

Everyone Can Make a Difference

At Fischer Medical Ventures Ltd and its 100% owned subsidiaries, we are committed to upholding the highest standards of corporate ethics and governance. As we grow, our challenge is to redefine new benchmarks in transparency, integrity, and accountability.

The ethical conduct of each individual at Fischer forms the backbone of our success. Our reputation—both as professionals and as a trusted healthcare organization—rests on the choices we make every day. We firmly believe that every member of our team is committed to doing what is right. Yet, in today’s dynamic environment, the right path isn’t always clear.

This Code of Conduct reinforces our shared responsibility to support each other in making ethical decisions. It complements—rather than replaces—our culture of sound judgment, open dialogue, and mutual respect. While it may not address every possible scenario, it serves as a guiding framework for ethical behaviour and responsible action.

If you ever face uncertainty or observe a potential breach of our Code, we encourage you to speak up. Your voice matters. Your actions matter. Each of us has the power to influence and inspire by choosing what’s right.

This Code reflects our dedication to act with integrity in all interactions—with colleagues, patients, partners, regulators, and society at large. Our continued success relies on your commitment to live by these principles. Together, let’s ensure that Fischer remains Powered by Purpose and Driven by Ethics.

When each one of us upholds these values, the power of an individual becomes the strength of a united team. It is through this unity that we will shape a future rooted in trust, excellence, and responsibility.

-Managing Director

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1. Objective

- 1.1 Fischer Medical Ventures Ltd and its 100% owned subsidiaries is committed to building a culture of trust, mutual respect, and collaboration. We believe that our employees, consultants, vendors, and all stakeholders should act with integrity, honesty, and fairness in all their dealings.
- 1.2 The purpose of this Code of Conduct is to articulate the high standards of honesty, integrity, ethics, and law-abiding behaviour expected of all employees, while also meeting the requirements of external stakeholders and applicable laws.

2. Applicability

- 2.1 This policy, along with its related procedures and measures, is applicable to all employees of Fischer Medical Ventures Ltd and its 100% owned subsidiaries, including probationers, trainees, and employees hired on a contractual basis (hereinafter referred to as “Fischer” or “the Company”).
- 2.2 This Code of Conduct applies to all Directors and Employees of the Company. For the purpose of this Code:
- 2.3 “Board” means the Board of Directors of the Company;
- 2.4 “Company” means **Fischer Medical Ventures Ltd and its 100% owned subsidiaries.**
- 2.5 “Employee” means every person on permanent or temporary rolls of the Company at its various business locations;
- 2.6 “Director” means a member of the Board; and
- 2.7 “Senior Management Personnel” means the officers / personnel of the Company identified as senior management in accordance with the provisions of the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- 2.8 Where the Company is a major or strategic shareholder in another company, that company should also be made aware of this Code and encouraged to adopt a similar Code. We aim to choose business partners who uphold moral and ethical values compatible with our own. If we find ourselves in a business relationship (e.g., distributor, agent, joint venture partner, supplier, etc.) where there is a serious incompatibility that cannot be resolved, we will seek to terminate the relationship.

3. Core Values

3.1 Integrity

- We pledge to operate our business with the highest professional integrity and serve as a model corporation for our community.
- We treat our customers, colleagues, shareholders, and suppliers with sincerity, trust, fairness, and impartiality.
- We insist on frank and open-minded discussions, with decisions made objectively based on facts and sound reasoning.
- We do not tolerate illegal behaviour and never accept kickbacks or bribes.

3.2 Excellence in Innovation

- We strive for continuous improvement and creativity in every aspect of our work. Our primary focus is delivering value of the highest standard to our stakeholders.
- We are constantly driven to reduce costs and improve the quality of production across all our businesses through a culture of best practice benchmarking.
- We appreciate brilliant minds that rely on sound analysis and fact-based approaches. Investing in our employees' development is essential to ensure outstanding results for our clients and to build long-lasting relationships.
- We value open discussion and debate in decision-making until the best possible outcome has been achieved. Strict quality control during and after every project ensures that all our deliverables meet the highest standards and lead to reliable, sustainable results.

3.3 Accountability

- We take ownership of our actions, decisions, and their consequences. Accountability means being answerable to our colleagues, stakeholders, and society for the results of our work.
- It includes honouring commitments, admitting mistakes, and proactively taking corrective action to maintain credibility and trust.
- We place the utmost importance on engaging ethically and transparently with all stakeholders, upholding the highest standards of professionalism, and complying with all relevant policies and procedures.

3.4 Empathy

- We recognize and respect the perspectives, feelings, and needs of others. Empathy guides us to listen actively, respond compassionately, and create an inclusive environment where diverse voices are heard and valued.
- We are insightful, respectful, and responsible advisors. Fischer employees offer a unique combination of intellectual and emotional competence to meet our clients' aims and needs.
- We act as partners alongside our clients, focusing on understanding the real problem and offering peer-to-peer advice and tailored approaches.
- Our firm is committed to tolerance and respect. We value diversity as a strength within our organization and understand how to thrive in diverse client environments.
- By appreciating others' perspectives and feedback, we aim to create sustainable solutions for all stakeholders and respond with integrity to the trust our clients place in us. We promote corporate social responsibility and—both as a company and as individuals—we behave as responsible citizens.

3.5 Collaboration & Respect

- All members of the Fischer team must foster an open, inclusive, and respectful environment, encouraging constructive and collegial interactions while discouraging any form of disrespect or hostility.
- Harassment, intimidation, disparagement, or exclusion whether verbal, non-verbal, or physical will not be tolerated.
- Members must treat one another equally and with dignity, regardless of gender, identity, orientation, race, ethnicity, nationality, disability, religion, age, or any other attribute.
- Disagreements and debates are a natural part of collaboration but must always remain professional and focused on ideas rather than individuals.
- When boundaries are unintentionally crossed, members are expected to address the matter promptly and respectfully.
- All Fischer members share the responsibility of maintaining this culture of collaboration and respect both within the organization and when representing it externally.

4. Guidelines

4.1 Responsibility of Employees

All employees are expected to uphold the highest standards of integrity, professionalism, and accountability in the performance of their duties. The following responsibilities must be adhered to at all times:

- a. **Compliance with Policies and Laws:** Employees must follow and comply with all applicable laws, regulations, and Company policies, including but not limited to data protection, intellectual property, and information security.
- b. **Professional Conduct:** Employees shall perform their duties diligently, honestly, and to the best of their ability, maintaining a professional demeanour in all interactions within and outside the organization.
- c. **Confidentiality and Data Protection:** Employees are responsible for protecting the confidentiality of sensitive and proprietary information, including customer data, source code, trade secrets, and other non-public information.
- d. **Use of Company Resources:** Employees shall use Company assets, systems, and infrastructure responsibly and solely for authorized business purposes. Misuse or unauthorized use of such resources is strictly prohibited.
- e. **Reporting Misconduct:** Employees have a duty to report any unethical behaviour, policy violations, or potential breaches of security or confidentiality through the designated reporting channels, without fear of retaliation.
- f. **Continuous Learning and Compliance:** Employees should stay informed about updates to Company policies and complete mandatory training and compliance programs as required.
- g. **Respect and Inclusion:** Employees must foster a respectful, inclusive, and harassment-free workplace, valuing diversity and treating colleagues with fairness and dignity.
- h. **Workplace Conduct:** Employees must contribute to a safe, inclusive, and collaborative work environment, free from discrimination, harassment, or any form of misconduct.

4.2 Responsibility of Managers

Managers play a critical role in upholding the ethical standards and core values of the Company. In addition to complying with the Code of Conduct, managers are expected to:

- a. **Lead by Example:** Demonstrate integrity, fairness, and professionalism in all actions and decisions. Managers must exemplify the behavior expected of all employees.
- b. **Promote a Culture of Compliance:** Foster a work environment that encourages open communication, ethical behaviour, and adherence to policies, laws, and regulations.
- c. **Support and Educate Team Members:** Ensure that team members understand and comply with the Code of Conduct. Provide guidance on ethical dilemmas and escalate issues when necessary.
- d. **Address Misconduct Promptly:** Take timely and appropriate action when aware of any violation of the Code or other Company policies. Managers are expected to report such concerns to HR or the Compliance Officer.
- e. **Ensure Fairness and Inclusion:** Treat all employees equitably and with respect. Avoid favouritism, bias, or discrimination in any managerial decision or workplace interaction.
- f. **Protect Confidential Information:** Uphold the confidentiality of sensitive information, including employee records, Company data, and client information, and ensure their team does the same.
- g. **Monitor Use of Company Resources:** Ensure that employees under their supervision use Company resources responsibly and only for legitimate business purposes.

