



Conflict of Interest

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Policy Approver	P. Balaji
Policy Reviewer	Ajoy Jauhar
Policy Writer	Hardeep Singh

Version Control

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1	Original Document	1 st Dec 2022	Ajoy Jauhar		Gurjot Malhi
1.1	Revised Air India Format & present signatory	1 st Sep 2024	Ajoy Jauhar		P. Balaji
1.2	<p>Harmonized policy on 'Conflict of Interest' for all the Group Airline Companies.</p> <p>Inclusions:</p> <ol style="list-style-type: none"> 1. Policy Statement & Purpose. 2. Updated Definitions. 3. Updated Categories of Col and illustrations table – Added more scenarios 4. Annexure 3 B 'Workflow for Reporting of an actual/ potential COI situation by Whistleblower'. 5. Annexure 5 showing dilemma situations (not exhaustive). 6. Annexure 6 - Templates for conveying Approval or decision of the Competent Authority on a COI report. <p>Refined:</p> <ol style="list-style-type: none"> 1. Objective, Scope 2. Annex 3 A - Workflow for disclosure and approval. 3. Annex 2 - COI Disclosure Form with addition of a table for declaring family members working with the Company. 	1 st October 2025	Hardeep Singh	Ajoy Jauhar	P. Balaji, Group Head-GRC & Corporate Affairs and CEC
1.3	<p>Refined:</p> <ol style="list-style-type: none"> 1. Para II (C) (D) & (E) of policy 2. Illustrations table of various Col situations – Association with Trade union, use of Company property for any outside personal activity 3. Annex-2 - Col form – Refined Complete form structure with removal of table for declaring family members. 4. Annex-5 – Dilemma Situations 	1st April 2026	Hardeep Singh	Ajoy Jauhar	P. Balaji, Group Head-GRC & Corporate Affairs and CEC

POLICY STATEMENT AND PURPOSE

Tata Code of Conduct (“TCOC”) underpin the way our employees are expected to conduct their business activities and avoid any ‘Conflict of Interest’ (COI). It provides that, “We respect our employees’ right to privacy. We have no concern with their conduct outside our work environment, unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests.”

It further provides that, “Our employees and executive directors shall always act in the interest of our Company and ensure that any business or personal association including close personal relationships which they may have, does not create a conflict of interest with their roles and duties in our Company or the operations of our Company. Further, our employees and executive directors shall not engage in any business, relationship or activity, which might conflict with the interest of our Company or our group companies.”

To uphold the aforesaid provisions of TCoC and other Regulatory provisions, Air India Group (“Company”) establishes the guidelines & procedures on “Conflict of Interest” for disclosure and mitigation of any conflict of interest by the employees.

OBJECTIVE

The **Conflict-of-Interest Policy** establishes guidelines governing conflict of interest matters related to employees, to avoid compliance risk and misconduct. The objective of this policy is to establish a very easy to understand & user-friendly process for declaration and mitigation of any potential or existing conflict of interest situation.

This policy guides us to act in the interest of the Company and avoid situations that could exploit our professional status for personal benefits.

Our employees shall always act in the interest of the Company. They should ensure that any business or personal association which they may have, does not create a conflict of interest with their roles and duties in the Company or its operations. These have been highlighted in two Core Principles of TCoC:

- I. *When representing our Company, we shall act with professionalism, honesty and integrity, and conform to the highest moral and ethical standards.*
- II. *Our conduct shall be fair and transparent and be perceived as fair and transparent by third parties.*

The Tata Code of Conduct provides clear guidance on Conflicts of Interest (as listed in Annex. 1).

SCOPE

This COI Policy is applicable to all Air India Group Personnel (as defined below) and our Company shall recommend adoption of this Policy to the Boards of its subsidiaries, associates and joint ventures.

This Policy constitutes a minimum standard that must be complied within all countries of the Company's business and operations. These minimum standards are applicable to the Company even

when this Policy is stricter than the relevant COI laws applicable in any country - including both applicable local laws and laws with extra-territorial application. However, if stricter norms are prescribed under any applicable law with respect to conflict of interest, then, employees shall comply with such stricter laws/norms.

The guidelines in this COI Policy should be read in conjunction with:

- i. Tata Code of Conduct
- ii. The Whistle-blower Policy
- iii. Gifts and Hospitality Policy
- iv. Anti-Bribery Anti-Corruption Policy
- v. Business Partner Code of Conduct
- vi. Any guidance published pursuant to this policy
- vii. Any other relevant policies as may be implemented from time to time

DEFINITIONS

- **Conflict of Interest:** A conflict of interest could be any known transaction, relationship or service engaged by an employee, his/ her immediate family/ relatives/ close personal relationships which may cause concern (based upon an objective determination) that the employee could not or might not be able to fairly perform his/ her duties to the Company.

It could also be defined as a situation in which an employee has private interests that may or be perceived to improperly influence or interfere with the performance of his/ her official duties and responsibilities. Such improper influence or perceived interference could be attributed to situations involving financial interest, family/ relatives/ friends, political, religious or national affinity of the official.

- **Air India Group:** Includes Air India, Air India Express and any other company which may be added to the AI Group.
- **Air India Group Personnel:** means directors, senior managers, officers, other employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agents, or any other person associated with our Company and such other persons, including those acting on behalf of our Company, as designated by the Compliance Officer from time to time (all of the aforesaid being collectively referred to as Air India Group Personnel or Designated Persons).
- **Chief Ethics Counsellor (CEC):** refers to an employee designated by the Company from time to time, with adequate seniority, competence, and independence to ensure compliance of TCoC and Ethics Policies to drive ethical environment throughout the Air India Group Companies.
- **Ethics Counsellor (DEC/ LEC):** refers to an employee designated by the Company from time to time, with adequate seniority, competence, and independence to support the CEC to ensure compliance of TCoC and Ethics Policies to drive ethical environment throughout the Air India Group Companies.
DEC : Department Ethics Counsellor
LEC : Local Ethics Counsellor

- **Business Partner:** The term “Business Partner” includes any individual or organization, who/ which comes into contact with the Company or transacts with the Company, and also includes actual and potential clients, vendors, consultants, retainers, agents, advisors, distributors, business associates, partners (including academic institutions), contractors, suppliers or service providers who work for and on behalf of the Company.
- **Immediate family members/ relatives:** It includes spouse, mother, father, son, daughter, son-in-law, daughter-in-law, brother, sister, brother-in-law and sister-in-law or immediate family members of spouse like mother-in-law, father-in-law, brother-in-law and sister-in-law.
- **Close Personal Relationships:** Close acquaintance between an employee and a person who is not from the employee’s immediate family or relation but who is or who is perceived by others to have close personal relationship with the employee, e.g., intimate friend, fiancé, fiancée, etc.
- **Competent authority:** For the purpose of this policy, in case of employees the competent authority would be Chief Human Resources Officer (CHRO)/ Group Head-GRC & Corporate Affairs and Chief Ethics Counsellor/ Apex Ethics Committee/ Audit Committee, as appropriate, in accordance with the conflict-of-interest case/ situation.
- **Audit Committee:** means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013.

