POLICY ON
CODE OF CONDUCT

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1. Purpose:

The purpose of the Code of Conduct Policy **("Policy")** is to define the standards of professional behaviour expected from all Members of Aster DM Quality Care Limited and its **subsidiaries in India ("Organisation")**. It sets clear guidelines for ethical conduct, integrity, workplace discipline, and respectful interactions. The policy ensures a safe, inclusive, and compliant work environment; prevents misconduct; supports legal and regulatory adherence; and provides a framework for accountability, decision-making, and organizational reputation protection.

2. Scope:

Applies to all full-time Associate, Trainees, Interns, Apprentices, Locum, Officers, Directors, member at and above Band 2 level, and all staff who are part-time, on contract / retainer, engaged through third party contractor, Consultants, Contract Workforce, Vendors, Partners, Suppliers / Service Providers, Auditors, and Patients of the Organisation **("Members")**.

"Applicable Law" means all laws, statutes, rules, regulations, notifications, orders, guidelines, judgments, and directions issued by any Indian central, state, local, statutory, regulatory, judicial, or governmental authority, as applicable to the Organisation, its Members, operations, services, and business activities, as amended from time to time.

3. Values

Ethics

We uphold the highest standards of honesty, integrity, and professional conduct in every interaction. We comply with all laws, medical regulations, and organizational policies, making decisions that prioritize patient safety, fairness, confidentiality, and transparency always.

Patient Centric

We place patients and their families at the centre of every action, decision, and service. We strive to provide compassionate care, timely communication, and respectful treatment, ensuring every patient experience, dignity, trust, and high-quality clinical outcomes.

Empowering

We create an environment where members, clinicians, and teams are trusted, supported, and equipped to perform at their best. We encourage accountability, independent decision-making within defined boundaries, and continual skill development so individuals can contribute confidently to patient care.

Innovate

We embrace new ideas, evidence-based practices, and modern technologies that improve clinical quality, operational efficiency, and patient experience. We continuously seek better ways of working and challenge outdated processes responsibly and safely.

Teaming

We collaborate across departments, specialties, and functions with mutual respect and open communication. We value diverse perspectives and work together seamlessly to deliver safe, coordinated, and effective care to every patient.

4. Conduct:

4.1 All Members are expected to:

4.1.1 Act with honesty, integrity, fairness, and professionalism always;

4.1.2 Comply with all applicable laws, regulations, accreditation standards, and internal policies;

4.1.3 Exercise sound judgment in all decisions and actions that may impact patients, colleagues, or the organisation;

4.1.4 Conduct themselves in a manner that upholds and enhances the organisation's reputation;

4.1.5 Avoid conflicts of interest and disclose any actual or potential conflict promptly;

4.1.6 Treat all individuals with respect, dignity, compassion, and non-discrimination;

4.1.7 Maintain confidentiality of patient, associate, and organisational information;

4.1.8 Report suspected misconduct, unethical practices, or violations of this Code without fear of retaliation;

4.1.9 Foster a respectful, inclusive, and harassment-free work environment.

4.2 Healthcare professionals

4.2.1 Provide medically competent, evidence-based care while prioritising patient safety and well-being;

4.2.2 Treat all patients with compassion, dignity, respect, and empathy, irrespective of gender, caste, religion, ethnicity, socioeconomic status, or medical condition;

4.2.3 Practice only within their approved clinical scope, credentials, and privileges, and under appropriate consultant or institutional supervision where applicable;

4.2.4 Uphold the highest standards of medical ethics, honesty, and professionalism in clinical practice and communication;

4.2.5 Maintain patient confidentiality and privacy in accordance with applicable laws and organisational policies;

4.2.6 Avoid exploitation of patients, families, or caregivers in any form;

4.2.7 Ensure informed consent is taken and respect patient rights at all times;

4.2.8 Maintain respectful, collaborative, and professional relationships with colleagues, nurses, allied health professionals, and support staff;

4.2.9 Participate in Continuous Medical Education (CME), training, and professional development activities as required;

4.2.10 Provide truthful, accurate, and unbiased medical opinions or testimony when required;

4.2.11 Act responsibly in community health initiatives and public health engagements; and

4.2.12 Use professional judgment to protect and enhance the credibility and reputation of the organisation

5. Violations

5.1 The following actions constitute serious violations of this Code and may result in disciplinary action, including termination of association and/or legal action:

- Fraud, theft, dishonesty, or falsification of records
- Substance abuse, including drug or alcohol misuse while on duty or on organisational premises
- Violence, threats, intimidation, harassment, or abusive behaviour
- Misuse of Organisation assets, resources, information, or authority
- Breach of patient confidentiality or data privacy
- Retaliation against whistleblowers or individuals reporting misconduct in good faith
- Any act that causes or may cause harm to Members, visitors, or the Organisation
- Bribery, corruption, or unethical inducements
- Gross negligence or wilful misconduct
- Unreasonably, frequently or substantially using work time to deal with private affairs or non-work-related matters, or leaving post / office without supervisor's approval
- Refusing to complete an assigned task
- Obstructing or refusing to cooperate with the Organisation's internal investigations (including but not limited to fact investigation, disciplinary investigation and compliance investigation), or failing to provide true information during the Organisation's internal investigations
- Demonstrating a blatant disregard for assigned duties and responsibilities; such activities as loafing, sleeping, and reading for personal pleasure while on the clock are evidence of blatant disregard
- Being flagrantly insubordinate or intentionally failing to perform a specifically assigned work task or failing to follow specific instructions made by management
- Demonstrating a significant lack of attention to assigned duties and responsibilities
- Failing to perform assigned work
- Engaging in any activity (including verbal, non-verbal or physical behaviours) that violates the Organisation's sexual harassment policies. Examples include but are not limited to - directing abusive or obscene language to fellow Members, patients or vendors, offensive jokes, threats of termination, wilfully creating circumstances that would make the workplace intolerable
- For supervisors and managers, failing to give notice to an appropriate supervisor of a report of alleged harassment or discrimination and/or failing to take appropriate investigatory or remedial action about a report of alleged harassment or discrimination
- Initiating or participating in physical altercations or assaults, attempted assault or offensive, aggressive and/or threatening conduct
- Vandalizing the Organisation's associate, vendor, client or patient's property
- Wilfully attempting to cause harm, damage, or injury to another person or property whether or not the harm actually occurs
- Any criminal or unlawful behaviour, such as copyright violation, falsification of documents, fraud, the giving or receiving of a bribe, or unlawful possession of illegal articles on Organisation premises (including, but not limited to, illegal narcotics or firearms), commission of any criminal offence or any other crime or offence of moral turpitude or being accused of any serious criminal offence

- Assigning work that places Members at risk of serious harm, threatens significant damage to the Organisation's property or financial loss to the Organisation whether or not such harm or damage occurs
- Performing unauthorized videotaping, audiotaping or photographing on the Organisation's property or off Organisation's property but while on Organisation business or on the clock without obtaining appropriate approval in advance
- Without permission, posting notices, photos or advertisements or distributing non-work-related items on the Organisation premises, or releasing non-work-related information through the Organisation intranet
- Sending group email to irrelevant associate, making report or accusations by other inappropriate means, or intentionally making exaggerated or untrue report or accusations
- Participating in gambling activity with other Members or with a third party or parties while on the Organisation property and / or during working hours. Conducting any kind of money lending, chit fund or other such activity (whether or not prohibited by law) involving other Members or persons related to the Organisation and / or using the Organisation assets or infrastructure during working hours. The nature of the behaviour will determine if it is major or minor and the level of discipline administered
- Failing to behave in a professional manner in the workplace
- Unintentionally destroying, losing, or misusing the Organisation's property;
- Failing to treat Members or vendors with respect or engaging in other inappropriate conduct toward others;
- Stealing or attempting to steal any Organisation property and/or data during the course of employment;
- Altering or forging Organisation files, data, records and important documents;
- Knowingly possessing stolen property;
- Saying or doing something that is dishonest, untruthful, or intentionally misleading;
- Providing information that the associate knows to be untrue or inaccurate about an incident or an associate with regard to a policy violation or investigation;
- Forging important experience, providing false certificates or have oneself employed by improper means or engaging in other cheating activities;
- Unauthorized use / Misuse of corporate credit cards;
- Falsifying, altering, destroying or misusing an Organisation document or a document relied upon by the Organisation;
- Providing false information or knowingly omitting relevant information;
- Clocking in or out for another associate;
- Clocking in for work and then leaving the work location for non-work-related reasons without clocking out;
- Impeding, refusing or failing to cooperate with an internal investigation;
- Participating in or inappropriately influencing the business between the Organisation and another individual or organization when self-interest is involved; any situation where a conflict of interest exists between the Organisation's interests and an associate's personal interests (i.e., working for or having a financial interest in a business that competes with the Organisation without prior approval of the Organisation; soliciting or accepting work from patients for personal gain, etc.);

