



SREE NARAYANA NURSING COLLEGE

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Recognized by Indian Nursing Council vide letter No. 02/Sep/2006 INC dated : 29.09.2006

A.P. Nurses & Midwives Council Letter No. APNMC/CON/5212/2006, dated: 4/11/2006

Affiliated to Dr. N.T.R. University of Health Sciences, A.P. Vijayawada.



HR POLICY

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HR

POLICIES|2021

THE NARAYANA GROUP

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This document is a guide to identifying and communicating our unique future-oriented stance, in a way that we collectively contribute to The Narayana Group's success.



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KNOWLEDGE DOCUMENTS

CODE OF CONDUCT

OBJECTIVE

The company's objective in establishing this 'Code of Conduct' is to promote ethics, honesty, and professionalism within the company and among its employees. The company believes in an integrated organization and that the action of every employee affects its entire organization and reputation. Any employee is obligated to strive for the extension of the company's interests within legal limits and is responsible for preventing damages or loss of the company's interest. The company expects all employees to abide by this code of conduct in carrying out their duties and functions so as to preserve public trust and to ensure the company's sustainable growth and development.

SCOPE

This policy and its related procedure and measures are applicable to all employees of The Narayana Group (including Sr. Officials, Academic Staff, Non-Academic Staff, and Officers). Service rule manual enclosed with this code of conduct shall govern your conduct at The Narayana Group and you are bound to abide by the terms and conditions given therein. The terms and conditions given in the service rule manual would be read as part and parcel of this Code of Conduct. Violations of any rule shall attract disciplinary action.

RESPECT AT WORKPLACE

All employees are bound by the equal opportunity policy of the company. They are obliged to behave in a respectful manner towards their colleagues and strictly refrain from any kind of discriminatory behaviour, harassment, or victimization. This applies to all aspects of the workplace, from the recruitment and evaluation processes to interpersonal relations between employees. The company has no tolerance for this kind of behaviour and disciplinary action will be taken when appropriate.

ACTIVITIES WHICH ATTRACT DISCIPLINARY ACTION

The following acts of commission and omission on the part of an employee shall constitute misconduct and attract disciplinary action.

- Disclosure of or leaking to any person/agency outside The Narayana Group or otherwise, any confidential information in regard to the working or procedure of the establishment which may come to the knowledge of the employee during the course of his employment, to any outsider or to the competitors.
- Frequent late attendance, unauthorized absence.
- Theft, fraud, or dishonesty in connection with The Narayana Group business or property.
- .


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- Accepting bribe or illegal gratification whatsoever for showing undue favor in discharge of his/her official duties.
- Insubordination or disobedience of any written, lawful or reasonable order of a superior, and/or indiscipline.
- Drunkenness, fighting, or riotous, disorderly, or indecent behavior while on duty at the place of work and/or the extended place of work.
- Neglect of work.
- Smoking within the office premises or in places where it is prohibited.
- Causing willful damage to work in progress or to the property of The Narayana Group.
- Sleeping on duty.
- Maligning or slowing down work.
- Conviction in any court of law for any criminal offense involving moral turpitude or detention in police custody for more than 48 hours.
- Giving false information regarding one's name, age, father's name, qualification, or previous service or any other information sought at the time of joining or at any other time during his/her service.
- Absence from work without permission, for any duration.
- Breach of any rule, regulation, or bye-laws.
- Threatening, abusing, assaulting, or misbehaving with or in the presence of any superior or co-worker.
- Habitual money-lending.
- Preaching of or inciting violence.
- Refusal to receive and/or accept any charge-sheet or order or notice communicated in writing.
- Indecent remarks, gestures, or unwarranted advances towards colleagues(s) at place or extended place of work.
- Rumor mongering, instigating employees and/or students, casting unfounded aspersions on people connected with The Narayana Group.
- Giving interviews to any media, and/or subscribing any written material about The Narayana Group and its students, writing and/or publishing any book/pamphlet/material, without written permission of the authorities.
- Indulging in anti-national activities.
- Using official machinery including stationery, manpower, computers, etc. for personal and non-official use.
- Going to class late.
- Missing class.
- Not completing the tasks, assignments, and duties faithfully and punctually.
- Activities which are detrimental to The Narayana Group, its interests, goodwill, and student community.
- Leaking/sharing confidential information, confidential data, etc. to unauthorized and outside person/competitors.



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- Not intimating change in present or permanent address within a week's time of such occurrence and/or non-delivery of letter(s) sent to the officially declared address.
- Refusal to accept the transfer/join new place of posting.
- Any other activity which is in contravention to the contents of the Manual of Service Rule for the employees of The Narayana Group or any other documents issued by The Narayana Group from time to time.
- Abetment of or attempt at abetment of any of the above acts of misconduct.
- Refusal to do the assigned tasks, duties, and responsibilities or not being found capable of fulfilling the same.

PROCEDURE OF DISCIPLINARY INQUIRY

- An employee found violating the code of conduct or found indulging in any activity which denotes misconduct shall be placed under observation.
- A preliminary departmental inquiry shall be conducted into the alleged act of misconduct.
- A report of the departmental inquiry shall be submitted to the disciplinary authority.
- Based on the report submitted, the disciplinary authority may initiate disciplinary proceedings/action against the concerned employee.
- The disciplinary authority would issue show cause/any other communication (if required) notice to the concerned employee.
- The disciplinary authority shall fix a timeframe within which the employee shall have to reply to the said mentioned communication.

The disciplinary authority may appoint Inquiry Officer/Enquiry Committee (as deemed fit) to investigate into the charges framed against the charge sheeted employee, in case the reply of the employee is found unsatisfactory.

- The employee may take assistance of a co-employee to help him in the enquiry, if he so desires.
- The inquiry officer shall submit the inquiry report to the disciplinary authority within the specified period.
- In case the charges against the employee are proved, then the disciplinary authority shall award punishment under code of conduct.
- The authority awarding punishment shall take into account the gravity of the misconduct, the previous record, if any, of the employee and any other extenuating or aggravating circumstances that may exist.
- The management may also take decision in awarding the punishment on the basis of complaint (s) and report received against the employee.

The gravity of judging the misconduct shall be sole decision of the disciplinary committee/management and heavy penalty along with or in lieu of termination/dismissal would be imposed on such employee found guilty.

SUSPENSION PERIOD

The disciplinary authority may place the charge sheeted employee under suspension during the pendency of disciplinary proceedings.

Where an employee is suspended pending investigation or inquiry into complaints or charges of misconduct against him, the subsistence allowance may be payable to the employee at the rate of 50% of the salary which the employee was entitled to immediately preceding the date of such suspension. If an employee does not cooperate or delays the process of enquiry he/she will not be given the subsistence allowance for the delay due to him/her.

The inquiry shall normally be completed within 10 days. The payment of subsistence allowance during suspension period shall also subject to the employee not taking employment elsewhere during the period of suspension. If an employee is exonerated by the disciplinary authority, he shall be deemed to be on duty during the full period of his suspension and he shall be entitled to receive the same salary as he would have received if he had not been suspended.

PENALTY

The disciplinary authority may impose the following penalties on the delinquent employee.

Minor Penalty

- Mandatory period of voluntary/social service
 - Warning
 - Censure
 - Withholding of increment or appraisal benefits in full or part.
 - Reduction in rank.

Major Penalty

- Termination/Dismissal

ABANDONMENT OF JOB

If an employee remains absent without permission or over stays sanctioned leave for 7 or more days, without any intimation, the employee shall be issued show cause notice for explaining there as on for absence and would be directed to join duty within 10days. If the employee does not report for duty or does not give any satisfactory reply, then it would be presumed that employee is not interested in continuing with the job &he/she has deserted the job and no further notice will be sent to him in this regard. The service



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of such employee will be terminated only after giving him clear chance to present his case.

The term“ employee” ,“he ”,“his ”,shall include all employee, male/female faculty member or support staff including those working in admissions, Accounts ,IT, Administration, HRD or any other departments of The Narayana Group.

