

## **Equal Employment Opportunity (EEO) Policy**

**Objective:** At Aarvy Healthcare, Gurgaon (A Unit of Aarvy Healthcare Pvt. Ltd.) ("Aarvy Healthcare"), we believe that our success depends on attracting the best talent and ensuring the full participation and commitment of all employees. Accordingly, it is our policy to provide equal employment opportunities to all individuals and to foster an inclusive workplace where everyone can grow, develop, and contribute to our shared success. Employment decisions are based on qualifications, merit, and business needs, and are made without regard to race, colour, religion, creed, sex, sexual orientation, gender identity, national origin, age, disability, veteran status, marital or domestic partner status, citizenship, or any other characteristic protected by law. Aarvy Healthcare is committed to fully utilising employees' abilities and upholding the principles of equal opportunity at every stage of employment. We also provide reasonable accommodations to qualified individuals with disabilities, unless doing so causes undue hardship.

### **1. Policy Implementation**

- Equal employment opportunity applies to all employment practices, including hiring, promotion, transfer, demotion, recruitment, termination, compensation, and training.
- Aarvy Healthcare is committed to provide a great workplace for the better performance from the employees as well as organization with equal opportunity and free from all types of differences and harassment. We all share responsibility for fostering a respectful environment where employees are welcomed, valued, and rewarded based on their contributions.
- Any form of harassment, intimidation, coercion, discrimination, or retaliation is strictly prohibited, including against individuals who:
  - Make a good-faith internal complaint regarding any policy violation;
  - File a complaint under any equal employment opportunity law or regulation;
  - Participate in an investigation by Aarvy Healthcare or a government agency related to EEO compliance, including under the Rights of Persons with Disabilities Act, 2016 and its rules;
  - Exercise any right under applicable EEO laws.
- Advancing equal employment opportunity benefits Aarvy Healthcare, its employees, and the community. The Head of Human Resources serves as the EEO Compliance Officer, responsible for monitoring effectiveness and ensuring adherence to this policy.
- Managers must ensure full compliance, and employees are expected to support EEO objectives and uphold Aarvy Healthcare's commitment through their conduct.
- Applicants or employees with disabilities covered under the Rights of Persons with Disabilities Act, 2016 should contact the HR Team in case of any concern related to their employment. Any information shared is voluntary, confidential, and used in line with applicable laws. Refusal to share will not result in adverse treatment. Individuals are protected from retaliation for filing complaints or assisting in investigations.
- Employees with questions or queries about this policy are free to contact their Supervisor, Department Head, HR Representative, or the Head of HR for better understanding.
- Any violation of this policy must be reported through the escalation process. Supervisors and managers receiving complaints must immediately inform the HR team.
- Certain roles may not be suitable for persons with disabilities where patient safety or rapid response is critical. An indicative list of such roles is provided in Annexure 1 and may be updated at Aarvy Healthcare's discretion.

## 2. Affirmative Action Policy

Aarvy Healthcare upholds the principles of affirmative action, developing and implementing programs each year to ensure equal opportunities and promote the employment and career growth of persons with disabilities and individuals with special abilities.

## 3. Facilities and Amenities for persons with disabilities

Aarvy Healthcare is committed to providing an inclusive and accessible environment for persons with disabilities, enabling them to perform their roles effectively and excel. To ensure compliance with EEO laws, the organization will:

- Maintain accessibility in physical spaces, transport, and information & communication systems.
- Provide barrier-free facilities and necessary assistive devices to support employees with disabilities.
- Ensure elevators, ramps, and adequately wide walkways, upgrading existing infrastructure as required by law.
- Make website documents accessible in OCR PDF format.
- Appoint a liaison officer in each Unit to oversee recruitment and facilities for employees with disabilities, with the officer's name displayed and reviewed periodically.
- Keep detailed records of employees with disabilities, including personal details, nature of work, and facilities provided.

## 4. Deviations & Exceptions

- Any exceptions to this policy must be approved in advance by the Chief Executive Officer (CEO).
- Aarvy Healthcare may revise, update, or replace this policy at any time without prior notice.

## 5. Miscellaneous

- Any term not defined in this Policy shall carry the meaning assigned to it under EEO Law.

If there is any inconsistency between this Policy and EEO Law, the provisions of EEO Law shall govern.

