



ANSHU HOSPITALS LIMITED
(Vigil Mechanism/ Whistle Blower Policy)

1. Preamble

- **Anshu Hospitals Limited** (“AHL” or “the Company”) is built on the standards of ethics and transparency. The Company’s values and the Code of Business Conduct (“Code”) require all Employees to conduct themselves with the highest standards of integrity, in compliance with all the applicable laws and regulations. Any actual or potential violation of the Code or of the applicable laws and regulations is a matter of serious concern, and the role of employees in reporting such violations is very important.
- **AHL** has formulated this Vigil Mechanism Policy (“Policy”) to provide a mechanism for the Employees to approach the Chairperson of the Audit Committee of the Company to report instances of unethical behavior, actual or suspected fraud or violation of the Company’s Code of Conduct or policies and provides safeguards against the victimization of employees who avails of the mechanism.

2. Purpose

- The purpose is to provide a platform to all the stakeholders, including the Employees & Directors of the company, to report any instance of misconduct, actual or potential violation of Code or other applicable laws or regulations without any fear of reprisal or victimization.
- Directors and Employees of the Company may come across instances of fraud, misconduct, violation of the Code or other applicable rules and regulations. There may also be situations where the right course of action is unclear. In such instances, the Employee has both legal and moral duty to take appropriate measures to identify such situations and to report genuine concerns about the incident of misconduct or potential violation of law or the Code.
- Any violations may be reported through regular channels of reporting for the Employees, there may be times when an Employee believes it to be inappropriate or difficult to report through these channels and such matters may be reported under this Policy.
- This Policy also provides information on how the Whistle Blower shall be protected.

3. Applicability

- This Policy is intended to encourage and enable all the stakeholders and Employees including the Directors of AHL to raise genuine concerns within the Company prior to seeking resolution outside the Company.
- This Policy will be applicable to all Directors, Employees and the stakeholders of Anshu Hospitals Limited.

4. Inclusions

- The Policy covers inter-alia reporting of following incidents which have, or are suspected to have, taken place:
 - a) Abuse of authority.
 - b) Financial irregularities, including fraud, or suspected fraud.
 - c) Leakage of information including confidential or propriety information.
 - d) Manipulation of documents data or records.

For ANSHU HOSPITALS LIMITED

[Signature]
Director





- e) Conflicts of interest.
- f) Misuse, misappropriation or wastage of Company assets or funds.
- g) Violation of Company's policies, practices and rules, including the Code or any other unethical, biased, favored or imprudent event.
- h) Civil and criminal offence. And/or
- i) Deliberate violation of applicable laws and regulations.

4. Exclusions

- The Vigil Mechanism should not be used for reporting of routine or operational matters like:
 - a) Issues related to routine Human Resources ("HR") matters (e.g. denial of promotion or reassignment of duties).
 - b) Issues related to career progression, transfer or deputation etc.
 - c) IT assets not working properly (e.g. printers not working).
 - d) Questioning the financial or other business decisions taken by the management.
 - e) Taxation related queries (e.g. excess tax deducted from salary).
 - f) Recruitment or job openings (e.g. to know the job openings in the Company). And/or
 - g) Inappropriate administration facilities (e.g. tea or coffee machine in the cafeteria).

5. How to file a Complaint under this Policy

- The Vigil Mechanism is not meant to substitute the regular communication protocols in the Company, and hence as a first step, the Employee may inform the Supervisor or Reporting Manager about the suspected or actual misconduct or violation in accordance with the Code.
- If the Protected Disclosure or Complaint is against the Supervisor, then the Employee may report it to the Human Resource Manager.
- If an Employee does not feel comfortable reporting the Protected Disclosure to his Supervisor or Human Resources Manager, he/ she can send email to the address hr@sarvodayahospital.com with the subject line "**Protected Disclosure under the Vigil Mechanism Policy**", providing the complete details of the Complaint.

6. Guidance for the Whistle Blower

- The Whistle Blower should consider the following points before or while reporting the Complaint:
 - a) Should identify himself or herself and tell the name, designation and Company email address, if having.
 - b) Should attempt to report the Protected Disclosure immediately after the event has occurred without any lapse of time.
 - c) Should ensure that the Protected Disclosure reported is factual and not speculative in nature.
 - d) Should ensure that the Protected Disclosure reported contains as much specific information, facts and evidence wherever possible to enable appropriate review, assessment and initiation of an investigation.
 - e) Should not investigate or attempt to investigate the matter.

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Director



7. Safeguards

- The Company provides the following safeguards to the Whistle Blowers under this Policy:

1) Confidentiality-

- 1.1 The Company shall treat all the Protected Disclosures and information received in a confidential manner.

2) Protection of the Whistle Blower-

- 2.1 AHL ensures that anyone who (based on a reasonable belief that a possible violation or suspected wrongdoing has occurred), reports any Complaint under this Policy is 'NOT' subjected to any retaliation, regardless of whether or not the Complaint is ultimately substantiated. Retaliation includes discrimination, reprisal, harassment, victimization or vengeance.
- 2.2 The Whistle Blower shall not be at the risk of losing his job or suffer loss in any other manner like transfer, demotion, refusal of promotion etc.
- 2.3 Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.
- 2.4 Making frivolous or bogus complaints through Whistle Blowing Mechanism is unacceptable and strictly prohibited.
- 2.5 Protection under this Policy shall 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 malafide intention.

8. Disposal of the Protected Disclosures/ Complaint(s)

- All the Protected Disclosures received through the channels defined in paragraph 5 shall be forwarded to the Chairman of the Audit Committee.
- The chairman or through any person/agency authorized shall perform a thorough preliminary review of the Protected Disclosures.
- Upon the preliminary review of the Protected Disclosure, if found that no sufficient facts are available to pursue the Complaint, they may consider responding to the Whistle Blower requesting additional information, if necessary, based on the contact information made available.
- If the Whistle Blower does not respond within one week or any other stipulated time as given to Whistle Blower or is unable to provide the additional information on being requested, the case can be close after documenting the reasons.
- If the chairman of Audit Committee found that the nature of complaint is very serious and harmful for the company's image or any other reason as decided by the chairman of audit committee may assign case to the external agencies for investigation.

9. Amendment to the Policy

- AHL reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees or Directors unless intimated.

For ANSHU HOSPITALS LIMITED



Director

**10. Glossary/Definitions**

- "Audit Committee" means the Audit Committee constituted by the Board of Directors in accordance with Section 177 of the Companies Act, 2013.
- "Code" means the Code of Business Conduct of the Company.
- "Company" means Anshu Hospitals Limited and all its offices.
- "Employee" means all Employee (whether permanent, full time or temporary) of the Company including Directors of the company.
- "Policy" means the Vigil Mechanism Policy of the Company.
- "Protected Disclosure" or "Complaint" means the communication made in Good Faith which discloses or demonstrates information that may evidence unethical or improper activity (actual or suspected) including but not limited to incorrect financial reporting or misappropriation of Company's funds or assets, unlawful acts, abuse of authority, misconduct, misusing of Company's assets, including confidential or propriety information, damage to Company assets including reputational.
- "Whistle Blower" means an Employee making a Protected Disclosure under this Policy.

For ANSHU HOSPITALS LIMITED

Director

ANSHU HOSPITALS LIMITED

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