

CARE HEALTH INSURANCE LIMITED



HEALTH INSURANCE

**Whistleblower Policy
(CHIL/POL/125/007)**

Prepared by:
Head - Payroll & HR
Operations

Reviewed by:
Head – Human Resources

Proposed Approved by:
Board of Directors

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1. OBJECTIVE

- 1.1. The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages disclosures by its stakeholders who have concerns about any suspected misconduct.
- 1.2. The disclosures made under this policy could pertain to concerns about possible irregularities, governance weaknesses, financial reporting issues, violation of law, unethical practices or gross misconduct by the employees of the Company that can lead to financial loss and/ or reputational risk to the organization.

2. DEFINITIONS

“Group Whistle Blowing Committee” (GWIC) means an officer or Committee of persons who is/ are nominated/ appointed to conduct detailed investigation of the disclosure received from the whistleblower and recommend disciplinary action. Currently, Director & General Counsel, Group Chief Financial Officer and Director & Group Head – HR of Religare Enterprises Limited, are nominated as part of the committee.

“Company Whistle Blowing Committee” (CWIC) means an officer or Committee of persons who is/ are nominated/ appointed to conduct detailed investigation of the disclosure received from the whistleblower and recommend disciplinary action. Currently, the Head - HR, Chief Financial Officer and Head - Services International Business is nominated as part of the committee.

3. SCOPE

This policy is applicable to various stakeholders of Care Health Insurance Limited. Various stakeholders under the policy may fall into any of the following broad categories:

- Permanent, contractual & ex-employees (served the company in the last 6 months from making the complaint) of the Company based in India or outside
- Employees of other agencies deployed for the Company
- Directors of the Company
- Contractors, vendors, suppliers or agencies (or any of their employees)
- Any other person having an association with the Company excluding intermediaries

The policy does not aim to address issues related to the following aspects as there are separate means prescribed for them:

- Dissatisfaction with appraisal & rewards – Resolutions can be sought from the Human Resources Department
- Company policies – Resolutions can be sought from the Human Resources Department

Gender harassment - Concerns may be addressed to grievance.care@careinsurance.com under the applicable Harassment Policy.

4. GUIDELINES

4.2. What conducts may be reported: Conduct including but not limited to the following may be reported:

- a) Harmful to the interest of the Customer
- b) Unfair and deceptive in commercial terms
- c) Corruptly supplying profits to others
- d) Driven by personal gain contrary to Company Interest

4.3. How should a Disclosure be made and to whom?

A Disclosure should be made in writing through physical letter or email to 'ombudsperson' as per the given details

Email Address: care.ombudsperson@careinsurance.com

Name of the Ombudsperson: Chairperson of the Audit Committee

Mailing Address:

The Ombudsperson,
5th Floor, 19 Chawla House
Nehru Place – New Delhi
110019

4.4. Is there any specific format for submitting the Disclosure?

While there is no specific format for submitting a Disclosure, the following details MUST be mentioned:

- a) Name, address and contact details of the Whistleblower (include Employee ID if the Whistleblower is an employee).

ANONYMOUS ALLEGATION: Whistleblowers must put their names to allegations as follow-up questions and investigation may not be possible unless the source of the information is identified. Disclosures expressed anonymously will ordinarily NOT be

investigated unless there is a specific or serious charge/allegation and the same is concurred by the committee members. Pseudonymous allegations by misrepresenting/faking identity will also be treated as anonymous allegations.

- b) Brief description of the Malpractice, giving the names of those alleged to have committed or about to commit a Malpractice. Specific details such as time and place of occurrence are also important.
- c) Whistleblower can request for anonymity & in that case the identity of the Whistleblower will be kept confidential to the extent possible given the legitimate needs of law and the investigation.