POLICY DETAILS

I. Clauses of Conflict of interest

Conflict of interest includes situations:

- a. Where an employee’s private affairs or financial interests’ conflict with his/ her work duties, responsibilities and obligations, or results in a perception that a conflict exists that could impair the employee’s ability to act in the Company’s interest.
- b. Where the actions of an employee would compromise or undermine the trust of stakeholders.
- c. A conflict of interest, actual or potential, arises when, directly or indirectly, an employee:
 - i. proposes to engage in a personal business transaction or a personal relationship with the Business Partners of our Company;
 - ii. is offered/ derives undue benefit, personally or for any Immediate family member/ friend, by making or influencing decisions relating to any transaction;
 - iii. is in a position to influence a decision with regard to the Company’s business with a Business Partner where an Immediate family member/ relative/ friend is a proprietor/ director/ partner or representative;
 - iv. is in a position to influence decisions with regard to award of benefits such as increase in salary or other remuneration, posting, promotion or recruitment of an Immediate family member/ relative/ friend employed in the Company.

II. Categories of Conflicts of Interest

A conflict of interest could be any known activity, transaction, relationship or service engaged in by an employee, his/ her immediate family relatives or a close personal relationship, which may cause concern (*based upon an objective determination*) that the employee could not or might not be able to fairly perform his/ her duties to our Company.

NOTE: The categories of Conflict of Interest listed here are for illustration and are not an exhaustive list.

A. Conflict of Interest due to personal relationships

- i. Employee is involved in the process of recruitment of an immediate family, relative or a person in 'close personal relationship' into the Company or any of the Group Companies.
- ii. Referring a relative or a person in 'close personal relationship' for a job opportunity to a Business Partner.
- iii. Maintaining non-disclosure of relatives already recruited or being recruited in the Company.
- iv. Employee is in a position to influence decisions with regard to award of benefits, such as increase in salary or other remuneration, posting, promotion or disciplinary decision for immediate family, relative or a person in 'close personal relationship'.
- v. Employee conducts business on behalf of the Company (*or is in a position to influence a decision with regard to the Company's business with a Business Partner*) where a relative of, or a person in 'close personal relationship' with an employee or Executive Director is a principal officer or representative, resulting in a personal benefit or a benefit to the relative.
- vi. Using his/ her position in the Company for personal advantage from Business Partner (Influencing known contact for service or supply).

B. Conflict of Interest due to financial interest in a third party (Competitors/ Business Partners)

- i. The employee engages in a business activity (with monetary or non- monetary benefits) with anyone who is party to a transaction with the Company.
- ii. The employee is in a position to derive a benefit for any immediate family member, or for any person in a 'close personal relationship' (wherein they have financial interest), by making or influencing decisions relating to any transaction.
- iii. Accepting money in any form from any Business Partner.
- iv. Requesting a Business Partner to invest money or donate to a charitable organization of your choice.

C. Outside employment/ External mandate:

- i. Membership/ position of responsibility in educational/ professional bodies, government committees/ bodies or government organizations.
- ii. Involvement in business activities outside primary employment (including, Real Estate, training school/ coaching or any other business activity of your own/ ancestral or of your family/ close relatives or friends) on full time/ part-time or working as a freelancer or in advisory roles with or without financial gain/ compensation.
- iii. Involvement/ engagement in any external paid or unpaid work, part-time or full-time—such as tutoring, coaching, consulting, investment advisory, consultation services, counselling services, etc. or hold any position—such as board member, advisor, or consultant— with or without financial gain/ compensation.

- iv. Holding any other profitable office either in personal capacity or in an agreement outside the Air India Group, including social media channels, advisory services, associations with social agencies, etc.
- v. Monetization on Social Media Space – Own channel on any multimedia and social networking websites. Posting information on social media connected with company's confidential or internal matters.
- vi. Involvement/ Engagement in Stock Trading with license or in Angel Investment, Pricing, Investment or Partnership related – trading of stocks commodities.
- vii. Participation in contests involving Prize Money, modelling or beauty contests, etc (single or limited).
- viii. Involvement in artistic hobbies, like writing a book, dancing, singing, painting, etc. and engaging in related activities like performing at stage (dance & music), exhibitions of painting, etc. for you are earning or being paid.

D. Association with any Religious institution/ NGO/ Association or Group for voluntary/ honorary services with or without financial gain/ effects

- i. Association with social/ religious (spiritual) or civic causes independently, or through an entity as an active member or as Volunteer/ worker or as non-member with active involvement.
- ii. Long/ Short-term voluntary activities done by an individual without association with any other organization – Association or NGO apart from Air India Group partner.
- iii. Knowledge Sharing Assignments (Honorary/ Paid) – engagement with educational institutions/ any other corporate forum.
- iv. Association with a trade union while occupying a position of authority / decision-making on behalf of the Company, and such role creates a direct or proximate overlap with:
 - (i) conducting disciplinary proceedings against any employee who is a member of a trade union?
 - (ii) representing the Company in discussions/ negotiations with a trade union on any matter whatsoever?
 - (iii) reviewing / handling union issues / matters against the interests of the Company?
 - (iv) participating in discussions and making decisions related to promotion, transfers, performance appraisal, or any disciplinary action involving any employee who is a member of a trade union?
- v. Access to sensitive or confidential information of the Company that is relevant to or could influence union negotiations or discussions?

E. Association with political process/ entity

- i. Participation as a candidate in the election process to public office, or to bodies deemed as public office.

Template for undertaking to be given by the employee for contesting elections is annexed as Annex-4

- ii. Participation as volunteer/ campaigner, directly or indirectly, in an election process.
- iii. Affiliation with external organisation, including advocacy groups with political influence.

III. Conflict of Interest disclosure and mitigation procedures

A. Conflict of Interest declaration

The declaration is mandatory for all employees even if there is no conflict of interest. All employees shall declare conflict of interest or no conflict of interest either online or in a prescribed form every financial year (**COI declaration form enclosed as Annexure-2**). Declarations of conflict of interest will be sent to the Competent Authority for approval. COI declaration to be as under:

- a. By Onboarding team in HR at the time of joining the Company.
- b. Starting of each financial year, i.e., April every year – all employees to submit a declaration if no conflict-of-interest situation has arisen from the date of last declaration till fresh date of declaration.
- c. During service - in case there is any change in actual or potential conflict of interest, the concerned employee must immediately declare such conflicts and seek approval from Competent Authority.

The Competent Authority shall revert to the employee within a reasonable time to enable the concerned employee to take necessary action as advised to resolve or avoid the conflict in an expeditious manner.

In case of any dilemma - Employees are required to be guided by the '**Schedule of Dilemma Situations**' enclosed as **Annexure-5** with this policy or consult with their superiors and/ or Chief Ethics Counsellor whenever they have any question/ dilemma as to whether a particular circumstance may place them in a conflict-of-interest situation.

Employees must be fair and transparent in all their dealings on behalf of the Company and not accept personal gifts or hospitality from those doing business or seeking to do business with the Company. (**Refer to the Gift and Hospitality Policy**)

B. Process for declaration of the Conflict of Interest

The following elements are to be considered to set the procedures for 'disclosure' and 'address the mitigation' of the Conflict of Interest:

1. What

- What types of Conflicts of Interest need to be disclosed?
- What information is required to be furnished during this disclosure?
- An employee is expected to disclose all types of personal or official acts/ activities, **as detailed in para II (A to E) above**, which conflicts with the interest of the Company.
- Brief details of information which is required to be furnished has been detailed under "**What**" column in the table below.

2. Who

- Who should be receiving the disclosure and who should review/ approve the Conflict-of-Interest disclosure?
- Who should be managing the overall process?

3. When

When should the Conflict of Interest be disclosed?

- All new joiners in the Company should submit a Conflict-of- Interest disclosure within **2 weeks** of their joining the Company.