- Asking another associate to commit a fraudulent or illegal act;
- Disclosing confidential or proprietary information on any internet discussion forum;
- Using the internet to access inappropriate websites as determined by the Organisation. (i.e., adult content, gambling, weapons and hate speech);
- Acts subversive of discipline or good behaviour, including acceptance or offering of illegal gratification, or any other acts on the Organisation premises, in the course of an Associate's duties, or outside of the Organisation premises if in any way connected with the working of the Organisation;
- Any breach of employment terms or any statutory duty or for any act or omission adversely affecting the goodwill, reputation, credit, operations or business of the Organisation, such as a failure to disclose required information (including information relating to any arrest, conviction, or charge for any offence or crime), misrepresentation of facts, participation in unauthorised secondary employment, or interference with the Organisation's relationship with other Members (including by solicitation), or;
- Breach of any provisions of these Guidelines as may be updated from time to time and/or any policies of the clients of the Organisation which the Members are required to follow;
- Any other breach of the Organisation's policies, as may be published and amended from time to time;
- Going on or abetting a strike in contravention of any law for the time being in force;
- Habitual unauthorized absence or unauthorized absence for a period exceeding [3] days;
- Engage in any other employment or business which has not been disclosed to and authorized by the Organisation;
- Unauthorized disclosure of any confidential information of the Organisation.

6. Attendance:

6.1 All Members are expected to adhere strictly to the prescribed working hours, duty rosters, shift schedules, and attendance norms applicable to their role, department, and location. Punctuality and regular attendance are critical to ensuring uninterrupted patient care, operational efficiency, and workplace discipline.

7. Anti-Harassment/ Anti-Discrimination:

7.1 The Organisation is committed to fostering a safe, inclusive, and respectful workplace and maintains zero tolerance towards harassment, discrimination, or victimization of any form

7.2 Discrimination or harassment of or by any member is strictly prohibited based on:

- Race, religion, caste, colour, nationality, or ethnicity
- Age
- Gender, gender identity, gender expression, or sexual orientation
- Genetic information
- Physical or mental disability
- Veteran status
- Marital or family status
- Physical appearance

- Any other characteristic protected under applicable Indian laws

7.3 This applies across all interactions, including patient care, employment decisions, promotions, transfers, training, compensation, and day-to-day workplace conduct.

7.4 Harassment may be verbal, physical, visual, written, or digital in nature and includes unwelcome conduct that creates an intimidating, hostile, or offensive work environment.

7.5 Sexual harassment shall be addressed in strict compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and the Organisation's POSH Policy.

8. Conflict of interest:

8.1 A conflict of interest arises when a member's personal, financial, or external interests interfere, or appear to interfere, with their ability to act in the best interest of the Organisation, patients, or stakeholders.

8.2 Members must promptly disclose, in writing, any actual or potential conflict of interest to the Ethics and Compliance Committee., including but not limited to, the matters of:

- Financial interests in, or compensation from, Members, suppliers, vendors, patients, or competitors
- Personal gain or benefit arising from organizational transactions or decisions
- Serving on the Board of Directors, Advisory Panel, or in any governance role in organisations which are in competing or allied business
- Close family members providing goods or services to the Organisation Hiring, supervising, or influencing the employment of relatives or individuals with whom the Member has a personal relationship
- Engagement in outside employment, consultancy, or professional practice with competitors or entities that may pose a conflict

8.3 Spouses of Members shall not be placed within the same department or specialty, particularly in clinical roles, where it may result in supervisory overlap, professional bias, or compromise in clinical governance.

