

## **WHISTLEBLOWER POLICY**

### **Shiva & Shiva Orthopaedic Hospital Private Limited**

#### **1. Introduction**

At Shiva & Shiva Orthopaedic Hospital Private Limited (“The Company”), integrity and ethical conduct are the foundation of our service. Guided by our mission to practice medicine with honesty, compassion, and social responsibility, we are committed to creating a safe and transparent work environment.

This Whistleblower Policy establishes a framework for employees, directors, partners, and stakeholders to raise concerns about misconduct, unethical practices, or violations of law without fear of retaliation.

#### **2. Purpose of the Policy**

The objectives of this policy are:

- To provide a secure mechanism for reporting genuine concerns.
- To encourage a culture of accountability and transparency.
- To safeguard whistleblowers from any form of harassment or victimization.
- To protect the reputation and values of “The Company” as a trusted healthcare institution.

#### **3. Applicability**

This policy applies to:

- All employees (full-time, part-time, and contractual).
- Directors and senior management.
- Consultants, interns, trainees, and volunteers.

- Vendors, contractors, and external partners and service providers engaged with “The Company”.

#### **4. Scope of Reportable Concerns**

Whistleblowers are encouraged to report any act that may amount to:

- Financial misconduct: fraud, misappropriation, bribery, or falsification of records.
- Violation of law: non-compliance with statutory requirements, healthcare regulations, or safety standards.
- Workplace misconduct: harassment, discrimination, abuse of authority, or unethical behavior.
- Endangerment of patient safety: negligence, malpractice, or deliberate withholding of medical care.
- Environmental & safety concerns: unsafe disposal of medical waste, pollution, or practices harmful to community health.
- Any act inconsistent with the Hospital’s vision, mission, and values.

#### **5. Guiding Principles**

- All disclosures shall be taken seriously and investigated promptly.
- The identity of the whistleblower shall remain confidential.
- No adverse action will be taken against anyone raising a concern in good faith.
- Malicious or knowingly false complaints will invite disciplinary action.

#### **6. Roles & Responsibilities**

- Whistleblower: Raise concerns honestly and provide supporting details.
- Ombudsperson/Compliance Officer: Receive and investigate complaints impartially.
- Management & Audit Committee: Ensure fair handling, corrective action, and protection against retaliation.

## **7. Reporting Mechanism**

Concerns may be reported through the following channels:

- Email: [vigilanceofficer@sparshhospital.com](mailto:vigilanceofficer@sparshhospital.com)
- Confidential Letter: Addressed to the Compliance Officer, Shiva & Shiva Orthopaedic Hospital Private Limited Office. Address: No. 146, Infantry Road, Opp. Police Commissioner Office, Bengaluru-560001
- Direct Reporting: To the Ombudsperson.
- Reports should include as much detail as possible: the nature of the concern, persons involved, evidence (if any), and relevant dates.

## **8. Investigation Process**

- Initial review by the Ombudsperson/Compliance Officer.
- Detailed investigation with fairness, confidentiality, and due process.
- A written report with findings and recommendations will be submitted to the Board Committee within 30 days.
- Corrective or disciplinary action will be taken where required.

## **9. Protection of Whistleblowers**

- Whistleblowers acting in good faith will be protected against retaliation, dismissal, demotion, or harassment.
- Confidentiality will be maintained throughout the process.
- Any retaliation against a whistleblower will be treated as a serious violation and attract disciplinary action.

#### **10. False or Malicious Complaints**

While genuine errors or unproven concerns will not result in penalty, deliberate misuse of this policy by lodging false complaints is strictly prohibited and may lead to disciplinary action.

#### **11. Communication & Training**

- This policy will be available on the Hospital's website and Internet.
- Awareness programs and periodic training will be conducted to ensure employees understand their rights and responsibilities under this policy.

#### **12. Review & Amendment**

This policy will be reviewed periodically by the Audit Committee and the Board of Directors to ensure its continued relevance and effectiveness. Amendments may be made as required by law or organizational needs.

#### **13. Commitment Statement**

At "The Company", we reaffirm our commitment to ethical practices, accountability, and patient-first values. We encourage all stakeholders to uphold this culture by fearlessly voicing concerns, thereby protecting not only our organisation but also the larger community we serve.