider shall have to implement the plan without any deviation.
 - b) The trading plan shall be deferred if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available.
 - c) The pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.
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- d) Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which securities are listed.
- e) Trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.

11. OPPOSITE TRANSACTIONS IN THE SECURITIES:

The Designated Persons who has been permitted to trade shall not, within six months of buying or selling any number of Securities of the Company, enter into an opposite transaction i.e. sell or buy, as the case may be, any number of the Securities of the Company.

The Compliance Officer can grant relaxation from strict application of the above restriction after recording the reasons in this regard provided that such relaxation does not violate the Regulations. It may however, be noted that in terms of the Regulations, no such purchase/ sale will be permitted when the Trading Window is closed.

Notwithstanding the above, should the Designated Persons execute an opposite transaction, inadvertently or otherwise, in violation of the restrictions set out above, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act, 1992.

Provided that this provision shall not be applicable for trades pursuant to exercise of stock options.

12. ADVICE REGARDING PRE-CLEARANCE:

In case of doubt, the Designated Person shall check with the Compliance Officer or the Officer designated by him/her from time-to-time whether the provisions relating to pre-clearance are applicable to any proposed transaction in the Company's Securities.

13. DISCLOSURE REQUIREMENTS UNDER THE CODE:

a) **Initial Disclosure**

By Whom	What to be disclosed	When to be disclosed	Form
Every Promoter, member of the Promoter Group, Director, Key Managerial Personnel	His holding of securities of the company	within 30 days of the implementation of the regulations	Annexure -8 (Form A)
Every Promoter, member of the Promoter Group, Director, Key Managerial Personnel	His holding of securities of the company on the date of appointment or becoming promoter.	Within 7 days of such appointment or becoming a promoter.	Annexure -9 (Form B)

b) **Continual Disclosure**

By Whom	What to be disclosed	When and whom to be disclosed	Form
Every Promoter, Member of Promoter Group, Director, and Designated person	Number of such securities acquired or disposed off	To the Company within 2 trading days of such transaction if value of the securities whether in one transaction or a series of transaction over any calendar quarter, aggregates to a traded value in excess of Rs 10 lakh or such other value as may be specified <i>*disclosure of incremental transactions shall be made when transactions effected after the prior disclosure exceeds the specified threshold limit.</i>	Annexure-10 (Form C)
Company to Stock exchange	Details of above disclosure	Within 2 trading days of receipt of disclosure or from becoming aware of such disclosure.	Annexure-10 (Form C)
Connected persons	Disclosure of holdings and trading in securities of the company	To the Company within 2 trading days of such transaction if value of the securities whether in one transaction or a series of transaction over any calendar quarter, aggregates to a traded value in excess of Rs 10 lakh or such other value as may be specified <i>*disclosure of incremental transactions shall be made when transactions effected after the prior disclosure exceeds the specified threshold limit.</i>	Annexure-11 (Form D)
Company to Stock exchange	Details of above disclosure	Within 2 trading days of receipt of disclosure or from becoming aware of such disclosure.	Annexure-11 (Form D)
All Directors, Key Managerial Personnel, and designated persons	All the transactions in securities of the Company during that quarter & the balance securities held by them and their immediate relatives	Quarterly disclosure within 4 working days of end of each quarter to the Company	Annexure-12

*The disclosures to be made by any person as above shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

**The disclosures of trading in securities shall also include trading in derivatives of securities and traded value of the derivatives shall also be taken into account for the purpose of clause 10.

*** The disclosures made under this Code of Conduct shall be maintained for a period of five (5) years by the Company.

c) Disclosures by Designated persons

Designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes (in **Annexure-13 and Annexure 14**):

- immediate relatives
- persons with whom such designated person(s) shares a material financial relationship
- Phone, mobile and cell numbers which are used by them

In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one-time basis.

Explanation - The term "material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

The Compliance Officer shall ensure that the above data is also entered in the structured digital database maintained by the company.

14. PENALTY FOR CONTRAVENTION:

Every Employee, Director, Promoter and Designated Person shall be individually responsible for complying with the applicable provisions of this Code (including to the extent the provisions hereof are applicable to their Immediate Relatives).

The persons who violate this Code shall, in addition to any other penal action that may be taken by the Company pursuant to law, also be subject to disciplinary action which in respect of an Employee may include wage freeze, suspension or termination of employment.

Action taken by the Company for violation of the Regulations and the Code against any person will not preclude SEBI from taking any action for violation of the Regulations or any other applicable laws/rules/regulations.