8.4 The Organisation reserves the right to evaluate disclosures and implement appropriate mitigation measures, including reassignment of duties, recusal from decision-making, or discontinuation of conflicting arrangements.

8.5 Failure to disclose a conflict of interest, or providing false or incomplete disclosures, shall be treated as misconduct and may attract disciplinary action.

9. Anti-bribery and corruption:

9.1 The Organisation adopts a zero-tolerance approach towards bribery, corruption, kickbacks, facilitation payments, or any form of improper advantage, whether direct or indirect. All members are expected to act with the highest standards of integrity, transparency, and ethical conduct in all professional dealings.

9.2 Any advantage intended to influence, or appear to influence, business, clinical, administrative, or employment decisions.

9.3 This prohibition applies to interactions with patients, attendants, vendors, suppliers, government officials, regulators, referral sources, pharmaceutical companies, medical device manufacturers, consultants, and any other third party.

9.4 Members may not accept or offer gifts, hospitality, or benefits that could reasonably be perceived as influencing professional judgment or decision-making.

9.5 No gifts, compensation, commissions, favours, or inducements shall be offered or accepted in connection with recruitment, employment, promotions, referrals, vendor selection, or patient referrals.

9.6 Referral commissions or fee-splitting arrangements, whether financial or non-financial, are strictly prohibited.

9.7 Members must not solicit or accept any benefit from pharmaceutical companies, diagnostic partners, or medical service providers that could compromise ethical medical practice.

9.8 Participation in conferences, Continuing Medical Education (CME) programs, workshops, or professional events sponsored by external entities requires prior written approval from the appropriate authority, as per organizational policy.

9.9 All sponsorships must be transparent, compliant, and free from any obligation or expectation of reciprocal benefit.

9.10 Trading in securities or making financial decisions based on non-public, confidential, or unpublished price-sensitive information obtained through employment is strictly prohibited.

9.11 Any violation may result in severe disciplinary action, including termination of employment, and may also attract civil or criminal liability under applicable laws.

10.Workplace Safety standards:

10.1 The Organisation is committed to providing a safe, healthy, and secure working environment for all Members, visitors, and stakeholders, in compliance with applicable laws, clinical standards, and best practices in healthcare safety.

10.2 Adequate pre-placement health checks, role-specific assessments, and verification of fitness for duty shall be conducted prior to deployment.

10.3 Members shall receive appropriate job-specific training, including safety protocols, infection control practices, emergency procedures, and use of equipment.

10.4 A dedicated Safety and Maintenance Team, comprising competent and trained associate, shall be responsible for monitoring, maintaining, and improving workplace safety standards.

10.5 Accurate reporting, documentation, and record-keeping of safety incidents, near misses, corrective actions, and preventive measures are mandatory.

10.6 Any environmental or biohazard spill, leakage, infection transmission risk, equipment malfunction or failure, safety violation, or incident involving threat, abuse, or workplace violence must be reported immediately to the designated authority or safety team.

10.7 Members are required to cooperate fully in incident investigations and corrective action processes.

10.8 Failure to report safety incidents or deliberate concealment shall be treated as serious misconduct.

10.9 All Members share responsibility for maintaining a safe workplace and complying with safety protocols.

10.10 Non-compliance with safety standards may result in disciplinary action, in addition to any legal or regulatory consequences.

11. Information Security

11.1 The Organisation is committed to safeguarding all information assets and ensuring the confidentiality, integrity, and availability of data entrusted to it.

11.2 All confidential business, financial, technical, clinical, patient, and hospital-related information must be treated as strictly confidential and shall not be disclosed, shared, or misused without prior written authorization. This obligation shall survive the termination or cessation of employment or engagement with the Organisation.

11.3 Records, whether in physical or electronic form, shall be created, maintained, archived, and disposed of securely in accordance with statutory, regulatory, and organizational record-retention requirements.

11.4 Members are responsible for ensuring that all information provided by them in organizational records, declarations, filings, and communications is accurate, complete, and truthful. Any suspected or actual breach of policy, confidentiality, or applicable law must be reported immediately through the prescribed reporting or escalation channels.