REPRESENTATION

- No employee shall indulge in any form of communication that creates or is likely to create a negative opinion about The Narayana Group or the company or any of its employees. This includes spreading rumors, making false allegations, writing or discussing in public forum about any policy or action taken by company.
- No employee shall indulge in lobbying for transfer, posting or any such issues through improper channel and in any case of any such instance; it shall be constituted as misconduct.
- The employee shall be required to obtain prior written approval from the competent authority of the company for interfacing with media in any form or representing him self or the company in a public forum. However, such permission is not required if the work is purely literary, artistic or scientific in nature.
- The employee shall be required to obtain prior written approval from the competent authority for holding any meeting(s) and/or displaying any newspapers, collaterals in the office premises.

POLICY ON ANTI-SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

POLICY

THE NARAYANA GROUP is committed for creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. All employees have a right to work in an environment free from the demoralizing effects of harassment or unwelcome offensive or improper conduct. All employees of THE NARAYANA GROUP have the right to be treated with dignity. THE NARAYANA GROUP treats sexual harassment at the workplace as a serious misconduct and grave offence and whoever commits the said offence is liable for disciplinary action and punishment, which may include termination from the service, depending on the gravity of the case.

SCOPE AND EFFECTIVE DATE

This Policy extends to all employees of THE NARAYANA GROUP and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

“Sexual harassment” would mean and include anyone or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-

- Physical contact and advances; or
- A demand or request for sexual favors; or
- Making sexually colored remarks; or
- Showing pornography; or
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature;

The following circumstances, among other circumstances, if it occur or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in her employment; or
- Implied or explicit threat of detrimental treatment in her employment; or
- Implied or explicit threat about her present or future employment status; or
- Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- Humiliating treatment likely to affect her health or safety;

You want to keep the phrase "Workplace includes any place visited by an employee arising out of or during the course of employment, including transportation provided by THE NARAYANA GROUP for undertaking such journey.

PENAL CONSEQUENCES OF SEXUAL HARASSMENT

If an allegation of sexual harassment against the respondent has been proved, the respondent shall be liable for such punishment as may be recommended by the Internal Compliance Committee (hereinafter referred to as the Internal Committee), under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the Act), which may include one or more of the following:

- written apology;
- Reprimand or censure;
- With holding of promotion;
- With holding of pay rise or increments;

Deduction of such sums from the salary or wages, as the Internal Committee may consider appropriate to be paid to the aggrieved woman or to her legal heirs as compensation. If the deduction is not possible and the respondent fails to pay the said amount, the order will be forwarded to the District Officer for recovery of the sum as an arrear of land revenue;

- Termination from the service, with or without the compensation indicated in sub-clause (e) above;

The abovementioned punishments are in addition to but not in derogation of the punishments, if any, for which the respondent will be liable under other applicable laws.

INTERNAL COMPLAINTS COMMITTEE FOR COMPLAINT REDRESSAL

- An Internal Committee has been constituted by THE NARAYANA GROUP to consider and redress complaints of Sexual Harassment. The Presiding Officer and Members of the Internal Committee are as follows:
 - Mrs. R. Siva Kumar (sivakumar.r@narayanagroup.com)
 - Mrs.P.Snehalatharaju (snehalatharajup@narayanagroup.com)
 - Mrs. K.Vijayalakshmi (vijayalakshmik@narayanagroup.com)
 - Mr. P.Nandagopalrao (nandagopalrao.hr@narayanagroup.com)
 - Mr. P.RameshBabu (ramesh.hr@narayanagroup.com)

In respect of the complaint(s) received from any of the site office / project location of THE NARAYANA GROUP, a member representing the respective site office / project location may be co-opted by the Internal Committee from time to time.



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A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer and at least two members, one of whom shall be a woman.

REDRESSAL PROCESS

Any aggrieved woman shall make, in writing, a complaint of sexual harassment at workplace, duly signed, to the Internal Committee. The said complaint shall be filed in six sets along with supporting documents and the names and addresses of the witnesses. The said complaint may be given to any member of the Internal Committee within a period of three months from the date of incident. However, the Internal Committee, for the reasons to be recorded in writing, may extend the time limit for a period not exceeding another three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the initial period of three months.

If the aggrieved woman is unable to make a complaint for any reason, the said complaint may be filed in such manner, and by such other persons, as may be specified under Rule 6 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the Rules) or alternatively, the aggrieved woman may contact the Presiding Officer for suitable advice in this matter.

Aggrieved woman in relation to a workplace means a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

The Internal Committee may, before initiating any inquiry and at the request of the aggrieved woman, take steps to settle the matter between her and the respondent through conciliation.

On receipt of the complaint, the Internal Committee shall send a copy of the complaint received from the aggrieved woman, to the respondent within a period of seven working days.

The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, if any, within a period not exceeding ten working days from the date of receipt of the copy of the complaint.

The Internal Committee shall make inquiry into the complaint in accordance with the principles of natural justice.

The Internal Committee shall, after giving fifteen days' notice to the party concerned, have the right to terminate the inquiry proceedings or to give an ex parte decision on the


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complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Presiding Officer.

The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Committee.

On completion of an inquiry, the Internal Committee shall provide a report of its findings and its recommendations to the employer, within a period of ten days from the date of completion of inquiry and such report be made available to the concerned parties.

On receipt of the report from the Internal Committee the employer will take action against those persons, who are guilty in respect of the complaint of sexual harassment.

GENERAL

The Internal Committee shall maintain a register of complaints showing the date of complaint, names of the complainant and respondents, brief of the complaint, brief of inquiry proceedings and recommendations.

The Internal Committee shall, for each calendar year, prepare and submit to the employer, an annual report, which shall have the following details:

- Number of complaints of sexual harassment received in the year;
- Number of complaints disposed off during the year;
- Number of case pending for more than ninety days;
- Number of workshops or awareness programmes against sexual harassment carried out;
- Nature of action taken by the employer;

The information in respect of complaint of sexual harassment, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by the employer shall be kept confidential.

If the Internal Committee arrives at the conclusion that the allegation against the respondent is malicious or the woman alleged to have been aggrieved or any other person making the complaint has made the complaint knowing it to be false; or has produced any forged or misleading document, it may recommend to the employer to take any one or more of the actions specified in Penal Consequences Of Sexual Harassment above.

MATERNITY LEAVE AND BENEFIT

POLICY

The Narayana Group (here in after referred to as "THE NARAYANA GROUP") is committed to protect the dignity of motherhood by providing maternity leave and benefit for the full and healthy maintenance of women and her child when she is not working. With the advent of modern age, as the number of women employees is growing, the maternity leave and other maternity benefits are becoming increasingly common. This policy is to achieve the object of doing social justice to women workers employed in THE NARAYANA GROUP.

- **Effective Date**
This policy will come in to effect immediately.

- **Maternity Leave and benefit**
Subject to the provisions contained in the Maternity Benefits Act, 1961 and subsequent amendments to it (hereinafter referred to as the "Act"), a female Employee shall be entitled to 26 weeks paid maternity leave or for such other period as may be mentioned in the Act, including rest days and any public holidays that fall during that time provided she satisfies the following:
 - She has been employed by the Company at any time in the four (4) months immediately before her confinement; and
 - She has been employed for a period of, or periods amounting in the aggregate to, not less than ninety (90) days during the nine (9) months immediately before her confinement.
 - If a female Employee is absent from work due to any illness or miscarriage during the first 28 weeks of pregnancy, the leave of absence shall be considered as normal sick leave.
 - A female Employee shall not be entitled to any maternity benefits if at the time of her confinement she has two or more surviving natural children irrespective of age.

NOTE:

Applicable to female employees who are out of ESI salary limits i.e, gross monthly Salary above Rs.21000/-



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TRAVEL RULES

POLICY

All employees who are required to travel on official work shall submit their on duty intimation to their respective reporting authorities with information to the HR Department.

The employees who intend to travel may submit duly approved travel requisition/advance form with an estimation of the travel expenditure. Employees are required to settle their travel expenditure with necessary supporting bills in the prescribed format within THREE working days from the date of return to the Home Branch / Base Location through their Functional Head. Further travel advance will be issued only after settling the pending advance, if any. The Functional Head may duly verify the authenticity of the travel and forward to F&A for further scrutiny and reimbursement as per Policy and eligibility.

APPLICABILITY

This Travel Policy shall be applicable to all employees of the Company who shall under take travel on official work. The policy sets forth rules regarding the mode of travel, type of accommodation for stay while traveling on business, local conveyance, etc.