- All employees irrespective of their employment period at the Company should submit a disclosure as soon as they became aware of any potential Conflict of Interest related to them.
- Employees who have submitted a COI disclosure in the past should immediately submit a fresh disclosure in case there is ‘any material change’ related to the said disclosure or there is any ‘additional’ Conflict of Interest to the situation.
- All employees shall submit an annual Conflict of Interest declaration every year in the month of April.

4. How

How should the self-disclosure and/ or reporting of an actual/ potential situation of COI and its subsequent review/ approval/ conclusion process be managed?

- To ensure timely and documented mitigation/ conclusion of the COI cases:
 - a. **For cases disclosed by the employees themselves**, a ‘Workflow for self-disclosure and approval of an actual/ potential COI situation’ has been outlined in **Annexure - 3 A**.
 - b. **For cases reported by the Whistleblowers**, a ‘Workflow for Reporting of an actual/ potential COI situation by Whistleblower’ has been outlined in **Annexure - 3 B**.
- The process should be aligned with the reporting structures followed within the Company, or each legal entity or entities within the Company (*subsidiaries/ Joint Ventures, etc.*).

The following illustrations of Conflicts of Interest situations lay out indicative procedures for disclosure and mitigation. This is not (and cannot be) an exhaustive list and is intended to provide illustrative value:

S. No.	Types of Conflict of Interest	What (Example of Conflict of Interest)	What (Information to be disclosed)	Who (Review/ Approving Authority)	Consideration for approval
1	Personal Relationship	<ul style="list-style-type: none"> ▪ Employee involved in recruitment of an immediate family member, relative or a person in close personal relationship in the Company or any of the group companies. ▪ Referring a relative or a person in ‘close personal relationship’ for a job opportunity to Business Partner. 	<ul style="list-style-type: none"> ▪ Name of the relative ▪ Relationship ▪ Position/ department/ entity name applied for and name of the Functional Head 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation – NA ▪ Decision – CHRO 	Decisions of recruitment may not be objective or may be regarded as ‘influenced’ by others. <u>These conflict-of-interest situations must be avoided or mitigated with safeguards.</u>
		<ul style="list-style-type: none"> ▪ Employee being in a position to influence decisions with regard to award of benefits such as increase in salary or other remuneration, posting, promotion disciplinary decision for immediate family, relative or a person in close personal relationship. 	<ul style="list-style-type: none"> ▪ Name of the relative ▪ Relationship ▪ Position/ department of relative 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation – Functional Head ▪ Decision – CHRO 	<u>These conflict-of-interest situations must be avoided or mitigated with safeguards.</u>

S. No.	Types of Conflict of Interest	What <i>(Example of Conflict of Interest)</i>	What <i>(Information to be disclosed)</i>	Who <i>(Review/ Approving Authority)</i>	Consideration for approval
		<ul style="list-style-type: none"> Employee conducts business on behalf of the Company or is in a position to influence a decision with regard to the Company's business with a supplier or customer where a relative of, or a person in close personal relationship with, an employee is a principal officer or representative, resulting in a personal benefit or a benefit to the relative. 	<ul style="list-style-type: none"> Name of third party Role of employee vis-a-vis third party (selection or financial decision maker/ influencer/ recipient of service/ goods/ Quality Control/ Certification of payment/ Payment processing) 	<ul style="list-style-type: none"> Review – CEC/ Apex Ethics Committee/ Audit Committee Consultation – NA Decision – CEC/ Apex Ethics Committee/ Audit Committee 	<p><u>These conflict-of-interest situations must be avoided or mitigated with safeguards</u></p>
2	Financial Interest in third party (Competitor/ Business Partner)	<ul style="list-style-type: none"> Employee engages in a business activity or has monetary or non-monetary benefits with anyone who is party to a transaction with the Company. 	<ul style="list-style-type: none"> Name of the third party Financial interest - Publicly traded financial instruments or otherwise Role of employee vis-a-vis third party (selection or financial decision maker/ influencer/ recipient of service/ goods/ Quality Control/ Payment processing) 	<ul style="list-style-type: none"> Review – CEC Consultation – Functional Head Decision – CEC/ Apex Ethics Committee/ Audit Committee 	<p>Employee may be, or perceived to be, unduly influenced to award work, or commercial terms that may not be in best interests of the Company.</p> <p><u>These conflict-of-interest situations must be avoided or rescinded (including by way of disinvestment).</u></p>
3	Financial Interest in third party (Competitor/ Business Partner) - by immediate family member, relative or a close personal relationship	<ul style="list-style-type: none"> Employee is in a position to derive an improper benefit for any immediate family member or for any person in a close personal relationship (<i>wherein they have financial interest</i>), by making or influencing decisions relating to any transaction between the Company and third party. Accepting money in any form from any Business Partner. Requesting a Business Partner to invest money or donate to a charitable organization of your choice. 	<ul style="list-style-type: none"> Name of the third party Financial interest - Publicly traded financial instruments or otherwise Role of employee vis-a-vis third party (selection or financial decision maker/ influencer/ recipient of service/ goods/ Quality Control/ Payment processing) 	<ul style="list-style-type: none"> Review – CEC Consultation – Functional Head Decision – CEC/ Apex Ethics Committee/ Audit Committee 	<p>Each disclosure to be evaluated and considered independently in the context of the disclosed association.</p>

S. No.	Types of Conflict of Interest	What <i>(Example of Conflict of Interest)</i>	What <i>(Information to be disclosed)</i>	Who <i>(Review/ Approving Authority)</i>	Consideration for approval
4	Outside employment/ External mandate	<ul style="list-style-type: none"> ▪ Membership/ position of responsibility in educational/ professional/ Industry Association bodies, government committees/ bodies/ organization <i>(including Social or Civic causes)</i>. ▪ Directorships on the Boards of any of the group companies, joint ventures or associate companies. 	<ul style="list-style-type: none"> ▪ Name of the entity engaged with ▪ Position to be held ▪ Key responsibilities ▪ Time commitment and days of the week (if fixed) or hours of the days of the week (if fixed) ▪ Does your activity involve use of Company property? ▪ Remuneration-Per activity/ per assignment (if any) ▪ Time period 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation – CEC/ Functional Head/ Legal ▪ Decision – CHRO 	Acceptance of a position of responsibility <i>(whether for remuneration or otherwise)</i> would typically be permitted, provided the time commitments these demands do not disturb or distract from the employee’s primary duties and responsibilities in our Company, and are promptly disclosed.
		<ul style="list-style-type: none"> ▪ Position of responsibility in business activities outside primary employment. ▪ Working either full or part-time outside the Company 	<ul style="list-style-type: none"> ▪ Name of the entity engaged with ▪ Position held ▪ Key responsibilities ▪ Time commitment and days of the week (if fixed) or hours of the days of the week (if fixed) ▪ Does your activity involve use of Company property? ▪ Remuneration-Per activity/ per assignment (if any) ▪ Time period 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation – CEC/ Functional Head ▪ Decision – CHRO 	An external position of responsibility <i>(with/ without remuneration)</i> for employee would require time commitments, create distraction from primary duties and possibly create conflict with the business activities of the Company or group companies.
		<ul style="list-style-type: none"> ▪ Position of responsibility with third parties related to the Company as Business Partner. 	<ul style="list-style-type: none"> ▪ Name of the entity engaged with ▪ Position held ▪ Key responsibilities ▪ Time commitment (and days of the week, if fixed) or hours of the days of the week, if fixed) ▪ Does your activity involve use of Company property? ▪ Remuneration-Per activity/ per assignment (if any) ▪ Time period 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation– CEC/ Functional Head/ Legal ▪ Decision- CHRO 	Employee may be, or perceived to be, unduly influenced to take decisions regarding award of contracts or commercial terms that may not be in best interest of the Company. <u>These conflicts of interest situations must be avoided.</u>

