

Star Health and Allied Insurance Company Limited

**STAR HEALTH
CODE OF CONDUCT
AND ETHICS**

Document Summary

Document Name:	Code of Conduct and Ethics
Current Version:	1.0
Document classification:	Internal

Revision History

Version No	Date	Description	Author	Reviewed by	Approved by
1.0	Sep 20, 2023	Code of Conduct and Ethics	Risk Management	EX-COM Members	Board
1.0	Apr 30, 2024	Code of Conduct and Ethics	Risk Management	EX-COM Members	Board
1.0	Apr 29, 2025	Code of Conduct and Ethics	Risk Management	EX-COM Members	Board

Revision Details

Change reference	Change details	Date
1.0	New Policy Created	Sep 20, 2023
1.0	Implementation for FY 2024 - 25	Apr 30, 2024
1.0	Implementation for FY 2025 - 26	Apr 29, 2025

MESSAGE FROM THE CEO's DESK

At Star Health Insurance, we are dedicated to fostering a legacy of trust, unwavering integrity, and exceptional services. Our commitment to becoming a symbol of trust begins at the heart of our customer-centric mission.

Our company's ethos demands nothing less than the highest standards of professionalism, ethics, and morality from each member of our remarkable team. This Code of Conduct and Ethics (Code) serves as our compass, guiding us towards ethical and responsible operations that reflect the very essence of Star Health.

At Star Health, we are more than a team; we are a community bound by shared values. In a world where healthcare and insurance intersect, our responsibilities are profound. We are entrusted with the well-being and security of individuals and families during their most challenging moments. This Code is a testament to our dedication to treating each policyholder, healthcare partner, and colleague with respect, fairness, and transparency. It empowers us to make decisions that align not only with our company's success but also with the well-being of those we serve. It's not just a document; it's a commitment to weave into our daily practices, ensuring that our choices remain rooted in integrity.

Embrace this Code and let it be the bedrock upon which we cultivate a culture of trust, empathy, and accountability, particularly within our health insurance operations. Employees are expected to uphold the highest ethical standards and conduct themselves with honesty, integrity, and fairness in all business dealings. Through these principles, we contribute to an environment that safeguards financial interests and enhances the physical and emotional well-being of those we serve.

Thank you for being an integral part of our journey towards excellence and integrity in the realm of health insurance. Together, let us champion the values that transform Star Health from a mere business entity into a compassionate guardian of health and security.

1. ETHICAL CONDUCT

Every employee of the Star Health, including the Senior Management (as defined in the SEBI regulations), is expected to consistently demonstrate culturally appropriate behaviour. They should represent the company with professionalism, honesty, and integrity, upholding the highest moral and ethical standards. This behaviour must always be fair and transparent, ensuring that it is perceived as such by external parties.

All employees are strongly encouraged to avoid any actions, whether through negligence or intention, that might be interpreted as misconduct by the Company. These actions could result in breaches of company policies, the Code of Conduct and Ethics, financial irregularities, mismanagement, fraudulent activities, misappropriation of company assets, misuse of authority, or any other conduct with a comparable impact or intention, including attempts to engage in such activities.

Each employee is accountable for implementing and adhering to the Code in their professional environment. Non-compliance with this Code may result in serious consequences, up to and including termination of employment or engagement.

2. EQUAL OPPORTUNITY EMPLOYER

Star Health values diversity and believes that a diverse workplace builds a competitive advantage and hence provides equal opportunities to all employees and to all eligible applicants for employment in the Company. Star Health does not unfairly discriminate on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability, economic status, pregnancy and/or paternity/maternity status or

any other category. We value diversity and believe that a diverse workplace builds a competitive advantage. All employees are expected to treat their colleagues in the same spirit and refrain from any kind of discrimination.

Recruitment and promotion of employees is solely based on performance, merit, competence, and potential. Every employee of Star Health should be permitted to work in a business-like atmosphere that promotes equal employment opportunities.

You can refer more details in Equal Employment Opportunity Policy.

3. PROMOTING DIVERSITY AND EMBRACING OPPORTUNITY

Our aim is to attract and advance the most exceptional talent within an environment that thrives on diversity, welcoming individuals with a wide range of skills and innovative ideas. We believe that an inclusive and diverse workforce is a catalyst for innovation, strengthening our competitive standing in the market.