11.5 Any breach of confidentiality, data security, or unauthorized access or disclosure of information shall be treated as a Level 4 misconduct, attracting strict disciplinary action, including termination of employment and/or legal proceedings, as deemed appropriate by the Organisation.

11.6 Member communications, including email, internet usage, and electronic communications conducted using organizational systems or networks, may be monitored, logged, or reviewed as permitted under applicable laws, including the Information Technology Rules, 2011, of India.

11.7 Organisation-issued devices, systems, and information assets must be used responsibly, securely, and solely for authorized official purposes. Unauthorized personal use, misuse, tampering, or negligent handling of Organisation assets is prohibited. All fixed and movable assets issued must be returned to the Organisation upon completion of use, transfer, separation, or as otherwise directed.

12. Social media/ Public Relations

12.1 The Organisation recognizes the influence of social media and public platforms and expects Members to exercise responsibility, professionalism, and discretion in all external communications.

12.2 Social media includes, but is not limited to, blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and any other digital platforms that enable users to create, share, or exchange information in real time.

12.3 Members may identify or associate themselves with the Organisation in their personal online presence; however, any views, opinions, or content shared must be clearly expressed as personal and must not be represented as official statements or positions of the Organisation.

12.4 The Organisation shall not be responsible or liable for any consequences arising from personal content, opinions, or interactions shared by Members on social media or other public platforms.

12.5 Members must not publish, share, or endorse any misleading, inaccurate, defamatory, or inappropriate content that may harm the reputation, credibility, or goodwill of the hospital or the Organisation.

12.6 Unauthorized publicity, promotional activities, public statements, media interactions, interviews, or representations on behalf of the Organisation are strictly prohibited unless expressly approved through designated corporate communications or public relations channels.

13. Financial Integrity

13.1 The Organisation is committed to maintaining the highest standards of financial discipline, transparency, and ethical conduct.

13.2 Members shall ensure the proper, prudent, and authorized use of all Organisation funds, assets, and property and shall prevent misuse, wastage, or misappropriation in any form.

13.3 All statutory returns, declarations, and filings required under applicable direct tax and other financial legislations must be completed accurately and within prescribed timelines. Any personal investments or financial interests of Members must not conflict with the Organisation's responsibilities, interests, or governance requirements. Where applicable, prior disclosures and approvals, including Board approvals, must be obtained.

13.4 Members shall protect the Organisation's intellectual property and confidential information, including but not limited to trade secrets, proprietary processes, technologies, clinical protocols, marketing strategies, business plans, and price-sensitive or unpublished information. Such information shall not be disclosed unless expressly authorized by the Board or required by law.

13.5 To ensure financial stability, regulatory compliance, and organizational sustainability, the Organisation shall conduct periodic financial and operational reviews, including half-yearly reviews and annual audits, in accordance with applicable laws and internal governance standards.

14. Supplier Standards of Conduct

All suppliers, contractors, distributors, consultants, and service providers ("Suppliers") engaged by the Organisation are expected to uphold the highest standards of integrity, ethics, and responsibility. Compliance with the following standards is mandatory and forms an integral part of all commercial engagements.

14.1. Labour and Human Rights

14.1.1 Suppliers shall respect and protect fundamental human rights and comply with all applicable labour laws and regulations in India, including but not limited to the Occupational Safety, Health and Working Conditions Code, 2020, Code on Wages, 2019, Child and Adolescent Labour (Prohibition and Regulation) Act, 1986, and other applicable statutes, as amended from time to time. Suppliers must, hence, make sure that:

- All employment is voluntary, and there is no use of forced, bonded, indentured, prison, or child labour.
- Associate of the Suppliers are treated with dignity and respect and are provided equal employment opportunities without discrimination or harassment based on gender, age,

caste, religion, disability, marital status, sexual orientation, or any other legally protected characteristic.

- Working hours, overtime, wages, and statutory benefits comply with applicable laws and industry standards.
- No recruitment or placement fees are charged to Members or job applicants, directly or indirectly.
- Operations and supply chains are free from slavery, human trafficking, and exploitative labour practices, including through appropriate due diligence and monitoring mechanisms.

