

# Indira IVF Hospital Private Limited

## Anti-bribery and Anti-corruption policy

### A. POLICY STATEMENT:

Indira IVF Hospital Pvt. Ltd. (herein after referred to as an 'Organisation') affirms and reinstates by way of formal adoption of this policy to conduct all our businesses in honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to act professionally, fairly and with full integrity in all our business dealings and relations.

We are aware of the criminal nature of bribery in jurisdictions wherever we operate. We therefore take our legal responsibilities towards counter bribery and corruption very seriously. Vide this policy document, we intend to formally set our operational standards in accordance with specific laws.

By implementing this policy we would specifically:

- ✓ Make aware and educate all those working for the Organisation, about recognising and dealing with bribery and corruption issues.
- ✓ Set our responsibilities.
- ✓ Set Responsibilities of those working under our administration

### B. Policy applies to whom:

This policy applies to all the employees working for the Organisation at all levels and grades including but not limited to senior managers, officers, directors, employees (permanent or temporary) consultants, contractors, trainees, casual workers and agency staff or any other person associated with us or with any of our subsidiaries or their employees, wherever located (collectively referred as 'Associate' in this policy)

*Bribery is an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or breach of trust.*

### C. Prohibited

The gifts of illegal or unethical nature or involving cash or cash equivalents should fall under prohibited category and should always be avoided.

It is specifically made unacceptable under this policy:

- i. To give, promise to give or offer a payment or hospitality to secure an improper business advantage or reward for a business advantage already given.
- ii. To give, promise to give or offer a payment or hospitality to a government official, agent or representative to facilitate, expedite or reward a routine or other process.
- iii. To accept payment from a third party knowing or suspecting that it is offered with expectation of obtaining an unfair business advantage.

- iv. To induce other individual or Associates to indulge in any activity prohibited under this policy.
- v. To threaten or retaliate against another Associate who has refused to commit a bribery or has raised a concern under this policy.

**D. Types of bribes:**

1. The Organisation does not make and shall not accept, facilitation payment or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine governmental or other organisational work. Kickbacks are typically payments made in return of undue business favours and advantages.
2. The Organisation does not make any contribution to any political party with an intent to influence any decision or gain unfair business advantage. No political contributions shall be made on behalf of the organisation either directly or indirectly to any political party or for any political purpose without the prior approval of the Board of Directors. The Organisation makes charitable donations only which are legal and ethical under local laws.

**E. What is allowed?**

1. This policy do not prohibits normal, reasonable, appropriate, modest and bona fide corporate hospitality (given and received) to or from third parties. If such hospitality is for the purpose of improving the Organisation’s image, present our products and services or to establish cordial relations.
2. Gifts can occasionally be offered to celebrate special occasions provided, such gifts are moderate in value, occasional, appropriate, unconditional and in accordance with local business ethics, customs or practises.
3. No gift should be given or accepted if it could reasonably be construed to induce or influence the decision making of recipient.

**F. How to identify a bribe or potential bribe:**

1. This policy recommends that the Associate always assess the purpose behind any hospitality or entertainment. Hospitality or entertainment with intention to improperly influencing anyone’s decision-making or objectivity or making the recipient feel unduly obligated in any way, should never be offer and received. While offering a hospitality an Associate should always consider how the recipient is likely to construe it. An Associate must always decline any invitation or offer of hospitality or entertainment when made with actual or apparent intent to influence their decision making. In some countries, cultures, customs or circumstances, refusal of any gifts may be construed as an insult and can have an adverse effect on business relationship. Under such circumstances, if the gift is of more than a moderate value, an Associate should consult with the reporting manager. If the reporting manager could not come to any conclusion, a relevant Human Resource personal should be approached for guidance.
2. An Associate should always be mindful of the purpose of all payments, irrespective of the proportion of payments. A documentary proof of payment in the form of receipt or otherwise should always be sought. In case of any doubt or suspicion about the purpose of any payment, an Associate should consult the reporting manager or appropriate member of Human Resource team.

3. Associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an associate is unsure whether a particular act constitutes bribery or corruption, s/he should raise the matter with his/her reporting manager or consult an appropriate member of Human Resource team.

#### **G. RESPONSIBILITIES OF ASSOCIATES:**

Associates must ensure a clear understanding and a strict adherence of this policy. All associates are required to avoid any activity that might lead to or suggest a breach of this policy. Associates must notify their reporting manager or consult an appropriate member of the Human Resource (HR) team as soon as possible if they believe or suspect or have a reason to believe or suspect that a breach of this policy has occurred or may occur. Please note that a failure to report an actual or suspected breach of this policy is itself a breach of this policy. Any associate who breaches any of the terms of this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Organisation reserves its right to terminate a contractual relationship with other associates and other associated persons, as the case may be if they breach any of the terms and conditions of this policy. Further, Bribery is a serious criminal offence in jurisdictions in which the Company operates, including India (Prevention of Corruption Act, 1988, Indian Penal Code, 1860, etc.)

#### **H. ORGANISATION'S RESPONSIBILITY:**

##### **1. Protection**

Associates who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Organisation aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Organisation is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any associate believes that s/he has suffered any such treatment, s/he should inform his/her reporting manager or a member of the Human Resources team of the Organisation immediately. If the matter is not remedied, and if the victim is an associate, s/he should raise the matter as per the procedure laid out in the Whistle Blower policy.

##### **2. Training and Communication**

Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all existing associates. If any associate has any query about this policy, they should contact their reporting manager. The Organisation's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Organisation's business relationship with them and as appropriate thereafter. Wherever possible, all such third parties should be sent a copy of this policy at the outset of the said business relationship. This policy may also be posted on the corporate website of the organisation for larger dissemination

### **3. Operational Safeguards**

The Organisation will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to and receiving payments from third parties relating to any type of hospitality. Associates must declare and keep a written record of all hospitality or gifts accepted or offered which will be subject to managerial review and/or a review from the appropriate member of the Organisation's Human Resource (HR) team. Associates must ensure that all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Organisation's applicable policy and specifically record the reason for such expenditure. Associates shall further ensure that all expense claims shall comply with the terms and conditions of this policy. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts should be kept "off-book" to facilitate or conceal improper payments.

#### **I. Who is responsible for this policy?**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The concerned head of Human Resource Department of the region has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and, if necessary and appropriate, are given adequate and regular training on it.

#### **J. Monitoring and Review**

The concerned head of Human Resource Department of the region will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. All associates are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

#### **K. Keeping it live**

Associates are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the CHRO—HR Operations. This policy can be amended from time to time by the Organisation.