

WHISTLE BLOWER POLICY

SOP Number:	# HRP 35 – Whistle Blower Policy – V7.0		
Applicable Sites:	QCIL and its Subsidiaries (running and operating Hospitals) in India	Status:	Approved
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Prepared by :	Reviewed by :	Reviewed by :	Approved by :
Mr. Rajendra Prasad DGM – HR	Mr. Jogesh Luthra AVP – Internal Management Audit	Dr. Amit Singh CHRO, Care Hospitals	Dr. Pawan Kumar CEO, Care Hospitals

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<p>1. Purpose</p>	<p>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 <i>without necessarily informing their supervisors, if they choose to do so.</i> It provides a frame work to promote responsible and secure whistle blowing. It protects and keeps secure associates wishing to raise a concern about serious irregularities within the Company.</p>
<p>2. Definitions</p>	<p>The definitions of certain key terms used in this Policy are given below.</p> <p>2.1 “Associate” means every employee of this Company.</p> <p>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.</p> <p>2.3 “Whistle Blower” is someone who makes a Protected Disclosure under this Policy</p> <p>2.4 “Whistle Blower Committee” means a Committee of persons who are nominated to conduct detailed investigations.</p> <p>2.5 “Investigators” means those persons authorized or appointed by the Whistleblower Committee in order to investigate into a Protected Disclosure.</p>
<p>3. Scope</p>	<p>3.1 This policy is applicable for all associates of Quality Care India Limited and its Subsidiaries. The Policy covers malpractices and events which have taken place/ suspected to take place involving:</p> <p>3.2 Abuse of authority</p> <p>3.3 Breach of contract</p> <p>3.4 Negligence causing substantial and specific danger to public health and safety</p> <p>3.5 Manipulation of company data/records</p> <p>3.6 Financial irregularities, including fraud, or suspected fraud</p> <p>3.7 Criminal offence</p> <p>3.8 Disclosure of confidential/propriety information</p> <p>3.9 Deliberate violation of law/regulation</p> <p>3.10 Wastage/misappropriation of company funds/assets</p>

	<p>3.11 Breach of employee Code of Conduct 3.12 Any other unethical, biased, favored, imprudent event.</p>
<p>4. Disqualification</p>	<p>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.</p> <p>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 <i>mala fide</i> intention.</p> <p>4.3 Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be <i>mala fide</i> 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.</p>
<p>5. Responsibility</p>	<p>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.</p> <p>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.</p> <p>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 (investigation committee may be formed as per requirements)</p> <p>5.4 Whistleblowers are not to act on their own in conducting any investigation.</p>
<p>6. Procedure</p>	<p>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</p>

the Committee. In case any Committee members receive the Protected Disclosure/ complaint, it will be forwarded to the Chairperson within forty-eight hours.

The Whistle Blower Committee will consist of the following :-

a) Chairperson

Chief Human Resources Officer

Present Details:

Name: Dr. Amit Singh

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

Office Land Line:-040-68106565

Mobile: - +91-9999410689

Email: amit.singh@carehospitals.com

b) Members

1. Chief of Medical Services

Present Details:

Name: Dr. Nikhil Mathur

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

Office Land Line:-040-68106565

Mobile: - +91-9885498943

Email: dr.nikhil.mathur@carehospitals.com

2. Asst Vice President – Information Technology

Present Details:

Name: Mr. Sachin Verma

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

Office Land Line:-040-68106565

Mobile:- +91-9810568028

Email: sachin.verma@carehospitals.com

3. Asst Vice President – Internal Management Audit

Present Details:

Name: Mr. Jogesh Luthra

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

Office Land Line:-040-68106565

Mobile:- +91-9891226644

Email: jogesh.luthra@carehospitals.com

	<p>4. Group Chief Human Resources Officer Present Details Name: Mr. Venkata Kiran Singamuneni Address: CARE Corporate Office, Road No.2, Banjara Hills, Hyderabad-500034. Office Land Line:-040-68106565 Mobile:- +91- 7550222333 Email: kiran.sv@qcilhospitals.com</p>
<p>7. Investigation</p>	<p>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.</p> <p>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.</p> <p>7.3 Whistle Blower Committee or officer 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.</p>
<p>8. Reports and Retention of Documents</p>	<p>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 –</p> <ul style="list-style-type: none"> 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

	<p>8.2 If the Malpractice constitutes a criminal offence, the Committee will take appropriate action including reporting the matter to the police, if required. The Investigation Team shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to Committee as soon as practically possible and in any case, not later than 60 days from the date of receipt of the Disclosure. The Committee may allow additional time for submission of the report based on the circumstances of the case.</p> <p>8.3 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 :</p> <ol style="list-style-type: none"> Order for an injunction to restrain continuous violation of this policy; Reinstatement of the employee to the same position or to an equivalent position; Order for compensation for lost wages, remuneration or any other benefits, etc.
<p>9. Notification</p>	<p>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 orientation programme and statement in this regard should be periodically submitted (i.e. annually) to the Whistle Blower Committee.</p>
<p>10. Annual Affirmation</p>	<p>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.</p> <p>This policy as amended from time- to - time shall be made available at the web site of the Company.</p>
<p>11. Definition of offences / outcomes of the investigations</p>	<p>Internal investigations will be initiated promptly if there is sufficient evidence to indicate that a compliance violation has occurred based on the below steps.</p> <ul style="list-style-type: none"> Level 1 : Verbal Advisory Level 2 : Written Advisory Level 3 : Strong Warning Letter Level 4 : Warning and Suspension Level 5 : Termination / Exit