Failure to uphold these responsibilities may result in disciplinary action, including but not limited to demotion, suspension, or termination, in accordance with Company policies.

All employees must comply with the Competition Act, 2002 and all applicable anti-trust and fair competition laws, ensuring that business is conducted honestly and without anti-competitive practices.

5. Standard of Conduct

- 5.1 The Company is committed to high standards of corporate governance and believes in compliance with all laws and regulations, both in letter and spirit. The Company strives to set standards for itself that are ahead of the times and higher than those stipulated by law. The Company is committed to providing timely, accurate, and complete information as required to all concerned, including its stakeholders.
- 5.2 All employees must conduct business activities in full compliance with the applicable laws, rules, and regulations of the jurisdictions in which the Company operates. This includes, but is not limited to, laws relating to:
- **Data protection and privacy**
 - **Intellectual property**
 - **Employment and labour**
 - **Anti-bribery and anti-corruption**
 - **Fair competition and antitrust**
 - **Health, safety, and environmental standards**
 - **Export and trade controls**
- 5.3 Employees are expected to stay informed about legal obligations relevant to their roles and seek guidance from the Legal or Compliance team when in doubt.
- 5.4 Ignorance of the law is not an excuse. Any actual or suspected violation of the law must be reported immediately through the designated reporting channels. Failure to comply with legal obligations may result in disciplinary action, up to and including termination of employment, and may also subject the individual and the Company to legal penalties.

6. Concern for Quality

- 6.1 Fischer Medical Ventures Ltd and its 100% owned subsidiaries is committed to delivering services of the highest quality standards, backed by efficient customer relationship management, consistent with the requirements of the customers, to ensure their total satisfaction.
- 6.2 Employees shall devote their time and attention to Fischer Medical Ventures Ltd and its 100% owned subsidiaries, its work, clients, and other external stakeholders.

- 6.3 Employees are expected to discharge their duties as entrusted from time to time, faithfully and to the best of their potential.
- 6.4 It is the responsibility of all employees to adhere to the Quality Standards of Fischer Medical Ventures Ltd and its 100% owned subsidiaries in order to ensure that services of the highest quality are provided to clients and external stakeholders.
- 6.5 It is also the responsibility of employees to ensure that all information collected or produced in the course of employment with Fischer Medical Ventures Ltd and its 100% owned subsidiaries is as accurate as possible.

7. Respect, Dignity

- 7.1 The Company's vision is based on inspiring and unleashing the creative potential of its human assets. This is possible only in an environment where we all respect the rights of those around us. In this direction, the Company shall:
 - Treat individuals in all aspects of employment solely on the basis of ability, irrespective of race, caste, creed, religion, age, disability, gender, sexual orientation, or marital status.
 - Not tolerate racial, sexual, or any other kind of harassment.
- 7.2 Always remember that we are asking users to trust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. Our security procedures strictly limit access to and use of users' personal information and require that each of us take measures to protect user data from unauthorized access. Know your responsibilities under these procedures and collect, use, and access user personal information only as authorized by our Security Policies, our Privacy Policies, and applicable data protection laws.
- 7.3 Respect is also demonstrated by contributing to a favourable work environment, such as not playing loud music, keeping cell phones on low volume, and avoiding loud conversations in and around work areas.
- 7.4 All employees are expected to maintain the dignity and propriety of office decorum and to respect the dignity of their colleagues.

8. Professional Conduct and Discipline

- 8.1 The Directors and Employees of the Company should act in accordance with the highest standards of personal and professional integrity, honesty, and ethical conduct. Honest conduct is conduct that is free from any fraud or deception. Ethical conduct is conduct conforming to accepted professional standards and includes the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. Employees shall refrain from using personal connections or relationships to exert external influence on the Company's decisions on any matter relating to day-to-day working or the furtherance of personal interests, including but not limited to promotion, transfer, or job rotation.
- 8.2 Every employee of Fischer Medical Ventures Ltd and its 100% owned subsidiaries, including the head of the Company, shall deal on behalf of the Company with professionalism, honesty, integrity, as well as high moral and ethical standards. Such conduct shall be fair and transparent and be perceived as such by third parties.
- 8.3 Every employee shall be responsible for the implementation of and compliance with the Code in their professional environment. Failure to adhere to the Code of Conduct may attract severe consequences, including termination of employment.
- 8.4 Every employee is a brand ambassador of the Company, and every action of an employee is a reflection of the Company's values and ethos.
- 8.5 Employees are expected to conduct themselves in a courteous and professional manner at Fischer Medical Ventures Ltd and its 100% owned subsidiaries premises and outside whenever they are representing the Company.
- 8.6 Punctuality is an important part of the courtesy one extends to others, and all employees are expected to be punctual in all their commitments within Fischer Medical Ventures Ltd and its 100% owned subsidiaries and outside of it.
- 8.7 Employees should always be aware of their personal appearance and grooming.
- 8.8 Employees should be conscious of their language, courtesy, manners, and conduct with other employees, clients, and other business associates/stakeholders. Negative, abusive, or obscene language will not be tolerated. Employees should demonstrate a sense of pride in Fischer Medical Ventures Ltd and its 100% owned subsidiaries and their work.

- 8.9 Verbal and/or physical threats against Directors, employees, clients, and other stakeholders will not be tolerated.

9. Honesty and Integrity

- 9.1 At all times, employees are expected to uphold the highest standards of honesty and integrity in their conduct, decisions, and communications.

- **Honesty** means being truthful, transparent, and straightforward in all professional interactions, whether with colleagues, clients, vendors, or government authorities.
- **Integrity** involves doing the right thing, even when it is not the easiest path or when no one is watching.

Employees must avoid any form of deception, misrepresentation, or manipulation of information. They are expected to communicate facts accurately, maintain confidentiality, and act in good faith.

- 9.2 Every employee has a responsibility to honour commitments, take accountability for their actions, and speak up if they observe unethical behaviour or practices that may compromise the Company's values or reputation. Engaging in or condoning dishonest behaviour including falsifying documents, misusing Company resources, hiding mistakes, or providing misleading information—will not be tolerated and may result in disciplinary action. The Company believes that honesty and integrity are foundational to a healthy work culture, long-term client relationships, and sustainable success, and expects all employees to consistently reflect these values in their daily work.
- 9.3 Where employees perceive any ambiguity, Fischer Medical Ventures Ltd and its 100% owned subsidiaries expects them to seek immediate clarification of the rules from their reporting managers or the HR Manager. If that is not immediately possible, they should use fair judgment to protect the interests of the Company as well as their own personal interests to the best of their ability.

10. Workplace Free of Harassment

10.1 The Company's vision emphasizes its commitment to safety, health, and responsible care for the environment. The health and safety of people in and around its areas of operation are of paramount importance to the Company.

10.2 As part of the team, Fischer Medical Ventures Ltd and its 100% owned subsidiaries has an unwavering commitment to prohibiting and effectively responding to harassment, discrimination, misconduct, abusive conduct, and retaliation. To that end, Fischer Medical Ventures Ltd and its 100% owned subsidiaries adheres to the following

Guiding Principles:

- a. **Commitment:** Fischer Medical Ventures Ltd and its 100% owned subsidiaries sets a tone at the top to ensure a respectful, safe, and inclusive working environment for all employees and members of the extended workforce.
- b. **Care:** Fischer Medical Ventures Ltd and its 100% owned subsidiaries create an environment emphasizing respect for each individual at all levels of the organization, offering assistance and empathy to employees and members of the extended workforce throughout and after the complaint process.
- c. **Transparency:** Fischer Medical Ventures Ltd and its 100% owned subsidiaries is open and transparent as an organization regarding the frequency of complaints relating to harassment, discrimination, misconduct, abusive conduct, and retaliation, and its approach to investigating and responding to such allegations.
- d. **Fairness & Consistency:** Fischer Medical Ventures Ltd and its 100% owned subsidiaries ensures that all individuals are treated respectfully, fairly, and compassionately in all team interactions, and applies policies, procedures, and outcomes consistently regardless of who is involved.

10.3 We are strongly committed to equal opportunity in all employment decisions and to promoting a culture where everyone is treated with dignity and respect. We prohibit any form of harassment or discrimination based on protected classes. Discrimination or harassment based on a protected class may occur in writing, verbally, physically, or visually (e.g., photos or videos).

