



Code of Conduct

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CODE OF CONDUCT

This Code of Conduct (“**Code**”) is stated under the stewardship of the Board of Directors and Senior Management of the Company and reflects the Company’s affirmation to the way we operate as an organization.

It applies to all employees and associates of the company (including Board of Directors), in all situations where such an individual is seen as representing or being associated with the company.

The terms of the Code are deemed to form a part of every contract involving the Company whether explicitly stated thereunder or not.

GUIDING BUSINESS PRINCIPLES

- We will conduct our operations in an honest and fair manner with integrity and openness.
- We will respect, obey and assist the law of the land in letter and spirit.
- We will respect human rights, dignity and legitimate interests of all individuals directly and indirectly associated with us.
- We will provide a safe and healthy work and business environment to all persons directly and indirectly associated with us.
- We will respect and protect the confidential and privacy rights of all persons associated with us.
- We will ensure the authenticity & veracity of our transactions and information. All activities (financial & non-financial) of the business will be fully captured and correctly reported reflecting the underlying transaction and ensuring the completeness and integrity of information.
- We will act & perform as a non-political commercial organization and all our activities will be directed in furtherance of that objective.
- We will support and strengthen the organization towards attaining its objectives and avoid apparent and potential situations of conflict of interest with these objectives.
- We will not accept any direct or indirect benefit(s) including bribes or inducements of any kind or use company property or position for personal gains.
- We will at all times ensure conduct, which sustains and enhances the global reputation and image of the organization.

Ignorance of the Code is no excuse and compliance is mandatory.

REPORTING OF VIOLATION OF CODE

Please note that complaints concerning matters that are separately covered or governed under the terms of separate Company policies (such as the Whistle Blower Policy, Sexual Harassment Policy and the Internal Job Posting Policy) shall be dealt with under the terms thereof and are not reportable matters under the terms of the present Code.

It is the duty of every employee / Director to report any breach or suspected breach of this policy, as soon as the same comes to their notice/ attention.

The reporting of any violation of the Code shall be made to the Company Secretary/ Chief Human Resources Officer of the Company. Upon receipt of a report of a violation, the same shall be directed by the Company Secretary/ Chief Human Resources Officer to the concerned department/ facility head(s) along with the Chief legal officer/Group General Counsel of the Company (“**Responsible**

Persons”). In the event that a report of a violation is in respect a department/ facility head or in respect of the chief legal officer of the Company, the same shall be taken up by the Managing Director of the Company. In the event that a report of a violation is in respect of the Managing Director of the Company, the same shall be taken up by the Board of Directors. In the event that the Responsible Persons or Managing Director believes, that a report of a violation, is of sufficient gravity, the same may be escalated to the Board of Directors for the Board of Directors to take suitable action in respect thereof, as per the terms of this Policy.

The Responsible Persons, Managing Director, or the Board of Directors, as applicable, shall initiate such action(s) as they deem appropriate- which actions may include but are not limited to:

- Requiring an existing internal committee of the Company, or constituting an internal committee of the Company, to take suitable action in respect of the complaint to ensure appropriate disposal of the same;
- Referring the matter to internal audit for review;
- Appointing any employees / external advisors/ legal counsels/ agencies or other third parties to investigate the alleged violation(s) and provide their findings; or
- Appointing any employees / external advisors/ legal counsels/ agencies or other third parties to undertake such actions, as are deemed necessary or suitable in respect of the reported violation(s).

Strict confidentiality shall be maintained in relation to any report of violation under this Code and the person reporting such violation shall not suffer any consequences as a result of such reporting of a violation.

CONSEQUENCES OF BREACH OF THE CODE

In determining the consequences to be imposed after due investigation, the Responsible Persons, Managing Director or the Board of Directors (as applicable) shall take, at their sole discretion, such action as they deem appropriate, including, but not limited to actions stipulated in the Consequence Management Policy, making disclosures to the stock exchanges, regulators, or making references to the regulators/ any other authorities to initiate further investigation/ legal proceedings/ or take any further action as they deem necessary.

AFFIRMATIONS/ CONFIRMATIONS

All Board members and employees would provide an affirmation of compliance to the Code which will be renewed on an annual basis.

For more information on the Code:

Address: Company Secretary / Chief Human Resources Officer
Fortis Hospital, Sector 62, Phase — VIII,
Mohali, Punjab — 160062

Contact No. is 0172-5096001