S. No.	Types of Conflict of Interest	What <i>(Example of Conflict of Interest)</i>	What <i>(Information to be disclosed)</i>	Who <i>(Review/ Approving Authority)</i>	Consideration for approval
5	Outside employment/ External mandate	<ul style="list-style-type: none"> ▪ Participation in competitions involving Prize Money (single or limited). ▪ Involving any consulting Fees (one time/ regular) ▪ Knowledge Sharing Assignments. ▪ Pricing, Investment or Partnership related. ▪ Monetization on Social Media Space. ▪ Long/ Short term voluntary activities done by an individual without association with any other organization. ▪ Engaging in Stock Trading with license or in Angel Investment. ▪ Fixed/ scheduled hours of engagement, mandated by a signed agreement. ▪ Income from Other sources ▪ Engagement in cultural activities/ Hobbies - Singing/ Drama/ Theatre, etc. (with or without remuneration) 	<ul style="list-style-type: none"> ▪ Name of the entity engaged with. ▪ Position to be held. ▪ Key responsibilities. ▪ Time commitment (and days of the week, if fixed or hours of the days of the week, if fixed). ▪ Does your activity involve use of Company property? ▪ Remuneration-Per activity/ per assignment (if any) ▪ Time period 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation – CEC/ Functional Head/ Legal ▪ Decision- CHRO 	<p>An external position of responsibility (<i>with/ without remuneration</i>) for employee would require time commitments, create distraction from primary duties and possibly create conflict with the business activities of the Company or group companies.</p> <p>Each disclosure would be evaluated and considered independently in the context of the disclosed association</p>
6	Association with any Religious institution/ NGO/ Association or Group for voluntary/ honorary services with or without financial gain/ effects	<ul style="list-style-type: none"> ▪ Participation as a post holder/ member/ volunteer/ Donor, etc. 	<ul style="list-style-type: none"> ▪ Name of the Institution/ Association ▪ Affiliation with any political organization or other National/ International Groups ▪ Period of association, time commitment and remuneration (if any) ▪ Nature and details of such voluntary/ honorary activities 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation – CEC/ Legal ▪ Decision – CHRO 	<p>Each disclosure to be evaluated and considered independently in the context of the disclosed association.</p>

S. No.	Types of Conflict of Interest	What <i>(Example of Conflict of Interest)</i>	What <i>(Information to be disclosed)</i>	Who <i>(Review/ Approving Authority)</i>	Consideration for approval
7	Association with a trade union (where such association creates a potential decision-making or confidentiality conflict)	<ul style="list-style-type: none"> ▪ Association with a trade union while occupying a position of authority / decision-making on behalf of the Company, and such role creates a direct or proximate overlap with: <ul style="list-style-type: none"> ▪ (i) conducting disciplinary proceedings against any employee who is a member of a trade union; ▪ (ii) representing the Company in discussing/negotiating with a trade union on any matter whatsoever; ▪ (iii) reviewing / handling union issues / matters against the interests of the Company; and/or ▪ (iv) participating in discussions and making decisions related to promotion, transfers, performance appraisal, or any disciplinary action involving any employee who is a member of a trade union. ▪ Having access to sensitive or confidential information of the Company that is relevant to or could influence union negotiations or discussions. 	<ul style="list-style-type: none"> ▪ Nature of role in trade union (Member/ office bearer) ▪ Nature of the potential conflict (Whether the employee makes decisions affecting a trade union member) 	<ul style="list-style-type: none"> ▪ Review & Decision: CHRO 	<ul style="list-style-type: none"> ▪ Each disclosure to be evaluated and considered independently in the context of the nature of employee’s association with the trade union and responsibilities the employee holds with the Company. ▪ Where a conflict exists, particularly in relation to disciplinary proceedings or discussions/ negotiations with the union, approval may be declined after considering whether recusal or other mitigation measures are feasible. ▪ Consideration may be given only if effective recusal mechanisms can fully mitigate the conflict. ▪ Conditions may include role re-assignment, recusal from specific decisions. ▪ Where risks remain unmitigable, the situation must be avoided, and approval will not be granted. In such cases, the Company shall have the absolute right to determine whether the risks are acceptable, and its decision in this regard shall be taken at its sole discretion and shall be final and binding.

S. No.	Types of Conflict of Interest	What (Example of Conflict of Interest)	What (Information to be disclosed)	Who (Review/ Approving Authority)	Consideration for approval
8	Association with Political process/ entity	<ul style="list-style-type: none"> ▪ Participation as a candidate in the election process to the public office or bodies deemed as public office. 	<ul style="list-style-type: none"> ▪ Name of the election ▪ Affiliation with any political organization ▪ Time period of election process 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation – CEC/ Legal ▪ Decision – CHRO 	Each disclosure to be evaluated and considered independently in the context of the disclosed association.
		<ul style="list-style-type: none"> ▪ Participation as volunteer/ campaigner, directly or indirectly, in the election process. 	<ul style="list-style-type: none"> ▪ Name of the election ▪ Affiliation with any political organization ▪ Time period of election process and the time commitment ▪ Nature and details of the volunteering/ campaigning activity 	<ul style="list-style-type: none"> ▪ Review – CHRO ▪ Consultation – CEC/ Legal ▪ Decision – CHRO 	Each disclosure to be evaluated and considered independently in the context of the disclosed association.

In case of any dilemma where employee needs clarifications whether Conflicts of Interest exist in a particular situation or not - Employees are required to be guided by the 'Schedule of Dilemma Situations' attached as Annexure-5 with this policy and/ or the employee must discuss it with the CHRO or CEC to determine whether it is so and, how it could be mitigated. While clarification on the matter is being sought, the employee should avoid taking part in any activity described in the Conflict-of-Interest disclosure. However, the final decision will be as per the table shared above.

C. Consequence of non - disclosure

If there is a failure to make the required timely disclosure and the Company management becomes aware of an instance of Conflict of Interest that ought to have been disclosed by an employee, the management will take a serious view of the matter and take suitable disciplinary action as per the employee's terms of employment and the applicable disciplinary action guidelines.

D. Mitigation

Where Conflicts of Interest are found to exist as per the disclosure submitted by the employee, the actions to be taken by the Company in order to mitigate the risk of Conflict of Interest are determined in consultation with relevant stakeholders and discussed with the employee (if required). Such mitigation actions may include, but are not limited to:

- Restricting involvement of the Employee in the decisions relating to the Conflict of Interest;
- Removing the Employee from responsibilities that have given rise to the Conflict of Interest;
- Relinquishment of the personal/ financial interest by the Employee in the matter.
- Any other action in the context of the disclosure.
- In the case of employees other than Executive Directors, the Chief Executive Officer/ Managing Director (or CEC/ Apex Ethics Committee/ Management Committee as defined through delegation of authority by the Chief Executive Officer/ Managing Director) shall be the approving authority, who in turn shall report such cases to the Audit Committee of the Board on a quarterly basis.
- In case of the Chief Executive Officer/ Managing Director and Executive Directors, the Board of Directors of the Company shall be the approving authority.

