



Environmental Social and Governance (ESG) Policy Framework

Version 1.0

ENVIRONMENTAL SOCIAL AND GOVERNANCE (ESG) POLICY 1.0

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Atulaya Healthcare Group ESG Policy

1. Background and purpose

With a vision to be a leading in the Medical Healthcare Industry, Atulaya Healthcare believes that promotes the integration of Environmental, Social and Governance (“ESG”) aspects is a crucial ingredient to capitalize on opportunities, as well as handling risks. Simply put, Atulaya Healthcare believes that a high standard of business conduct and promoting integration of ESG aspects makes good business sense and is more likely to create sustainable value over the long term. Conversely, poor management of ESG aspects may pose a risk to the reputation and value of businesses.

The purpose of this ESG policy is to outline Atulaya Healthcare’s ESG and responsible investment philosophy and its commitments and by doing so provide guidelines for how ESG aspects are handled in Atulaya healthcare.

Atulaya Healthcare’s day-to-day management of ESG matters and how it is integrated across the company is the responsibility of management. The Board of Director of the company shall constitute ESG Committee and the ESG Committee will assist the Board of Directors related to this ESG policy matters.

Environmental, social, and governance (ESG) criteria have been used for years to assess a company’s performance beyond the black-and-white lines of a profit-and-loss statement, challenging executives to measure the value their businesses create in the context of more fundamental ethical values.

For healthcare organizations, an ESG framework calls for sustainable energy and waste management systems, prods investment in community health, and demands that leaders embrace diversity and inclusion as essential duties. These and other initiatives recognize the fact that running a good healthcare business requires a sense of communal responsibility

2. ESG Policy Statement

Atulaya Healthcare is supported by a diverse, multi-state workforce across India, serving a fairly large customer base and growing. The Company is conscious of its responsibilities towards customers, employees as well as all other stakeholders.

In order to demonstrate the approach and commitment to ESG principles, Atulaya Healthcare commits to:

- Comply with all relevant and applicable ESG statutory rules and regulations
- Maintain a high level of social and ethical conduct within own operations and communicate our ethical standards to the customers, third parties, investors and general public

- Demonstrate accountability to ESG related concerns of all stakeholders
- Measure and monitor ESG performance in the same spirit as financial performance and periodically communicate performance with staff, customers and other key stakeholders
- Allocate resources towards training workforce on ESG policy and commitments. Instill an organization wide culture aligned to our ESG policy
- Regularly review ESG and associated policies considering new and emerging risks as well as stakeholder concerns

3.1. Principles for environmental sustainability:

- To meet the compliance requirement as defined under the Environmental Laws as applicable on the company
- To prepare the compliance report on Environmental Laws as applicable on the Company
- Strive to mitigate environmental risks and impacts associated with it.

3.2 Principles for social sustainability and occupational health and safety:

- Promote and encourage, safe and healthy working culture by engaging our workforce, customers and other stakeholders in a periodic manner
- Respect human rights of all staff (permanent hires as well as those hired through third parties), offer equal employment opportunity to all staff and to not tolerate discrimination or harassment in any form.
- Avoid human rights violations through business relationships with clients and through direct business relationships with vendors.
- Establish and maintain effective grievance channels for all stakeholders
- Prevent child labor and forced labor in any form, within in own operations

3.4 Principles for good governance:

- Develop and implement a robust and effective corporate governance framework, adhering to applicable national regulatory requirements, and in line with leading global guidance on good corporate governance
- Establish robust internal controls, compliance with policies and practices
- Ensure transparency and objectivity in dealing with our stakeholders

4. Policy Ownership and Applicability

This policy is applicable to all associates at Atulaya Healthcare including contractors and part-time consultants, patients, patient attendants, visitors, public and the community around Atulaya Healthcare Pvt ltd and its Subsidiary Companies.

This policy applies to and is communicated to all staff (both permanent and third-party) at all levels and all functions of the organization. The Company shall allocate the appropriate resources and conduct in-house training in order to ensure the effective implementation of the Sustainability policy and corresponding ESG.

Disclosure of this policy shall be maintained on the Company's website for general viewing.

5. Environmental

Atulaya Healthcare recognizes that our planet needs to be a sustainable home for current and future generations.

5.1 Environmental Protection and Awareness

The Company seeks to protect and maintain the quality of the environment, create environmental awareness and promote it among its employees, clients and the communities in which it operates. Accordingly, employees must:

- Operate in compliance with environmental laws and regulations;
- Promptly report to management any environmental violations; and
- Consider opportunities to improve environmental programs Employees should direct any reports of actual or potential environmental violations, or any questions about responsibilities or Company Policies in these areas, to their supervisor.

6. Social

Atulaya Healthcare seeks to earn the trust of our stakeholders by operating our global business in a responsible way to ensure the sustainability of our colleagues, our clients and our communities.

6.1 Human Rights and Labor Management

Atulaya Healthcare endeavors to:

- protect the fundamental human rights of all individuals;
- observe fair and ethical labor practices in our business and our communities, including our relationships with third-party vendors and suppliers;
- respect the human rights of minority and disadvantaged groups; and promoting fair and ethical labor relations with all our colleagues.

As stated in the Atulaya Healthcare HR Policy, the Company has zero tolerance regarding illegal and immoral practices involving child labor, forced labor and modern slavery, including human trafficking. This important subject matter is addressed within the Company's annual mandatory ethics and compliance training program.