- a. Race or skin colour
- b. Sex, sexual orientation and gender identity or expression
- c. Creed or religion

- d. Age
- e. Marital status
- f. National origin, ancestry or citizenship
- g. Pregnancy
- h. Medical condition
- i. Veteran status
- j. Physical or mental disability

11. Safe and Healthy Workplace

- 11.1 We are committed to maintaining a safe, healthy, and violence-free work environment. Behaviour that poses a risk to the safety, health, or security of employees of Fischer Medical Ventures Ltd and its 100% owned subsidiaries, the extended workforce, or visitors is prohibited. If you become aware of any risk to the safety, health, or security of the workplace, you should report it to management immediately. If it is life-threatening or an emergency, contact local police, fire, or emergency responders first and then report it to Fischer Medical Ventures Ltd and its 100% owned subsidiaries.
- 11.2 We follow all safety protocols and procedures applicable to both work processes and workplace security. Fischer Medical Ventures Ltd and its 100% owned subsidiaries employees, consultants, contractors, and guests except authorized personnel or law enforcement officials are prohibited from bringing any kind of weapon into Company facilities. If you see someone with a weapon in the office, report it immediately to the person in charge.
- 11.3 Our position on substance abuse is simple: it is incompatible with the health and safety of our employees, and we do not permit it.
 - Consumption of alcohol is banned at our offices. If alcohol is permitted at a Company-sponsored event, employees are expected to drink responsibly, use good judgment, and never engage in behaviour that leads to impaired performance, inappropriate conduct, endangers others, or violates the law.
 - Illegal drugs in our offices or at Company-sponsored events are strictly prohibited.

If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect their job performance or the safety of others, the manager may request an alcohol and/or drug screening. Reasonable suspicion may be based on objective symptoms such as appearance, behaviour, or speech.

12. POSH

- 12.1 Fischer Medical Ventures Ltd and its 100% owned subsidiaries is committed to providing a safe, respectful, and harassment-free workplace for all employees. Sexual harassment in any form—verbal, physical, visual, or online is strictly prohibited.
- 12.2 All employees have the right to work in an environment free from intimidation, humiliation, or discrimination based on gender or sexuality.
- 12.3 Complaints of sexual harassment will be treated seriously, handled confidentially, and investigated promptly in accordance with the Company's POSH Policy. Retaliation against any individual who raises concerns or participates in investigations is strictly prohibited.
- 12.4 Employees are encouraged to report incidents without fear and to seek support from the designated Internal Complaints Committee. For full details, please refer to the POSH Policy available at the provided link. [POSH Policy](#)

13. Confidentiality of Information and Insider Trading

- 13.1 During the course of employment or dealings with the Company, any information of a confidential nature (whether about the Company, other companies, or individuals) that is known to Directors or Employees shall be treated as confidential unless publicly available. Such information should be used only for the business purposes of the Company. The use of Company information for personal gain is strictly prohibited. The Company also respects the rights of others regarding their confidential information. Where information is received from third parties under conditions of confidentiality, Directors and Employees must comply with those conditions. No one should solicit confidential information from third parties without prior authorization.
- 13.2 An employee of Fischer Medical Ventures Ltd and its 100% owned subsidiaries and their immediate family shall not derive any benefit, or assist others in deriving any

benefit, from access to or possession of information about the Company that is not in the public domain and constitutes insider information.

- 13.3 An employee of Fischer Medical Ventures Ltd and its 100% owned subsidiaries shall not use or share insider information for making or giving advice on investment decisions related to the securities of Fischer Medical Ventures Ltd and its 100% owned subsidiaries.
- 13.4 Such insider information might include the following:
- a. Acquisition and divestiture of businesses or business units.
 - b. Financial information such as profits, earnings and dividends.
 - c. Announcement of new product introductions or developments.
 - d. Asset evaluations.
 - e. Investment decisions/plan
 - f. Restructuring plans
 - g. Major supply and delivery agreement
 - h. Raising finances.
- 13.5 To protect our confidential business information, we: • Never leave confidential information where others can see or access it • Access and store such information only on approved devices • Never discuss confidential matters in public • Ensure confidential information is always secure, even at your office desk • Dispose of all confidential information according to company policy • Always get permission from the Legal Department before sharing confidential information.
- 13.6 Your responsibility to protect confidential business information does not end when you leave the Company. You are still legally obligated to protect confidential information and must not share it with any current, former, or future employers. We depend on you to do what is right and take appropriate measures to preserve our confidential business information.

14. Protection of Intellectual Property

- 14.1 Developing or helping to develop outside inventions that:
- a. relates to Fischer Medical Ventures Ltd and its 100% owned subsidiaries' existing or reasonably anticipated products and services,
 - b. relates to your position at Fischer Medical Ventures Ltd and its 100% owned

subsidiaries, or

c. are developed using Fischer Medical Ventures Ltd and its 100% owned subsidiaries corporate resources,

may create conflicts of interest and be subject to the provisions of Fischer Medical Ventures Ltd and its 100% owned subsidiaries' Non-Disclosure Agreement and other employment agreements.

- 14.2 Intellectual property rights (including our trademarks, logos, copyrights, trade secrets, "know-how," and patents) are among our most valuable assets. Unauthorized use can lead to their loss or serious damage. You must respect all copyright and other intellectual property laws, including those governing the fair use of copyrights, trademarks, and brands. You must never use Fischer Medical Ventures Ltd and its 100% owned subsidiaries (or its affiliated entities') logos, marks, or other protected information for any business or commercial venture without pre-clearance from the Marketing Team. We strongly encourage you to report any suspected misuse of trademarks, logos, or other Fischer Medical Ventures Ltd and its 100% owned subsidiaries intellectual property to HR.
- 14.3 Fischer Medical Ventures Ltd and its 100% owned subsidiaries' communication facilities (including both our network and hardware such as computers and mobile devices) are critical Company assets both physical and intellectual. Be sure to follow all security policies. If you have any reason to believe that our network security has been compromised (e.g., you lose your laptop or smartphone, or believe your network password may have been compromised), please report the incident promptly.

15. Protection of Company Assets.

- 15.1 During your employment with the Company, you will have, or may have had, access to or possession of confidential and proprietary information or materials of the Company (including, but not limited to, information systems and processes, sales figures, projections, estimates, licensee or customer lists, information regarding customer needs and preferences, manufacturing information, pricing information, and promotions). You acknowledge that all such information or materials constitute the protected trade secrets of the Company. You agree that, in the event your

employment terminates, you shall immediately return to the Company all originals or copies of such materials as well as any other Company property. You further agree that both during and after your employment, you shall not disclose or divulge any such confidential or trade secret information of the Company to any firm, individual, or institution without the specific written authorization of the President of the Company. Your obligation to protect Company assets continues in effect regardless of the termination of your employment or this Agreement.

- 15.2 At Fischer Medical Ventures Ltd and its 100% owned subsidiaries, all employees, contractors, and affiliated personnel are entrusted with the responsibility to protect and use the Company's assets responsibly and exclusively for legitimate business purposes, in accordance with applicable intellectual property laws, including the Patents Act, 1970, and the Copyright Act, 1957.

Company assets include:

- **Physical property** (such as laboratory equipment, manufacturing machinery, medical devices, office facilities, and raw materials)
- **Intellectual property** (including patents, trademarks, proprietary formulas, technical designs, and confidential research data)
- **Digital resources** (such as software, electronic records, networks, and communication systems)
- **Financial resources**

- 15.3 Employees must exercise due care in the use and safeguarding of these assets to prevent loss, damage, theft, or unauthorized use. Any suspected misuse, negligence, theft, damage, or security breach must be promptly reported to the relevant manager or through defined internal reporting channels. Personal use of Company assets is prohibited unless expressly authorized and must never interfere with work responsibilities or Company interests.

- 15.4 Access to sensitive data, intellectual property, and technological systems must be strictly controlled and protected in accordance with Fischer Medical Ventures Ltd and its 100% owned subsidiaries' information security policies. Employees must not disclose proprietary or confidential information outside the Company without proper authorization.

- 15.5 The installation of unauthorized software, copying of Company data for personal use, or sharing of confidential information externally is strictly forbidden. Adherence to cybersecurity protocols including secure passwords, cautious handling of emails or attachments, and timely software updates is mandatory.
- 15.6 All Company assets provided for employee use must be maintained in good condition and returned upon termination or transfer of employment. The Company reserves the right to monitor the use of its assets to ensure compliance with this policy.