In case it is observed by the Compliance Officer that there has been a violation of the Regulations by any person, he/she shall forthwith inform the Audit Committee of the Company about the violation. The penal action will be initiated on obtaining suitable directions from the Audit Committee. The Compliance Officer shall simultaneously inform SEBI about such violation. The person, against whom information has been furnished by the Company/Compliance Officer to SEBI for violations of the Regulations/Code, shall provide all information and render necessary cooperation as may be required by the Company/Compliance Officer or SEBI in this connection.

Any person who violates this Code and the Regulations or any other designated person who notice such violation shall immediately intimate the same to the Compliance Officer or the Board.

15. PROCEDURES FOR INQUIRY IN CASE OF LEAK OF UPSI

- a) On becoming aware of actual or suspected leak of UPSI, the Compliance Officer shall ensure that the same shall be promptly intimated to the Audit Committee, Board of Directors of the Company and the Stock Exchanges on which the securities of the Company are listed and the SEBI.
- b) The Audit Committee shall be responsible to conduct a preliminary enquiry to ascertain the truth contained in the information or complaint pertaining to suspected leak of UPSI, if any and to decide disciplinary action thereon.
- c) The Audit Committee shall submit its report to the Board of Directors within fifteen days from the date on which the case was referred to it.
- d) The Board shall take the report on record and if the charges for the leakages of UPSI are found correct, then may on its own discretion initiate the disciplinary action against such person(s).

16. CLARIFICATIONS:

The Compliance Officer shall be responsible for providing clarifications on any query arising under this code.

17. JURISDICTION

In the event of any dispute arising from the provision of the Code or its interpretation, the same shall be subject to the exclusive jurisdiction of the Courts at Delhi.

18. CONFLICT BETWEEN THE REGULATIONS AND THIS CODE:

In case of any conflict between the provisions of the regulations and this code, the provisions of the regulations shall prevail.

ANNEXURE 1

Sr . No	Name of the Designated Person & PAN	Department	Div & Locatio n	Names of Immediat e Relatives	DP BEN ID or FOLIO NO.	Date on which the person is identified as a Designated Person	Date on which the person ceases to be the Designated Person

to be filled in only in case of Designated Person

ANNEXURE 2

SPECIMEN OF APPLICATION FOR PRE-TRADING APPROVAL

Date: _____

To,
The Compliance Officer
_____ Limited

Dear Sir/Madam,

APPLICATION FOR PRE-TRADING APPROVAL IN SECURITIES OF THE COMPANY

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval for purchase/ sale/subscription of the _____ Securities (including derivatives) (GIVE DESCRIPTION) of the Company as per the details given below

NAME

State whether

Director Designated

Person Immediate

Relative

#EMPL NO. _____ **DESIGNATION** _____

#DEPARTMENT _____

LOCATION _____

Nature of transaction	*Name of Proposed Buyer/Seller	No. of Securities	**Date of purchase/allotment	***Previous Approval no. and date for purchase/allotment)	DP/BEN ID of the account / folio no. where the securities will be credited/debited	No. of Securities held in such Account /Folio No.	Estimated Consideration Value

* Applicable for off market transaction

** Applicable only if the application is in respect of sale of Securities (including derivatives)

*** Applicable only if the application is in respect of sale of Securities (including derivatives) for which an earlier purchase sanction was granted by the Compliance Officer

To be filled in only by Designated Person

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

(Signature of Applicant)

Note: This application has to be necessarily submitted through electronic mail at the dedicated e-mail id _____ and followed by a hard copy.

ANNEXURE 3

FORMAT OF UNDERTAKING/DECLARATION TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-TRADING APPROVAL

UNDERTAKING/DECLARATION

To,
_____ Ltd

I, _____, resident of _____ hereby declare that I am Designated Person of _____ [INSERT NAME OF THE COMPANY].

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information [as defined in the Company's Code of Conduct for Prevention of Insider Trading (the Code)] up to and at the time of signing this Undertaking/Declaration.

In case I have access to or I receive any Unpublished Price Sensitive Information after signing this Undertaking/Declaration but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would, and ensure that my Immediate Relatives would completely refrain from Trading in the Securities (including derivatives) of the Company till the time such Unpublished Price Sensitive Information becomes generally available.

I declare that I have not contravened the Code as notified by the Company from time to time.

I undertake to submit the necessary report within two Trading Days of execution of the transaction/a "Nil" report if the transaction is not undertaken.

I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.

I agree to comply with the provisions of the Code and provide any information relating to the trade as may be required by the Compliance Officer and permit the Company to disclose such detail to SEBI, if so required by SEBI.

I declare that I have made full and true disclosure in the matter.

