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

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.

<u>AMENDMENT</u>

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

Prepared By:	Reviewed By:	Approved By:
Quality Manager	COO	CEO