



Human  
Wellness

# Non- Retaliation Policy



RESPECT each other's differences

FREEDOM in your work and  
personal lives

TRUST you as an adult

TRUTH in what we do every day



**MEGA COMMITMENT**

is to provide

**Quality Products and Services to  
Our Customers**

**Through constant Improvement and  
Innovation**



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## Introduction

We are all privileged to work for one of the finest companies. It is our utmost responsibility and duty to preserve and strengthen our Company's worldwide reputation built by people over many years. We have built our successes on the strong foundation of sustainable, transparent & Ethical business practices and quality products. Our quest for growth and excellence goes hand in hand with unflinching commitment to integrity in all our relationships with employees, customers, suppliers, government, local communities and our collaborators and shareholders.

The Non-Retaliation policy ('Policy') is aimed at conducting effective business through good corporate governance and to build a sustainable business with growth, social acceptance and stakeholder wellness.

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## Foundation

Mega Lifesciences believes in inculcating freedom of expression and communication within its' work spaces including but not limited to offices or any venues work linked to Mega Lifesciences outside its' offices like trips, conventions, outdoor meetings, virtual meetings, etc. This Non-Retaliation Policy (Policy) is made alongside and also in reference to Mega Lifesciences' Business Ethics and Code of Conduct, Whistle-Blower Policy, Anti-Harassment and Anti-Discrimination Policy and Sustainability Policy. In addition, Mega Lifesciences has a Supplier Code which is for evaluation of our business partners in line with Mega Lifesciences' vision to promote sustainable work culture in our stakeholders' work places.

This Policy is aligned in letter and spirit with the following:

- i) Universal declaration of Human rights and United Nations Guiding Principles on Business and Human Rights (UNGP)
- ii) Fundamental conventions identified by the International Labor Organization



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## Scope

This Policy shall apply to all Directors, Executives and employees (permanent/ contractual/ on-deputation in and on-deputation out of the Company), consultants and trainees of Mega and business partners including but not limited to suppliers, contractors, healthcare partners and Joint Venture partners ( 'employees').

This policy shall be applicable from December 01, 2021 and Mega or its Board of Directors/ Board of Management has the right to amend this policy from time to time.

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## Policy statement

Mega Lifesciences wishes to create a work space free of unethical and unlawful behavior in which people are encouraged to share their concerns. Consequently no adverse action will be taken against employees or third party for raising issues, asking questions, reporting threat to employees or public health, reporting improper practices, complain about, participating in investigation or assisting in the investigation (in each case 'Protected activity') of suspected violation of Mega Lifesciences' Business Ethics and Code of Conduct, any of the company policies or applicable laws, unless allegation made or information provided is found to be intentionally fake or not made or provided in good faith.

Any employees engaging in Protected activity will be shielded against retaliation. To be specific retaliation, without being exhaustive, may include:

- i) Termination
- ii) Suspension
- iii) Denial of or delayed promotions
- iv) Failure to give equal consideration for the respective position
- v) Withholding any benefits during work or upon retirement/ resignation
- vi) Being subject to Intimidation or hostile work environment



Mega Lifesciences shall ensure non-retaliation even in the event matters are not confirmed upon fair investigation. However, complainant will be disciplined in the event a false allegation is made intentionally by providing false, misrepresenting or misleading information during investigation or complainant has acted in bad faith. In such cases the outcome may be punitive and may not fall short of termination of employment in case the complainant is an employee and withholding benefits/ appropriate legal action within applicable legal framework.

Mega Lifesciences depends on and encourages employees to raise questions or concerns that the company can take appropriate action on. All employees are required to report any suspicion of improper or wrongful activity. Reports of suspected improper or wrongful activity will be treated confidentially, and employees have the choice to report concerns anonymously. If submitting a concern anonymously, it is important to provide sufficiently detailed information regarding the subject matter of the concern and identify potential witnesses to enable Mega Lifesciences to effectively address the concern.

Employees who believe they have either witnessed retaliation or been personally retaliated against or that any other violation of this policy has occurred, or who have questions concerning this policy, must immediately notify the Head Coach or Chief Coach or may write to [audit.committee@megawecare.com](mailto:audit.committee@megawecare.com) and or [whistleblow@megawecare.com](mailto:whistleblow@megawecare.com). We take all claims of retaliation very seriously and reports will be reviewed promptly and investigated where appropriate.

This Non-Retaliation policy does not exempt employees from the consequences of their own misconduct or inadequate performance, and self-reporting such issues is not Protected Activity. The policy also does not prevent company from managing employee performance and addressing conduct issues after an employee has engaged in Protected Activity, so long as Protected Activity is not the reason for the performance management.



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## Non-Compliance

Any Director, Executive, Manager or employee of Mega Lifesciences or entities to whom this Policy applies who violates this Policy retaliates against an employee engaged in a Protected activity or who otherwise violates this policy is subject to disciplinary action which may even include termination of employment.