### Version

Version	Changes	Date	Reviewed By	Approved By
1	Baseline Version	1 October, 2025	Head - Human Resources	CEO/ VP - Operations

**Annexure 1**  
**Indicative list of work areas identified for persons with disabilities**

	Designations	Blind	Deaf	Handicap	Mute
Front Office	Trainee	N	N	Y	N
	PCC / PCE / Sr. PCE	N	N	Y	N
	Call Centre Executive	Y	N	Y	N
	Coordinator	N	N	Y	N
	Asst. / Dep Duty Manager	N			
	Asst. / Dep Manager				
	Manager				
Nursing	Computer Operator / Coordinator / Counsellor	N	N	Y	N
	Staff Nurse / Sr. Staff Nurse / Speciality Nurse	N			
	Team Leader / Incharge				
	Nursing Supervisor				
	ANS / DNS / NS / CNO				
Paramedics	Jr. Pharmacist / Pharmacist / Sr. Pharmacist	N	N	Y	N
	Specialist Pharmacist	N	N	N	N
	Cashier	N	N	Y	N
	Asst. / Officer - Medical Records	N	N	Y	N
	Technician / Sr. Technician / Technologist - OT, CSSD, Dialysis, Gas Manifold, Emergency Medicine	N	N	N	N
	Jr. Scientific / Scientific / Sr. Scientific Officer	N	N	Y	N
	Coordinator / Sr. Coordinator	N	N	Y	N
	Clinical Nutritionists	N	N	Y	N
	Biomedical Engineer	N	N	N	N
	Medical Transcriptionist / Typist	N	N	Y	N
	Physiotherapist / Sr. Physiotherapist	N	N	Y	N
	Psychologist	N	N	Y	N
Support	Assistant / Officer / Executive / Asst. Manager / Dep. Manager / Manager (All Depts)	N	N	Y	N
	Librarian	N	N	Y	N
	Engineering	N	N	N	N
	AMS / DMS / MS	N	N	N	N
	Biostatistics Consultant	N	N	Y	N
	Clinical Research	N	N	Y	N
	Computer Operator / Executive / Coordinator / Departmental Secretary	N	N	Y	N
	Pilots	N	N	N	N

**ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

## **1. POLICY STATEMENT**

Aarvy Healthcare (*a unit of Aarvy Healthcare Pvt. Ltd., “the Company”*) practices a zero-tolerance approach to bribery and corruption and committed to act professionally, fairly with integrity during the course of business activities dealings and relationships wherever it operates and in implementing and enforcing effective systems to counter bribery and corruption in any form.

The Company mandates compliance with all applicable anti-bribery and anti-corruption laws in all markets and jurisdictions in which it operates. Bribery is a serious criminal offence in jurisdictions in which the Company operates, including India (Prevention of Corruption Act, 1988, Indian Penal Code, 1860, Prevention of Money Laundering, 2002, etc.).

This Anti-Bribery and Anti-Corruption Policy (*the “Policy” or ABAC Policy*) has been formulated and designed to provide a framework for ensuring compliance with various legislations governing bribery and corruption globally, and provides guidance on the standards of behaviour to which we must all adhere. The Company’s commitment is to always act with integrity to ensure that we are trusted by our customers, colleagues, business partners and the communities in which we operate. As part of this commitment, any form of bribery and corruption is not acceptable. We prefer foregoing business opportunities rather than paying bribes.

## **2. PURPOSE**

The purpose of this model Anti-Bribery and Anti-Corruption Policy is to ensure that our Company sets up adequate procedures in order to prevent our Company’s involvement in any activity relating to bribery, facilitation payments, or corruption, even where the involvement may be unintentional. It further provides information and guidance to those working for us, including but not limited to our entire supply chain and any third party (or their affiliated enterprises conducting business with the Company) on how to recognize and deal with bribery and corruption issues.

## **3. SCOPE**

The Policy applies to the employees, Assignees, Representatives and all third parties involved in business activities of any type.

“Employees” include all directors, officers, employees engaged directly or indirectly, wherever located regardless of grade and position, in terms of all dealings and transactions.

“Third Party” means any individual or organization who has business dealings with the Company and includes actual and potential business associates, customers, contractors, subcontractors, business partners, suppliers, distributors, business contacts, agents, technical and other consultants and government bodies and officials or any other person associated with or acting on behalf of the Company.

