



**kishore B**

## **compliance POLICY v1**

**Department:** IT  
**Policy Owner:** Kishore B  
**Effective Date:** 2026-01-27  
**Version:** 1.0  
**Status:** Draft

### **Revision History**

Version	Date	Revision Author	Summary of changes
No revision history available			



# kishore B

## compliance POLICY v1

### Review & Approval

---

NAME	POSITION	DATE
Kishore B	CEO	2026-01-27

### Mapped Frameworks

---

FRAMEWORKS	CRITERIA
No mapped frameworks	



# Table of Contents



# Pro1 Health Systems Private Limited

## Compliance Policy

**Security Classification: Private**

**Document Reference: P1H/HIPAA/2022**

**Document Owner: Compliance Officer**

**Document Author:**

**Version: 1.1**

## Revision history

||||

| --- | --- | --- | --- |

| **VERSION** | **DATE** | **REVISION AUTHOR** | **SUMMARY OF CHANGES** |

| 1 | 04/05/2022 | Initial Version | |

| 1 | 03/05/2023 | No Changes | |

| 1 | 02/05/2024 | No Changes | |

| 1.1 | 01/04/2025 | Changes Made | Individual Policies have been created to align with ISO 27001:2022 requirements |

## Table of Contents

[1. Code of Conduct 4](#_Toc211507512)
[1.1. Do's and Don'ts of Code of Conduct 4](#_Toc211507513)
[1.2. Disciplinary Procedures 5](#_Toc211507514)
[2. Policy 5](#_Toc211507515)
[2.1. HIPAA / HITECH Training Program 5](#_Toc211507516)
[2.2. Medicare Fraud, Waste and Abuse (FWA) Training Program 6](#_Toc211507517)
[2.3. Code of Conduct (HR Policy) Training Program 6](#_Toc211507518)
[2.4. Pro1Health Policy & Procedure Training Program 6](#_Toc211507519)
[2.5. Office of Inspector General (OIG) Exclusion Check 7](#_Toc211507520)
[2.6. General Services Administration's (GSA) Excluded Parties List System Exclusion Check 7](#_Toc211507521)
[2.7. Office of Foreign Asset Control's (OFAC) Specifically Designated Nationals List (SDN) Exclusion Check 8](#_Toc211507522)



[2.8. Background Check(s) 8](#\_Toc211507523)

[2.9. I. Educational documents and Permanent Account Number (PAN) or Equivalent Verification 8] (#\_Toc211507524)

## Code of Conduct

### Do's and Don'ts of Code of Conduct

Company will initiate disciplinary action against any employee indulging in

- 1.1.1. Failing to attend company provided training program on compliance on periodic intervals.
- 1.1.2. Failing to attend induction and orientation program
- 1.1.3. All forms of misconduct that is fighting, using foul or abusive language or acting in a manner that is potentially dangerous to others in the workplace (e.g., unsafe working practices).
- 1.1.4. Revealing Company's processes, business secrets and confidential information to non-employee or external source without the permission from management. A "Nondisclosure agreement" will be executed by the employee.
- 1.1.5. Removal of materials, tools or equipment without written authority, deliberate negligence or damage or gross misuse of tools, equipment, materials or property belonging to the company.
- 1.1.6. Refusing to accept reasonable instructions within laws of land from Superiors / Authorized Officials.
- 1.1.7. Leaving company premises during normal working hours without prior written permission from immediate Supervisors / Authorized Officials.
- 1.1.8. Lack of application to duties and poor quality workmanship.
- 1.1.9. Non-observance of company rules as addressed in company Policy & Procedures.
- 1.1.10. Poor attendance or time keeping, long term certified or non-certified sickness.
- 1.1.11. Smoking within Company's premises other than specified areas.
- 1.1.12. Chewing pan and spitting.
- 1.1.13. Failure to notify of contact with any infectious diseases.
- 1.1.14. Remaining silent on absenteeism more than a day.
- 1.1.15. Employee's absence: Employee's unauthorized absence for a period of three consecutive days will make the employee loose his / her lien and his services with the company.
- 1.1.16. Sleeping during duty hours.
- 1.1.17. Taking part in gambling either during working hours or inside the company premises at any time.
- 1.1.18. Misusing the privilege to receive or make personal telephone calls or personal mail except in emergencies while on company's duty hours.
- 1.1.19. Involving in any commercial transaction whatsoever benefiting anything except company.
- 1.1.20. Enrolling or renewing of any agency or association membership without company's permission.
- 1.1.21. Accepting any sort of gratis either in the form of donation or gift from Company's suppliers and Customers without written declaration.



1.1.22. Non-observance of fire safety procedures.

1.1.23. Bringing alcoholic drinks into company's premises or being in an inebriated state or consumption of any quantity of alcohol during working hours.