We recognize that the foundation of our success lies in the valuable contributions of our people, who have a clear understanding of our business. Star Health remains steadfast in its dedication to recruit expertise and offer our talent a positive business milieu, leadership prospects, and equitable compensation.

4. COMPLIANCE WITH LAWS AND REGULATIONS

We are governed by various laws and regulations related to health insurance, data protection, anti-corruption, consumer protection, etc. The company ensures that all the operations, as well as the products and services offered, follow the letter and spirit of law.. The company will ensure that its employees are provided with a safe and healthy workplace and are treated with respect and dignity,.

It is the responsibility of every employee to strictly observe and adhere with applicable laws, regulations, and industry standards. Any violation of such laws or regulations may lead to disciplinary action, including termination.

5. ACCOUNTABILITY AND EFFICIENCY

Star Health aims to promote efficiency in all its operations and accountability amongst all employees. The Company provides its employees with the necessary tools to effectively and efficiently service the markets in which it operates and requires employees to operate as efficiently and effectively as possible, providing the highest level of customer service, while adhering to all operational accountability standards of the Company. At all times, equally share the responsibility for our successes and accept accountability for our failures.

Employees should provide accurate and complete information in all business communications and maintain proper records and documentation. Any actions or decisions taken on behalf of the company must be transparent, accountable, and in the best interests of the company and its stakeholders.

6. ETHICAL SALES AND CUSTOMER COMMITMENT

Engaging in inappropriate sales tactics and pressuring customers to purchase unnecessary products, a practice often referred to as "mis-selling" in pursuit of meeting targets, is unacceptable. Such behaviour not only harms our customers but also tarnishes the reputation and credibility of Star Health. This contradicts our core goal of being a customer-centric organization. Instead, the focus should be on assisting customers in making well-informed decisions tailored to their specific needs, their financial profile, and the most suitable products to fulfil those requirements. As we act in an advisory capacity when selling health insurance products, it is imperative that we align our recommendations with the customer's needs, risk tolerance, and financial objectives.

Our long-term success at Star Health hinges on building trust, satisfaction, and loyalty among our customers. Therefore, it is paramount that we thoroughly understand our customers' needs and act in their best interests to foster sustainable business relationships.

7. REPORTING STRUCTURE AND ACCOUNTABILITY

At Star Health, we place great importance on maintaining a transparent and accountable organization. To ensure the effective implementation of our Code, each department within our company, operates with a systematically defined reporting line and clear accountability. Within each department, employees are aware of their direct supervisors and department heads. This structured reporting hierarchy ensures that employees know where to turn when faced with ethical dilemmas or concerns related to compliance with our Code.

Every department, from frontline to management, holds accountability for upholding the principles and guidelines outlined in our Code. Department heads and managers are responsible for ensuring that employees under their supervision are familiar with and adhere to the standards.

This systematic approach to reporting and accountability empowers employees to voice concerns, seek guidance, or report potential violations without fear of retaliation. Star Health remains committed to fostering a culture of integrity, transparency, and ethical behaviour across all departments and levels of our organization.

8. CREATING AND MAINTAINING A PROFESSIONAL WORKING ENVIRONMENT

Employees are expected to maintain a workplace which honours human dignity, respects individuals, and establishes high professional standards.

- Employees must treat teammates with respect, share responsibility for successes and accept accountability for failures.
- Employees are prohibited from creating situations which are threatening, intimidating, hostile, resulting in spreading of false rumours or displays of abusive behaviour in the workplace.
- Employees should strive to maintain a disciplined, ethical, healthy, and productive work environment.

Senior Leadership Team and Department Heads set the precedent for all employees, their conduct reflects on the Company, and they bear extra obligations to promote ethical conduct, make judicious choices, and foster a workplace that upholds human dignity, values individuals, and upholds elevated professional standards.

Our work environment transcends the confines of Star Health offices. When fulfilling their official responsibilities, employees are anticipated to uphold the same principles that govern a professional workplace at Star Health offices, both in essence and in practice.

9. ANTI-HARASSMENT POLICY

Star Health actively promotes a work environment where every employee is valued and harassment in any form is strictly prohibited, regardless of whether it originates from a manager, colleague, client, supplier, or visitor.

Furthermore, we expressly forbid the misuse of our communication tools, equipment, systems, and services, including email, intranet, and internet services, to create an environment that is hostile, discriminatory, or offensive. This includes the downloading, transmitting, viewing, or exchanging of any content such as "jokes," pictures, stories, videos, or other materials that may be perceived as threatening, harassing, demeaning, or offensive to any individual.