- The disclosure, approval and reporting of Conflict of Interest related to the Board of Directors would be to the Audit Committee or Chairman of the Board, or as defined by the Company's corporate governance policy.

RESPONSIBILITIES

I. Employee

- Employees shall always act in the interest of our Company and ensure that any business or personal association including 'close personal relationships' which they may have, does not create a Conflict of Interest with their roles and duties in our Company or the operations of our Company.
- Employees shall not engage in any business, relationship, or activity, which might conflict with the interest of the Company, or Tata group companies.
- Notwithstanding such or any other instance of Conflict of Interest that exists due to historical reasons, adequate and full disclosure by interested employees shall be made to the Company's management.
- At the time of appointment in the Company, employees shall make full disclosure of any interest leading to an actual or potential conflict that such persons or their immediate family or persons with whom they have close personal relationships, may have in a family business or a Company or firm that is a competitor, supplier, customer or distributor of, or has other business dealings with, our Company.
- Should any actual or potential Conflicts of Interest arise, the concerned person must immediately report and seek approvals as required by applicable Company policy.

II. Reporting Manager/ LEC/ DEC

Should treat the information disclosed by the employee with appropriate confidentiality and without bias and advise the employee to follow the process as defined in the COI policy.

III. CHRO/ CEC

- a. Ensure the Conflicts of Interests (potential or actual) brought to their notice formally or informally by employees are recorded formally and actioned upon in a timely manner as per the Company's process.
- b. Treat the information disclosed by the employee with appropriate confidentiality and without bias.
- c. Fairly evaluate the Conflict-of-Interest situation disclosed by the employee including risks to business interests and the reputation of the Company.
- d. Seek guidance if needed from the (Head of Department/ Function, Legal, CHRO) and the Ethics team.
- e. Make a pragmatic decision to address the 'Conflict of Interest' so that risks are minimized, and the personal interests of the employees are protected as far as possible.
- f. Communicate the decision and its reasoning to the employee and follow up to ensure that conditions/ safeguards in the approval are adhered to by the employee.
- g. Retain documentation of the disclosure and decision on the Conflict-of-Interest disclosure as per the Company's Information Security policy and Document Retention policy.

Templates for seeking approval of the Competent Authority, conveying approval or decision to the concerned employee are annexed as **Annexure-6**.

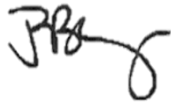
AUDITING & COMPLIANCE

Compliance with this Policy is subject to audit and monitoring.

POINT OF CONTACT

CHRO/ CEC/ Head-Ethics can be contacted in case of any queries.

Approved by



P. Balaji
Group Head - GRC & Corporate Affairs and Chief Ethics Counsellor

Annexure 1 - Tata Code of Conduct clauses related to Conflict of Interest

Conflicts of Interest

Clause D 24 - Our employees and executive directors shall always act in the interest of our Company and ensure that any business or personal association *including close personal relationships* which they may have, does not create a conflict of interest with their roles and duties in our Company or the operations of our Company. Further, our employees and executive directors shall not engage in any business, relationship or activity, which might conflict with the interests of our Company or our group companies.

Clause D 25 - Should any actual or potential conflicts of interest arise; the concerned person must immediately report such conflicts and seek approvals as required by applicable law and Company policy. The competent authority shall revert to the employee within a reasonable time as defined in our Company's policy, so as to enable the concerned employee to take necessary action as advised to resolve or avoid the conflict in an expeditious manner.

Clause D 26 - In the case of all employees other than executive directors, the Chief Executive Officer/ Managing Director shall be the competent authority, who in turn shall report such cases to the Board of Directors on a quarterly basis. In case of the Chief Executive Officer/ Managing Director and executive directors, the Board of Directors of our Company shall be the competent authority.

Clause D 27 - Notwithstanding such or any other instance of conflict of interest that exists due to historical reasons, adequate and full disclosure by interested employees shall be made to our Company's management. At the time of appointment in our Company, our employees and executive directors shall make full disclosure to the competent authority, of any interest leading to an actual or potential conflict that such persons or their immediate family (including parents, siblings, spouse, partner, children) or persons with whom they enjoy close personal relationships, may have in a family business or a Company or firm that is a competitor, supplier, customer or distributor of, or has other business dealings with, our Company.

Clause D 28 - If there is a failure to make the required disclosure and our management becomes aware of an instance of conflict of interest that ought to have been disclosed by an employee or executive director, our management shall take a serious view of the matter and consider suitable disciplinary action as per the terms of employment. In all such matters, we shall follow clear and fair disciplinary procedures, respecting the employee's right to be heard.

Note - A conflict of interest could be any known activity, transaction, relationship or service engaged in by an employee, his/ her immediate family (including parents, siblings, spouse, partner, and children), relatives or a close personal relationship, which may cause concern (based upon an objective determination) that the employee could not or might not be able to fairly perform his/her duties to our Company.

Clause D 7 – Dignity and respect

We respect our employees' right to privacy. We have no concern with their conduct outside our work environment, unless such conduct impairs their work performance, creates conflicts of interest or adversely affects our reputation or business interests.

Clause D 12 - Freedom of association

We recognize that employees may be interested in joining associations or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our Company. Our employees must notify and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable Company policies and law.

Clause D 13 - Working outside employment with us

Taking employment, accepting a position of responsibility, or running a business outside employment with our Company, in your own time, with or without remuneration, could interfere with your ability to work effectively at our Company or create conflicts of interest. Such activity must not be with any customer, supplier, distributor, or competitor of our Company. Our employees must notify and seek prior approval for any such activity as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable Company policies and law.

Clause F 1 - Communities

We are committed to good corporate citizenship and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate.

We engage with the community and other stakeholders to minimize any adverse impact that our business operations may have on the local community and the environment.

We encourage our workforce to volunteer on projects that benefit the communities in which we operate, provided the principles of this Code, where applicable, and in particular the 'Conflicts of Interest' clause is followed.

Clause I 1 - Political non-alignment

We shall act in accordance with the constitution and governance systems of the countries in which we operate. We do not seek to influence the outcome of public elections, nor to undermine or alter any system of government. We do not support any specific political party or candidate for political office. Our conduct must preclude any activity that could be interpreted as mutual dependence/ favour with any political body or person, and we do not offer or give any Company funds or property or other resources as donations to any specific political party, candidate, or campaign.

Any financial contributions considered by our Board of Directors in order to strengthen democratic forces through a clean electoral process shall be extended only through the Progressive Electoral Trust in India, or by a similar transparent, duly authorized, nondiscriminatory and non-discretionary vehicle outside India.

Annexure 2 - Template for disclosure of Conflict of Interest

Conflict of Interest Disclosure Form

Please complete this form if you believe that you may be involved in a conflict-of-interest situation or if you are unsure and seek to disclose a potential or perceived conflict of interest. Please read the Air India group Conflict of Interest Policy.

Employee Details

Name	
Designation	
Department	
Employee ID	
Reporting Manager	
Location	
Email ID	
Mobile No.	