Violation of this policy may lead to disciplinary action, including termination and legal proceedings, in alignment with company regulations and applicable law.

16. Conflict of Interest

- 16.1 Directors and employees shall not engage in any activity or enter into any pecuniary relationship which might result in a conflict of interest, either directly or indirectly. A “conflict of interest” occurs when an individual’s personal interest directly or indirectly interferes or appears to interfere with the interests of the Company. Directors and employees must act at all times in the Company’s best interests and avoid putting themselves in a position where their personal interests conflict, or appear to conflict, with those of the Company. Personal interests also include those of immediate relatives. Any director, senior management personnel, or employee who is aware of a conflict of interest or concerned that one might develop is required to disclose the matter promptly.
- 16.2 When you are in a situation where competing loyalties could cause you to pursue a personal benefit for yourself, your friends, or your family at the expense of Fischer Medical Ventures Ltd and its 100% owned subsidiaries or its users, you may be faced with a conflict of interest. All of us must avoid conflicts of interest and situations that reasonably present the appearance of a conflict.
- 16.3 When considering a course of action, ask yourself:
- Could this action create an incentive for me or appear to others to create an incentive for me to benefit myself, my friends, my family, or an associated business at the expense of Fischer Medical Ventures Ltd and its 100% owned subsidiaries?

If the answer is “yes,” the action you are considering is likely to create a conflict-of-interest situation, and you should avoid it.

16.4 Below is guidance on seven areas where conflicts of interest often arise:

1. Personal investments:

Employees and directors must avoid investments in competitors, suppliers, partners, or any other business that could create, or appear to create, a conflict of interest with the Company. Any financial interest that could influence judgment or decision-making in the course of Company duties must be disclosed promptly for review and approval. Investments held by immediate family members or close associates that may affect business dealings are also covered under this policy. A minor holding in publicly traded stock is generally acceptable unless significant enough to impact or appear to impact impartiality. Employees must never use confidential Company information to make personal investment decisions. Any change in circumstances that could turn an existing investment into a potential conflict must be immediately reported to the compliance officer or manager.

2. Outside employment, advisory roles, board seats, and starting your own business:

Employees may engage in outside employment or activities only if they do not interfere with their work performance, misuse Company assets or information, or create an actual or perceived conflict of interest. Any secondary work must not negatively impact the Company’s business, influence professional judgment, or compete with Company products or services. Outside activities must not be conducted on Company premises, during working hours, or using Company resources. Employees are prohibited from soliciting colleagues or business partners for personal ventures and must avoid any engagement that could cause confusion about their employment status with the Company. If outside work affects job performance or raises potential conflicts, it must be promptly disclosed to a manager or the compliance office. Prior approval may be required where the outside activity overlaps with the Company’s business interests.

3. Business opportunities found through work:

Employees must not take for personal gain any business opportunity discovered through their position in the Company unless the Company has formally declined to pursue it. Using Company resources, confidential information, or influence to exploit such opportunities is strictly prohibited. Any potential business venture related to the Company's operations must be disclosed to management for review.

4. Inventions:

The Fischer Intellectual Property (IP) organization manages Fischer's IP assets, including patents, trademarks, copyrights, trade secrets, technical designs, and know-how. Fischer owns all IP created by employees during their employment or by third parties working for Fischer. Employees must not privately protect, exploit, or disclose Fischer IP without written authorization from the Fischer Development Company or as provided by law. All inventions or potentially patentable ideas made in the course of employment must be promptly disclosed to Fischer. Employees must not publish or share inventions, trade secrets, or technical know-how without Fischer Legal's written approval.

5. Friends and relatives; co-worker relationships:

Fischer respects employee privacy but recognizes that certain family and personal relationships may pose actual or perceived conflicts of interest. Immediate family members (including spouses, domestic partners, parents, children, siblings, in-laws, and anyone residing in these households) and those with close personal or financial relationships must not be involved in:

- Direct or indirect managerial or supervisory relationships
- Employment-related decisions such as hiring, performance reviews, compensation, or disciplinary actions involving each other

If organizational changes result in such a relationship, employees must promptly disclose this in writing to their manager and director.

6. Accepting gifts, entertainment, and other business courtesies:

Employees must not receive personal benefits or advantages from Fischer business activities beyond their Fischer compensation.

Accepting gifts or entertainment is allowed only if compliant with Fischer's internal policies and does not create real or perceived conflicts of interest.

- Gifts or benefits above approved thresholds must be disclosed and, if required, refused or returned.
- Soliciting gifts or personal Favors from business partners is strictly prohibited.
- If in doubt, employees should consult their manager or the Compliance team.

Directors and Employees shall not engage in any activity or enter into any pecuniary relationship which might result in conflict of interest, either directly or indirectly, in compliance with Section 166(4), Companies Act, 2013 Director's Duty to Avoid Conflict of Interest

17. Acceptance of Gifts and other Benefits

- 17.1 Fischer Medical Ventures Ltd and its 100% owned subsidiaries and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations, or comparable benefits that are intended to or perceived to obtain business or unfair favours for the conduct of its business. However, Fischer Medical Ventures Ltd and its 100% owned subsidiaries and its employees may accept and offer nominal non-cash gifts, the value of which shall not exceed **Rs. 5000/-** per annum, which are customarily given and are of a commemorative nature for special events.
- 17.2 While business gifts and entertainment are customary in many parts of the world, they must be viewed with caution. Directors and employees may accept and offer gifts of nominal value which are customary and/or of a commemorative nature on official events or occasions only. Directors and employees are prohibited from giving or accepting gifts exceeding **Rs. 5000/-** from colleagues and/or business associates during private functions, occasions, or festivals. Directors and employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, gifts, or benefits intended to obtain unethical favours.

17.3 We comply with rules on gifts and entertainment when we:

- a. Never allow gifts or entertainment to affect our business decisions
- b. Never accept gifts or entertainment that might appear to affect our business decisions
- c. Never ask for gifts
- d. Never accept cash or gift cards
- e. Never seek personal gain through our position at Fischer Medical Ventures Ltd and its 100% owned subsidiaries, we may at times give gifts or offer entertainment. Such offers must be:
- f. For a proper business purpose only
- g. Legal and documented
- h. In accordance with company policy
- i. Nominal in value (i.e., not cash or cash equivalent)

At times you may not be sure whether to accept a gift. In such cases, seek help from your manager.

18. Prevention of Corruption and Unfair Practices

18.1 We believe that the right way to do business is the only way to do business. We never offer or accept anything improper to secure business.

18.2 We follow anti-corruption laws in all jurisdictions where we do business. To avoid bribery and corruption, we:

- a. Never offer or accept anything of value to influence a business decision
- b. Follow all policies on gifts and entertainment
- c. Take extra care when interacting with public officials
- d. Know limits on gifts and things of value in all places we do business.
- e. Follow all policies in vetting third parties working on our behalf
- f. Keep accurate, detailed records.

18.3 Bribery involves offering, promising, giving, demanding, or accepting an advantage to induce illegal, unethical, or untrustworthy actions. Corruption refers to the misuse of public office or business position for private gain. Bribery of public officials or agents, whether public or private, is strictly prohibited under the Prevention of Corruption Act, 1988, with severe penalties including imprisonment. Facilitation payments, which

are made to speed up predetermined administrative actions, are also considered acts of bribery and corruption and are strictly forbidden by the Company.

- 18.4 The Company and its employees must never offer or accept undue monetary or other benefits to gain improper advantages or secure business unlawfully. Employees must avoid seeking or accepting payments, favours, or benefits that might influence or appear to influence business decisions. Using contracts, subcontracts, or agreements to channel payments to public officials, employees of business partners, or their associates is prohibited. Employees should always be truthful, cooperative, and courteous when interacting with government or regulatory officials and promptly notify their supervisor or the Legal/Secretarial team if a non-routine request is made. The Company has a zero-tolerance policy against bribery and corruption.
- 18.5 Regarding Corporate Social Responsibility (CSR), the Company commits to supporting communities through its CSR Policy and applicable laws. Charitable contributions must be carefully managed to prevent misuse as a form of bribery, with all contributions made strictly under the CSR Policy. Sponsorships, including sporting and cultural events, will be monitored to ensure they do not disguise bribery. Employees may make personal charitable donations but not as Company representatives or with Company reimbursement.
- 18.6 All employees of Fischer Medical Ventures Ltd and its 100% owned subsidiaries shall strictly comply with all applicable anti-bribery and anti-corruption laws, including but not limited to the Prevention of Corruption Act, 1988 and other relevant statutes. The Company prohibits bribery, corruption, or any form of improper payments or improper influence in all business dealings.