Star Health has a zero-tolerance approach for sexual harassment and takes all allegations seriously. We have put in place Prevention of Sexual Harassment(POSH) policy as required under provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“Act”), to prevent any act of sexual harassment against women at our offices and to provide proper procedure for resolution, settlement or prosecution of acts of sexual harassment by taking all possible preventive/remedial steps.

Employees found guilty of any kind of harassment will face disciplinary actions, including termination if necessary. Anyone experiencing or reporting such unwelcome behaviour can trust that the matter will be handled with the utmost sensitivity and care.

You can refer more details in Workplace Anti-Harassment Policy and the POSH policy.

10. CONFLICTS OF INTEREST (COI)

At Star Health, employees in their roles must not utilize their position for inappropriate personal gain, either for themselves or their family members / relatives. We are committed to avoiding any conflicts of interest that may arise between personal interests and the interests of the company. Any potential conflicts of interest should be promptly reported to the HR Head, who will decide the best course of action.

Employees of Star Health are prohibited from engaging in any business, relationship, or activity that could negatively impact the company's interests. Such conflicts may arise when an employee, in their personal capacity, engages in business or relationships with parties involved in transactions with the company, stands to benefit personally or benefit their relatives by influencing decisions related to transactions, and when they are unable to exercise impartial judgment in the company's best interests.

Our employees must not knowingly place themselves in positions where their interests may clash with those of Star Health. Furthermore, maintaining a stable personal financial situation is essential to ensure undivided attention to their responsibilities at Star Health.

Our Conflict of Interest (COI) Policy serves as a valuable resource for employees, guiding them in identifying, preventing, and reporting potential conflicts of interest. It also emphasizes the importance of safeguarding the interests of both the company and our policyholders. Any concealment of information critical to the business of the company and in contravention to the COI Policy may warrant necessary disciplinary action including termination.

You can refer more details in Conflict-of-Interest Policy.

11. OUTSIDE BUSINESS ACTIVITIES | CONCURRENT EMPLOYMENT

Star Health Employee shall not, without the prior written approval of the CHRO / MD&CEO of the Company, engage in concurrent employment or take up a position of responsibility (such as a consultant or a Director) with any other company. They are also prohibited from providing "freelance" services, with or without remuneration, to competitors of the Company.

Not-For-Profit: Star Health employees desiring to serve as a Director, Trustee, Officer, Owner, or Partner of a 'Not-For-Profit' organization as a volunteer and without compensation (for example, on the Board of a school, hospital, co-operative, or social organization) need to obtain prior approval from CHRO if there are no actual, potential, or perceived conflicts of interest in writing. In case conflicts of interest arise, Star Health employees must avoid any appearance of impropriety in association with their conduct. All Conflicts of Interest should be disclosed to the organization in line with the COI Policy.

You can refer more details in Conflict-of-Interest Policy.

12. PERSONAL RELATIONSHIPS

The employees should act independently and ensure that their business decisions are not influenced by their immediate family members or any other person with whom they share a close personal relationship.

13. REPRESENTING THE COMPANY RESPONSIBLY

Star Health is committed to meeting the information requirements of the public and its stakeholders. In all instances where the company shares business information with various audiences, including the media, financial community, employees, shareholders, agents, and distributors, only authorized Employees are allowed to represent Star Health. These authorized representatives bear the responsibility of disclosing company information.

It is imperative that only authorized individuals speak on behalf of Star Health, ensuring that the information provided is complete, fair, accurate, timely, and understandable. Any requests from investors, analysts, or the media should be directed to the Publicity Department or Chief Corporate Strategy & Investor Relations Officer.

Furthermore, all public statements associated with Star Health, its employees, and channel partners should be carefully considered, and personal views should be separated from the company's official stance. Never give the impression that you are speaking on behalf of Star Health in any personal communication, including user forums, blogs, chat rooms, Social Media Platforms and bulletin boards.

- Employees should refrain from speaking publicly on behalf of the company unless they have explicit authorization from the Management.
- If a media representative seeks comments on company-related matters or the health insurance sector, employees should direct the request to the Publicity Department, which will seek necessary approvals and provide guidance on permissible content.
- Usage of the company's name, logo, or branding in advertising, promotional materials, customer references, or press releases by suppliers or other parties requires prior approval from the Branding Team.
- Company stationery should not be used for non-company business communications.
- Employees should avoid associating the company with their personal opinions or implying endorsement by the company in personal affairs, unless authorized.
- When publishing articles, delivering speeches, or giving lectures on business, professional, or managerial topics, employees must clarify that they are acting as private individuals and not as representatives of Star Health.
- Employees should be cautious and careful not to mix their personal and business lives, and keep in mind at all times, the global audience of social media.
- Use of social media for grievance redressal related to business is prohibited.