Declaration:

I have read and fully understood the Conflict-of-Interest policy/ Guiding Principles/ Dilemma situations. I am aware that I am required to report Conflicts of Interest (potential/ perceived or actual) under the Tata Code of Conduct.	YES/ NO
In the last one-year period up to the date of my signing this statement, neither me nor any of my family member(s)/ close relative(s) have taken any action inconsistent with the Conflict-of-Interest policy.	YES/ NO
To the best of my knowledge, I have no Conflict of Interest to be reported or the Conflict of Interest is already reported, and I undertake to notify the Company, in writing, should I discover any violation to the Company policy governing Conflict of Interest after signing this statement.	YES/ NO

If any response is 'No', please fill the following:

The potential/ perceived or actual conflict of interest relates to: <i>(tick all appropriate box/s)</i>	
<input type="checkbox"/> Personal Relationship	<input type="checkbox"/> Outside Employment/ External Mandate
<input type="checkbox"/> Financial Interest in a third party	<input type="checkbox"/> Engagement/ Association with NGO/ Civic/ Religious organization/ Trade Union
<input type="checkbox"/> Engagement/ Association with Political Process/ Entity	<input type="checkbox"/> Other (please provide details)

*** Kindly fill up separate form in case of more than one conflict.**

*** Kindly choose from the possible Conflict situations (Not exhaustive) given below:**

Personal Relationship

1. Are you involved in recruitment of a family member, relative, or close personal relationship into Air India?
2. Have you referred a relative or close/ personal contact for a job opportunity with a Business Partner/Vendor?
3. Do you have any influence over salary, promotion, posting, appraisal, or disciplinary decisions of a relative or close personal contact employed with the Company or with a Business Partner/Vendor?
4. Are you dealing with a Business Partner/ Vendor where your relative/ close contact is a director, owner, partner, principal officer, or representative?
5. Do you/ your family/ close relatives/ friends are involved in any work/ activity/ business with an organization that does business with or competes with Air India?

Outside employment/ External mandate

1. Are you holding membership or responsibility positions in educational/ professional association, government committees, or organisations?
2. Are you involved in business activities outside primary employment (including, Real Estate, training school/ coaching or any other business activity of your own/ ancestral or of your family/ close relatives or friends) on full time/ part-time or working as a freelancer or in advisory roles with or without financial gain/ compensation?
3. Are you involved/ engaged in any external paid or unpaid work, part-time or full-time—such as tutoring, coaching, consulting, investment advisory, consultation services, counselling services, etc. or hold any position—such as board member, advisor, or consultant— with or without financial gain/ compensation?

4. Are you involved/ engaged in stock trading with license, angel investment, pricing, Investment or partnership-related trading of stock commodities, etc.?
5. Are you engaging in monetization of social media space - own channels or any multimedia or social networking websites/handles giving you financial gains?
6. Are you participating in contests with prize money, modelling, beauty contests, etc.?
7. Are you engaging in knowledge-sharing or speaking assignments (paid or honorary)?
8. Are you pursuing artistic hobbies, like, writing a book, dancing, singing, painting, etc. and engaging in related activities like performing at stage (dance & music), exhibition of painting, etc. for which you are earning or being paid?

After choosing one of above options, please provide response to following queries:

- a. Is this a temporary assignment or long term? If temporary, how long?
- b. How many hours/ days do you spend every week/ month on this activity?
- c. Are there any remuneration/ honoraria you receive for this activity? If yes, specify how much per activity/ per assignment?
- d. Will your external activity overlap with your role at Air India impact your availability, performance, or ability to fulfill your primary job responsibilities?
- e. Does this activity require you to share company information?
- f. Does your activity involve use of Tata or Air India Group Brand, as a leverage/ reference to solicit business?
- g. Does your activity involve use of Company property (office premises) or Company assets (Laptop/Tablet/Mobile, etc.) or Company time (working hours)?
- h. Does your position/ rank at Air India Group play as a leverage or reference in this activity?

For Flying Crew

- i. Do you undertake this activity during your working hours or during your off days?
- j. Does this activity disrupt your required FDTL?

Financial interest in a third party

1. Do you or your family/ close relatives/ friends have any personal, financial, or business relationship with a third party that conducts business with Air India, including situations where such relationships could influence your official role?"
 - a. Is this a temporary assignment or long term? If temporary, how long?
 - b. How many hours/ days do you spend every week/ month on this activity?

- c. Are there any remuneration/ honoraria you receive for this activity? If yes, specify how much per activity/ per assignment?
- d. Will your external activity overlap with your role at Air India impact your availability, performance, or ability to fulfill your primary job responsibilities?
- e. Does this activity require you to share company information?
- f. Does your activity involve use of Tata or Air India Group Brand, as a leverage/ reference to solicit business?
- g. Does your activity involve use of Company property (office premises) or Company assets (Laptop/Tablet/Mobile, etc.) or Company time (working hours)?
- h. Does your position/ rank at Air India Group play as a leverage or reference in this activity?

For Flying Crew

- i. Do you undertake this activity during your working hours or during your off days?
- j. Does this activity disrupt your required FDTL?

Engagement/ Association with any NGO/ Civic/Religious organizations

1. Are you engaged/ associated with any Long/ Short-term voluntary activity, done by an individual, organization, Association or NGO apart from Air India Group partner:
 - a. Is this a temporary assignment or long term? If temporary, how long?
 - b. How many hours/ days do you spend every week/ month on this activity?
 - c. Are there any remuneration/ honoraria you receive for this activity? If yes, specify how much per activity/ per assignment?
 - d. Will your external activity overlap with your role at Air India impact your availability, performance, or ability to fulfill your primary job responsibilities?
 - e. Does this activity require you to share company information?
 - f. Does your activity involve use of Tata or Air India Group Brand, as a leverage/ reference to solicit business?
 - g. Does your activity involve use of Company property (office premises) or Company assets (Laptop/Tablet/Mobile, etc.) or Company time (working hours)?
 - h. Does your position/ rank at Air India Group play as a leverage or reference in this activity?

For Flying Crew

- i. Do you undertake this activity during your working hours or during your off days?
 - j. Does this activity disrupt your required FDTL?
2. Do you have any association with a trade union while occupying a position of authority / decision-making on behalf of the Company, and such role creates a direct or proximate overlap with:
- (i) conducting disciplinary proceedings against any employee who is a member of a trade union?
 - (ii) representing the Company in discussions/ negotiations with a trade union on any matter whatsoever?
 - (iii) reviewing / handling union issues / matters against the interests of the Company?
 - (iv) participating in discussions and making decisions related to promotion, transfers, performance appraisal, or any disciplinary action involving any employee who is a member of a trade union?
3. Do you have access to sensitive or confidential information of the Company that is relevant to or could influence union negotiations or discussions?

Engagement/ Association with Political Process/Entity

- 1. Are you participating as a candidate in the election process to public office or bodies deemed as public office?
- 2. Are you participating in any election process, directly or indirectly, as a volunteer, campaigner, advisor, or supporter, etc.?
- 3. Do you have any affiliation with external organisation, including advocacy groups with political influence?

After choosing one of above options, detailed information to be provided for the potential/ perceived or actual Conflict of Interest:

Give details of the potential/ perceived or actual conflict of interest. *(Please insert all relevant details)*

Describe factors/ steps that you are already taking, or you propose to take to reduce the impact or overcome this Conflict of Interest.

Acknowledgement

- To the best of my knowledge and belief, I have disclosed here all potential/ perceived or actual conflicts which I have or I might have, in accordance with the Air India group Conflict of Interest Policy.
- I acknowledge and agree to comply with any approach identified by the Company for redressal/ mitigation of this potential/ perceived or actual conflict of interest.
- I understand that false declarations may lead to disciplinary action.

