

NARAYANA HRUDAYALAYA LIMITED

**Business Responsibility
Policy**

1. PHILOSOPHY

Narayana Hrudayalaya Limited was established with the philosophy of providing high quality of healthcare with care and compassion at an affordable cost to the society at large. Towards this end the Promoters of the Company had taken various initiatives which are a first of its kind in the healthcare sector; cardiac procedures at subsidised rate and the concept of community insurance evolved by the Promoters and adopted by the State of Karnataka are few to name. Narayana Hrudayalaya Limited believes in the interest of all its stakeholders and how they are upheld and protected is key to the responsible and sustainable conduct of business.

2. BACKGROUND, OBJECTIVE & SCOPE, EFFECTIVE DATE & IMPLEMENTATION

Background

The Ministry of Corporate Affairs brought out the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business in 2011. The Guidelines were voluntary in nature which may be adopted by corporates in India. The Guidelines were intended for the Indian businesses to embrace the ‘triple bottom-line’ approach whereby its financial performance can be harmonized with expectations of society, the environment and the many stakeholders it interfaces with in a sustainable manner. The Guidelines espouses 9 principles on which companies could focus as a responsible business and these principles are in the realm of social, environmental and economic aspects.

The Securities and Exchange Board of India (SEBI) vide its notification dated 22nd December, 2015, amending the SEBI (Listing Obligations and Disclosure Requirements) (Amendments) Regulations, 2015 mandated that top five hundred listed companies (based on market capitalization of every financial year) have to include Business Responsibility Report as a part of its Annual Report. The Business Responsibility Report to be adopted by Listed Companies under the SEBI Regulations, is based on the aforesaid Guidelines issued by the Ministry of Corporate Affairs and 9 principles laid down therein.

Objective & Scope

Narayana Hrudayalaya Limited was conceptualised and started by its Promoters with the objective of doing business on a socially sustainable principle with a unique concept of providing affordable critical medical care to weaker sections of the society in a corporate set up. This Policy is intended to further enhance its principles in terms of its responsibility towards society and environment as a sustainable business practice.

Applicability and Effective Date

This Policy shall be applicable to Narayana Hrudayalaya Limited, its subsidiaries, all its directors and employees. It shall be effective from 29th May 2017.

Implementation

The Managing Director of the Company shall be responsible for the implementation of this Policy with guidance and advice of the Independent Directors of the company.

3. POLICY

Company's business practices would be governed by the following guiding principles and the Company shall endeavour to ensure compliance with these principles in the course of conducting its business.

Principle 1: Ethics, Transparency & Accountability

Principle 2: Product Lifecycle Sustainability

Principle 3: Employee Well Being

Principle 4: Stakeholder Engagement

Principle 5: Human Rights

Principle 6: Preservation of Environment

Principle 7: Responsible Advocacy

Principle 8: Inclusive Growth & Equitable Development

Principle 9: Customer Value

Principle 1: Ethics, Transparency & Accountability

1. The company shall develop governance structures, procedures and practices that ensure ethical conduct at all levels across its value chain.
2. The company shall assure access to information about its decisions that impact relevant stakeholders.
3. The company shall not engage in practices that are abusive, corrupt, or anti-competition.
4. The company shall truthfully discharge its responsibility on making timely financial and other mandatory disclosures.
5. Every employee of the company shall abide by the values and the commitment to ethical business practices reflected in the company's Code of Conduct.
6. The company shall ensure that genuine concerns of misconduct/ unlawful conduct can be reported in a responsible and confidential manner through its Vigil Mechanism.
7. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 2: Product and Service Lifecycle Sustainability