19. Anti-Money Laundering Clause

- 19.1 Fischer Medical Ventures Ltd and its 100% owned subsidiaries is committed to conducting its business in full compliance with applicable laws and regulations related to anti-money laundering (AML), including but not limited to the Prevention of Money Laundering Act, 2002, and associated rules and guidelines issued by Indian regulatory authorities.

- 19.2 All employees are strictly prohibited from engaging in or facilitating any activity that involves or appears to involve the use of funds derived from illegal or unethical sources. This includes, but is not limited to,
- Knowingly engaging in transactions that may involve the proceeds of criminal activity.
 - Assisting in the concealment or disguise of the origin, nature, location, or ownership of assets acquired through unlawful means.
 - Failing to report suspicious financial activities or transactions to the appropriate internal authority.
- 19.3 Employees must exercise due diligence and report any suspicious behaviour or red flags they may encounter in the course of their duties. Any violation of this policy may result in disciplinary action, up to and including termination of employment, and may also expose the employee to civil or criminal liability under Indian law. If you are ever in doubt regarding a transaction or activity, promptly escalate the matter to your manager.

20. Public Officials and Third Parties

- 20.1 Use extra care when interacting with public officials, including employees of state-owned enterprises. Many countries, states, and local jurisdictions have limits on what gifts and other things of value can be offered to these parties. Know these limits wherever you operate. What may be legal in one jurisdiction may be illegal in another.
- 20.2 Fischer Medical Ventures Ltd and its 100% owned subsidiaries is subject to Indian law as well as applicable anti-corruption laws of other countries in which we operate. If you are ever in doubt, contact your manager.
- 20.3 Remember that this also applies to third parties. Third parties cannot be used to make offers that Fischer Medical Ventures Ltd and its 100% owned subsidiaries cannot lawfully make itself. Never offer something of value to a third party if you think it may be passed along to a public official in a pending business deal. Follow our procurement procedures to vet the use of third parties.
- 20.4 If you suspect a third party is misusing Fischer Medical Ventures Ltd and its 100% owned subsidiaries funds (or any funds), report it to the Legal & Compliance Team.

- 20.5 Enforcement: Consequences for violating anti-bribery laws are increasingly harsh. This is as true for individuals as it is for corporations. Criminal and civil enforcement actions are on the rise, often carrying harsh sentences and large fines.

21. Privacy, Security and Freedom of Expression

- 21.1 Always remember that we are asking users to trust us with their personal information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. Our security procedures strictly limit access to and use of users' personal information and require that each of us take measures to protect user data from unauthorized access. Know your responsibilities under these procedures and collect, use, and access user personal information only as authorized by our Security Policies, Privacy Policies, and applicable data protection laws.
- 21.2 Fischer Medical Ventures Ltd and its 100% owned subsidiaries is committed to advancing privacy and freedom of expression for our users around the world. Where user privacy and freedom of expression face government challenges, we seek to implement internationally recognized standards that respect those rights as we develop products, do business in diverse markets, and respond to government requests to access user information or remove user content.
- 21.3 Fischer Medical Ventures Ltd and its 100% owned subsidiaries communication facilities (which include both our network and the hardware that uses it, such as computers and mobile devices) are a critical aspect of our Company's property, both physical and intellectual. Be sure to follow all security policies. If you have any reason to believe that our network security has been violated – for example, if you lose your laptop or smartphone or think that your network password may have been compromised – promptly report the incident to Information Security.
- 21.4 An employee of Fischer Medical Ventures Ltd and its 100% owned subsidiaries and their immediate family shall not derive any benefit or assist others in deriving any benefit from access to and possession of information about the Company which is not in the public domain and thus constitutes insider information.
- 21.5 An employee of Fischer Medical Ventures Ltd and its 100% owned subsidiaries shall not use or proliferate information that is not available to the investing public and which therefore constitutes insider information for making or giving advice on

investment decisions on the securities of Fischer Medical Ventures Ltd and its 100% owned subsidiaries based on such insider information.

22. Involvement in Political Activities

- 22.1 Fischer Medical Ventures Ltd and its 100% owned subsidiaries respect the right of employees to engage in political processes as private citizens. However, any such participation must be done in a personal capacity, outside of working hours, and without the use of company resources or facilities.
- 22.2 Employees must not use the company's name, address, logo, or other assets—tangible or intangible—when participating in or endorsing political parties, candidates, campaigns, or movements. Personal political views should not be presented as those of the company.
- 22.3 While engaging in political discourse, including on social media, blogs, or public forums, employees must ensure that their actions do not adversely affect the company's reputation, neutrality, or working relationships with stakeholders, clients, or government authorities.
- 22.4 The company does not make political contributions (financial or in-kind) to candidates, parties, or political campaigns unless explicitly permitted by law and pre-approved by the Board and the Legal & Compliance Team. This includes contributions made through trade associations or third parties.
- 22.5 Employees in roles involving government interaction or regulatory affairs must exercise particular care to avoid any real or perceived conflict of interest arising from political affiliations or contributions.
- 22.6 If you are considering taking an active role in political office, lobbying, or advocacy that may impact or overlap with the company's operations or interests, you must disclose this in advance to your manager and the Legal & Compliance Team for guidance.

23. Principles of Disciplinary Procedure

- 23.1 No disciplinary action will be taken against any employee until the case has been fully investigated.

- 23.2 At every stage in the procedure, the employee will be advised of the nature of the complaint against him or her and will be given the opportunity to state his or her case before any decision is made.
- 23.3 Except in cases of gross misconduct, no employee will be dismissed for a first breach of discipline. In cases of gross misconduct, the penalty will be dismissal without notice or payment in lieu of notice.
- 23.4 The Disciplinary Committee formed to investigate a reported concern must not include any person who is the subject of the allegation or has any interest in the matter. The Disciplinary Committee should include employees at a higher level than the accused employee.
- 23.5 We expect all of our employees and Board members to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. While the Code is specifically written for Fischer Medical Ventures Ltd and its 100% owned subsidiaries employees and Board members, we also expect members of our extended workforce (temps, vendors, and independent contractors) and others temporarily assigned to perform work or services for Fischer Medical Ventures Ltd and its 100% owned subsidiaries to follow the Code in connection with their work for us. Failure of a member of our extended workforce or other covered service provider to follow the Code can result in termination of their relationship with Fischer Medical Ventures Ltd and its 100% owned subsidiaries.
- 23.6 Directors and employees are accountable for full compliance with this Code of Conduct. Sanctions for breach of this Code shall be determined by the Board in the case of Directors and by the Managing Director in the case of employees. Sanctions may include serious disciplinary action, removal from office, as well as other remedies, all to the extent permitted by law and as appropriate under the circumstances. Any significant breaches of the Code by Directors or employees must be notified to the Board and the Managing Director, as applicable. The Managing Director shall report to the Board any significant breach of the Code.

24. Employee Behaviour

24.1 Employees of Fischer Medical Ventures Ltd and its 100% owned subsidiaries are expected to maintain high standards of professional conduct that reflect the Company's values of integrity, respect, and excellence. This includes:

- **Grooming and Appearance:** Employees should present themselves in a neat, clean, and professional manner appropriate to their role and work environment. Adhering to any department-specific dress codes ensures a positive and respectful workplace atmosphere.
- **Speech and Communication:** Employees must communicate respectfully and professionally at all times with colleagues, clients, suppliers, and other stakeholders. The use of language should be courteous, inclusive, and free from offensive or discriminatory remarks, harassment, or any form of intimidation.
- **Respect for Diversity and Inclusion:** Fischer Medical Ventures Ltd and its 100% owned subsidiaries values diversity in all forms including race, gender, ethnicity, religion, age, disability, sexual orientation, and cultural background. Employees must treat everyone with fairness and respect, fostering an inclusive culture where differences are welcomed and collaboration is encouraged.
- **Workplace Conduct:** Employees are expected to behave ethically, honestly, and responsibly. Disruptive behaviour, discrimination, harassment, bullying, or any conduct that undermines the dignity or safety of others will not be tolerated.

24.2 All employees share the responsibility to contribute to a positive and respectful work environment, supporting teamwork, open communication, and mutual respect. Concerns about workplace behaviour or violations of this policy should be promptly reported to management or the Human Resources department.