Employees who are paid fixed conveyance/Travel allowance to visit the branches under their purview by virtue of the nature of his/her role are excluded from this local conveyance policy.

LOCAL CONVEYANCE – SELF DRIVEN VEHICLES FOR OFFICIAL USE

For journey undertaken at the Headquarters/Base location/Branch by the employees using their own vehicles may be paid as conveyance expenses as under (as per the respective Grade of the Employee and their entitlements):

Grades of Employees	Rate per Km.(Amount in Rs.)	
	Four Wheeler(4W)	Two Wheeler (2W)
Top &Senior Management	Rs.7.00	Rs.3.00
Middle Management (MM)	Note ligible	Rs.3.00
Junior Management(JM)	Note ligible	Rs.3.00



DEFINITIONS

“Day“ means, twenty-four hours from the START of journey.

“Employee“ means, a regular employee of the Company, who is on the rolls of the Company. Travelling Allowances shall be admissible only for journeys in connection with OFFICIAL work of Company. All such journeys shall be authorized by the HOD / Reporting Authority. This is in the nature of reimbursement of reasonable expenses incurred by an individual while traveling, halting, etc. at an outstation. Before approving the tour programs of staff working under their administrative supervision, the supervisory officers shall scrutinize the necessity and duration of journeys & halts and shall curb any tendency to undertake tours too frequently.

CATEGARISATION OF CITIES

The cities for the purpose of entitlements are categorized as follows:

‘A’ Class: Bangalore, Chennai, Delhi, Hyderabad, Kolkata, Mumbai and Vijayawada.

‘B’ Class: All other state capitals other than in A-class and Vizag, Guntur, Tirupati, Warangal, Nellore, Rajamundry,

Kakinada, Surat, Aurangabad, Jamshedpur, Patna and Bellary.

‘C’ Class: All District Head Quarters/Major Towns other than in “B” class. ‘D’

Class: All other places not described above.

TRAVELLIN GENTILEMENT

The mode of travel to which an employee is entitled shall be as below:

Grades of Employees	Designation	Entitlements
Top Management(TM)	DGM,GM,AVP,VP, Sr. VP, President, CFO,CPO, CIO, COO, Core / Executive Deans.	Economy Air/IIAC Rail
Senior Management(SM)	Ref .Annexures for designations.	II nd A C Rail/VOLVO
Middle Management(MM)	Ref. Annexures for designations.	III rd A C Rail/Chair Car/AC Bus
Junior Management(JM)	Ref. Annexures for designations.	Sleeper Class Rail/Deluxe Bus



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- While on tour an employee shall be paid a single fare of the Mode/Class of accommodation to which, he/she is entitled by the shortest route. If he/she travels in a lower class he/she will be entitled to the actual fare of the class in which he/she travels.
- When a particular class of travel to which an employee is entitled is not available, he/she should travel by the next lower class of travel. Travel by any class higher than the entitlement, may be permitted only by the Concerned Directors depending on the exigency of the work. Employees may route such special approvals through the PA/EA of the concerned Directors.
- However, for Senior Management Team Members (SM) travel by air / II class AC by train may be availed on prior approval in case of emergency OR for long distance travel like Kolkata, Delhi and Mumbai.
- A journey performed is to begin from the residence of the employee at his/her Head quarters and end at the duty point at the out station advice versa.
- Conveyance charges for local travel within the town/city visited on official tour shall be reimbursed at the following modes, subject to furnishing of
- information related to places and parties visited, purpose and the amount actually spent.

To and Fro travel one time in a day is permitted from the place of stay to workplace, viz. Inappropriate and unrelated local conveyance expenses are not allowed. If an employee has not hired any conveyance separately and has travelled using conveyance provided by the company, the conveyance expenses shall not be reimbursed

TAXI FARE / CITY CAB TRAVEL SHALL BE REIMBURSED SUBJECT TO SUBMISSION OF BILLS ONLY.

Grades of Employees	Designation	Entitlements
Top Management(TM)	DGM,GM,AVP,VP, Sr.VP, President,CFO,CPO,CIO, COO,Core / Executive Deans.	Actual Expenses incurred
Senior Management(SM)	Ref. Annexures for designations.	Auto/Critical with Bill
Middle Management(MM)	Ref. Annexures for designations.	Auto/Bus Fare(AC)
Junior Management(JM)	Ref. Annexures for designations.	Auto/Bus Fare(non-AC)



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- However, specific Grade of employees will be allowed to avail four wheeler facilities on specific approval from the Management at Central Office. In order to avail this facility, the employee is required to obtain the permission in writing and submit to F&A & HR.

ENTITLEMENT- Covering Lodging & Boarding.

(Rs./day)

(All rates mentioned below include taxes & levies)

Boarding—Own accommodation(O)

Employees preferred to have food other than the hotel where they are put up, shall only claim 75% (rounded-off) of the eligible amount without submitting any bills for food/boarding expenses. Bills for all hotel lodging expenses is a must to submit / claim travel reimbursement.

Grade	Designation	"A"Class Cities		"B"Class Cities		"C"Class Cities		"D"Class Cities	
		Lodging	Boarding	Lodging	Boarding	Lodging	Boarding	Lodging	Boarding
Top Mgmt.(TM)	Ref. Annexures for designations.	Actuals With Bill	Actuals With Bill 2500(O)	Actuals With Bill	Actuals With Bill 2000(O)	Actuals With Bill	Actuals With Bill 1500 (O)	Actuals With Bill	Actuals With Bill 1250 (O)
Senior Mgmt. (SM)	Ref. Annexures for designations.	Min 2500 Max 4000 (Single) Min 2500 Max 4500 (Double) (With Bills)	530 With Bills 400 75% Without Bill	Min 1800 Max 2500 (Single) Min 1800 Max 2750 (Double) (With Bills)	425 With Bills 320 75% Without Bill	Min-1500 Max 2000 (Single) Min-1500 Max 2250 (Double) (With Bills)	380 with Bills 285 75% Without Bill	Min-1100 Max 1500 (Single) Min-1100 Max 2000 (Double) (With Bills)	340 with Bills 255 75% Without Bill
Middle Mgmt. (MM)	Ref. Annexures for designations.	Min 2000 Max 2500 (Single) Min 2000 Max 3000 (Double) (With Bills)	490 With Bills 370 75% Without Bill	Min 1800 Max 2000 (Single) Min 1800 Max 2000 (Double) (With Bills)	375 With Bills 280 75% Without Bill	Min-1400 Max-1750 (Single) Min-1400 Max-1900 (Double) (With Bills)	340 With Bills 255 75% Without Bill	Min 1000 Max 1500 (Single) Min 1000 Max 1750 (Double) (With Bills)	300 With Bills 225 75% Without Bill
Junior Mgmt. (JM)	Ref. Annexures for designations.	Min 1500 Max 2000 (Single) Min 1500 Max 2250 (Double) (With Bills)	450 With Bills 340 75% Without Bill	Min 1200 Max 1500 (Single) Min 1200 Max 1750 (Double) (With Bills)	345 With Bills 255 75% Without Bill	Min-1000 Max-1250 (Single) Min-1000 Max-1500 (Double) (With Bills)	300 With Bills 225 75% Without Bill	Min-750 Max 1000 (Single) Min-750 Max 1250 (Double) (With Bills)	260 With Bills 195 75% Without



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OWN ACCOMMODATION OPTED BY EMPLOYEE

		OWN ACCOMMODATION ARRANGEMENT MADE BY EMPLOYEE - NO BILLS REQUIRED			
		50%	50%	50%	50%
ALL	Applicable for SM, MM & JM	Boarding+	50%	Boarding+	Boarding+
		50% of Single.Min.	Boarding+	50% of Single.Min.	50% of Single.Min.
		Lodging amount	Single.Min.	Lodging amount	Lodging amount

Own accommodation rates mentioned above are inclusive of boarding & lodging expenses (TA & DA). Hence, NO separate Daily Allowance is payable in case of own accommodation.

Car-pooling, Car sharing while on tour will be reimbursed @ 30% of the actual Train Journey Fare as per the class of train travel eligibility, provided there is no claim at actuals by any of the other co-travelers, viz.,

For all employees, tour duration of more than 8 hours and less than 16 hours will be considered as half day boarding allowance. Travel less than 8 hours shall come under local conveyance guidelines. 25% of the boarding amount will be allowed for half day. However, any expenditure incurred over and above the cited expenditure will be allowed on specific approval from the Directors on a case to case basis. Employees are required to route their travel bills through the Concerned Director's PA/EA and get special approval for policy deviation.

