

# **JUVENOR HEALTHCARE LIMITED**

## **WHISTLE BLOWER POLICY/ VIGIL MECHANISM**

### **INTRODUCTION**

JUVENOR HEALTHCARE LIMITED introduce, as a part of promoting a conducive and ethical working environment, a Vigil Mechanism/ Whistle Blower Policy in the Company. Under this, any of the employees/directors of the Company can freely bring before the Audit Committee his views, make complaints and seek redressal.

### **DEFINATIONS**

“**Audit Committee**” means the committee constituted by the Board of Directors of JUVENOR HEALTHCARE LIMITED in accordance with Section 177 of the Companies Act 2013, which has responsibility for supervising the development and implementation of this Policy

“**Employee**” means any employee or director of JUVENOR HEALTHCARE LIMITED.

“**Whistle-blower**” means any Employee who makes a Protected Disclosure under this Policy.

“**Director**” means every Director of the Company, past or present.

“**Reportable Matter**” means a genuine concern concerning actual or suspected:

- i. fraudulent practices, such as improperly tampering with Reliance Group books and records, or theft of company property;
- ii. Corruption, including bribery and money laundering;
- iii. breaches of the Code of Conduct.

### **OBJECTIVE:**

JUVENOR HEALTHCARE LIMITED follows highest standards of business ethics and management practices in the conduct of its business. Forming a Vigil Mechanism policy is to encourage the employees and directors of the corporation to come forward and express their suspected concerns without fear of punishment or unfair treatment.

### **ELIGIBILITY**

All employees, directors and stakeholders of the Company and all its subsidiaries are eligible to make Protected Disclosures under the Policy. The Protected Disclosures may be in relation to matters concerning the Company.

## **DISQUALIFICATIONS**

- a. While it will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.
- b. Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistleblower knowing it to be false or bogus or with a mala fide intention.
- c. Whistleblowers, who have been found to be making multiple Protected Disclosures which are mala fide, frivolous, baseless, malicious, or reported otherwise than in good faith, will be disqualified from reporting further Protected Disclosures under this Policy.

## **GUIDELINES ISSUED FOR IMPLEMENTATION OF POLICY:**

Any employee/director of the Company who has knowledge of any unethical conduct by another employee or any other person within the Company shall be free to approach the Audit Committee, through Company Secretary and seek redressal in the matter. The employee/director shall produce evidence in support of his complaint. The Audit Committee may examine the matter placed before it and make such investigations and inquiries from the concerned employee/director and other persons as it may deem fit. The matter brought before the Audit Committee will be treated in confidence.

## **PROCEDURE:**

All the Protected Disclosures should be reported in writing by the Complainant, not later than 30 days after the Whistle Blower becomes aware of the same and should either be typed or written in legible handwriting either in English or Hindi or in the regional language. All Protected Disclosure should be addressed to the Vigilance Officer or to the Managing Director or to the chairperson of the Audit Committee. To protect the identity of the Complainant, the Vigilance Officer, shall not issue any acknowledgement to the Complainant and they are advised neither to write their name/address on the envelope nor enter into any further correspondence with the Vigilance Officer.

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.

## **PROTECTION OF WHISTLE-BLOWERS**

1. If a Whistle-blower does provide his or her name when making a Protected Disclosure, Reliance Group will treat as confidential the identity of the Whistle-blower and the fact that a Protected Disclosure has been made, except as otherwise required by law and to the extent possible while allowing an investigation to proceed.
2. A Whistle-blower may make a Protected Disclosure without fear of retaliation or intimidation. Reliance Group prohibits its Employees from engaging in retaliation or intimidation that is directed against a Whistle-blower. Employees who engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action, which may include dismissal from employment.
3. If a Whistle-blower has been found to have made a deliberately false Protected Disclosure that Whistle-blower may be subject to disciplinary action, which may include dismissal.

### **ROLE OF THE AUDIT COMMITTEE**

The Audit Committee is responsible for supervising the development and implementation of this Policy. The Audit Committee shall periodically review the Policy to consider whether amendments are necessary, and, if so, it shall communicate any such amendments to all Employees as soon as possible.

In addition, the Audit Committee shall have responsibility for coordinating the investigation of any serious Protected Disclosures concerning the alleged violation of laws or regulations.

### **CONFLICTS OF INTEREST**

Where a Protected Disclosure concerns the Audit Committee, that member of the Audit Committee shall be prevented from acting in relation to that Protected Disclosure. In case of doubt, the Chairman of the Board of Directors shall be responsible for determining whether a member of the Audit Committee must recuse himself or herself from acting in relation to a Protected Disclosure.

### **AMENDMENT**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the directors, employees and stakeholders unless the same is notified to the directors and employees in writing and displayed on the website in case of stakeholders

\*\*\*\*