14.2. Ethical Sourcing and Fair Business Practices

14.2.1 Suppliers shall conduct business ethically and in full compliance with applicable competition and commercial laws, including the Competition Act, 2002.Suppliers must:

- Adhere to fair competition, anti-trust, and anti-collusion laws at all times.
- Refrain from engaging in unfair, deceptive, coercive, or anti-competitive practices, including price-fixing, bid rigging, or abuse of market dominance.
- Conduct all sourcing, procurement, and commercial dealings with transparency, integrity, and fairness.

14.3. Environmental, Health, and Safety Standards

14.3.1 Suppliers shall operate in an environmentally responsible manner and comply with all applicable environmental, health, and safety laws in India, including relevant regulations issued by the Central and State Pollution Control Boards, as well as the Organisation’s sustainability and environmental policies. In adherence to this, Suppliers are required to:

- Comply with all environmental permits, approvals, and legal requirements applicable to their operations.
- Implement appropriate controls to safely manage waste, emissions, effluents, and wastewater, particularly where biomedical or hazardous materials are involved.
- Take preventive measures to avoid accidental spills, leaks, or environmental releases, and maintain emergency response plans.
- Promote resource efficiency, including responsible use of energy, water, and raw materials.
- Adopt climate-conscious and sustainable practices wherever feasible, aligned with nationally and globally accepted sustainability principles.

14.4. Compliance and Accountability

14.4.1 Suppliers are expected to maintain adequate policies, procedures, and records to demonstrate compliance with this Policy.

14.4.2 Allow audits, assessments, or inspections by the Organisation or its authorized representatives, where required.

14.4.3 Promptly report any actual or suspected violations of these standards.

14.4.4 Failure to comply with this Supplier Code of Conduct may result in corrective actions, suspension, or termination of the business relationship.

15.Political Contributions

15.1.1 Political Contributions can take many forms, including monetary or non-monetary contributions to political parties, political candidates, election campaigns, or political organisations; provision of material resources, facilities, associate, labour, or services for political purposes; sponsorship of political events; purchase of tickets, tables, or seats at political fundraisers or events; and any other support intended to promote or assist a political party, candidate, campaign, or political cause.

15.1.2 The Organisation upholds its commitment to not support any political party or have any political affiliation

15.1.3 Any political contribution made by the Organisation, if required, must be approved by the Board of Directors or Audit Committee and must be in compliance with applicable laws, including all disclosure and payment requirements under the Representation of the People Act, 1951, the Companies Act, 2013, and any other applicable laws.

15.1.4 No Political Contributions shall be made with the intent to improperly influence any decision of a Public Official or to secure any undue advantage for the Organisation.

16. Compliance with Laws, Rules, Regulations & Policies

The Organisation and its Members are strongly encouraged to follow and respect the provisions of this Policy and the Applicable Laws. We expect the Members to always adhere to the rules and regulations of the Organisation in all given situations. All the Members are expected to know and comply with the Applicable Law. If you ever have questions, contact your Human Resources for support and your reporting manager for guidance.

17.Insider Trading & Confidential Information

17.1.1. The Organisation prohibits Members from trading in the Organisation's shares, or any other securities while in possession of unpublished price-sensitive information or any confidential information that is not publicly available. Non-compliance with insider trading requirements may result in disciplinary action and may also attract civil or criminal liability under Applicable Law. Members who are unsure about the interpretation or applicability of insider trading requirements must seek guidance from the Company Secretary or the designated Compliance Officer of the Organisation before taking any action.

17.1.2. Confidential information includes any information relating to the Organisation, its Members, business partners, operations, finances, strategies, clinical practices, technology, intellectual property, commercial arrangements, records, databases, trade secrets, unpublished financial information, unpublished price-sensitive information, and any other information that is not publicly available.

17.1.3. Members who have access to confidential information must use it only for legitimate business purposes and must not disclose, share, discuss, reproduce, misuse, or trade based on such information unless expressly authorised by the Organisation or required by Applicable Law.

17.1.4. This obligation continues during and after employment, engagement, or association with the Organisation. Any unauthorised disclosure, misuse, or improper handling of confidential information shall be treated as serious misconduct and may result in disciplinary action, termination of employment or engagement, and/or legal action, as applicable.