In case food expenses payment made by any one employee for a group of employees, the tour expenses claim form should mention all the names of the employees travelled and others in the same group are not allowed to claim boarding (DA) expenses as the actual expense was borne by one employee in the group.

No expenses shall be reimbursable on account of lodging charges / DA / fixed own accommodation allowance for any period of leave (casual/earned/sick) availed by the employee while on tour.

Allowance for travel when an employee is recalled from his /her leave shall be applicable as per the respective Employee Grades above but limited to the return journey only.

Actual expenses incurred on telephone, courier, fax, e-Mail, etc., for official work shall be reimbursed subject to submission of bills.

All delayed tour expense claims need deviation approvals from Directors and it is the responsibility of the concerned employee to take this approval before submitting to F&A. The Head / Reporting Authority shall sanction the travel advance to an employee proceeding on tour. Such advance shall normally be restricted to 75% of the estimated expenditure.

No claim for any intoxicants including alcoholic drinks and cigarettes is admissible and hence kindly ensure the same is not put up for reimbursement.

The Chief People Officer / Chief Financial Officer in consultation with Directors shall interpret the rules and guidelines in the above policy whenever and wherever required.

Please refer to the Annexure for detailed list of other grades/designations.

SENIOR MANAGEMENTTEAM	MIDDLE MANAGEMENTTEAM	JUNIOR MANAGEMENTTEAM
CO-R&D HEAD-ACADEMIC OPERATIONS HOD - PRE PRIMARY HOD - PRIMARY HOD-HIGH SCHOOL HOD- SOFT SKILLS HOD-ANALYSIS	CO-ACADEMICSTEAMLEADS(TL)	CO-R&D RESOURCEPERSON(RP) ANALYST GRAPHICDESIGNE R DTP OPERATOR TELECALLER
BRANCHACADEMICS-SCHOOL EXECUTIVE DEAN - SCHOOLS DIVISIONAL DEAN-SCHOOLS DGM-NONACADEMICS-SCHOOLS	BRANCHACADEMICS-SCHOOLS PROGRAMIN CHARGE PRINCIPAL TRAINEEPRINCIPAL VICE PRINCIPAL BRANCHACADEMICDEAN HOD (SUBJECT-WISE)	BRANCHACADEMICS-SCHOOL TEACHER ASSOCIA TETEACHER COUNSELLOR P.E.T. LIBRARIAN REGIONAL SOFT SKILLS MENTOR (RSM) SOFT SKILLS MENTOR (SSM) CCA-YOGA/KARATE TEACHER CCA - DANCE TEACHER CCA-MUSICTEACHER CCA-ART&CRAFTTEACHER
BRANCH ACADEMICS-COLLEGE DIVISIONALDEA N HOD	BRANCH NON-ACADEMICS- SCHOOL AGM A.O.	BRANCH NON-ACADEMICS SCHOOLS ACCOUNTANT BOARDCLERK COMPUTER OPERATOR FRONT OFFICE EXECUTIVE MATERIAL/EXAMINCHARG E P.R.O FLOORINCHARGE OFFICEBOY/ GIRL



		VEHICLE INCHARGE DRIVER DOCTOR MEDICAL ASSISTANT HOSTEL INCHARGE STORE INCHARGE CARPENTOR ELECTRICIAN PLUMBER COURIER BOY COOK
CO-ACADEMIS-COLLEGE COMPETITIVE EXAM HOD CONSULTANT DIVISIONAL DEAN	BRANCH ACADEMICS-COLLEGES ACADEMIC DEAN AGM / AO ASSOCIATE DEAN LECTURER PRINCIPAL PROGRAM INCHARGE TEACHER TRAINEE PRINCIPAL VICE PRINCIPAL	
CO-NON ACADEMICS HOD IT MANAGER NETWORK ENGINEER OPERATION HOD PROGRAM INCHARGE R&D HOD SOFTWARE ENGINEER SR.MANAGER	CONON-ACADEMICS/COLLEGES ANALYSIS TEAM LEAD AD ASST.MANAGER CONTENT WRITER DBA DBA TEAM LEAD DEPUTY MANAGER DIVISIONAL OBSERVER ELECTRICAL ENGINEER HARDWARE ENGINEER MANAGER NETWORK ADMIN NETWORK INCHARGE PROJECT MANAGER PURCHASE INCHARGE	
	SR.EXECUTIVE SYS ADMIN TEAM LEAD TESTING ENGINEER DIVISIONAL ACCOUNTANT	NON-ACADEMICS-COLLEGE ACCOUNTANT BOARD CLERK COMPUTER OPERATOR COUNSELLOR FRONT OFFICE EXECUTIVE MATERIAL EXAMINER STORE IC SUPERVISOR CO-NON ACADEMICS ANALYSIS ASSOCIATE COMPUTER OPERATOR ELECTRICIAN EXECUTIVE FRONT OFFICE EXECUTIVE HELP DESK ASSOCIATE HELP DESK TEAM LEAD JR.ACCOUNTANT JR.EXECUTIVE RESOURCE PERSON SOFTWARE TRAINEE STAFF



PRIVACY POLICY

THE NARAYANA GROUP TAKES YOUR PRIVACY VERY SERIOUSLY

In general, you can visit THE NARAYANA GROUP's websites without telling us who you are and without revealing any information about yourself. There are times, however, when we may need information from you.

THE NARAYANA GROUP does not share personal information about you with non-affiliated companies except: (a) to provide products or services you've requested; (b) when we have your permission; or (c) under the following circumstances:

- We provide the information to trusted entities who work on behalf of or with THE NARAYANA GROUP under strict confidentiality agreements. These entities may use your personal information to help THE NARAYANA GROUP communicate with you about offers from THE NARAYANA GROUP and our marketing partners. However, these companies do not have any independent right to further share or disseminate this information; We respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims;
- We believe it is necessary to share the information in order to investigate, prevent, or take action against any illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.
- We believe it is necessary to share the information in order to protect or enforce THE NARAYANA GROUP's rights, usage terms, intellectual or physical property or for safety of THE NARAYANA GROUP or associated parties.
- We may share information about you if THE NARAYANA GROUP is acquired by or merged with another company.

You may choose to give us personal information such as your name and address or e-mail identification address ('ID') that may be needed, for example, to correspond with you, for you to download our white papers, to provide you with subscription information etc. We intend to protect the quality and integrity of your personally identifiable information.

THE NARAYANA GROUP will not be liable to any unsolicited information provided by you. You consent to THE NARAYANA GROUP using such information as per THE NARAYANA GROUP's privacy policy.



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We will make a sincere effort to respond in a timely manner to your requests to correct inaccuracies in your personal information. To correct inaccuracies in your personal information, please return the message containing the inaccuracies to the sender.

THENARAYANAGROUP's websites are not directed at nor targeted at children. No one who has not reached the age of thirteen may use the websites unless supervised by an adult.

COOKIESANDOTHERTECHNOLOGIES

We sometimes collect anonymous information from visits to our site to help us provide better customer service. For example, we keep track of the domains from which people visit and we also measure visitor activity on THE NARAYANA GROUP web sites, but we do so in ways that keep the information of the visitor anonymous. THE NARAYANA GROUP or its affiliates or vendors may use this data to analyze trends and statistics and to help us provide better customer service. We maintain the highest levels of confidentiality for this information. Our affiliates and vendors follow the same high levels of confidentiality. This anonymous information is used and analyzed only at an aggregate level to help us understand trends and patterns. None of this information is reviewed at an individual level. If you do not want your transaction details used in this manner, you can either disable your cookies or opt-out at the download or request page. Alternatively, you can set your browser to intimate upon receiving a cookie. You may accordingly decide to opt out.

MAILERS

THE NARAYANA GROUP may, if you so choose, send direct mailers to you at the address given by you.

ANTI-SPAM POLICY

THE NARAYANA GROUP recognizes the receipt, transmission or distribution of spam emails (i.e. unsolicited bulk emails) as a major concern and has taken reasonable measures to minimize the transmission and effect of spam emails in our computing environment. All emails received by THE NARAYANA GROUP are subject to spam check. Any email identified as spam will be rejected with sufficient information to the sender for taking necessary action. With this measure, along with other technical spam reduction measures, THE NARAYANA GROUP hopes to minimize the effect of spam emails. THE NARAYANA GROUP reserves the right to reject and/or report any suspicious spam emails, to the authorities concerned, for necessary action.