6.2 Inclusion and Diversity

The Company supports equal opportunity in its employment practices, including the selection, hiring, promotion, transfer, and compensation of qualified applicants and employees without regard to any characteristic protected by applicable law, including, but not limited to, race and/or ethnicity, color, gender, gender identity, gender expression, sexual orientation, age, religion or belief, national origin or ancestry, citizenship status, language, political affiliation, social or economic status, veteran or military status, marital status, familial status, pregnancy, physical or mental disability, medical conditions, genetic information.

The Company does not tolerate harassment of any of its employees, applicants, vendors or customers, and seeks to maintain a work environment free from harassment. Any form of harassment related to an individual's race and/or ethnicity, color, gender, gender identity, gender expression, sexual orientation, age, religion or belief, national origin or ancestry, citizenship status, language, political affiliation, social or economic status, veteran or military status, marital status, familial status, pregnancy, physical or mental disability, medical conditions, genetic information, and/or any other characteristic protected by applicable law is a violation of this policy and is treated as a disciplinary matter.

6.3 Health and Safety

Atulaya Healthcare is focused on the health, safety and well-being of our employees. We provide employees with a comprehensive package of health care benefits. Atulaya Healthcare is committed to providing a safe workplace for all employees at all Company facilities. Atulaya Healthcare will comply with all applicable workplace health and safety requirements in our facilities.

7. Governance

Atulaya Healthcare is committed to operating our Company with integrity and the highest ethical standards and has implemented comprehensive governance structures and practices that meet or exceed the requirements of applicable laws, regulations and rules.

7.1 Corporate Governance

Atulaya Healthcare maintains robust corporate governance policies to ensure accountability and transparency, manage operational risks and uphold compliance with applicable laws, regulations and rules governing business conduct and ethics.

7.2 Ethics and Compliance

Ethics and Compliance is at the core of what we do. It is the culture that defines how we operate. The company takes seriously its reputation for honest, fair and ethical business dealings around the world. We seek customers and business partners whose ethical standards mirror our own and decline to do business with unethical entities and individuals. Atulaya Healthcare seeks to protect our reputation by operating our business with the highest ethical standards and in compliance with all applicable laws and regulations.

Atulaya Healthcare seeks to maintain compliance all company policies and has a Corporate Compliance Portal that is overseen by our Compliance Officer. The Code of Business Conduct and Ethics, related policies and the Program's operating guidelines are evaluated at least annually and are updated throughout the year, as necessary. Various risk assessments are an integral part of our evaluation. The program includes the following essential elements: Clear Accountability, Risk Assessments, Written Policies and Standards, Training and Education, Operational Controls, Monitoring and Reporting, Independent Testing, Investigations and Response, Anonymous Reporting.

In addition, we also maintain the following measures to deter non-compliance and reduce exposure to unethical opportunities:

- Training and awareness campaigns for employees and contractors on various policies and subject matter;
- Annual anonymous employee ethics and anti-corruption surveys;

7.3 Anti-Bribery and Anti-Corruption

Atulaya Healthcare operates its business ethically and in compliance with all applicable laws and regulations, including compliance with applicable anti-bribery and anti-corruption laws. All Atulaya Healthcare employees are required to complete mandatory anti-bribery and anti-corruption training and testing upon being hired and annually thereafter. This training and testing, which covers receiving and giving gifts, conflicts of interest and proper record-keeping, as well as regular awareness campaigns executed throughout the year, promotes our company's cultural commitment to ethical behavior and compliance.

8. ESG Governance Structure, Roles and Responsibilities

For ESG framework to function properly, it is essential that roles and responsibilities for carrying out the necessary procedures and making decisions are clearly defined. This section defines roles and responsibility of key stakeholders in the ESG framework implementation which is summarized in the below:

- The Company shall develop an effective governance structure with a clear set of roles and responsibilities in order to implement the ESG
- The approach for developing an ESG governance structure is based on a holistic approach to sustainability, with a joined-up structure that operates across the Company. Integration is thus required across business teams dealing with different customer segments, geographies, business functions, product, and revenue models.
- The ESG governance structure and corresponding roles and responsibilities are developed in a way to gradually develop a cross-functional team of people trained and calibrated on ESG aspects.
- The ESG governance structure for the company represents all the relevant internal business and operations areas, led by a member of the Leadership Team. The performance related to various ESG aspects is reviewed at the Leadership.
- The following ESG governance structure is adopted for ESG management as part of core business functions:

The Company understands the importance of a clear and robust ESG governance structure, which is an essential component for long-term success. In this regard, the Company shall establish a dedicated Management ESG Committee which shall report to the Board.



9. Periodic Monitoring and Report of ESG

The Company shall adopt a robust set of procedures to ensure that the business activities are in line with ESG requirements, and there is a process of undertaking continual assessment and improvement to the ESG procedures. The Board of Directors of the Company shall nominate the ESG Committee and ESG Leader.

The ESG Leader shall evaluate the adherence to ESG principles and procedures on quarterly and on an annual basis through an annual performance monitoring process.

These include:

- Quarterly monitoring procedures to track the progress made towards ESG integration
- Half-yearly reporting to the ESG management committee by the ESG Leader
- Annual review and monitoring procedures which includes annual performance assessment, implementation of upgrades to the ESG, including an update to the training programs.
- The ESG Committee shall half yearly report to the Board of Directors of the Company.