4.5. Duties of the Whistleblower:

- a) At the time of reporting whistleblower must make reasonable efforts to articulate the following items:
 - i) Details of the Conduct
 - ii) How the whistleblower became aware of the conduct
 - iii) Name and Designation of the offending Employee(s) and Department in which the conduct took place
- b) The appointed actuary and the statutory/internal auditors have the duty to 'whistle blow', i.e., to report in a timely manner to the IRDA if they are aware that the insurer has failed to take appropriate steps to rectify a matter which has a material adverse effect on its financial condition. This would enable the IRDA to take prompt action before policyholders' interests are undermined

4.6. What will happen after the Disclosure is submitted?

- a) The Ombudsperson will forward the Disclosure to a member of the CWIC/ IWIC as appropriate who shall in turn acknowledge the same as soon as practical (preferably within 07 working days of receipt of Disclosure) where the Whistleblower has provided his/ her contact details.
- b) The respective Committee as appointed by the Ombudsperson will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the Disclosure constitute a Malpractice. If the appointed Committee determines that the allegations do not constitute a Malpractice, it will record this finding with reasons and report the same to the Ombudsperson and then communicate the outcome to the Whistleblower.
- c) The Committee for carrying out the investigation will be appointed as per below guidelines:

- i) disclosures against Management Team (typically CEO and his reportees) will generally be referred to GWIC
- ii) Any other disclosures will generally be referred to CWIC

If the alleged Malpractice is required by law to be dealt with under any other mechanism, the Ombudsperson/ Committee shall refer the Disclosure to the appropriate authority under such mandated mechanism and seek a report on the findings from such authority.

- d) The GWIC/ CWIC shall conduct such investigations as soon as practically possible and in any case, not later than 90 days from the date of receipt of the Disclosure. The Ombudsperson may allow additional time based on the circumstances of the case.
- e) Whilst it may be difficult for the Ombudsperson/ Committee to keep the Whistleblower regularly updated on the progress of the investigations, it will keep the Whistleblower informed of the result of the investigations and its recommendations subject to any obligations of confidentiality.
- f) The Ombudsperson/ Committee at its discretion may decide not to disclose the name of the whistleblower to investigating committee members (GWIC/ CWIC) in case of sensitive matters.

4.7. Protection to the Whistleblower

If one submits a disclosure under this Policy, he/she will not be at risk of suffering any form of reprisal or retaliation. Retaliation includes discrimination, reprisal, harassment or vengeance in any manner. Company's employee will not be at the risk of losing her/ his job or suffer loss in any other manner like transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistleblower's right to continue to perform his/ her duties/ functions including making further Disclosure, as a result of reporting under this Policy.

(The protection is available provided that:

- a) The communication/ disclosure is made in good faith
- b) He/ She reasonably believes that information, and any allegations contained in it, are substantially true; and
- c) He/ She are not acting for personal gain.)

Anyone who abuses the procedure (for example by maliciously raising a concern knowing it to be untrue) will be subject to disciplinary action, as will anyone who



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victimizes a colleague by raising a concern through this procedure. If considered appropriate or necessary, suitable legal actions may also be taken against such individuals.

(However, no action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation.

Any other Employee/business associate assisting in the said investigation shall also be protected to the same extent as the Whistleblower. However, a disciplinary action against the Whistle Blower which occurs on account of poor job performance or misconduct by the Whistle Blower and which is independent of any disclosure made by the Whistle Blower shall not be protected under this policy.)

5. GUIDELINES

Investigation

- All the disclosures will be investigated by the Committee (alongwith any appropriate support mechanism as required in the case) as decided by the Ombudsperson.
- In case investigation process leads to another investigation which has not been reported by the whistleblower, Committee may expand the scope and timeline to take final decision. The Committee based on its discretion may take decision based on interim report in cases leading to more investigation and take the final decision after final report is submitted.
- If allegations are against a team member of any of the IWIC/CWIC member(s) or in case of conflict of interest in a given case, the member(s) should recuse themselves and the others on the committee would deal with the matter on hand.

Decision

If the investigation leads the Committee to conclude that an improper or unethical act has been committed, the Committee will recommend the disciplinary or corrective action to be taken against the subject.

- For actions against Management Team Members (typically CEO and his direct reportees), if the case has been referred to the IWIC, findings of the investigation will be presented to the Ombudsperson and based on the recommendations from the Ombudsperson, the Board shall decide on the recommendation.

- For actions against other employees, if the case has been referred to CWIC, investigation findings along with the recommendations on the proposed action will be made to the CEO of the Company with due intimation to the Ombudsperson.

Reporting

- CHIL Audit committee shall be updated on all the disclosures made under the said policy, progress and closures quarterly.

Any investigation beyond 90 days of initial whistleblowing disclosure will be separately presented to CHIL Audit Committee with reasons.