LINKSTONON-THE NARAYANA GROUP WEBSITES

THE NARAYANA GROUP may provide links to third-party websites for your convenience and information. If you access those links through the NARAYANA GROUP website, you will leave the NARAYANA GROUP website. THE NARAYANA GROUP does not control those sites or their privacy practices, which may differ from THE NARAYANA GROUP's practices. We do not endorse or make any representations about third-party websites. The personal data you choose to provide to or that is collected by these third parties, including any social media websites featured on our website, is not covered by the THE NARAYANA GROUP Privacy Policy .We encourage you to review the privacy policy of any website before submitting your personal information.

We may also provide social media features on our website that enable you to share THE NARAYANA GROUP information with your social networks and to interact with THE NARAYANA GROUP on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites with which you interact to make sure you understand the information that could be shared by those sites.

PRIVACY POLICY ON PERSONAL INFORMATION

▪ Effective Date

This Privacy Policy on Personal Information ('Policy') is effective from January 2016 and it supersedes all existing policies on the subject matter.

▪ Applicability

This Policy applies to all Personal Data collected electronically by THE NARAYANA GROUP Limited or its affiliated companies.

▪ Definitions

'Personal Data' for the purposes of this Policy means any information that relates to a natural person and is capable of identifying such person available or likely to be available with THE NARAYANA GROUP.

▪ Objective of Policy

THE NARAYANA GROUP takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy and to ensure the appropriate use of the information, THE NARAYANA GROUP utilizes appropriate physical, technical and administrative procedures to safeguard the information collect.

▪ Reasonable Security Practices & Procedures

THE NARAYANA GROUP will take reasonable steps to ensure that all dealings in Personal Data, shall:

- Be processed fairly & lawfully;
- Be obtained only with the consent of the information provider;
- Be collected, only when:
 - The information is collected for a lawful purpose connected with a function or activity of THE NARAYANA GROUP; and
 - The collection of the sensitive personal data or information is considered necessary for that purpose.
- Be available for review by the information provider, as and when requested.
- Be kept secure against unauthorized or unlawful processing and against accidental loss, destruction or damage, as per the prescribed standards.

▪ Changes to this Policy

Please note that this Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent. We will post any Policy changes on this page.



KNOWLEDGEDOCUMENTS

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ANTI-CORRUPTION AND BRIBERY POLICY

■ POLICY STATEMENT

It is the policy of Narayana Group or any of its affiliates (hereinafter collectively referred to as the "Company") to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and to implementing and enforcing effective systems to counter bribery.

Bribery is a serious criminal offense in jurisdictions in which the Company operates, where bribery offences can result in the imposition of severe fines and / or custodial sentences, exclusion from tendering for public contracts and severe reputational damage.

We therefore take our legal responsibilities very seriously. We will uphold all laws relevant to countering bribery and corruption. The purpose of this policy is to:

- Set out our responsibilities, and the responsibilities of those working for us, in observing and upholding our position on bribery and corruption; and"
- "Provide information and guidance to those working for us on how to recognize and deal with bribery and corruption issues;

In this policy, third party means any individual or organization an associate (as defined in paragraph 2 below) comes into contact with during the course of his/her engagement with the Company and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, business associates etc. and government and public bodies, including their advisors, representatives and officials, politicians and political parties;.

■ APPLICABILITY

This policy applies to all individuals working for the Company anywhere in the world and at all levels and grades, including but not limited to senior managers, officers, directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, agents, sponsors, or any other person associated with us, wherever located (hereinafter collectively referred to in this policy as 'Associates' and individually as 'Associate')



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- **DEFINITION**

- Bribery is an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust. A non-exhaustive list of examples is set out at Schedule 2 hereto. **GIFT AND HOSPITALITY**

This policy does not prohibit normal, reasonable, appropriate, modest and bona fide corporate hospitality (given and received) to or from third parties if its purpose is to improve our Company image, present our products and services, or establish cordial relations. This policy recommends that Associates always assess the purpose behind any hospitality or entertainment. Hospitality or entertainment with the intention of improperly influencing anyone's decision-making or objectivity, or making the recipient feel unduly obligated in any way, should never be offered or received. Associates should always consider how the recipient is likely to view the hospitality. Similarly Associates must also decline any invitation or offer of hospitality or entertainment when made with the actual or apparent intent to influence their decisions.

The giving or receiving of gifts can in some cases influence, or appear to influence, decision-making, for example by persuading the recipient to favour the person who made the gift over his own employer. As such Associates should think very carefully before making, or receiving gifts.

Gifts can occasionally be offered to celebrate special occasions (for example religious holidays or the birth of a child) provided such gifts are moderate in value, occasional, appropriate, totally unconditional, and in-fitting with local business practices. No gift should be given or accepted if it could reasonably be seen improperly to influence the decision-making of the recipient. In addition some types of gifts will clearly never be acceptable including gifts that are illegal or unethical, or involve cash or cash equivalent (e.g. loans, stock options, etc.). Furthermore, certain gifts or favours, such as the use of a customer holiday home, or an invitation to his / her family to join him on a foreign business trip, or the extension of a trip at the customer's expense etc. are at all times unacceptable, and Associates should not in any way indulge in such practices. It is acceptable to offer modest promotional materials to contacts e.g. branded pens. Use of one's position with the Company to solicit a gift of any kind is not acceptable. However, the Company allows Associates occasionally to receive unsolicited gifts of a very low intrinsic value from business contacts provided the



gift is given unconditionally and not in a manner that could influence any decision-making process.

In some cultures/countries, it may be seen as an insult to reject a gift, and refusals may adversely affect business relationships. In these circumstances, and if the gift is anything other than moderate, the gift should be reported to the reporting manager who will decide whether such gift will be retained or returned. If your reporting manager is uncertain as to how to treat the gift, he / she should seek clarification from his / her relevant Human Resource (HR) contact.

Finally, Associates should never personally pay for gifts or hospitality in order to avoid this policy. Associates should also be mindful of, and respect, the policies of the recipients, of gifts and hospitality.

■ WHAT IS NOT ACCEPTABLE

It is not acceptable to

- Give, promise to give, or offer, a payment, gift or hospitality to secure an improper business advantage or to reward unethically a business advantage already given;
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate, expedite or reward a routine or other procedure;
- Accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them;
- Induce another individual or Associate to indulge in any of the acts or omissions mentioned in this clause 5;
 - "Threaten or retaliate against another Associate who has refused to commit a bribery offence or who has raised concerns under this policy; or"
 - "Engage in any activity that might lead to a breach of this policy;

■ FACILITATION PAYMENTS AND KICK BACKS

The Company does not make, and shall not accept, facilitation payments of "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government / any other organization's action by an official. Kickbacks are typically payments made in return for a business favour or advantage. All Associates must avoid any activity that might lead to a facilitation payment or kickback being made or accepted.

If an Associate is asked to make a payment on behalf of the Company, such Associate shall at all times be mindful of the purpose of the payment and whether



The amount requested is proportionate to the goods or services so provided. A receipt which details there as on for the payment should also be sought at all times. In case of suspicions, concerns or queries regarding a payment, the Associate should raise the matter immediately with their reporting manager or consult an appropriate member of the HR team.

▪ DONATIONS

The Company does not make contributions to political parties which are so made to influence any decision or gain a business advantage. The Company only makes charitable donations that are legal and ethical under local laws and practices.

▪ RESPONSIBILITIES OF ASSOCIATES

Associates must ensure that they have read and understood this policy and, must at all times comply with the terms and conditions of this policy.

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

Associates must notify their reporting manager or consult an appropriate member of the HR team as soon as possible if they believe or suspect, or have a reason to believe or suspect, that a breach of this policy has occurred, or may occur in the future - for example, if a customer or potential customer offers an Associate something to gain a business advantage with the Company or indicates to an Associate that a gift or payment is required to secure their business. The compliant mail clearly mentioning the events with sufficient proofs shall be send to nsafe@narayanagroup.com (or) nsafe@nspira.in

Further “red flags” that may indicate bribery or corruption are set out in Schedule 1 to this policy. Please note that a failure to report an actual or suspected breach of this policy is itself, a breach of this policy.