1.1.24. Any commission or omission on the part of any employee that goes against the company's interest and failure to report such findings in their working environment.

1.1.25. The company prohibits use of personal mobile phone and online personal chat during office hours.

## **Disciplinary Procedures**

Company will initiate disciplinary action by following the various procedures according to Rules of Natural Justice and Company will issue the following punishments depending upon the Nature and seriousness of the misconduct.

1.2.1.1. Employee Counselling

1.2.1.2. Verbal Warning

1.2.1.3. Warning Letter

1.2.1.4. Second and final Warning Letter

1.2.1.5. Termination / Dismissal

## **Policy**

### **HIPAA / HITECH Training Program**

#### **1. New Hire Training**

All new hires are required to complete a HIPAA / HITECH compliance training within 30 days of being hired.

#### **2. Annual Training**

All current employees are required to be trained at least annually on HIPAA / HITECH compliance. The training includes instruction about HIPAA / HITECH regulations, how the regulations apply to the employee's job and a test is conducted. (Likely to be conducted by January month of every year)

#### **3. HIPAA / HITECH Evidence**

1. Evidence Type: pdf document of attendance, copies of tests, etc.

2. Naming Convention: Last Name,FirstName (HIPAA) MM-DD-YYYY

### **Medicare Fraud, Waste and Abuse (FWA) Training Program**

#### **1. New Hire Training**

All new hires are required to complete Medicare FWA compliance training within 30 days of being hired.

#### **2. Annual Training**

All current employees are required to be trained at least annually on Medicare FWA compliance.

#### **3. FWA Evidence**



1. Evidence Type: pdf document of attendance, copies of tests, etc.
2. Naming Convention: Last Name,FirstName (FWA) MM-DD-YYYY

## **Code of Conduct (HR Policy) Training Program**

### **1. New Hire Training**

All new hires are required to complete the Code of Conduct training within 30 days of being hired.

### **2. Annual Training**

All current employees are required to be trained at least annually on Code of Conduct program / policy. (mostly every January month of the year)

### **3. Code of Conduct Evidence**

Evidence Type: pdf document of attendance

## **Pro1Health Policy & Procedure Training Program**

### **1. New Hire Training**

All new hires are required to complete the Code of Conduct training within 30 days of being hired.

### **2. Annual Training**

All current employees are required to be trained at least annually on Code of Conduct program / policy. (Mostly every January month of the year)

### **3. Code of Conduct Evidence**

Evidence Type: pdf document of attendance

## **Office of Inspector General (OIG) Exclusion Check**

### **1. Pre-employment Screening**

Prior to engaging the employee in any assignment, the HR is required to verify that each new hire is not included on the OIG exclusions listing ().

### **2. Monthly Screenings**

On a monthly basis, the HR is required to verify all current employees are not included on the OIG exclusions listing (<http://exclusions.oig.hhs.gov/>).

### **3. OIG Evidence**

1. Evidence Type: pdf document of OIG check
2. Naming Convention: Last Name, FirstName (OIG) MM-DD- YYYY

## **General Services Administration's (GSA) Excluded Parties List System Exclusion Check**

### **1. Pre-employment Screening**



Prior to engaging the employee in any assignment, the HR is required to verify that each new hire is not included on the GSA exclusions listing (<https://www.epls.gov/>).

## **2. Annual Screenings**

On a monthly basis, the HR is required to verify all current employees are not included on the OIG exclusions listing

## **3. GSA Evidence**

1. Evidence Type: pdf document of GSA check
2. Naming Convention: Last Name, First Name (GSA) MM-DD- YYYY

## **Office of Foreign Asset Control's (OFAC) Specifically Designated Nationals List (SDN) Exclusion Check**

### **1. Pre-employment Screening**

Prior to engaging the employee in any assignment, the HR is required to verify that each new hire is not included on the OFAC exclusions listing

### **2. Annual Screenings**

Annually once HR must verify that all current employees are not included on the OFAC exclusion listing.

### **3. OFAC Evidence**

1. Evidence Type: pdf document of OFAC check
2. Naming Convention: Last Name,FirstName (OFAC) MM-DD- YYYY

## **Background Check(s)**

### **1. Pre-employment Screening**

Prior to engaging the employee in any assignment, the HR is required to verify that each new hire has not been convicted of a crime during his past and employment period.

### **2. Criminal Background Check Evidence**

Third party criminal background check will be conducted, and report will be saved in PDF format for future reference

## **I. Educational documents and Permanent Account Number (PAN) or Equivalent Verification**

### **1. Pre-employment Screening**

Prior to engaging the employee in any assignment, the HR is required to verify each new hires' educational qualification and other credentials along with PAN.

### **2. PAN / UIN Evidence**

Evidence of this check will be Xerox copy of the educational qualification & PAN/ UIN