6. COMMITTEE MEMBERS

Group Whistle Blowing Committee (GWIC)

Name	Designation	Contact Details
Nishant Singhal	Director & General Counsel	Email Id: nishant.singhal@religare.com Tel: + 91-11-61405318
Nitin Aggarwal	Group - CFO	Email Id: nitin.aggarwal@religare.com Tel: + 91-11-61405395
Dr. Richa Mishra	Director & Group Head – HR	Email Id: richa@religare.com Tel: +91 -11-61405332

Company Whistle Blowing Committee (CWIC)

Name	Designation	Contact Details
Sanjeev Meghani	Head - Human Resource	Email Id: sanjeev.meghani@careinsurance.com Tel: +91 - 124 - 6141866 , M:+91 8860086195
Pankaj Gupta	Chief Financial Officer	Email Id: pankaj.gupta@careinsurance.com Tel: +91 - 124 - 6141801 , M:+91 9971011654
Siddhartha Kansal	Head - Services International Business	Email Id: siddhartha.kansal@careinsurance.com Tel: +91 - 124 - 6147122 , M:+917838253465

The constitution of the committee can be changed by the CEO, CHIL and Head, Human Resources – CHIL.



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Both the committees may co-opt other members as required.

7. AUDIT COMMITTEE

The audit committee shall be apprised of any changes in the committees.

The Audit Committee shall take appropriate measures on all cases of compliance violation to prevent recurrence of cases of violation reported to them.

Familiarization of the Whistle Blower Policy

The Management will take appropriate measures to make the Whistle Blower Policy known internally to all the Employees of the Company at the time of Induction /other stakeholders. The Company will also notify the employees/stakeholders when there are any changes in the Policy or reporting mechanism.

8. DOCUMENT RETENTION

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

9. 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. CHIL Audit Committee will review and may amend this policy from time to time.

10. EFFECTIVE DATE OF THE POLICY

This Policy will come into effect from the date of approval of the same by the Board of Directors

11.AMENDMENT HISTORY:

Version No.	Description	Date	Prepared By	Reviewed By	Approved By
1.1	Whistle Blower Policy	31 st Oct, 2014	Varidhi Arora	Gaurav Bakshi	Board of Directors
1.2	Reconstitution of Company Whistleblower Committee	28 th Apr, 2016	Amit Mishra	Sanjeev Meghani	Board of Directors
1.3	Reconstitution of Group Whistleblower Committee	26 th Jul, 2016	Amit Mishra	Sanjeev Meghani	Board of Directors
1.4	Reconstitution of Group Whistleblower Committee	24 th Oct 2016	Abhimanyu Sodhi	Sanjeev Meghani	Board of Directors
1.5	a. Format & Content Change : updation of mailing address of Ombudsperson b. Reconstitution of Group Whistleblower Committee	06 th Feb 2017	Abhimanyu Sodhi	Sanjeev Meghani	Board of Directors
1.6	Reconstitution of Group Whistleblower Committee	25 th July, 2017	Abhimanyu Sodhi	Sanjeev Meghani	Board of Directors
1.7	a. Content Change : Ex-employee has also been covered under the scope b. Reconstitution of Group Whistleblower Committee	30 th July, 2018	Amit Gupta	Sanjeev Meghani	Board of Directors
1.8	Reconstitution of Group Whistleblower Committee	6 th August 2019	Amit Gupta	Sanjeev Meghani	Board of Directors
1.9	Reconstitution of Group Whistleblower Committee	04 th Nov 2019	Amit Gupta	Sanjeev Meghani	Board of Directors
2	Change in format as per ISO. Also Reconstitution of Group Whistleblower	18 th Jun 2020	Amit Gupta	Sanjeev Meghani	Board of Directors

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	Committee				
3	Change in Ombudsperson	14 th Aug 2020	Amit Gupta	Sanjeev Meghani	Board of Directors
4	Formatting as per re-branding	03 rd Nov 2020	Amit Gupta	Sanjeev Meghani	Board of Directors
5	Reconstitution of Group Whistleblower Committee	03 rd Feb 2021	Amit Gupta	Sanjeev Meghani	Board of Directors
6	Change in Email Id's	02 nd Aug 2021	Amit Gupta	Sanjeev Meghani	Board of Directors
7	Reinstate	7 th Nov 2022	Amit Gupta	Sanjeev Meghani	Board of Directors