Any associate who breaches any of the terms of this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves its right to terminate a contractual relationship with other Associates and other associated persons, as the case may be if they breach any of the terms and conditions of this policy.



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- **RECORDKEEPING**

The Company shall keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to, and receiving payments from, third parties.

Associates must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review and / or a review from the appropriate member of the Company's HR team.

Associates must ensure that all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Company's applicable policy and specifically record the reason for such expenditure. Associates shall further ensure that all expense claims shall comply with the terms and conditions of this policy. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts should be kept "off-book" to facilitate or conceal improper payments.

- **RAISING A CONCERN/COMPLAINT**

Associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an Associate is unsure whether a particular act constitutes bribery or corruption, he / she should raise the matter with his / her reporting manager or consult an appropriate member of the HR team. Concerns should be reported clearly mentioning the events with sufficient proofs to nsafe@narayanagroup.com (or) nsafe@nspira.in

- **WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

If any Associate is offered a bribe by a third party, is asked to make one, suspects that this may happen in the future, or believes that he/she is, or anyone else is, a victim of any form of unlawful activity, such Associate shall comply with clause 8 above

- **PROTECTION**

Associates who refuse to accept or offer a bribe, or those who raise concerns or report another's wrong doing, are sometimes worried about possible repercussions. The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.



The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any Associate believes that he/she has suffered any such treatment, he/she should inform his/her reporting manager or a member of the HR team of the Company immediately. If the matter is not remedied, and if the victim is an Associate, he/she should raise the matter as per the procedure to nsafe@narayanagroup.com(or) nsafe@nspira.in

■ TRAINING AND COMMUNICATION

Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all existing Associates. If any Associate has any query about this policy, they should contact their reporting manager.

The Company's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate thereafter. Wherever possible, all such third parties should be sent a copy of this policy at the outset of the said business relationship.

■ WHO IS RESPONSIBLE FOR THE POLICY

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it

The concerned head of HR Department of the region has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and, if necessary and appropriate, are given adequate and regular training on it

■ MONITORING AND REVIEW

The concerned head of HR Department of the region will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be



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subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All Associates are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrong doing Associates are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Head- HR Operations. This policy does not form part of the Associates' contract of employment and it may be amended at any time by the Company

SCHEDULE-1-POTENTIAL RISK SCENARIOS--"RED FLAGS"

The following is a list of possible red flags that may arise during the course of an Associate's engagement with the Company and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If an Associate encounters any of these red flags he / she must report them promptly as per the procedure set out in the Whistle-blower policy:

- Being aware that a third party engages in, or has been accused of engaging in, improper business practices;"
- "Learning that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a 'special relationship' with foreign government officials;"
- "A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;" "A third party requests payment in cash and / or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
 - A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business
 - A third party requests an unexpected additional fee or commission to facilitate a service;
 - A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
 - A third party requests that a payment is made to overlook potential legal violations;
 - A third party requests that you provide employment or some other advantage to a friend or relative;


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- You receive an invoice from a third party that appears to be non-standard or customized
- A third party insists on the use of side letters or refuses to put terms agreed in writing;
- You observe that the Company has been invoiced for a commission or fee.
- payment that appears large compared to the service stated to have been provided;
- A third party requests or required the use of an agent, intermediary, consultant, distributor or supplier that is no typically used by or known to the Company; and / or
- You are offered an unusually generous gift or lavish hospitality by a third party;

▪ SCHEDULE-2-EXAMPLES

- Offering a bribe

You offer a potential customer tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence by you as you are making the offer to gain an improper commercial and contractual advantage. The Company may also be found to have committed an offence because the offer has been made improperly to obtain business for us. It may also be an offence for the potential customer to accept your offer.

- Receiving a bribe

A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organization to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain an improper personal advantage. Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing computer hardware through customs.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. The Company may also be found to have committed an offence..

WHISTLE BLOWER POLICY

PREAMBLE

This policy is formulated to provide an opportunity to employees and an avenue to raise concerns and to access in good faith the Audit Committee, to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication, in case they observe unethical and improper practices or any other wrongful conduct in the Company, to provide necessary safeguards for protection of employees from reprisals or victimization and to prohibit managerial personnel from taking any adverse personnel action against those employees.

APPLICABILITY

This policy applies to all permanent employees of the Company.

POLICY

No adverse action shall be taken or recommended against an employee in retaliation to his/her disclosure in good faith of any unethical and improper practices or alleged wrongful conduct. This policy protects such employees from unfair termination and unfair prejudicial employment practices. However, this policy does not protect an employee from an adverse action which occurs independent of his/her disclosure of unethical and improper practice or alleged wrongful conduct, poor job performance, any other disciplinary action, etc. unrelated to a disclosure made pursuant to this policy.

DEFINITIONS

▪ Adverse Personnel Action

An employment-related act or decision or a failure to take appropriate action by managerial personnel which may affect the employee's employment, including but not limited to compensation, increment, promotion, job location, job profile, immunities, leaves and training other privileges.

▪ Alleged Wrongful Conduct

Alleged Wrongful Conduct shall mean violation of law, infringement of Company's Code of Conduct or ethic policies, mismanagement, misappropriation of monies, actual or suspected fraud, substantial and specific danger to public health and safety or abuse of authority

Audit Committee

Audit Committee shall mean a Committee of Board of Directors of the Company, constituted in accordance with provisions of Section 177 of Companies Act, 2013.

- **Company**

Company means, "The Narayana Group".

- **Compliance Officer**

Compliance Officer means, "Company Secretary" of the Company.

- **Good Faith**

- An employee shall be deemed to be communicating in "good faith" if there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct. Good Faith shall be deemed lacking when the employee does not have personal knowledge of a factual basis for the communication or where the employee knew or reasonably should have known that the communication about the unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous.

- **Managerial Personnel**

Managerial Personnel shall include Director, all Executives at the level of Manager and above, who has authority to make or materially influence significant personnel decisions.

- **Managerial Personnel**

Managerial Personnel shall include Director, all Executives at the level of Manager and above, who has authority to make or materially influence significant personnel decisions..

- **Policy or This Policy**

Policy or This Policy means, "Whistle Blower Policy".

- **Unethical and Improper Practices**

Unethical and improper practices shall mean –

- An act which does not conform to approved standards of social and professional behavior;
- An act which leads to unethical business practices;
- Improper or unethical conduct;
- Breach of etiquette or morally offensive behavior;
- May lead to incorrect financial reporting;
- Are not in line with applicable company policy;
- Are unlawful, etc.

- **Whistle Blower/Complainant**

An employee of the Company who discloses in good faith any unethical & improper practices or alleged wrongful conduct to the Head of Department or in case it involves Managerial Personnel to the DIRECTOR and in exceptional cases to the Audit Committee in writing. The Whistle Blower's role


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is as a reporting party, he/she is not an investigator. Although the Whistle Blower is not expected to prove the truth of an allegation, he/she needs to demonstrate to the Audit Committee, that there are sufficient grounds for concern.

INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013 and/or SEBI Act and/or any other SEBI Regulation(s) as amended from time to time.

GUIDELINES

Internal Policy & Protection under Policy

This Policy is an internal policy on disclosure by employees of any unethical and improper practices or wrongful conduct and access to the Head of Department or in case it involves Senior Managerial Personnel access to the DIRECTOR and in exceptional cases access to Audit Committee of Directors constituted by the Board. This Policy prohibits the Company to take any adverse action against its employees for disclosing in good faith any unethical & improper practices or alleged wrongful conduct to the Head of Department or to the DIRECTOR or to the Audit Committee. Any employee against whom any adverse action has been taken due to his disclosure of information under this policy may approach the Audit Committee.

Safeguards

- Harassment or Victimization
Harassment or victimization of the complainant will not be tolerated and could constitute sufficient grounds for dismissal of the concerned employee.
- Confidentiality
Confidentiality of whistle blower shall be maintained to the greatest extent possible. Every effort will be made to protect the whistleblower's identity, subject to legal constraints.
- Anonymous Allegations
Complainants must put their names to allegations as follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously SHALL NOT BE usually investigated BUT subject to the seriousness of the issue raised the Audit Committee can initiate an investigation independently.