25. Punishment for Misconduct

25.1 An employee found guilty of misconduct may be given any of the following punishments commensurate with the offence:

25.2 Minor Punishments

- a. Warning – verbal and written
- b. Fine
- c. Recovery to the full extent of actual or potential loss caused to Fischer Medical Ventures Ltd and its 100% owned subsidiaries.

25.3 Major Punishments

- a. Suspension without pay.
- b. Withholding of increments for a specific period, with or without cumulative effect.
- c. Termination of service with or without notice or payment in lieu of notice.
- d. Recovery to the full extent of actual or potential loss caused to Fischer Medical Ventures Ltd and its 100% owned subsidiaries.

Fischer Medical Ventures Ltd and its 100% owned subsidiaries may also report the case to the police or other appropriate authorities and initiate legal action against the accused.

Documentation of Disciplinary Action: All disciplinary action taken against an employee will be documented in his or her personnel file, beginning with the first verbal warning.

Fischer Medical Ventures Ltd and its 100% owned subsidiaries is committed to providing a workplace free from harassment and discrimination. The Company strictly adheres to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Equal Remuneration Act, 1976, and all relevant laws to ensure a safe, respectful, and inclusive environment for every employee.

26. Whistleblower Policies

26.1 Purpose

The Whistleblower Policy aims to encourage employees and stakeholders to report unethical behaviour, malpractice, misconduct, or violations of legal or regulatory requirements without fear of retaliation.

26.2 Scope

This policy applies to All employees (permanent, temporary, contract) /Directors and officers /Interns and trainees /Vendors, consultants, and third-party partners /Any stakeholder directly or indirectly associated with Fischer Medical Ventures Limited and its fully owned subsidiaries.

Reportable Matters: A Whistleblower may report concerns related (but not limited) to Breach of applicable laws, regulations, or standards /Safety or quality concerns in medical devices or technologies /Fraud, corruption, or embezzlement /Manipulation or falsification of clinical data or trials /Harassment, discrimination, or abuse in the workplace /Health, safety, and environmental violations /Any other unethical or illegal activities.

26.3 Whistleblower Reporting mechanism

- A whistleblower may report concerns through **whistleblower@fischermv.in**.
- Anonymous reporting is permitted; however, in cases of non-disclosure of identity, updates regarding the investigation may not be provided to the informant to maintain confidentiality of operations.

26.4 Whistleblower Policy

- a. Whistleblower policies are critical tools for protecting individuals who report activities believed to be illegal, dishonest, unethical, or otherwise improper.
- b. The organization will not retaliate against a whistleblower. This includes protection from adverse employment actions such as termination, compensation decreases, poor work assignments, or threats of physical harm.
- c. Any whistleblower who believes he or she is being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower to protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.
- d. Whistleblower protections are provided in two important areas: **confidentiality** and **retaliation**. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, comply with the law, or provide accused individuals their legal rights of defence.

26.5 Limitation to protections

- a. A person is not entitled to the protections under this policy unless he or she reasonably believes that the information reported is or is about to become a matter of public concern and reports the information in good faith.
- b. A person is entitled to the protections under this policy only if the matter of public concern is not the result of conduct by the individual seeking protection, unless the conduct was required by his or her employer.
- c. Before an employee initiates a report to a public body under this policy, the employee shall submit a written report concerning the matter to the organization's Director. The employee is not required to submit a written report if he or she believes with reasonable certainty that the activity, policy, or practice is already known to the Director or that an emergency is involved.

26.6 False or Unproven Allegations

Deliberately false complaints may invite disciplinary action; however, complaints made in good faith will not invite action even if the allegations remain unproven.

26.7 Relief and Penalties

- A person who alleges a violation of this policy may bring a civil action, and the court may grant appropriate relief.
- A person who violates or attempts to violate this policy is also liable for a civil fine.

26.8 Procedures and Process

- All complaints will be acknowledged within 7 days of receipt via communication to the sender's email address.
- The Compliance Officer and Whistleblower Committee will take at least 15 days to investigate cases of proven misconduct. An extension may be taken by the Committee but will not exceed an additional 30 days, marking the investigation period at a maximum of 45 days.
- Reports will then be sent to management or the Board for execution of corrective measures.

If an employee has knowledge of or a concern about illegal or dishonest/fraudulent activity, the employee must contact his or her immediate supervisor or the Human Resources Director. All reports or concerns of illegal and dishonest activities will be promptly submitted by the receiving supervisor to the Human Resources Director, who is responsible for investigating and coordinating any necessary corrective action. Any concerns involving the Human Resources Director should be reported to the Director.

The whistleblower is not responsible for investigating the alleged illegal or dishonest activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

26.9 Roles and Responsibilities:

- **Whistleblower Committee:** Receives and investigates complaints and recommends action.
- **Compliance Officer:** Oversees the implementation and adherence to the policy.
- **Board of Directors:** Reviews quarterly summaries of whistleblower cases and ensures policy effectiveness, making additions to strengthen protections.

26.10 Amendment and Review of Policy

Fischer Medical Ventures Ltd and its 100% owned subsidiaries reserves the right to amend, modify, or review the policy in whole or in part at any time in alignment with applicable laws and regulations, subject to the approval of the Board of Directors.

Employees may raise concerns or report violations of this Code or any applicable law without fear of retaliation. All reports made in good faith are protected under the Companies Act, 2013 (Section 177) and the Company's Whistleblower Policy.

FAQ's On Whistle Blower Policy

1. Why do we have a whistle blower Policy?

The whistle blower policy is in place to prohibit and proactively target issues linked to employee integrity by ensuring an effective redressal mechanism. The policy clarifies what integrity means and formalizes a channel for communicating any such issues faced by employees at their workplace.

2. What Kind of issues/practices can be complained about, under this policy?

Following are some examples of practices which are not in consonance with the value of integrity:

- Information Leakage
- Money Leakage
- Disclosing Company Secrets
- Accepting gifts & bribery
- Impairing the image of the company

3. Whom do I complain to in case of such issues?

If you want to communicate on matters relating to non-consonance of integrity, you may directly write to non- consonance of integrity, you may directly write to whistleblower@fischermv.in

4. Will my name be disclosed for lodging the complaint?

No. It will not be disclosed.

5. Will anonymous mail call for action?

No. It will not be considered for action.

6. Will I be punished in case any evidence comes out wrong?

No. You will not be punished & your initiative will be taken as in the interest of the Organization.

27. Waivers

The provisions of this Code of Conduct are expected to be followed at all times. However, in exceptional circumstances, a waiver of certain provisions may be granted, subject to appropriate approvals.

Waiver of any provision of this Code for **officers of the Company** must be approved by the **Code of Conduct Committee**.

Waivers for **all other employees** must be approved in writing by the **Compliance Team** or an authorized member of senior management.

All waiver requests must include a clear justification and will be reviewed on a case-by-case basis. Approved waivers will be documented and retained for reference. No waiver will be granted if it violates applicable laws or undermines the ethical principles of the Company.

28. Corporate Social Responsibility (CSR), Sustainability, and Environment Policy

28.1 Purpose

This Corporate Social Responsibility (CSR), Sustainability, and Environment Policy (“Policy”) has been developed in accordance with Section 135 of the Companies Act, 2013, and the Companies (CSR Policy) Rules, 2014, as amended from time to time. The objective of this Policy is to demonstrate Fischer Medical Ventures Ltd and its 100% owned subsidiaries’ commitment to ethical, sustainable, and socially responsible conduct, community development, and environmental conservation.

28.2 Scope and Applicability

This Policy is applicable to all directors, employees, and business associates of Fischer Medical Ventures Ltd and its 100% owned subsidiaries. It covers all CSR and sustainability initiatives undertaken in India or by the Company’s Indian subsidiaries or associates.

28.3 CSR Objectives

- To undertake and promote socially relevant programs, projects, and activities in accordance with Schedule VII of the Companies Act, 2013.
- To ensure responsible stewardship of environmental resources and integrate sustainability into business practices.
- To foster a volunteering culture among employees, promoting active participation in social and environmental initiatives.

28.4 CSR Focus Areas

- Eradication of hunger, poverty, and malnutrition; promoting health care (including preventive health care) and sanitation; making available safe drinking water.
- Promotion of education, including special education and employment enhancing vocation skills.
- Promoting gender equality, empowering women, and supporting socioeconomically disadvantaged groups.
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water.
- Protection of national heritage, art, and culture.
- Measures for the benefit of armed forces veterans, war widows, and their dependents.
- Rural development projects.
- Slum area development.
- Disaster management including relief, rehabilitation, and reconstruction activities.
- Additional activities may be allowed under the Act, as amended from time to time.

