

Policy: Whistle-blower Policy / Vigil Mechanism

1. Purpose

House of Diagnostics Healthcare Pvt. Ltd. (HOD) is committed to conducting business with integrity and transparency. This policy provides a formal mechanism for individuals to report unethical practices, policy violations, or unlawful activities, while ensuring they are protected from retaliation.

2. Scope

This policy applies to:

- All employees including doctors (full-time, part-time, contractual)
- Directors
- Interns and trainees
- Vendors, suppliers, contractors
- Associates and business partners
- Any third party connected with the Company

Note: Complaints related to sexual harassment must be reported under the POSH Policy to the Internal Complaints Committee (ICC).

3. Responsibility

The overall responsibility for implementing and maintaining this policy lies with Dr. Shubham Sogani (Director cum CEO). He is the designated recipients of whistle-blower complaints.

4. What Can Be Reported?

The following issues can be reported under this policy:

- Fraud, bribery, or financial misconduct
- Violation of company policies
- Unethical behavior or misuse of company assets
- Data privacy breaches
- Any illegal or questionable activities

Grievances related to performance, promotions, or interpersonal issues should be reported through the internal Grievance Redressal process.

5. Reporting Process

Whistle-blower complaints must be made in good faith and submitted through one of the following methods:

- **Email:** Write to the Dr. Shubham Sogani (Director) at ceo@hod.care
- **In Writing:** Send a sealed envelope marked “**Confidential – Whistle-blower**” to:
CEO, House of Diagnostics Healthcare Pvt. Ltd., Upper Ground Floor, World Trade Tower, Smartworks, Sector 16 Noida, Uttar Pradesh

Prepared By:

Reviewed By:

Approved By:

Quality Manager

COO

CEO

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Include the following:

- Description of the issue
- Supporting evidence (if any)
- Your name and contact information

Anonymous complaints may be reviewed **only if** they contain specific, verifiable details.

6. Handling of Complaints

- The CEO will conduct a preliminary review of the concern.
- If the matter requires deeper inquiry, appropriate individuals or external experts may be appointed.
- If the issue relates to internal processes (non-ethical), it may be referred to the **Grievance Redressal Committee**.
- The investigation should typically be completed within **45 days**.
- Action taken (if any) will be documented and implemented accordingly.

7. Protection of Whistle-blower

- The identity of the whistle-blower will be kept confidential to the best possible extent.
- Retaliation against a whistle-blower is strictly prohibited.
- Anyone found retaliating or engaging in victimization may face disciplinary action.
- However, **knowingly false or malicious complaints** may also lead to appropriate action.

8. Documentation and Record Keeping

All records related to whistle-blower complaints, investigations, and outcomes will be securely maintained for a period of at least **3 years**, or longer if required by law.

9. Policy Review and Amendment

This policy may be amended or updated by the Company from time to time. All changes will be communicated appropriately.

AMENDMENT

Sr. No.	Rev No.	Amendment Date	Amendment made	Reason	Signature of Q. Mgr.

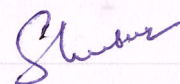
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