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- Malicious Allegations

Malicious allegations by employees may result in disciplinary action.

- False Allegation & Legitimate Employment Action

An employee who knowingly makes false allegations of unethical & improper practices or alleged wrongful conduct to the Audit Committee shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies and procedures. Further, this policy may not be used as a defense by an employee against whom an adverse personnel action has been taken independent of any disclosure of information by him and for legitimate reasons or cause under Company rules and policies.

- Disclosure

An employee who observes or notices any unethical & improper practices or alleged wrongful conduct in the Company may report the same to the Head of Department or incase it involves Managerial Personnel to the DIRECTOR and in exceptional cases to Audit Committee through e-mail addressed to 'nsafe@nspira.in'.

- Accountabilities–Employees

- Bring to early attention of the company any improper practice they become aware of. Although they are not required to provide proof, they must have sufficient cause for concern.
- Avoid anonymity when raising a concern.
- Co-operate with investigating authorities , maintainingfull confidentiality.
- The intent of the policy is to bring genuine and serious issues to the fore and it is not intended for petty complaints. Malicious allegations by employees may attract disciplinary action.
- A complainant has the right to protection from retaliation. But this does not extend to immunity for complicity in the matters that are the subject of the allegations and investigation.
- In exceptional cases, where the complainant is not satisfied with the outcome of the investigation carried out by the Ombudsperson, she/he can make a direct appeal to the Chairman of the Audit Committee.

Accountabilities–Head of Department/DIRECTOR/Audit Committee

- Conduct the enquiry in a fair, unbiased manner.
- Ensure complete fact-finding.
- Maintain strict confidentiality.
- Decide on the outcome of the investigation, whether an improper practice has been committed and if so by whom.
- Recommend an appropriate course of action—suggested disciplinary action, including dismissal, and preventive measures.
- Minute Committee deliberations and document the final report.

Procedures

The whistle blowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical & improper practices or alleged wrongful conduct shall make a disclosure to the Head of Department or in case it involves Managerial Personnel to the DIRECTOR and in exceptional cases to the Audit Committee as soon as possible but not later than 45 consecutive calendar days after becoming aware of the same. The Departmental Head shall immediately forward Whistle Blower Report to the DIRECTOR of the Company. The DIRECTOR may inquire in respect of the Whistle Blower Report and after preliminary inquiry, if required, shall report the same to the Audit Committee. Audit Committee shall appropriately and expeditiously investigate all whistleblower reports received. In this regard, Audit Committee, if the circumstances so suggest, may appoint a senior executive or a committee of managerial personnel to investigate into the matter and prescribe the scope and time limit therefore

Audit Committee shall have the right to outline detailed procedure for an investigation. Where the Audit Committee has designated a senior executive or a committee of managerial personnel for investigation, they shall mandatorily adhere to the scope and procedure outlined by the Audit Committee for investigation.

The Audit Committee or officer or committee of managerial personnel, as the case may be, shall have the right to call for any information/document and examination of any employee of the Company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy.

A report shall be prepared after completion of investigation and the Audit Committee shall consider the same. After considering the report, the Audit Committee shall determine the cause of alleged adverse action and may order for appropriate course of action, which may inter-alia, include:

- Order for an injunction to restrain continuous violation of this policy;
- Reinstatement of the employee to the same position or to an equivalent position;
- Order for compensation for lost wages, remuneration or any other benefits, etc.
- Disciplinary action, including dismissal, if applicable, as well as preventive measures for the future.

Subject to legal constraints, she/he will receive information about the outcome of any investigations. All discussions would be minuted and the final report prepared. The decision of the Audit Committee shall be final and binding. If and when the Audit Committee is satisfied that the alleged unethical & improper practice or wrongful conduct existed or is in existence, then the Audit Committee may

- Recommend to Board to reprimand, take disciplinary action, and impose penalty/punishment order recovery when any alleged unethical & improper practice or wrongful conduct of any employee is proved.
- recommend termination or suspension of any contract or arrangement or transaction vitiated by such unethical & improper practice or wrongful conduct

Notification

All departmental heads are required to notify & communicate the existence and contents of this policy to the employees of their department. Every departmental head shall submit a certificate duly signed by him to the Compliance Officer that this policy was notified to each employee of his department. The new employees shall be informed about the policy by the Personnel department and a statement in this regard should be periodically submitted to the Compliance Officer. This policy, as amended from time to time, shall be made available at the Website of the Company

Annual Affirmation

The Company shall annually affirm that it has not denied any personnel access to the Audit Committee and that it has provided protection to whistleblowers from adverse personnel action. The affirmation shall form part of the Corporate Governance report as attached to the Annual Report of the Company



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FRAUD PREVENTION & DETECTION POLICY

PREAMBLE

The corporate policy for fraud prevention & detection (the Policy) is established to facilitate the development of controls which will aid in the detection and prevention of fraud against Narayana Group Entities (the Organisation). It is the intent of the organisation to promote consistent organizational behaviour by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

POLICY OBJECTIVES

The Policy is framed to provide a system for detection and prevention of fraud, reporting of any fraud that is detected or suspected and fair dealing of matters pertaining to fraud. The Policy will ensure and provide for the following.

- To ensure that management is aware of its responsibilities for detection and prevention of fraud and for establishing procedures for preventing fraud and / or detecting fraud when it occurs.
- To provide a clear guidance to employees and others dealing with the Organisation forbidding them from involvement in any fraudulent activity and the action to be taken by them where they suspect any fraudulent activity.
- To conduct investigations into fraudulent activities
- To provide assurances that any and all suspected fraudulent activities will be fully investigated.

SCOPE OF POLICY

This Policy applies to any fraud, or suspected fraud, involving employees as well as consultants, vendors, lenders, borrowers, contractors, outside agencies doing business with the Organisation, employees of such agencies, and / or any other parties with a business relationship with the Organisation.

DEFINITION OF FRAUD

- Fraud means “all instances wherein the Organisation has been put to loss through misrepresentation of books of accounts, fraudulent encashment of instruments like cheques, drafts and bills of exchange, unauthorized handling of cash or any other assets belonging or in the control of the Organisation, misfeasance, embezzlement, theft, misappropriation of funds, conversion of property, cheating, shortages, irregularities, treachery, deceit, deception, sharp practice, disguise or any other acts of similar nature.”

- In terms of Section 25 of Indian Penal Code, a person is said to have done a thing fraudulently if he / she did that thing with an intent to defraud but not otherwise. Hence, Fraud can be interpreted as 'an act of deception carried out singly or in collusion with others with a view to deriving gains to which one is not legally entitled to

ACTIONS CONSTITUTING FRAUD

While fraudulent activity could have a very wide range of coverage, considering the nature of industry we operate in, the following are some of the act(s) which constitute fraud:

- Specific to our operations:
 - Collection of fee (any fee collected from students) by other than the designated person, for example accountant / Principal, and not reporting or not handing over the same to the concerned accountant, in the absence of accountant not handing over the same to the designated person(s) nominated by Revenue Department, within 12 hours of such collection.
 - The concerned accountant after receiving such amount as mentioned in (i) above a) not recording the amount so received in NERP and b) not depositing the amount so received into the bank account within 24hours of such receipt.
 - Collection of fee (any fee collected from students) by the accountant and either issue of manual receipt or not generating printed receipt from Admissions Module.
 - Issue of TC's (Transfer Certificate) to students of all categories and more in particular for 10th, 11th & 12th standard having "fee due" status in the Admissions Module and without prior and proper approval (in writing) from central office.
 - "No-id" students without ADMISSION or RESERVATION number found in any class without prior and proper approval from central office (Dean / DGM / HOD- Revenue)
 - Students forming part of board enrolment list with out having Admission/ Reservation Number.

▪ GENERALLY APPLICABLE TO ALL

- Forgery or alteration of any document or account (such as Bank account, ledger accounts, etc.,) belonging to the Organisation with a mala-fide intention.
- Forgery or alteration of cheque, bank draft or any other financial instrument.

