	WHISTLE BLOWER POLICY	
	Human Resources Department	
	Policy No # HRP35	Version: 3

1. Purpose

The purpose of the Whistleblower Policy is to enable an associate who observes an unethical (whether or not a violation of law), actual or suspected fraud or violation of the Company's policies, to approach a Whistleblower Committee *without necessarily informing their supervisors, if they choose to do so*. It provides a frame work to promote responsible and secure whistle blowing. It protects and keeps associates secure who wish to raise a concern about serious irregularities within the Company.

2. Definitions

The definitions of certain key terms used in this Policy are given below.

- 2.1 "Associate" means every employee of this Company.
- 2.2 "Protected Disclosure" means a concern raised by a written communication (including email) made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. A protected disclosure can be an anonymous complaint.
- 2.3 "Whistle Blower" is someone who makes a Protected Disclosure under this Policy
- 2.4 "Whistle Blower Committee" means a Committee of persons who are nominated to conduct detailed investigations.
- 2.5 "Investigators" means those persons authorized or appointed by the Whistleblower Committee in order to investigate into a Protected Disclosure.

3. Scope

- 3.1 This policy will be applicable to all associates of Care Hospitals. The Policy covers malpractices and events which have taken place/ suspected to take place involving:
- 3.2 Abuse of authority
- 3.3 Breach of contract
- 3.4 Negligence causing substantial and specific danger to public health and safety
- 3.5 Manipulation of company data/records
- 3.6 Financial irregularities, including fraud, or suspected fraud
- 3.7 Criminal offence
- 3.8 Disclosure of confidential/propriety information
- 3.9 Deliberate violation of law/regulation
- 3.10 Wastage/misappropriation of company funds/assets
- 3.11 Breach of employee Code of Conduct

PREPARED ON : 15th March 2021

APPROVED ON : 16th March 2021

	Prepared by	Reviewed by	Approved by
SIGNATURE			
Name	K.Krishna Kishore	Mayank Rautela	Jasdeep Singh
DESIGNATION	Regional Head-HR	CHRO	Group CEO



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3.12 Any other unethical, biased, favored, imprudent event.

4. Disqualification

4.1 While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.

4.2 Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a *mala fide* intention.

4.3 Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be *mala fide* or malicious or Whistle Blowers who make three or more Protected Disclosures, which have been subsequently found to be frivolous, baseless or reported otherwise than in good faith, will be disqualified from reporting further Protected Disclosures under this Policy. In addition, a penalty may be levied by the Whistle Blower Committee.

5. Responsibility

5.1 Whistleblowers provide initial information related to a reasonable belief that an unethical activity has occurred. The motivation of a Whistleblower is irrelevant to the consideration of the validity of the allegation.

5.2 Whistleblower (including anonymous Whistleblower) must provide all factual corroborating evidence, as is available/possible, to enable commencement of an investigation. An investigation will not be undertaken without verifiable support. However, Whistleblower shall refrain from obtaining evidence for which they do not have a right of access.

5.3 Whistleblowers have a responsibility to be candid with the Whistleblower Committee and Investigation Committee. The person should be prepared to be questioned by the Investigator / Investigation Committee.

5.4 Whistleblowers are not to act on their own in conducting any investigation.


6. Procedure

6.1. Any employee who observes any unethical & improper practices or alleged wrongful conduct shall make a disclosure to the Chairperson Whistleblower Committee or to any of the members of the Committee. In case any Committee members receive the Protected Disclosure/ complaint, it will be forwarded to the Chairperson within forty-eight hours.

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6.2. The Whistle Blower Committee will consist of the following:-

a) Chairman

Present Details:

Name: Mr. Mayank Rautela- CHRO

Address: CARE Corporate Office, Road No.2, Banjara Hills, Hyderabad-500034.

Office Land Line: -040-68106565 **Mobile:** - +91-98199 95375

Email: mayank.rautela@carehospitals.com

b) Members

1. Company Secretary

Present Details:

Name: Ms.Gayathri S.C.

Address: CARE Corporate Office, Road No.2, Banjara Hills, Hyderabad-500034.

Office Land Line: -040-68106565 **Mobile:** - +91-9717130666

Email: gayathri.sc@carehospitals.com

2. Vice President (Operations)

Present Details:

Name: Mr. Rajeev Chourey

Address: CARE Corporate Office, Road No.2, Banjara Hills, Hyderabad-500034.

Office Land Line: -040- 68106565 **Mobile:** -+91-9704910001

Email: rajeev.chourey@carehospitals.com

3. Vice President (Nursing)

Present Details:

Name: Ms.Sanjula Verma

Address: CARE Corporate Office, Road No.2, Banjara Hills, Hyderabad-500034.



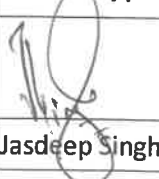
Office Land Line: -040-68106565 **Mobile:** -+91-84110 00527


Email: sanjula.verma@carehospitals.com

7. Investigation

7.1. Whistle Blower Committee shall appropriately and expeditiously investigate all whistle blower reports received. In this regard, Whistle Blower Committee, if the circumstances so suggest, may appoint a senior executive or a committee of managerial personnel to investigate into the matter.

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7.2 Whistle Blower Committee shall have right to outline detailed procedure for an investigation. Where the Whistle Blower Committee has designated a senior executive or a committee of managerial personnel for investigation, they shall mandatorily adhere to scope and procedure outlined by Whistle Blower Committee for investigation.

7.3 Whistle Blower Committee or Senior Executive or committee of managerial personnel, as the case may be, shall have right to call for any information/document and examination of any employee of the Company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy.

8. Reports and Retention of Documents

8.1. A report shall be prepared after completion of investigation by the Whistle Blower Committee. The decision of Whistle Blower Committee shall be final and binding. If and when the Whistle Blower Committee is satisfied that the alleged unethical & improper practice or wrongful conduct existed or is in existence, then the Whistle Blower Committee may –

- a) Recommend to Senior Management to reprimand, take disciplinary action, impose penalty / punishment order recovery when any alleged unethical & improper practice or wrongful conduct of any employee is proved.
- b) Recommend termination or suspension of any contract or arrangement or transaction vitiated by such unethical & improper practice or wrongful conduct.
- c) To suggest any other action as found suitable

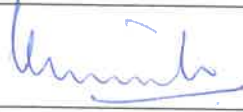
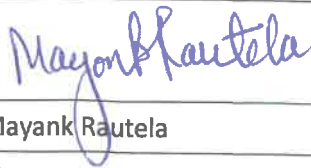

8.2. After considering the report, the Whistle Blower Committee shall determine the cause of alleged adverse action and may also order for remedies which may inter-alia include:


- a) Order for an injunction to restrain continuous violation of this policy.
- b) Reinstatement of the employee to the same position or to an equivalent position;
- c) Order for compensation for lost wages, remuneration or any other benefits, etc.

9. Notification

All Associates will be notified and communicated the contents of this policy through e-mail and company intranet. Awareness sessions will also be conducted. The new associate shall be informed about the policy by the Human Resources Department during induction programme and statement in this regard should be periodically submitted (i.e. annually) to the Whistle Blower Committee.

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10. Annual Affirmation:

The Company shall annually affirm that it has not denied any personnel access to the Whistle Blower Committee and that it has provided protection to whistle blower from adverse personnel action.

11. Date of commencement: This policy replaces and supersedes the prior whistle blower policy (Version 2, dated 15th March 2015) and will come into effect from 16th March 2021.

12. This policy as amended from time- to - time shall be made available at the web site of the Company.

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