28.5 Sustainability and Environmental Commitments

- Comply strictly with all applicable national and local environmental laws and regulations.
- Continuously improve environmental performance through conservation of resources, energy efficiency, waste minimization, pollution prevention, and adoption of best environmental practices.
- Promote initiatives such as tree plantation, clean water projects, clean energy use, recycling, and biodiversity protection.

28.6 CSR Committee

The Board of Directors of Fischer Medical Ventures Ltd and its 100% owned subsidiaries shall constitute a Corporate Social Responsibility Committee (“CSR Committee”) as per statutory requirements.

The CSR Committee will be responsible for:

- Formulating and recommending the CSR Policy and activities.
- Recommending annual expenditure on CSR.
- Monitoring implementation and reporting progress to the Board.

28.7 Implementation

- CSR projects will be identified and implemented by internal teams or in collaboration with verified external agencies, NGOs, or trusts.
- The Company will prefer CSR projects that are strategic, sustainable, and measurable.
- Employee volunteering will be encouraged and supported.

28.8 CSR Budget and Spending

- Fischer Medical Ventures Ltd and its 100% owned subsidiaries will allocate and spend (If applicable), in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years, in accordance with the Act and Rules.
- Unspent or surplus/deficit amounts will be managed as per the regulatory provisions.

28.9 Monitoring and Reporting

- The CSR Committee shall monitor and review the progress of CSR projects and ensure compliance with approved implementation schedules.
- An annual report on CSR activities will be included in the Board's Report, as required by law, and the CSR Policy will be made available on the Company's website.

28.10 Whistleblower and Grievance Redressal

- Employees, suppliers, and stakeholders may report CSR, sustainability, or environmental concerns or violations through the Company's whistleblower mechanisms.
- The Company assures protection from retaliation and maintains confidentiality in the reporting and resolution process in line with the official Whistleblower Policy currently in force.

28.11 Amendments and Interpretation

- The Board of Directors reserves the right to modify, amend, or update this Policy at any time in compliance with applicable laws.
- Any interpretation or resolution of issues relating to the Policy will rest with the CSR Committee and the Board of Directors.

Fischer Medical Ventures Ltd and its 100% owned subsidiaries is committed to responsible corporate citizenship and the highest standards of legal, ethical, and environmental integrity.

Fischer Medical Ventures Ltd and its 100% owned subsidiaries will allocate and spend (If applicable), in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years, in accordance with the Act and Rules, Section 135, Companies Act, 2013; Companies (CSR Policy) Rules, 2014, Rule 8(3)(a). The Company is committed to providing a safe and healthy work environment in compliance with all applicable health, safety, and environmental laws and regulations, including the Factories Act, 1948, Employees' Compensation Act, 1923 (ECA), Occupational Safety, Health and Working Conditions Code, 2020 (OSH Code) and any other relevant statutory requirements.

29. Global Norms and Cultural Sensitivity

29.1 Fischer Medical Ventures Ltd and its 100% owned subsidiaries operates in a diverse, international environment and is committed to respecting and adhering to global norms while fostering cultural sensitivity across all its locations. Employees are expected to understand and appreciate cultural differences, practices, and values to promote an inclusive, respectful, and effective workplace.

- **Singapore:**

In Singapore, a multicultural and multiracial society, it is important to respect hierarchical structures and observe formal communication styles that prioritize harmony and indirectness. Employees should be mindful of the nation's ethnic and religious diversity and avoid behaviours that might disrupt social or cultural cohesion. Understanding Singapore's emphasis on punctuality, professionalism, and consensus-building is essential for successful workplace interactions and business negotiations.

- **Manila(Philippines):**

In Manila and the Philippines broadly, cultural values such as *pakikisama* (valuing smooth interpersonal relationships), respect for authority, and strong family and community ties play a central role in workplace culture. Employees are encouraged to demonstrate warmth, patience, and collaboration, fostering a supportive and community-oriented environment. Effective communication often involves balancing respect for hierarchy with a personable approach to build trust and teamwork.

- **Indonesia:**

In Indonesia, workplace behaviour is guided by values of respect, harmony, and professionalism, which closely align with the principles of the Code of Conduct. Employees are expected to uphold hierarchical structures, demonstrate courtesy toward colleagues and superiors, and communicate in a polite and indirect manner to maintain positive relationships and avoid conflicts. Building trust, collaboration, and mutual understanding is highly valued and forms the foundation of effective teamwork and successful business negotiations. Demonstrating integrity, accountability, and adaptability is essential to foster an ethical and cohesive work environment.

- **Malaysia:**

In Malaysia, the workplace culture emphasizes mutual respect, inclusivity, and ethical conduct, reflecting the diverse and multicultural nature of the society. Employees are encouraged to follow the Code of Conduct by respecting hierarchical structures, maintaining professionalism in communication, and practicing cultural sensitivity when interacting with colleagues from different backgrounds. Decision-making often involves consensus-building to ensure fairness and balanced outcomes. By demonstrating integrity, courtesy, and responsibility, employees contribute to a respectful, harmonious, and ethical workplace environment where collaboration thrives.

29.2 Fischer Medical Ventures Ltd and its 100% owned subsidiaries encourage all employees to continue learning about cultural nuances, respect diversity, and actively promote inclusivity. The Company supports open dialogue and provides resources to help employees adapt to regional cultural expectations while maintaining compliance with local laws and global business ethical standards.

For more detailed guidance on cultural practices specific to Singapore and Manila, please refer to the Company's cultural sensitivity training.

30. Legal Compliance

30.1 Fischer Medical Ventures Ltd and its 100% owned subsidiaries and its employees are committed to conducting business in full compliance with all applicable laws, regulations, and standards. This commitment extends to laws relating to information technology, data privacy, workplace conduct, anti-corruption, and financial crimes.

1. Information Technology Act, 2000 (IT Act):

The Company adheres to the provisions of the IT Act to ensure the security and integrity of electronic records, digital signatures, and cybersecurity. Employees must comply with Company policies on electronic communications, data security, and the appropriate use of information systems to prevent unauthorized access, cyber threats, and data breaches.

2. Data Protection and Digital Privacy (DPDP) Rules:

Fischer Medical Ventures Ltd and its 100% owned subsidiaries respect the privacy of individuals and complies with applicable data protection regulations, including DPDP principles. Personal data must be collected, processed, stored, and shared only for legitimate business purposes, with adequate safeguards to maintain confidentiality, integrity, and availability. Employees handling personal or sensitive data must do so responsibly and report any data breaches or privacy concerns immediately.

3. Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act):

The Company strictly prohibits sexual harassment in any form and is committed to a safe and dignified workplace. In compliance with the POSH Act, Fischer Medical Ventures Ltd and its 100% owned subsidiaries have constituted an Internal Complaints Committee (ICC), which promptly addresses and resolves complaints of sexual harassment. All employees must adhere to the Company's POSH Policy and participate in awareness and training programs.

Complaints of sexual harassment will be treated seriously, confidentially, and investigated promptly in accordance with the Company's POSH Policy.

Retaliation against any individual who raises concerns or participates in investigations is strictly forbidden. Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Rule 7 of POSH Rules.

4. Prevention of Money Laundering Act (PMLA), 2002:

The Company maintains robust systems to detect and prevent money laundering activities and financial fraud. Employees must not engage in or facilitate any transactions that could involve laundering proceeds from illegal activities.

Compliance with anti-money laundering laws, including customer due diligence and transaction monitoring, is mandatory.

All employees are strictly prohibited from engaging in or facilitating any activity that involves or appears to involve the use of funds derived from illegal or unethical sources. Prevention of Money Laundering Act, 2002; FATF Guidelines

5. Anti-Corruption and Bribery:

Fischer Medical Ventures Ltd and its 100% owned subsidiaries enforces a zero-tolerance policy towards bribery, corruption, facilitation payments, and unethical business practices. All employees must conduct business honestly and fairly, avoiding conflicts of interest and ensuring transparency in dealings with government officials, clients, and partners.

6. Whistleblower and Reporting:

Employees are encouraged to report suspected legal violations, unethical behaviour, or compliance failures without fear of retaliation. The Company provides secure and confidential channels for raising concerns and ensures timely investigation and corrective action.

7. Employees' Compensation Act, 1923 (ECA):

Provides mandatory compensation to employees or their families for injury, disability, or death during employment.