Signature: _____

Name: _____

Employee No.:_____

Date: _____

Place: _____

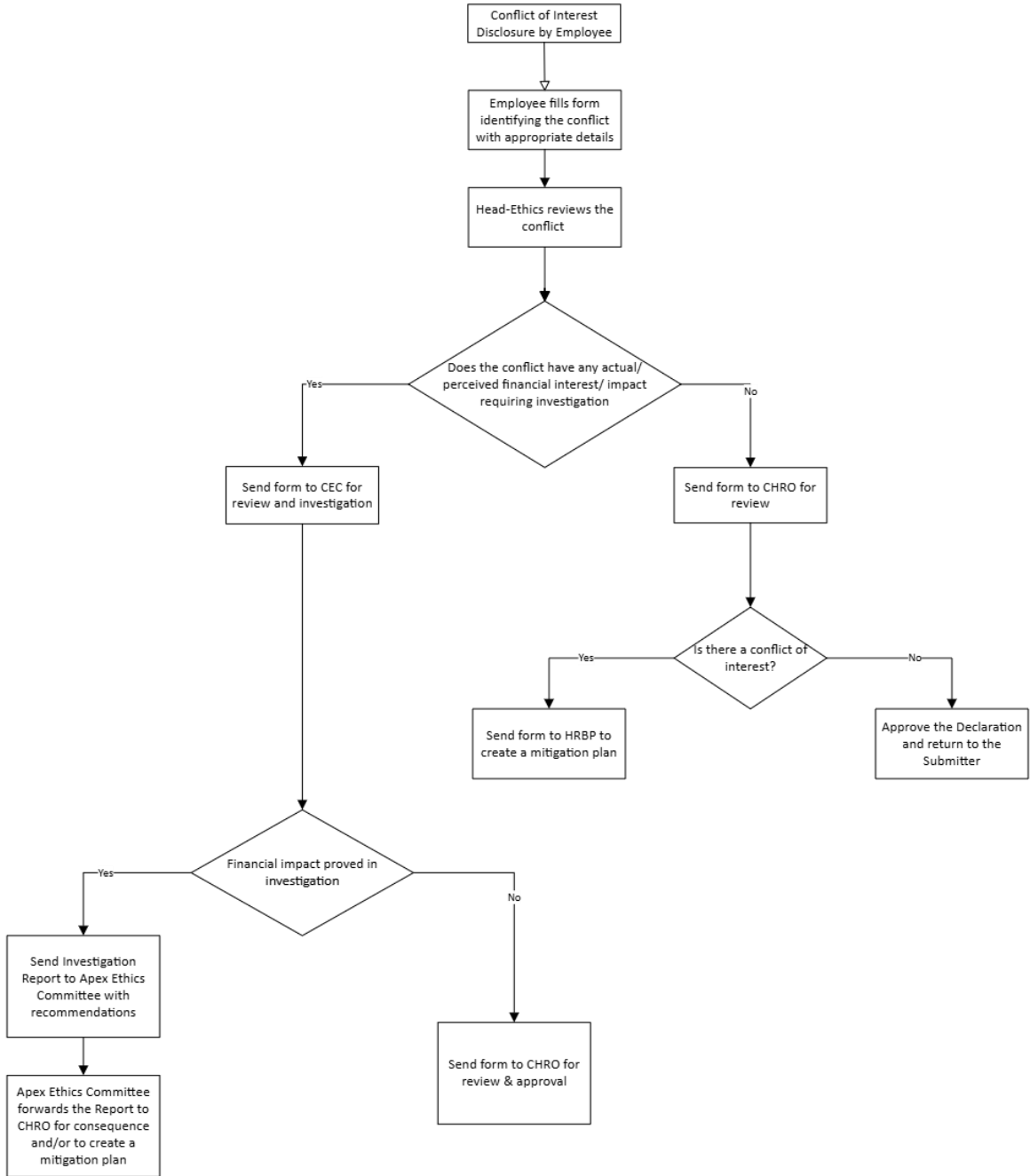
Mitigation Action(s) Required

- For employee
- For Supervisor/ Reporting Manager
- For Relevant Department(s)

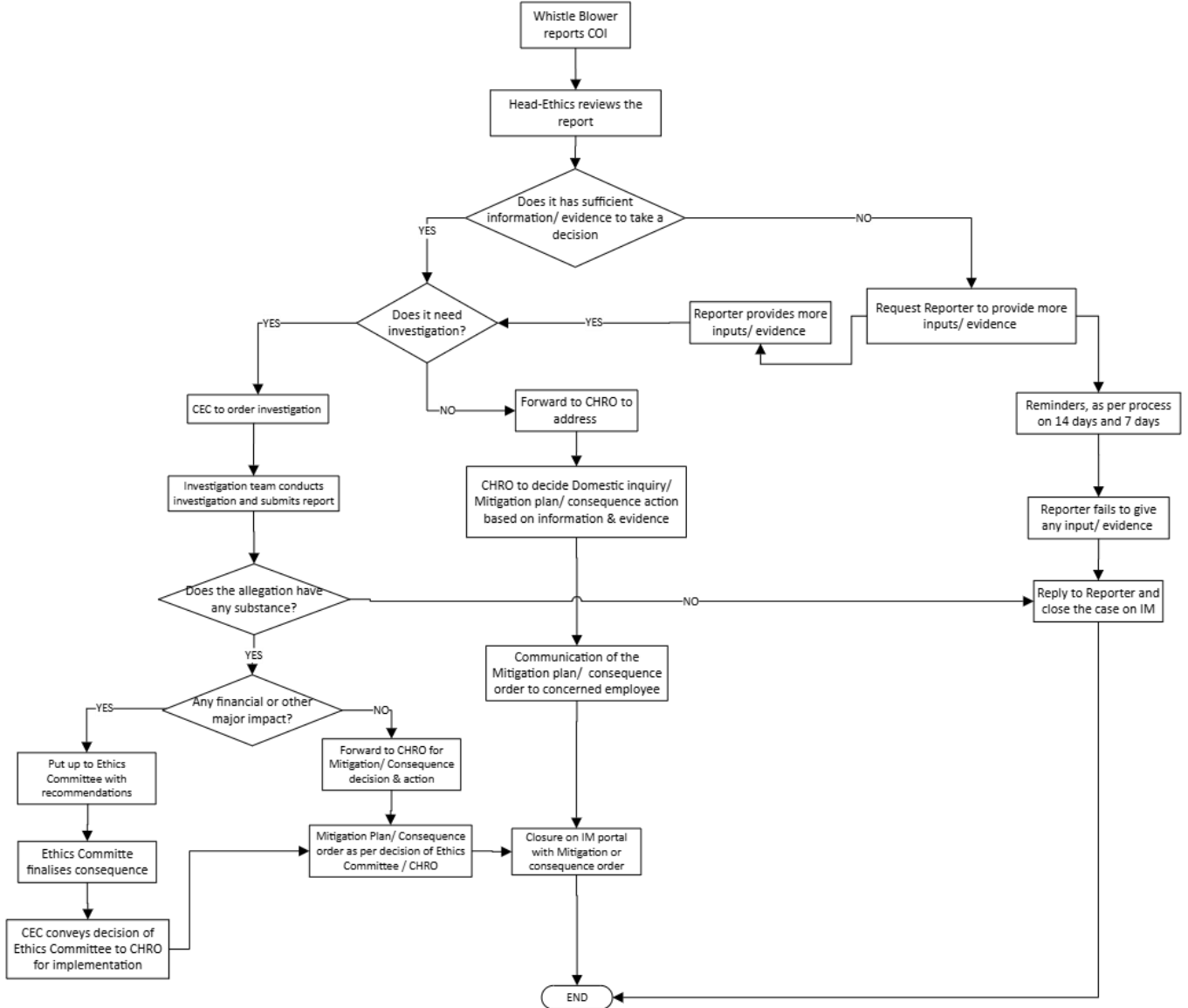
Mitigation action plan to be reviewed:

- | | | |
|---|--|---|
| <input type="checkbox"/> Within 1 month | <input type="checkbox"/> Within 3 months | <input type="checkbox"/> Within 6 months |
| <input type="checkbox"/> Within 12 months | <input type="checkbox"/> Other – specify | <input type="checkbox"/> N/A: the conflict is one-off or short duration |

Annexure 3 A - Workflow for self-disclosure and approval of an actual/ potential COI situation



Annexure 3 B - Workflow for Reporting of an actual/ potential COI situation by Whistleblower



Annexure 4 - Template for undertaking to be submitted to the CHRO by the employee for contesting elections

UNDERTAKING to Air India Ltd./ Air India Express Ltd.

