

## VIGIL MECHANISM POLICY

Jupiter Life Line Hospitals Limited (hereafter referred to as “JLHL”) believes in promoting a fair, transparent, ethical and professional work environment.

The Vigil Mechanism Policy is implemented not only as a safeguard to unethical practices but intended to provide the best mechanism for reporting genuine concerns or grievance and ensure that deviations from the Company’s Business Mission & Values are dealt with in a fair and unbiased manner as provided in Section 177 (9) and (10) of the Companies Act, 2013 and the Companies Rules, 2014 thereto.

The Vigil Mechanism aims to provide a channel to the Directors and employees to report genuine concerns about unethical behaviour, actual or suspected fraud or violation of the policy.

The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations and in order to maintain these standards, the Company encourages its employees who have genuine concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment.

The mechanism provides for adequate safeguards against victimization of Directors and employees to avail of the mechanism and also provide for direct access to the Chairman of the Audit Committee in exceptional cases.

This neither releases employees from their duty of confidentiality in the course of their work nor can it be used as a route for raising malicious or unfounded allegations about a personal situation.

### **PROCEDURE**

All Disclosures should be reported in writing to the Vigilance Officer of the Company or to the members of the Audit Committee in exceptional cases.

The Contact details of the Vigilance Officer members are as follows: -

1. Chief Executive Officer
2. COO
3. Company Secretary
4. HR Head

Jupiter Life Line Hospitals Limited

Office – Jupiter Hospital, Eastern Express Highway, Thane (West) 400601.

In order to protect the identity of the complainant, the Vigilance Officer will not issue any acknowledgement to the complainants and they are not advised neither to write their name/ address on the envelope nor enter into any further correspondence with the Vigilance Officer.

Anonymous disclosure shall not be entertained by the Vigilance Officer.

On receipt of the protected disclosure the Vigilance Officer shall detach the covering letter bearing the identity of the Sender and process only the Protected Disclosure.

### **MECHANISM:**

All request received under this policy shall be recorded and thoroughly investigated. The Vigilance

office shall make necessary arrangements to investigate the matter and shall submit the report to the Chairperson of the AUDIT COMMITTEE.

A complainant who makes false allegations of unethical & improper practices or about alleged wrongful conduct of the Subject to the Vigilance Officer or the Audit Committee shall be subject to appropriate disciplinary action in accordance with the rules, procedures and policies of the Company.

The complainant, Vigilance Officer, Members of Audit Committee, the Subject and everybody involved in the process shall, maintain confidentiality of all matters under this Policy, discuss only to the extent or with those persons as required under this policy for completing the process of investigations and keep the papers in safe custody.

JLHL holds the right to amend or modify the policy. Any amendment or modification of the policy would be done by an appropriate authority as mandated in law. The updated Vigil mechanism would be shared with the employees, suppliers and vendors thereafter.

**Jupiter Life Line Hospitals Limited reserve the right to modify, add and cancel the points in the Vigil Mechanism policy.**