- Applies regardless of employer fault if the accident arises out of employment.
- Ensures financial security and legal compliance.

8. Occupational Safety, Health and Working Conditions Code, 2020 (OSH Code)

Consolidates various workplace safety laws into a single framework.

- Mandates safe working environments, hazard prevention, and reporting of accidents.
- Requires employers to provide protective equipment and health checks.
Should be referenced in safe workplace, emergency response, and safety compliance sections.

9. Code on Wages, 2019

Unifies laws on minimum wages, payment of wages, and equal pay.

- Mandates timely payment and prohibits discrimination in remuneration.
- Promotes fairness in compensation.
Relevant for salary, diversity, and non-discrimination policies in the COC.

10. Rights of Persons with Disabilities Act, 2016

Prohibits workplace discrimination against persons with disabilities.

- Requires reasonable accommodation and equal opportunity.
- Ensures accessibility and inclusion in employment practices.
Should be included in diversity, inclusion, and equal opportunity sections.

11. Environmental Protection Act, 1986

Provides the legal framework for environmental protection and pollution control.

- Enforces standards for emissions, waste management, and resource conservation.

- Enables sustainable business practices.
Links directly to CSR, sustainability, and environmental policies in the COC.

12. Factories Act, 1948 (*if Fischer has manufacturing/lab facilities*)

Ensures safety, welfare, and working conditions in industrial units.

- Mandates regular inspections, safety training, and accident reporting.
- Requires health and welfare facilities for workers.
Should be part of workplace safety and compliance sections.

13. Industrial Relations Code, 2020

Governs employment terms, disciplinary procedures, and dispute resolution.

- Standardizes termination and grievance handling processes.
- Encourages harmonious employer-employee relations.
Relevant for disciplinary procedures, misconduct, and dispute resolution clauses.

14. Shops and Establishments Act (State-specific)

Regulates working hours, holidays, leave, and employee welfare in commercial establishments.

- Varies by state but mandatory for office-based businesses.
- Protects employee rights on work conditions and rest periods.
Should be mentioned in working hours, leave, and general HR policy sections.

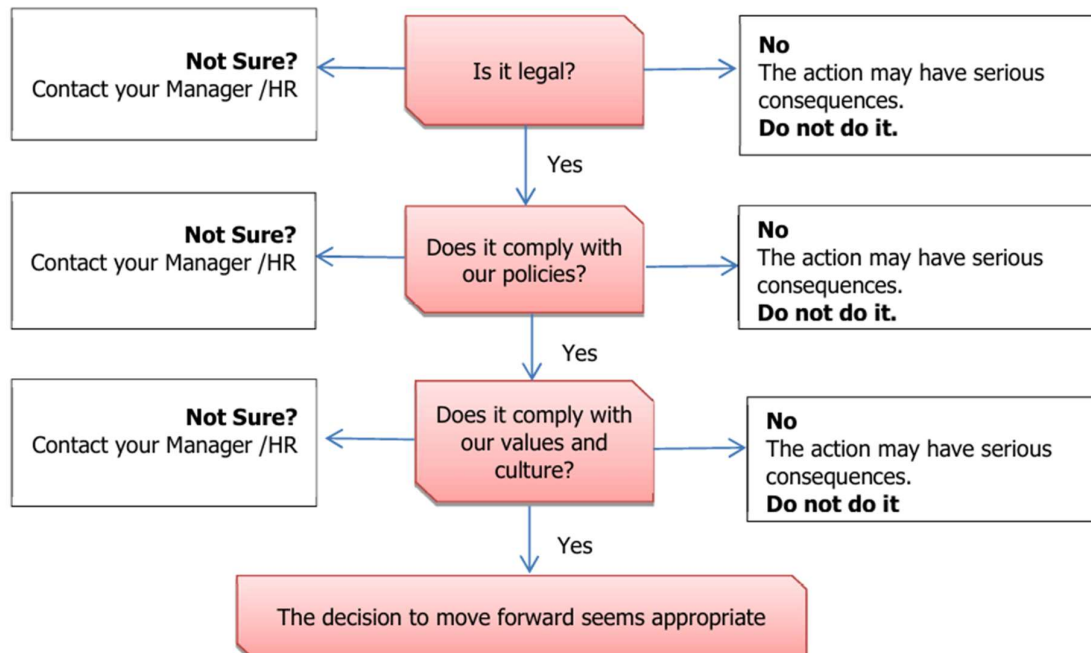
30.2 This Legal Compliance clause applies universally to all Fischer Medical Ventures Ltd and its 100% owned subsidiaries employees, contractors, and third-party associates. Non-compliance with applicable laws and this Policy may result in disciplinary action, including termination and legal proceedings.

31. Ethics Decision Framework

- 31.1 At Fischer Medical Ventures, employees are guided by a clear Ethics Decision Framework to address dilemmas and ensure integrity in all business actions.
- 31.2 When faced with ethical questions, employees should pause, assess the situation against the Company's values and policies, and consider legal and reputational

implications. If uncertain, individuals are encouraged to seek advice from their manager, the Compliance Team, or the Legal Department.

- 31.3 The framework promotes transparency, accountability, and responsible decision-making to uphold trust with stakeholders. All employees are required to follow this framework consistently to maintain a culture of honesty and ethical excellence.



32. Acknowledgment, Sign-Off, and Training

- 32.1 All employees, consultants, and third-party contractors of Fischer Medical Ventures Ltd and its 100% owned subsidiaries are required to thoroughly review, understand, and comply with the Company's Code of Conduct and all related internal policies. Upon receipt of the Code of Conduct, each individual must formally acknowledge their understanding and agreement to fully abide by its provisions. This acknowledgment must be provided in writing, either as a signed physical document or through a secure electronic platform designated by the Company.

32.2 The formal acknowledgment process consists of:

- Reading the complete Code of Conduct and any referenced or supplemental policies.
- Completing an Acknowledgement Form, declaring that the recipient has read, understood, and agrees to comply with all policies, and understands the consequences of non-compliance.
- Submitting the signed form to the Human Resources (HR) department for record-keeping within the employee's official personnel file.

New hires are required to complete this process as part of their onboarding. Additionally, all employees must renew their acknowledgment annually or within 30 days of any material update to the Code or related policies, whichever occurs first. HR will notify employees of updates and provide access to revised versions.

32.3 Mandatory Training:

- To ensure a clear understanding of the Code of Conduct, Fischer Medical Ventures Ltd and its 100% owned subsidiaries conducts compulsory training sessions for all employees, both at the time of induction and on an annual basis thereafter. These sessions cover topics such as business ethics, anti-corruption, data privacy (including DPDP and IT Act compliance), anti-money laundering, prevention of sexual harassment (POSH), workplace behaviour, and cultural sensitivity, especially for global operations. Department-specific training may also be required based on job roles or regulatory requirements.
- Training modules are interactive and may include e-learning, live seminars, workshops, or assessments to verify comprehension. Employees who do not complete the required training within specified deadlines may face restrictions on certain work duties or escalation to management for further action.
- HR is responsible for maintaining all acknowledgment forms and training completion records, ensuring compliance with internal audit and regulatory requirements. Line managers are tasked with facilitating training participation and escalating any compliance concerns.

32.4 Affirmation and Commitment:

By signing the acknowledgment, employees affirm their ongoing obligation to:

- Adhere to all legal and ethical standards set by the Company.
- Seek clarification from HR, Legal, or Compliance teams if they have any doubts about the Code or related policies.
- Report any suspected violations or misconduct through the established reporting channels without fear of retaliation.

I hereby confirm that I have received, read, and understood the Fischer Medical Ventures Ltd and its 100% owned subsidiaries Code of Conduct and all referenced policies. I commit to fully adhere to these standards both during and, where applicable, after my association with the Company. I understand that any breach of these provisions may result in disciplinary action, which could include termination of employment and potential legal consequences.

Employee Name (Print)
Date

Employee Signature
Company Stamp

Failure to complete the acknowledgment or training requirements, or repeated non-compliance, may result in corrective or disciplinary measures in accordance with Company procedures.

Annexure - I
List of Code of Conduct Members at Fischer

S.no	Name	Designation
1	Ms. Svetlana Rao	Executive Director
2	Mr. R Alagaraja	Chief Technology Officer
3	Mr. Yogendra Kumar Sharma	VP - Manufacturing
4	Mr. Sannasi T	Head - HR
5	Mr. Chitti Babu	Legal