(Signature of the Applicant)

ANNEXURE 4

FORMAT FOR PRE-TRADING APPROVAL LETTER

Date: _____

Approval No: ____ of ____

To,
Mr. /Mrs. _____
Emp. No.: _____
Designation: _____

PRE-TRADING APPROVAL/DISAPPROVAL -

Your application Date _____

Dear Mr. /Mrs. _____

With reference to your above application seeking approval for undertaking certain transactions in Securities (including derivatives) of the Company detailed therein, please be informed that you are / your Immediate Relative _____ is hereby authorized/not authorized to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till _____ (i.e. for {7} trading days from date hereof). If you / your Immediate Relative _____ do (es) not execute the approved transaction /trade on or before this date you would have to seek fresh pre-trading approval before executing any transaction/deal in the Securities (including derivatives) of the Company. Further, you are required to file the details of the executed transactions in the attached format within two {2} Trading Days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be furnished.

Yours truly,

Compliance Officer

Encl: Format for submission of details of transaction (Annexure 5)

ANNEXURE 5

FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS

[To be submitted within 2 Trading Days of transaction/Trading in Securities (including derivatives) of the Company]

Date:___

To,
The Compliance Officer
Artemis Medicare Services Limited

Dear Sir,

DETAILS OF PRE-APPROVED TRANSACTION

Ref: Your Approval Letter No. _____ dated _____

I hereby inform you that I / my _____

- **have not bought/sold/subscribed any Securities (including derivatives) of the Company**
- **have bought/sold/subscribed to the _____ Securities (including derivatives)**
(GIVE DESCRIPTION) as mentioned below on _____(INSERT DATE)

Name holder	of	** First or joint holder	No. of Securities (including derivatives) dealt with	Bought / Sold/ Subscribed	DP ID/CLIENT ID (electronic form) or Folio no. for physical where the Sec. will be debited or credited	Price (Rs)

** "F" first holder" J" joint holder

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 (Five) years and produce to the Compliance Officer/SEBI any of the following documents:

- **Broker's contract note**
- **Proof of payment to/from brokers**
- **Extract of bank passbook/statement (to be submitted in case of demat transactions).**
- **Copy of Delivery instruction slip (applicable in case of sale transaction)**

I declare that the above information is correct and that no provisions of the Company's Insider Trading Code and/or applicable laws/regulations have been contravened for effecting the above said transaction(s).

I agree not to buy/sell the Securities (including derivatives) for a period of [six months] from the date of the aforesaid transaction

In case there is any urgent need to sell these Securities (including derivatives) within the said period, I shall approach the Company (Compliance Officer) for necessary approval (applicable in case of purchase / subscription).

Yours truly,

Signature: _____

Name: _____

#Emp No: _____

#Dept/ Div. _____

— Strike out whichever is not applicable.

to be filled in only by Designated Person

ANNEXURE 6

REQUEST OF TRADING PLAN

To,

The Compliance Officer,
Artemis Medicare Services Limited

I, (Name of Insider) in my capacity as (Designation of Insider, if any) of Artemis Medicare Services Limited ("Company"), hereby submit the following trading plan for your review and approval in terms of the Code of Conduct and SEBI Insider Trading Regulations.

TRADING PLAN

Date/intervals of trade execution	No of securities to be traded	Nature of transaction & Quantity			Trading account details	Trading member details
		Purchase	Sale	Others		

Details of securities traded by Immediate Relative of the Employee

Name of the person and relationship with the Designated Employee	Date of trading in securities in current financial year	No of securities traded	Nature of transaction & quantity			Trading account details	Trading member details
			Purchase Sale Others	Purchase Sale Others	Purchase Sale Others		

I hereby undertake that I am not in violation of Company's Code of Conduct or SEBI Insider Trading Regulations while formulating the aforesaid trading plan.

I undertake to furnish such information as required by the Compliance Officer with regard to the Trading Plan.

I undertake that I will not trade in Shares of Artemis Medicare Services Limited during the following period:

- Cool off period from_ to_ _
- between the twentieth trading day prior to the last day of any financial period for which results are required to be announced and the second trading day after the disclosure of such financial results; and
- As and when Company's trading window will be closed as per "SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended" and "AMSL" Code of conduct for Internal Procedures and to Regulate, Monitor and Report Trading by Insiders".

Date:

Signature _____

ANNEXURE 7

FORMAT FOR APPROVAL OF TRADING PLAN

To,

**Name: [Insert Name] Designation:
[Insert Designation] Place: [Insert
Place]**

This is to inform you that your request/immediate relatives request for approval of trading plan in relation to shares of the Company as mentioned in your application dated [Insert Date] is approved.