18.Reporting

18.1.1 The scope of whistleblower reporting includes actual, attempted, or suspected malpractices, unethical conduct, or irregular events, misconduct, whether past or ongoing, including but not limited to the following:

a. Abuse or misuse of authority or position
b. Breach of contract, fiduciary duty, or organizational obligations
c. Negligence or acts causing substantial and specific risk to public health, patient safety, or general safety
d. Manipulation, falsification, destruction, or unauthorized alteration of Organisation data, records, or reports
e. Financial irregularities, including fraud, misrepresentation, embezzlement, or suspected fraud
f. Commission of, or involvement in, any criminal offence
g. Unauthorized disclosure or misuse of confidential, proprietary, or sensitive information
h. Deliberate or wilful violation of applicable laws, regulations, policies, or statutory obligations
i. Wastage, misappropriation, or unauthorized use of Organisation funds, assets, or resources
j. Breach of the Associate Code of Conduct or ethical standards
k. Any other unethical, biased, favoured, imprudent, or non-transparent act that may harm the Organisation, patients, stakeholders, or public interest
l. Disclosures may be made to the Whistleblower Committee or any other designated Committee member through official email or the Organisation's Whistleblower Hotline.

18.1.2 A Reportable Concern received by a member must be forwarded to the Chairperson of the Whistleblower Committee.

18.1.3 Upon submission, each Reportable Concern logged into the Whistleblower Hotline will be assigned a unique Report Key, and an acknowledgement of receipt will be provided, for other mediums of reporting, within 72 hours.

18.1.4 Members, witnesses, and informants who raise concerns or provide information in good faith shall be protected against retaliation, harassment, victimization, or adverse employment action.

18.1.5 The Whistleblower Committee shall ensure that no discrimination, bias, or retaliation occurs against any individual participating in the reporting or investigation process.

18.1.6 Any act of retaliation against a whistleblower shall itself be treated as a serious disciplinary offence.

19. Disciplinary and Corrective Actions

19.1.1 For any non-compliance of the provisions of this Policy, appropriate disciplinary action may be taken against the concerned person/group of persons, which includes, in its recommendation, but is not limited to, the following levels:

Level 1: Verbal Advisory

Level 2: Written Advisory

Level 3: Strong Warning

Level 4: Warning and/or Suspension

Level 5: Termination of employment or engagement

19.1.2 Serious or gross violations may result in immediate dismissal and/or initiation of civil or criminal legal proceedings, as applicable.

19.1.3 Repeated behavioural or conduct-related issues (including misconduct or insubordination) may result in corrective measures, as deemed appropriate as per this Policy.

19.1.4 Escalations and resolution shall be handled through the appropriate hierarchy, including Line Manager / Head of Department (HOD), Human Resources, and Governance / Audit / Whistleblower Hotline, depending on the nature and severity of the matter.

20. Review and Amendment

20.1.1 The Organisation reserves the right to review and revise this policy annually as required at the discretion of management.

20.1.2 Any amendments shall be communicated to all Members in a timely manner.

20.1.3 In case of any conflict between the provisions of the Policy and Applicable Law, Applicable Law shall prevail.

21. FAQs

Q1: Are Members required to read and acknowledge the Code of Conduct?
A: Yes. All Members must read, understand, and formally acknowledge the Code as part of joining and periodically as required.

Q2: Will I face retaliation for reporting misconduct in good faith?
A: No. The Organisation follows a strict zero-retaliation policy. Whistleblowers and witnesses acting in good faith are protected.

Q3: What should I do if I am unsure whether something violates the Code?
A: Yes. Member performance data and discussions are confidential and shared only on a need-to-know basis.

Q4: Can I discuss patient details with colleagues or friends outside work?
A: No. Patient information is strictly confidential and may only be shared with authorized clinical associate directly involved in care.

22. Contact

For any queries related to this policy, please contact the Human Resources Department
Email Id: hrhelpdesk@asterqualitycare.com
Contact No.: Authorised person at your work location

23. Document History & Review

Version	Date	Reviewed by	Approved by	Reasons with Description