- Misappropriation of funds, securities, supplies or other assets by fraudulent means
- Falsifying records such as pay-rolls, removing the documents from files and/or replacing it by a fraudulent note etc.
- Wilful suppression of facts/deception in matters of appointment, placements, submission of reports, tender committee recommendations, building/lease finalization, purchase of assets etc., as a result of which a wrongful gain(s) is made to one or more and wrongful loss(es) is caused to the Group and others."
- Utilising the funds for personal purposes without approval as per the procedures prescribed by the Group
- Authorizing or processing payments for goods not supplied or services not rendered or making payment without relevant supporting documents
- Destruction, disposition, removal of records or any other assets of the Organization with an ulterior motive to manipulate and misrepresent the facts so as to create suspicion / suppression / cheating.
- Any other act that falls under the gamut of fraudulent activity

The list given above is only illustrative and not exhaustive and the Organisation reserves the right to add any activity to this list.

Suspected improprieties concerning an employee's moral or behavioural conduct should be resolved by departmental management and Employee Relations of Human Resources rather than under the Policy

RESPONSIBILITY FOR FRAUDPREVENTION

- Every employee (either full time, part time, temporary, contract), representative of vendors, suppliers, contractors, consultants, lenders, borrowers, service providers or any other agency(ies) doing any type of business with the Organisation, is expected and shall be responsible to ensure that there is no fraudulent act being committed in their areas of responsibility / control. As soon as it is learnt that a fraud or suspected fraud has taken place or is likely to take place they should immediately apprise the same to the concerned HOD as per the procedure.
- All HODs shall ensure prevention and detection of fraud and implementation of the Policy of the Organisation for the same. HODs shall ensure that there are mechanisms and effective internal controls in place within their area of operations to
 - Familiarise each employee with the types of improprieties that might occur in their area of operations,
 - Educate employees about fraud prevention and detection,



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- Create a culture whereby employees are encouraged to report any fraud or suspected fraud which comes to their knowledge, without any fear of victimization.
- Promote employee awareness of ethical principles subscribed to, by the Organization.
- Due amendments shall be made in the general conditions of contracts, sanctions, other agreements of the organization wherein all bidders / service providers / vendors / consultants etc. shall be required to certify that they would adhere to the Policy for Fraud Prevention & Detection of the Organization and not indulge or allow anybody else working in their organization to indulge in fraudulent activities and would immediately Apprise the organization of the fraud/suspected fraud as soon as it comes to their notice.

REPORTING OF FRAUD

- Any employee, representative of vendors, suppliers, contractors, consultants, service providers or any other agency (ies) doing any type of business with the Organization as soon as he / she comes to know of any Fraud or suspected fraud or any other fraudulent activity must report such incident(s). Such reporting shall be made to the Designated Nodal Officer(s). If, however, there is shortage of time such report should be made to the immediate HOD whose duty shall be to ensure that input Received is immediately communicated to the Nodal Officer with a copy to the CFO. The reporting of the fraud normally should be in writing. In case The reporter is not willing to furnish a written statement of fraud but is in a position to give sequential and specific transaction of fraud / suspected fraud, then the officer receiving the information / Nodal Officer should Record such details in writing as narrated by the reporter and also maintain the details about the identity of the official/employee/other person reporting such incident. Reports can be made in confidence and the person to whom the fraud or suspected fraud has been reported must maintain the confidentiality with respect to the reporter and such matter should under no circumstances be discussed with any unauthorized person All reports of fraud or suspected fraud shall be handled with utmost speed and shall be coordinated by Nodal Officer(s). On receiving input about any suspected fraud, Nodal Officer(s) shall ensure that all relevant records, documents and other evidence is being immediately taken into custody and being protected from not being tampered with, destroyed or removed by suspected perpetrators of fraud or by any other official under his influence.

- At each office of the Organization, the name(s), email IDs etc. Of the Nodal Officers shall invariably affixed to the Notice Board of the office.

INVESTIGATIONPROCEDURE

- The Nodal Officer shall carry out preliminary investigation within 24hours upon getting the compliant. The employee who reports suspected dishonest or fraudulent activity should not attempt to personally conduct investigations or interviews / interrogations related to any suspected fraudulent act. The reporting individual should be informed of the following:
 - Do not contact the suspected individual in an effort to determine facts or demand restitution.
 - Do not discuss the case, facts, suspicions, or allegations with any one unless specifically asked to do so by the Nodal Officer or the HOD.
 - The Nodal Officer shall treat all information received confidentially. Utmost care must be taken in the investigation of suspected improprieties.
- No information concerning the status of a investigation will be given out. The proper response to any inquires is: "I am not at liberty to discuss this matter". Under no circumstances should any reference be made to the allegation, the crime, the fraud, the forgery, the misappropriation, or any other specific reference. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the Organization from potential civil liability.
- If the preliminary investigation of the Nodal Officer substantiates that fraudulent activities have occurred; then the nodal officer shall seek approval of the competent authority and refer the details of the fraud/suspected fraud to the CFO of the organization.", who shall refer the matter to the Special Investigation Authority, if required. The special investigation authority with minimum three members (from below mentioned list), shall be constituted from time to time by the Directors. If the Fraud is proved beyond doubt and accepted in writing with apology, CFO may, in consultation with CPO, HOD-Revenue, HOD-Internal Audit & Directors, take disciplinary action within 24 Hours of submission of Report.
- After completion of the investigation by the Special Investigation Authority, due and appropriate action shall, which could include administrative action

Disciplinary action, depending upon the outcome of the investigation, be taken. Later, the same may be reported to the Audit Committee/Board for civil and criminal action, if need be

NODAL OFFICERS, SPECIAL INVESTIGATION AUTHORITY&AUDIT COMMITTEE

- Names of the Nodal Officers–refer Annexure-A
- Special Investigation Authority–refer Annexure-A
- Central Office Audit Committee
 - Mr. K.S.Sastry (sastryks@narayanagroup.com)
 - Mr. M.SrinivasRao(auditor.muvvala@narayanagroup.com)
 - Mr. YSChandrasekhar (chandrasekharys@narayanagroup.com)
 - Mr. RSivakumar (sivakumar.r@narayanagroup.com)

ANNEXURE-A

RevenueTeamLeads

Mr. Sujankumar (sujankumarj@narayanagroup.com)	Hyderabad Schools, Colleges, AP-Colleges
Mr. Durgaprasad (durgaprasadpvk@narayanagroup.com)	AP-Schools, Bangalore, Chennai, Odisha, West Bengal, Delhi & Mumbai
Mr. Hemamalini (hemamalini@narayanagroup.com)	Kurnool, Guntur, Nellore–Both Schools & Colleges, Hyderabad Colleges.
Mr. UmaRani (umaranis@narayanagroup.com)	Chittoor, Prakasam, Cadappa, Ananthapur–Both Schools & Colleges, Hyderabad Schools.

InternalAuditTeamLeads

Mr. K.Sundarasivarao (sivaraok@narayanagroup.com)	Krishna, West Godavari, Visakhapatnam, Srikakulam Vizianagaram, Patna & Dhanbad
Mr. Ch Rajesh (rajeshchundi@narayanagroup.com)	Guntur, Prakasham, Nellore, East Godavari, Bhubaneswar & Jamshedpur
Mr. SY Yadav (yadavs.ia@narayanagroup.com)	Tarnaka, Uppal, Dilsukh Nagar, Narayaguda Zone-1 & Delhi
Mr. V V Rao (veeravenkateswararaov@narayanagroup.com)	SR Nagar, Mehdipatnam, Kukatpally, Secunderabad, Madhapur, Narayanaguda Zone-2, Cudappa, Mumbai, Surat & Aurangabad
Mr. K Srinivasulu (srinivasuluk.ia@narayanagroup.com)	Bangalore, Chennai, Chittoor & Anathapuram
Mr. V Seshadri (internalaudit.co@nspira.in)	Central Office
Mr. Pawan (internalaudit.pc@narayanagroup.com)	Nellore Medical Colleges

Members in the Special Investigation Authority

Mr. PNandaGopalRao	nandagopalrao.hr@narayanagroup.com
Mr. K. Srinivas	ks4455@narayanagroup.com
Mr. VPNRPrasad	prasadvpnr@narayanagroup.com
Mr. PRamesh	ramesh.hr@narayanagroup.com
Mr. GSuresh	casureshkumarg@narayanagroup.com
Mr. PPurnayya	purnayyap@narayanagroup.com
Mr.MV Rangarao	rangaraomv@narayanagroup.com

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