You can refer more details in Gifts, Meals & Entertainment Policy and Social Media Policy.

14. COMMUNICATING WITH REGULATORS AND OTHER GOVERNMENT OFFICIALS

In the event of an inquiry from regulators, whether it comes through telephone, mail, message or a personal visit, Employee should promptly reach out to the Compliance Department. For inquiries from regulators that are beyond the usual scope of Star Health's regulatory interactions, they must be reported immediately to the Compliance Department before responding.

In all responses to regulators, it is crucial to provide comprehensive, factual, and accurate information. Documents must always be kept transparent, unaltered, and preserved during a regulatory inspection or examination. Likewise, making false statements or providing misleading information to regulators or auditors, is strictly prohibited.

If a Star Health Employee is served with legal documents like a subpoena, they must immediately notify the Legal Department and send the documents without delay. Furthermore, no Employee of the Company is permitted to write, publish, or share articles, news, or views related to the Company including Promoters or Regulators/Government Bodies, without obtaining prior written permission from the Compliance Department.

Employees are encouraged to actively cooperate with regulatory authorities, ensuring the truthful reporting of any violations related to regulations, laws, internal processes, contract requirements, guidelines, and more, in their capacity as involved parties, witnesses, or based on their roles and responsibilities.

15. POLITICAL NON-ALIGNMENT

Star Health shall not support, directly or indirectly, any specific political party or candidate for political office. The Company's conduct shall preclude any activity that could be interpreted as mutual dependence/favour with any political body or person. The Company shall not offer or give any Company funds or property as donations, directly or indirectly, to any specific political party, candidate or campaign.

Star Health Employees have the right to engage in community affairs and support the political party or candidate of their choice, as granted by the Constitution of India. However, employees are prohibited from using Star Health's name in connection with any political campaign.

It is crucial to ensure that personal political activities do not conflict with responsibilities at Star Health or imply the company's endorsement.

- No employee shall take an active part in politics, represent a political party and contest for election anywhere outside the company and shall not involve other employees, clients, suppliers, vendors, or any other party with whom the company does business.
- Employees may not contribute or solicit political contributions, the company's funds or assets, resources to any political candidate, party, or similar organization. Under no circumstances will the company directly or indirectly reimburse any employee for their individual contributions.

16. PARTICIPATING IN COMMUNITY SERVICES

Star Health encourages its employees to be actively involved in civic affairs and corporate social responsibility (CSR) programs of the company. When speaking on public issues, employees should do so only as individual citizens of the community and must be careful not to create the impression they are acting for or representing the views of Star Health.

17. TRANSACTING WITH PEOPLE OUTSIDE THE COMPANY

Star Health treats all customers, distributors, and vendors fairly and honestly. All employees have a responsibility to translate Company's policies and established procedures into practice. In dealing with outside groups and when providing products and services, each employee must uphold the company's values and never act in a manner that may create an appearance of impropriety or bring disrepute to the company's name in any manner.

- Employees must never directly or indirectly offer payments or other inducements to a customer to make a sale.
- Employees must not misrepresent Star Health's products and services in advertising, public statements, or offerings.
- Employees should give fair consideration to all prospective suppliers. Purchasing decisions should be based on objective judgment of the vendor's reliability and integrity, on the value of the offering and adherence with applicable policies of the company.

Anti-Competitive Practices: Star Health strictly prohibits any form of anti-competitive behaviour. We are committed to fair and transparent competition within the healthcare and insurance industry. Our employees and stakeholders must

avoid engaging in practices that hinder market competition, manipulate prices, or unfairly disadvantage competitors. We will adhere to Competition Act and other applicable laws and regulations, upholding the principles of fairness and integrity in all business dealings.

18. RESPECTING STAKEHOLDERS INTERESTS

Star Health equally respects interests of stakeholders such as customers, competitors, suppliers, any related agency, etc. The company's commitment to dealing with such external stakeholders is based on the principles of fair competition, compliance with laws and regulations of the land and in the spirit of honesty and integrity of the company's corporate values. The company policy in its treatment of competitors, is not to engage in disparagement, predatory conduct, theft of proprietary information, or interference with existing contractual relationships. While maintaining a competitive outlook in the market, company shall practice the following:

- When seeking information about Star Health's competitors in matters relating to the marketplace as a means of enhancing the Company's competitive position, information must not be gained through illegal acts or through the sanctioning of illegal acts by others.
- Employees are expected to follow transparency in all business dealings
- Employees should respect the confidentiality, privacy and intellectual property of external stakeholders
- Transfer of accurate and complete information from and to Star Health's customers while complying with internal proprietary policies, data protection laws and any contractual obligations
- Give fair hearing to any concerns from Star Health's customers while acting promptly on the resolution. If the complaint involves data privacy or an accounting or auditing matter, special measures will be followed.

19. SPEAK UP CULTURE

The Company is committed to adhere to the highest standards of ethics, morality, legality, integrity and professionalism in all the business operations. To maintain these standards, the company encourages disclosures by its stakeholders who have concerns about any suspected misconduct. The company encourages an open and transparent system of working environment between the employees, policy holders, contractors, vendors, suppliers or agencies and members of general public coming in contact with the company and enable them to raise concerns regarding any serious irregularities happening within the company. The policy ensures that Whistle Blowers are protected from any harassment or any unfair practice or treatment and such concerns raised are properly investigated and necessary action is taken.

You can refer more details in Whistle-blower Policy.

20. PRIVACY POLICY

Star Health's commitment to safeguarding the privacy of personal information, whether pertaining to valued customers or dedicated employees, is unwavering. The company views this commitment not merely as a policy but as a fundamental corporate duty and an individual responsibility that every member of the organization must uphold with the utmost diligence. In this regard, Star Health has implemented stringent measures to ensure that any lapses or negligence in protecting sensitive information are taken seriously. Ignorance or disregard of these privacy protection measures will attract strict disciplinary actions. Such actions may include but are not limited to reprimands, suspension, termination of employment, or legal action,, depending on the severity of the breach and its impact on data privacy

Star Health's disciplinary actions are designed to serve as a deterrent against any breaches of privacy and underscore the company's commitment to maintaining the highest standards of data security and confidentiality. Such actions may include but are not limited to reprimands, suspension, termination of employment, or legal action, , depending on the severity of the breach and its impact on data privacy. These measures are not intended to be punitive alone; they also

reinforce the critical importance of treating personal information with utmost care and respect, emphasizing that privacy protection is an integral aspect of Star Health's corporate culture and values.

Customer's Privacy: The company's files or database on applicants, policyholder and insured, are confidential and may be seen only by employees with a legitimate business requirement for the information, (i.e., on a need-to-know basis). Information will be disclosed to others only when the employee is authorized in certain specific circumstances. Employees must not disclose or use personal and sensitive information of the customers for their personal gain or unauthorized purposes.

Employees' Privacy: The company maintains appropriate safeguards to respect the personal privacy of employees and protect the confidentiality of personal information about them. Employee-related information should not be shared or discussed with any external agencies or employees, except where internally authorized or required under applicable laws and regulations,.

You can refer more details in Privacy Policy.

21. ALCOHOL AND SUBSTANCE ABUSE

Employees should not possess, distribute, sell, transfer or use alcohol, illegal or controlled substances, or other items that could adversely affect health, safety and security in the workplace. Consumption of alcohol and/or drugs, is prohibited, subject to following exceptions, at the workplace:

- Specifically prescribed drugs as medication for an ailment, and
- Consumption of reasonable quantities of alcohol at social occasions/gatherings/functions organized/sponsored by the company at designated areas only

22. BUSINESS DRESS CODE GUIDELINES

All employees should ensure that work attire should complement an environment that reflects the company as efficient, orderly and professionally operated.

23. GIFTS, MEALS AND ENTERTAINMENT POLICY

Star Health follows Gifts, Meals & Entertainment Policy through which it provides guidance on the exchange of any gifts, meals & entertainment to its employees. This Policy also applies to its intermediaries or vendors acting on behalf of Star Health with public officials or entities/persons with whom company has a business interest. Extravagant gifts, meals and entertainment provided or received while the recipient is, or will be in the near term, making a determination on a matter of interest to the company, is prohibited.

You can refer more details in Gifts, Meals and Entertainment Policy.

24. ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Star Health has adopted a "Zero Tolerance" approach to bribery and corruption. Employees and those working on its behalf shall not abet to offer, offer, or promise any form of bribery or indulge in any sort of corruption, or, act in contravention of any anti-bribery and anti-corruption laws in India. The Anti-Bribery and Anti-Corruption Policy of Star Health aims to provide guidance on the standards of behaviour which employees or any of its business partners, acting on behalf of Star Health, must adhere with.

You can refer more details in Anti-Bribery and Anti-Corruption Policy.

25. INSIDER TRADING

Star Health being a listed Company is required to comply with SEBI (Prohibition of Insider Trading) Regulations, 2015 which prohibits trading in the securities of the company by the Designated persons and their immediate relatives/connected persons and insiders while in possession of Unpublished Price Sensitive Information (UPSI).

Unpublished price sensitive information means any information directly or indirectly relating to the Company or its securities, directly or indirectly that is not generally available which upon becoming generally available is likely to materially affect the price of the securities.

All employees who are covered under the category of designated persons are expected to adhere to the policy on insider trading under the Employee Dealing Guidelines as per the Investment Policy of the Company as required under IRDAI (Investment) regulations, 2016 are expected to adhere to the guidelines.

You can refer more details in the Policy on Insider Trading.

26. ANTI-MONEY LAUNDERING (AML) POLICY

Money-laundering is an illegal activity and prohibited under the Prevention of Money Laundering Act, 2002 as amended from time to time. IRDAI has issued master circular on Master Guidelines on Anti-Money Laundering/ Counter Financing of Terrorism (AML/CFT), 2022 and strict adherence to such regulatory guidelines is a pre-requisite that cannot be compromised.

Adhering to regulations concerning KYC (Know Your Customer) and anti-money laundering is of paramount importance for maintaining the quality and integrity of the Star Health's operations. Strict compliance with regulatory guidelines is non-negotiable. Therefore, it is crucial that you exercise the highest level of diligence when verifying the backgrounds of our customers during the onboarding process. Additionally, continuous oversight of customer accounts is essential to identify and address any suspicious transactions promptly.

You can refer more details in AML Policy.

27. PROTECTING CONFIDENTIAL AND PROPRIETARY INFORMATION

While conducting business operations, employees may have access to important and non-public information that is confidential and proprietary information of the company. The information could be in paper, electronic, or verbal form. Examples of confidential and proprietary information include new product or product enhancements, strategic business plans, personally identifiable information, etc. Employees should take extra care in protecting such information and safeguard it against inappropriate disclosure. Employees must keep such information strictly confidential and not act on it for personal gain. They should not share confidential and proprietary information with fellow employees unless such fellow employees are specifically authorized to receive it. Careless and casual discussions outside the company about this type of information, is strictly prohibited.

28. FINANCIAL REPORTING

At Star Health, we understand the critical role that financial reporting plays in supporting the decisions of our shareholders, business partners, regulators, and the public. Our financial reports are a reflection of our commitment to honesty, completeness, timeliness, fairness, accuracy, and clarity. To maintain these high standards consistently, only authorized employees are permitted to provide external parties with financial reports. Star Health diligently prepares and maintains its accounts with fairness and accuracy, adhering to universally accepted accounting and financial reporting standards, guidelines, principles, laws, and regulations.

Our internal accounting and audit procedures are designed to accurately record all company transactions and asset dispositions, supported by robust internal controls. These measures provide reasonable assurance to our Board and shareholders that our transactions are both accurate and legitimate. All necessary information is accessible to our auditors, authorized parties, and government agencies. We are committed to transparency, with no tolerance for deliberate omissions, advance income recognition, hidden bank accounts, or concealed funds.

Any wilful misrepresentation or misinformation in our financial accounts and reports is considered a violation of our Code and may lead to appropriate civil and/or criminal actions under relevant laws. We insist on the utmost integrity and accuracy in maintaining Star Health's business records. Records, regardless of their medium, including hard copies, electronic records, emails, instant messages, videos, and backup tapes, should never be falsified or altered. Dishonesty or deception in this regard, aimed at misleading Star Health's management, auditors, regulators, or shareholders, is strictly prohibited.

29. COMPLIANCE OF CODE, AUDIT AND INVESTIGATIONS

We prioritize ethical conduct and compliance with the highest standards. Our comprehensive framework includes regular audits, proactive risk assessments, incident reporting mechanisms, and a dedicated whistleblower platform to ensure the adherence of this “Code” in word and spirit.

We also encourage self-disclosure by functions and have established a robust compliance system to track adherence to code. This commitment ensures transparency, accountability, and integrity throughout our organization, reinforcing our mission and reputation.

In the event of an internal or external audit or investigation of Star Health's activities, our employees & other entities are expected to fully cooperate with auditors and investigators. Acts intended to obstruct the effectiveness of an audit or investigation, including the improper disclosure of investigation details, may result in disciplinary action.

30. PROTECTING STAR HEALTH’S RESOURCES

Business processes at Star Health are conducted using computer and electronic resources which are Company’s property. It is important that these resources are protected to ensure confidentiality and integrity of information, continuity of business processes and comply with legal and regulatory requirements. Any personal use that involves personal gains is strictly prohibited. Some of the important measures employees are required to follow while using computer and electronic resources include:

- Wherever applicable, employees shall use password to access computer and electronic resources and need to keep the password confidential
- Employees shall use Star Health authorized e-mail system for messages that contain company’s confidential and proprietary information.
- Use of internet or intranets, hardware device or via software owned, managed or leased by Star Health must be primarily used to conduct legitimate business only.
- Use of computer and electronic resources for accessing websites which carry objectionable content including obscene materials, is prohibited.
- Every employee is expected to consciously protect the company’s assets under his/her direct/indirect control and/or knowledge.

Company assets are not only tangible items, but also include intangibles, which employees may develop or acquire in the course of their work, including customer or agent lists and contacts, and other information to which employees may have access to, as a result of their responsibilities. Improper or careless handling of such assets may harm the reputation of the company, create financial liability or loss, and adversely affect other interested parties. Safeguarding company

assets is each employee's responsibility, who should ensure that no corporate funds are used for unlawful or personal purposes.

31. INFORMATION AND CYBER SECURITY

IRDAI has issued general guidelines on 'Information and Cyber Security' to enable the insurance industry to strengthen its defences as well as related governance mechanisms to deal with emerging cyber threats. These guidelines help to provide user centric trusted and secure set of resources and environment to employees to conduct business, while ensuring protection of the company's information assets including customer data. The purpose of this policy is to:

- Identify responsibilities and establish goals for consistent and appropriate protection of the company's critical data and information assets.
- Reduce risk of accidental or intentional disclosure, modification, destruction, delay or misuse of information assets.
- Protect information and information infrastructure in cyberspace, build capabilities to prevent and respond to cyber threats, reduce vulnerabilities and minimise damage from cyber incidents.
- Establish and maintain control for ensuring confidentiality, integrity and availability of all information assets, etc.

Any violation of the Information & Cyber Security Policy will be taken seriously, and appropriate disciplinary action will be taken based on the nature of breach. Such actions may include but are not limited to reprimands, suspension, termination of employment, or legal action, depending on the severity of the breach and its impact on Information & Cyber Security.

You can refer more details in Internal Information & Cyber Security Policy.

32. INTELLECTUAL PROPERTY RIGHTS

Star Health retains ownership in all its patents, trademarks, copyrights, designs, and other intellectual property rights ("IPR"), including all improvements, modifications or other derivative works thereof. The employees shall not have any right, title or interest in the IPR belonging to the company, whether during the term of their employment or at any time thereafter. Further, the proprietary rights in any derivative works developed by the employees based on the said IPR shall vest with Star Health, as an employer.

33. COPYRIGHTS AND SOFTWARE COMPLIANCE

Copyright laws prohibit the copying, distribution, use and display of a copyrighted work without the prior permission of the copyright owner. The restrictions apply to software and written material and extend to making derivative works or compilations of any copyrighted material. Company policy is to respect copyright laws, and to observe the terms and conditions of any license agreements to which the Company has agreed. Materials and software used by Star Health should be assumed copyrighted. Copyright laws and company policy prohibit individuals from making copies of software programs they use at work for their personal use.

34. SOCIAL RESPONSIBILITY

As a health insurance company, we prioritize social responsibility by implementing policies that safeguard the interests of our valued clients. We ensure that all employees & other entities involved in collections undergo comprehensive training in collection practices, with a particular focus on distinguishing between acceptable and unacceptable collection practices. These guidelines are explicitly outlined in our Code. Furthermore, we are committed to adhering to anti-trust regulations and fostering fair competition within the healthcare industry to protect the rights and choices of our clients.