The trading plan once approved shall be irrevocable and you shall implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

You acknowledge that in order to comply with the principles of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 you may be required to further furnish information in relation to the trading plan.

The approval is based on your express undertakings that you will not contravene any provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct and the Trading plan is not for the purposes of market abuse.

Yours faithfully,

For ARTEMIS MEDICARE SERVICES LIMITED

COMPLIANCE OFFICER

Date: _ _ _ _ _

Encl: Format for submission of details of transaction

ANNEXURE 8

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Promoter Group, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ Promoter Group/ KMP / Directors/ immediate relative to/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Details of Open Interest (OI) in derivatives of the company held by Promoter, Promoter Group, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options

Name:

Signature:

Designation:

Date:

Place:

ANNEXURE 9

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a director/KMP/Promoter]

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the Promoter Group of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/Promoter Group/KMP / Directors/immediate relative to/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter/Promoter Group	Securities held at the time of becoming Promoter/Promoter Group/appointment of Director/KMP		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No .	
1	2	3	4	5	6

Note: “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or Promoter Group of a listed company and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of becoming Promoter/Promoter Group/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/Promoter Group/ appointment of Director/KMP		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

***Note:** In case of Options, notional value shall be calculated based on premium plus strike price of options*

Name:

Signature:

Designation:

Date:

Place:

ANNEXURE 10

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Promoter Group, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name , PAN, CIN/ DIN, & address s with contact nos.	Category of Person (Promoter/ Promoter Group/ KMP & / Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimat ion to compa ny	Mode of acquisitio n / disposal (on market/pub lic/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debenture s	No. and % of shareho lding	Type of security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No.	Valu e	Transact ion Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareho lding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

Note: “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015. **Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).**

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specification s	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.

Name: _____

Signature:
Designation:
Date:
Place:

ANNEXURE 11
FORM D (Indicative format)

SEBI (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by Other connected persons as identified by the company Details of trading in securities by other connected persons as identified by the company

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/ disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition/disposal (on market/ public/ rights/ Preferential offer / off market/Inter-se transfer, ESOPs etc.)
		Type of security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke /Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

Note: “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Details of trading in derivatives by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.

Name and Designation:

Signature:

Date:

Place:

ANNEXURE 12

Date
The Compliance Officer,
Artemis Medicare Services Limited,

Dear Sir/Madam,

SUB: QUARTERLY DISCLOSURE OF SECURITIES HELD PURSUANT TO AMSL CODE CONDUCT FOR INTERNAL PROCEDURES AND TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

I, _____, hereby disclose that I am holding equity shares of Artemis Medicare Services Limited ("Company") in my name, & _____ equity shares of the Company jointly through immediate relatives** (as per Annexure-A) as per following details as on MM/DD/YYYY:

Name	
Designation	
Department	
Employee Code	
Permanent Account Number	
DP ID & Client Id/ Folio No.	
Name(s) of Account Holder(s)*	
Relation with Designated Employee *	
No & % of securities held (including those held by immediate relatives**)	

Thanking you,
Signature:
Name and
Designation

Note:

* Applicable in case of relatives (as defined under the Companies Act, 2013) of the Designated Employee.

** **Immediate Relative**" means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

ANNEXURE 13
(DISCLOSURE BY DESIGNATED PERSON)

The Compliance Officer,

Artemis Medicare Services Limited,

Name of the Designated Person

PAN No.

Mobile No.

DP Id. & Client Id/ Folio No.

No of Shares Held in Artemis Medicare Services Limited.

Following is the list of my immediate relatives:

SI No.	Name of Immediate Relative	PAN	Mobile No.	No. of shares held

Following is the list of persons with whom such designated person(s) shares a material financial relationship

SI No.	Name of Immediate Relative	PAN	Mobile No.	No. of shares held

Note:

1. Material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions
2. Immediate relative means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities:

Thanking you,

Signature:

Name of Designated Person:

Date:

Place

:

ANNEXURE 14

(ONE TIME DISCLOSURE BY DESIGNATED PERSON)

The Compliance Officer,
Artemis Medicare Services Limited,

Name of the Designated Person	
PAN No.	
Mobile No.	
DP Id. & Client Id/ Folio No.	
No of Shares Held in Artemis Medicare Services Limited	
Name of educational institutions from which designated persons have graduated	

Following is the name of my Past Employers:

- 1.
- 2.
- 3.
- 4.

Thanking you,

Signature:

Name of Designated Person:

Date:

Place: