



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

I. Introduction

Medi Assist Healthcare Services Limited and its Subsidiary Company, Associate Company and any successor company thereof (“Medi Assist Group” or the “Company”) are committed to the highest ethical standards and expect each of its employees to behave ethically in all activities when working on behalf of the Company.

II. Objective

The objective of this policy is to assist the employees of Medi Assist Group in complying with the anti-corruption and anti-bribery laws, its directives including but not limited to Prevention of Corruption Act, 1988 amended in 2018 by the Prevention of Corruption (Amendment) Act, 2018, the United States Foreign Corrupt Practices Act (FCPA), and United Kingdom Bribery Act 2010 (UKBA).

III. Applicability

This Anti-Bribery and Anti-Corruption Policy (this “Policy”) applies to all individuals working for Medi Assist Group at all levels and grades (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, or any other person associated with or dealing with Medi Assist Group (collectively referred to as “Employee(s)” in this Policy).

IV. Definitions

1. “Bribe” is an inducement, payment, reward or advantage offered, promised or provided to any person directly or indirectly in order to gain any commercial, contractual, regulatory or personal advantage.
2. “Corruption” includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral or incompatible with ethical standards. Corruption often results from patronage and is associated with Bribery.
3. “Ethics Compliance Officer”, means a designated employee of the Company, competent and independent to ensure compliance with the provisions of this Policy.
4. “Government and Public Official” means and includes any officer or employee of a government department, agency, legislature, judiciary or instrumentality, or of a public international organization, any person who exercises a public function or acts in an official capacity for a government or public international organization, and any political party, party official or candidate.
5. “Indirectly” means indulging in Bribery or Corruption through another party, such as an agent, consultant, joint venture partner or other intermediary.
6. “Third Party(ies)” means any individual or organization, who / which comes into contact with Medi Assist Group or transacts with Medi Assist Group and also includes actual and potential clients, customers, suppliers, vendors, business contacts, consultants, intermediaries, representatives, subcontractors, agents,

advisers, joint ventures and Government and Public bodies (including their advisers, representatives and officials, politicians and political parties).

7. "Gift" means a gift is considered to be any item, service, favour, money, entertainment or hospitality, offered without expectation of return.

1. General Principles for Gift(s)

- 1.1. Employees should not accept gifts that could potentially influence or be perceived to influence their professional judgment or decisions.
- 1.2. No gifts should be accepted that would violate any laws or regulations.
- 1.3. Gifts should not be solicited.
- 1.4. Repeated gifts from the same source should be courteously declined.

2. What is Acceptable as a Gift

- 2.1. Employees may accept non-cash gifts that have an approximate value of less than INR 10,000/- (INR Ten Thousand) in a year (or another value determined by the organization), given the gift does not conflict with other guidelines in the policy. The acceptance of a gift must be reported by the employee to the employee's direct supervisor or Human Resources or the Ethics Compliance Officer for approval prior to acceptance.
- 2.2. Any gift with an estimated value exceeding INR 10,000/- in a year (or another value determined by the organization) should be politely declined to maintain the integrity of our business. If declining the gift could negatively impact the Company's relationship with the giver, it may be accepted on behalf of the Company, transferred to the organization's pool of gifts and not personally used by the employee. The acceptance of such gifts must be approved by the employee's direct supervisor or Human Resources or the Ethics Compliance Officer.
- 2.3. This Policy does not prohibit normal and appropriate gifts, hospitality, entertainment and promotional or other similar business expenditure, such as calendars, diaries, pens, meals etc. (given and received), to or from Third Parties. However, the key determining factor for appropriateness of the gift or hospitality and/or its value would be based on facts and circumstances under which such gift or hospitality is provided.

3. What is not Acceptable

- 3.1. Accept an offer of a gift of any value or size from any Third Party which is in negotiation with, or is submitting a proposal with the Company except as provided in this Policy.
- 3.2. Give, promise to give or offer, any payment, gift, hospitality or advantage to any Third Party except as provided in this Policy with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given.
- 3.3. Give, promise to give or offer any payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure.
- 3.4. Threaten or retaliate against, another employee who has refused to commit a Bribery offence or who has raised concerns under this Policy.

3.5. Engage in any activity that might lead to a breach of this Policy.

VI. Books, Records and Gift Disclosure

Employees are expected to maintain books, records and accounts that, in reasonable detail, accurately and fairly reflect all payments, expenses and transactions. No undisclosed or unrecorded fund or asset is to be established for any purpose and no false or misleading entries are to be made in the books and records. No payment by the Company is to be made without adequate supporting documentation or made for any purpose other than as described in such documents.

Employees are also required to disclose any gifts received in connection with their employment at the Company using the Gift Disclosure Form and such disclosure must be made within 10 working days of receipt of the gift.

VII. Reporting & Whistleblowing

1. All the complaints, suspicion, or any other concerns shall be raised by any person on the discovery of any corrupt practice or Bribery or any such malpractice shall be promptly brought to the notice of the Ethics Compliance Officer:

Ethics Compliance Officer

Address: Tower D, 4th Floor, IBC Knowledge Park,
4/1, Bannerghatta Road, Bangalore- 560029

Email: eco@mediassist.in

2. Medi Assist regards the reporting of any instance of Bribery or attempted Bribery as a legitimate example of 'whistle blowing' and affirms that no employee will suffer demotion, penalty, or other adverse consequences for reporting examples of or suspicions of the offer or request for or the receipt or payment of bribes.

VIII. Disciplinary Actions

If any employee is involved in an act of Bribery or Corruption he/ she will be violating company guidelines and core values and shall be subject to penalty, suspension, immediate termination of his/her services and other civil or criminal actions shall be initiated as per the applicable law.

IX. Monitoring and Review

1. This Code has been endorsed by the Board of Directors and is available to all employees and associated persons, and, where appropriate, to Third Parties such as suppliers and business partners.
2. The Board of Medi Assist Group Healthcare Services is authorized to amend or modify this Code in whole or in part, from time to time. The revised Code shall be applicable from the date of its approval by the Board.
3. Medi Assist Group reserves the right to vary and/or amend the terms of this Code from time to time.