35. SAFE, HEALTHY AND SECURE WORKPLACE

Star Health is dedicated to fostering a safe, secure, and healthy working environment, characterized by cleanliness and ergonomic considerations. We are unwavering in our commitment to comply with all environmental regulations within the regions where we operate.

We do not employ children at our workplaces. We do not use forced labour in any form. We do not confiscate personal documents of our Employees or force them to make any payment to us or to anyone else in order to secure engagement with us or to work with us.

You can refer more details in the ESG Policy.

36. PENAL ACTION

Star Health employees are required to comply with all the requirements of the Code of Conduct in order to maintain a professional, safe, and compliant atmosphere at the workplace. Any breach of the Code of Conduct will be considered as a serious violation and depending on the case and the nature of the breach, the employee is liable for the disciplinary action which may include a direct impact on an employee's remuneration and appraisal. Such actions may include but are not limited to reprimands, suspension, termination of employment, or legal action, depending on the severity of the breach and its impact on the Company.

37. DOCUMENT RETENTION

Star Health employees & other entities must adhere to applicable record maintenance principles. Documents, records, and data, including emails, must be retained as stipulated in these policies. Destruction of such documents, records, or data, in accordance with these policies, may be halted if litigation, the threat of litigation, an investigation (internal or external), or regulatory inquiry, is imminent. If an employee believe that any document, record, or data in your possession or control is or may become subject to litigation, audit, or investigation, he/she must promptly notify and consult with the Legal / Compliance Department. Failure to maintain the required documents, records, or data may result in criminal and/or civil proceedings against Star Health and the concerned employees

38. Business Opportunity Diversion

Employees are prohibited from diverting potential business opportunities of the company for their personal gain. No employee should engage in such activities without providing prior written notice and obtaining approval from the company. This practice is strictly prohibited.

39. Smoke-Free Environment

At Star Health, we recognize that smoking poses health risks to both the smoker and those in close proximity. Additionally, it increases the risk of fire accidents. Employees, clients, visitors, interns, vendor employees, and any individuals are strictly prohibited from smoking within office premises and in company vehicles to maintain a safe and healthy environment."

40. REPORTING CONCERNS:

All employees have a duty to promptly report any situations that could potentially violate this Code of Conduct and Ethics or any other Company policies, or pose a risk to the Company's reputation or interests. This includes situations that may disrupt business operations or cause harm in any way. To report concerns, employees should send a written email to a dedicated helpdesk at whistleblower@starhealth.in.

You can also feel free to contact your respective HR Business Partner to seek support or guidance.

41. PERIODIC REVIEW

The policy shall be reviewed at least once annually and more frequently, where required, to ensure it remains up to date, relevant and aligned with the evolving landscape of social media platforms and user behaviour.

EMPLOYEE PLEDGE

As an employee of Star Health, I am fully committed to upholding the organization's ethical principles and contributing to its mission of successful business operations. In doing so, I recognize the paramount importance of prioritizing the well-being of our customers, shareholders, stakeholders, employees, and all other associates.

In my role at Star Health, I pledge to embrace and integrate the core spirit, values, and principles outlined in our Code. By doing so, I commit to the following:

1. Demonstrating utmost professionalism and responsibility in all my actions.
2. Delivering unparalleled, high-quality services to our valued customers and stakeholders.
3. Nurturing and enhancing the efficiency of our work environment.
4. Interacting respectfully with not only our esteemed customers but also vendors, service providers, stakeholders, and all parties we engage with during the course of our work.
5. Upholding the highest standards of ethics and integrity.
6. Adhering to all relevant statutory, regulatory, and local laws, as well as the comprehensive policies and procedures established by Star Health.
7. Safeguarding sensitive information and prioritizing the best interests of Star Health.
8. Taking proactive steps to prevent any form of fraudulent, abusive, or unethical activities.
9. Recognizing that while guidelines are essential, they can never replace the importance of sound judgment, common sense, and professional integrity.
10. Holding in high regard our communities, society, and the environment we operate in.

With unwavering dedication, I solemnly pledge to uphold and promote the Star Health Code of Conduct and Ethics in every facet of my professional life. I am fully committed to fostering an environment of honesty, transparency, and excellence.

This pledge extends to every member of the Star Health team. Should any employee encounter a situation that runs counter to the principles laid out in this pledge, they are duty-bound to report it promptly to their immediate supervisor or CHRO or CRO. By doing so, we collectively ensure that our organization continues to thrive on the foundation of integrity and ethical conduct.