#### **4. BRIBERY AND CORRUPTION**

Bribe is anything of value, including money, gifts and entertainment, other business courtesies, hospitality, or personal gratification given, offered, or received in an attempt to influence a person’s behavior, in order to obtain or retain business, or to secure an unfair benefit or advantage.

Corruption is dishonest behavior by those in positions of power, such as managers or Government Officials. Corruption can include giving or accepting bribes or inappropriate gifts, under-the-table payments or benefits, diverting funds, laundering money and defrauding investors.

#### **5. FORMS OF BRIBERY THAT POSE THE GREATEST RISK**

There can be numerous types of forms of bribery and corrupt practices, but the following areas pose the greatest risk:

##### **a) Gifts and Hospitality**

This Policy recommends that all employees should assess the intention behind any gift or hospitality given or received. Gifts or Hospitality, with the intention of improperly influencing one’s decision-making ability or making the recipient feel unduly obligated in any way, shall never be offered or received. The Company prohibits the offer or receipt of gifts or hospitality that are not reasonable and bona fide.

##### **b) Prohibited activities**

It shall not be acceptable for any employee to:

- i. give, promise to give, or offer, a thing of value with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- ii. give, promise to give, or offer, a thing of value to a government official, agent or employee to facilitate or expedite a routine procedure;
- iii. accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- iv. accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- v. threaten or retaliate against another employee who has refused to commit a bribery offense or who has raised concerns under this Policy; or
- vi. engage in any activity that might lead to a breach of this Policy.

c) POLITICAL CONTRIBUTIONS

The Company upholds its commitment to not support any specific political party or have any political affiliation. No political contributions shall be made on behalf of the Company either directly or indirectly to any political party or for any political purpose without the prior approval of the CEO/ Board of Directors. No employee shall use his job title or Company affiliation in connection with political activities.

d) Charitable contributions and sponsorships

The Company shall ensure that charitable contributions and sponsorships are not used as a vehicle for bribery. We shall publicly disclose all our charitable contributions and sponsorships and ensure that all such transactions are legal and ethical under local laws and practices.

e) Facilitation payments and kickbacks

Facilitation Payments are small expediting or grease payments made to Government Officials to facilitate or expedite the performance of a routine, non-discretionary governmental action that a Government Official is already obligated to perform, such as issuing certain permits, licenses, visas and mail. Facilitation payments do not include any decision by a Government Official to award new business or to continue business with a Company.

A Kickback is a form of negotiated bribery in which a commission is paid to the bribe-taker as a Quid Pro Quo or services rendered. The remuneration (money, goods or services handed over) is negotiated ahead of time. The kickback varies from other kinds of bribes in that there is implied collusion between agents of the two parties, rather than one party to cooperate in the illegal scheme.

The Company prohibits facilitation or grease payments or kickbacks of any kind, regardless of whether such payments are permitted under applicable law. It is our policy that we work to ensure that our agents and other intermediaries, joint ventures and consortia, contractors and suppliers do not make facilitation payments or kickbacks on our behalf.

## **6. RESPONSIBILITY OF EMPLOYEES**

All employees shall ensure that they have read and understood this Policy and must at all times comply with its requirements.

The prevention, detection and reporting of the bribery and other forms of corruption are the responsibility of all those working for the Company or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

Employees shall notify respective HOD/ reporting manager, as soon as possible, if they believe or suspect or have a reason to believe or suspect that a breach of this Policy has occurred or may occur in the future.

An employee who breaches any terms of this Policy shall face disciplinary action, up to and including termination. The Company reserves the right to terminate a contractual relationship with third parties or associated persons if they breach this Policy. The Company may also report the matter to the relevant authorities.

## **7. JUDGEMENT/RESOLUTION IN CASE OF DISPUTE**

If it is difficult to judge whether the planned Business Entertainment is permissible from a review of this Policy, such cases may be referred to the CEO through respective HOD/ reporting manager, who will with the help of legal department will decide whether such expense is within the permitted limits or not under this policy.

## **8. WHISTLEBLOWING**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company encourages openness and supports anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. If a violation of the relevant laws or policies is proven, appropriate action shall be taken.

The Company will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behavior. All reports shall be treated confidentially.

#### **9. PERIODIC REVIEW AND EVALUATION**

The Board of Directors/ CEO will monitor the effectiveness and review the implementation of this ABAC Policy, considering its suitability, adequacy and effectiveness. The Company reserves the right to vary and/or amend the terms of this ABAC Policy from time to time.

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