

INTERNAL AUDIT

ANTI BRIBERY AND CORRUPTION POLICY

OFFICIAL DOCUMENT

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REVISION LIST

Version	Date	Author	Verified By	Approved By	Revision Reason
1.0	20 th Mar 2015	Sanal Menon	Kesavan Venugopalan	Dr. Ashutosh Raghuvanshi	
1.1	06 th May 2015	Akshay Oleti	Kesavan Venugopalan	Dr. Ashutosh Raghuvanshi	Language correction
1.2	07 th Nov 2015	Akshay Oleti	Kesavan Venugopalan	Dr. Ashutosh Raghuvanshi	Company Name change; Disclosure contact detail

1. Objective

This document sets out the policy of Narayana Hrudayalaya Limited (referred to as 'NH') in mitigating bribery and corruption. The policy is governed by a set of principles and series of procedures. The objective of the policy is to emphasize NHs 'Zero Tolerance' approach towards bribery and corruption.

2. Scope

The scope of this policy extends to NH and all its related subsidiaries and related entities.

3. Principles

NH as a part of fair practices do not pay and accept bribes, either directly or via third parties, in any manner or circumstances. Any violation or breach to this principle by an employee will be viewed seriously and treated as an act of gross misconduct.

4. Practical Procedures

a. Training

Compulsory training will be provided to all associates in ensuring their awareness of this policy, relevant legislation and their obligations under this policy including the code of conduct set as part of their employment.

b. Review

NH will monitor, review and annually report the effectiveness of this policy. The report will be submitted for approval to the Board of Directors.

c. Internal Record Keeping

NH will ensure safe record-keeping of such reviews and timely submission of such reports of such reviews to the senior management.

d. Communication

The Principles and Practical Procedures of this policy will be communicated effectively through employee handbook, induction and the corporate website. The provisions of this policy is also effectively communicated to all NH vendors through written communication and clear statement on NH Corporate website.

e. Employee Conduct

Associates are required to report any knowledge / suspicion of receipt or payment of a bribe/graft. Known suppression of knowledge of such graft is also treated as misconduct.

f. Whistleblowing

NH regards reporting of any instance of bribery or attempted bribery as a responsible 'whistleblowing' and affirms that such associates do not suffer work place harassment, bullying, demotion, penalty, or other adverse consequences.

All disclosures must be addressed to the respective authorities as per the details documented in the organization's Whistle-Blower policy available on the NEST portal.

g. Gifts Register

NH will maintain records of Corporate Gifts and favours extended to its staff (other than doctors) of any amount exceeding gross estimated value of Rs.6,000 and to Doctors over Rs. 10,000. Such records will be reviewed regularly.

h. Contractors and Vendors

NH requires screening procedures to be carried out on those of its agents, advisers, contractors, intermediaries, and other representatives who supply material goods and services to it ("**Associates**") to protect NH from reputational risk of being associated with illegal or corrupt payments.

NH requires all its Associates, Contractors and Vendors are made aware of its Anti-Bribery Principles and Practical Procedures and they reaffirm faith that they do not indulge in any act which is in violation of this policy

5. Reporting

The report and accounts of NH for the Annual General Meeting will include a report on the working and effectiveness of this policy (including the number of reports of bribery and corruption recorded and a short summary of any investigations on them).

6. Exceptions

Any exception to the policy must receive the prior written approval of the Group Head Audits, and or Group CEO.

7. Disclaimer

NH will not be liable and shall not hold any responsibility for any acts of omissions that the participants under this policy may commit in their personal capacity.

8. Effective Date

This is with effect from 1st January 2015.