1. The company shall ensure that its products and services comply with all applicable statutes and regulations;
2. The company shall work towards ensuring that all goods and services are procured, and services delivered embedding the principles of labour practices, human rights, ethics, occupational health, safety and environment as defined in the company's policies namely:
 - a. Code of Conduct
 - b. Code of Ethics
 - c. Environmental and Social Governance Policy
 - d. Fairness at Workplace Policy
 - e. Policy on prevention of sexual harassment at workplace
3. The company shall work towards sourcing significant inputs, products and services in a manner so as to continuously improve the balance between social, economic and environmental impacts ;
4. The company shall continue to progressively factor in relevant social and environmental considerations during the process of development of products / services;
5. The company shall continue to recognise and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property, wherever relevant.
6. In designing the services, the company shall ensure that the processes and technologies required to render it are resource efficient and sustainable.
7. The company shall work towards safe and optimal resource use over the lifecycle of its services, including recycling of resources wherever possible and statutorily not restricted or prohibited;
8. The company shall work with supply chain members that comply with applicable laws and regulations related to labour practices, human rights, bribery & corruption, occupational health, safety and environment ;
9. The Company shall encourage resource efficiency in the supply chain and shall guide supply chain members towards becoming more sustainable.
10. The company shall work towards building capacity such that all the value chain partners, namely the third party manufacturers, service providers including transporters and suppliers of significant inputs, are sensitised and empowered to fulfil their roles and responsibilities towards sustainability ;
11. The company shall raise the consumer's awareness of their rights through education, appropriate and helpful marketing communication, as per the applicable laws and promotion of safe usage its services.
12. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 3: Employee Well Being

Diversity, Equal Opportunity, Freedom of Association

1. The company shall provide and maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
2. The company shall respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.

Prevention of Child Labour/ Forced Labour and Harassment

3. The company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
4. The company shall ensure that no person below the age of eighteen years is employed in the workplace ;
5. The company shall ensure that no employee is made to work against his / her will or to work as bonded/forced labour, or subjected to corporal punishment or coercion of any kind, related to work ;
6. The company shall provide a work environment that is free from any form of discrimination, including but not limited to sexual harassment ;
7. The company shall create systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities.

Employee Well Being:

8. The company shall strive to instil a sense of duty in every employee including those of service providers at the Company's premises, towards their personal safety, as well as that of their co-workers
9. The company shall take cognizance of the work-life balance of its employees, especially that of women.
10. The company shall provide facilities for the wellbeing of its employees including those with special needs.
11. The company shall ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
12. The company shall provide a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
13. The company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. The company shall promote employee morale and career development through enlightened human resource interventions.

Principle 4: Stakeholder Engagement

1. The company shall understand the concerns of its stakeholders, define its purpose and scope of engagement, and commit to engaging with them.
2. The company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders.
3. The company shall strive to give special attention to stakeholders in areas that are underdeveloped.
4. The company shall resolve differences with stakeholders in a just, fair and equitable manner.

Principle 5: Human Rights

1. The company shall integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
2. The company shall recognize and respect the human rights of all relevant stakeholders and groups, including that of communities, consumers and vulnerable and marginalized groups.
3. The company shall, within its sphere of influence, promote the awareness and realization of human rights across their value chain.
4. The Company shall encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 6: Preservation of Environment

1. The company shall utilize natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
2. The company shall take measures to check and prevent pollution. The company shall assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
3. The company shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
4. The company shall continuously seek to improve their environmental performance by adopting cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy.
5. The company shall develop Environment Management Systems and contingency plans and processes that shall help it in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations.
6. The company shall strive to report its environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.
7. The company shall proactively persuade and support its value chain to adopt these principles.

Principle 7: Responsible Advocacy

1. The company shall work with industry organisations that are engaged in policy advocacy in a responsible manner.
2. The company shall ensure that policy advocacy is conducted ethically.

Principle 8: Inclusive Growth & Equitable Development

1. The company shall innovate and invest in products, services and technologies and processes that promote the wellbeing of society.
2. The company shall make efforts to complement and support the development priorities at local and national levels, and assure appropriate resettlement and rehabilitation of communities who have been displaced owing to their business operations.
3. The company shall be sensitive to local concerns while operating in regions that are underdeveloped.
4. The company shall undertake CSR activities in accordance with Schedule VII of the Companies Act, 2013 as per the recommendation of the CSR committee and as per the CSR policy of the company

Principle 9: Customer Value

1. The company shall take into account the overall well-being of the customers and that of society.
2. The company shall ensure that it does not restrict the freedom of choice and free competition in any manner while designing, promoting and selling its services.
3. The company shall educate its customers on the safe and responsible usage of its products and services.
4. The company shall promote and advertise its services in ways that do not mislead or confuse the consumers.
5. The company shall exercise due care and caution while providing services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
6. The company shall provide an adequate consumer feedback mechanism to address customer concerns and feedback.