SUB: Standing as a Candidate and campaigning in the _____ Elections

1. I am desirous of standing as a Candidate in the upcoming elections, and in undertaking related election campaign activities.
2. I will take a 'Sabbatical' from the Company - as per due process - in order to undertake these election campaign activities.
3. I understand and agree to the following conditions that would apply to me during the course of my undertaking election campaigning:
 - a. Non-use of the Tata brand in any form or manner or use of my employee status/ position/ rank with the Company as 'leverage'/ reference in the election campaigning.
 - b. Non-use of Tata offices or any other facilities, or Company resources, for the campaign work, that would be undertaken by me in my individual capacity.
 - c. Non-use of my position/ rank in the Company by me (or by my supporters) to coerce support for my candidate from Tata group/ Company stakeholders like Business Partners, other employees, etc.
 - d. I confirm my agreeing to clarify to my target audiences/ media of any kind, should the question be raised during the course of campaigning, that I am contesting the elections as an 'individual' and not representing any Tata interests.
 - e. If elected to the public office, I would give an undertaking that my application would be deemed as 'resignation' from the Tata Company, from the date of assuming the new role as an elected member.

Name:

Place:

(Sign)

Date:

Annexure 5: Dilemma Situations (not exhaustive)

Sr. No.	Dilemma Situations	Recommendations (Existing)
Concurrent Employment		
1	Giving consultancy to any other entity	Not allowed
2	Being an agent of any other entity (LIC/ AIG/ Amway, etc.)	Not allowed
3	Trading of Stocks with license	Not allowed
4	Running a business in the name of self	Not allowed
5	Having social media channels and subscribers from where employee has earnings	Not allowed
6	Teaching in an institute having business relation with the Company or training in Aviation related courses	Not allowed
7	Business in the name of immediate family member, where employee earns any income out of it	Not allowed
8	Engaging in Tuition, Coaching, Training etc. not on regular basis or working as a lecturer/ invigilator/ Faculty for any other institution (other than Aviation) on one off assignment	Guest lecture at an Educational Institute/ Association allowed on a pro-bono basis. Any such activity involving remuneration/ payment, in any kind, is Not allowed.
Conflict of Interest		
1	Participating in the talent review/ interview panel/ selection process for relatives or for persons having close personal relationship	Not allowed
2	Engaging in Teaching, Coaching, Training on aviation courses without a letter of request from DGCA/ regulatory body	Not allowed
3	Engaging in Teaching, Coaching, Training on aviation courses approved by DGCA/ regulatory body with/ without remuneration	Guest lecture on aviation courses approved by DGCA/ regulatory body allowed on a pro-bono basis. Any such activity involving remuneration/ payment, in any kind, is Not allowed.
4	Engaging in a family-owned businesses	Not allowed
5	Engaging in part-time assignments due to financial constraints. Special cause when Stations/ operations are suspended and staff on LOP	Not allowed
6	Relatives (parents, child or siblings, spouse or in laws or persons having close personal relationship etc.) working or having business relation with the Company	Allowed with prior approval, as long as the employee does not participate in decision making relating to awarding the contract

Sr. No.	Dilemma Situations	Recommendations (Existing)
7	Participating in any quiz/ contest/ beauty contest, involving prize money	Allowed with prior approval
8	Education at work	Allowed with prior approval and basis principles listed below: 1.Classes should not be attended during official working hours and should not impact official deliverables. 2.Leaves would be granted on prior request subject to operational feasibility. 3.Undertaking for non-disclosure of any sensitive Company information which is not meant for public information.
9	Angel investment	Allowed with prior approval, as long as it does not impact employee's deliverables, if employee is not spending time as Mentor/ Director for the purpose of investment and also not involved in day-to-day decisions/ activity
10	Association with NGO (voluntary activities) apart from Air India group Partner	Allowed with prior verification of the NGO, upon approval and without payment as long as it does not belong to AI Group competitor
11	Membership or participation in Govt. Committees/ Bodies or Organizations	Allowed with prior approval
12	Directorship on the Board of any group companies, or Membership, or participation in committees/ bodies or organizations	Allowed with prior approval
13	Any engagement in the form of blogs, videos, articles related to personal reviews of place/ product/ service, including aviation related content on own social media channels without any monetization	As long as content is in personal capacity and not violating any regulatory guidelines/ COI/ social media Policy of Air India group
14	Association with political process/ entity: participation as a candidate in the election process	Each disclosure to be evaluated and considered independently in the context of the disclosed association. However, on winning the election process, he/ she shall decide on one profession
15	Association with political process/ entity: participation as a volunteer/ campaigner in the election process	Each disclosure to be evaluated and considered independently in the context of the disclosed association

Annexure-6: Templates for Approval & Rejection emails

These templates are for reference, kindly edit as appropriate basis the request.

A. Draft email conveying approval of the Competent Authority

Dear (Name of staff)

Basis internal discussions, we are approving your request dated _____ subject to the following undertaking:

- You will not undertake any activity related to the event during your official working hours & the same should not in any way impact your official deliverables.
- You will not use any article or any item belonging to Air India Group under your possession.
- You will not disclose any sensitive information about Air India Group, which is not currently / meant for public information.
- You will participate/ engage in the same in personal capacity & not representing Air India Group as a brand.
- Any prize money involved, may be utilized by you as per your discretion post declaring the same to the Company.
- You will not monetize through any platform including social media platforms, e.g., having business account on social media/ registered for YouTube Partner Program (YPP) etc.
- Please ensure that you display the below disclaimer on your channel/ content shared by you:

“The Video/ Audio/ Article Content has been made available for informational/ entertainment/ educational purposes only. Any views represented in the Video/ Audio/ Article are in personal capacity and do not represent any individual/ group/ company”.

- You will always act in the interest of the Company and that any business or personal association you may have, does not create a conflict of interest with your roles and duties in the Company or the operations of the Company; and
- You shall not engage in any business, relationship, or activity, which might conflict with the interest of the Company.

If any violation of the terms & conditions of the approval is noticed by the Company and/ or if any violation/ non-compliance is brought to the notice of the Company by any Whistleblower, then action will be taken in accordance with TCoC and related policies of the Company and also the terms of your employment contract.

Annexure-6: Templates for Approval & Rejection emails

B. Draft email conveying Rejection by the Competent Authority

Dear (Name of Staff)

With reference to your request for external engagement dated_____, basis internal discussions, we regret to inform you that we will be unable to approve your request due to your association with the firm as a _____. While we respect the fact that you have followed in letter and in spirit, the Code of Conduct 'lived' by our employees as well as those who work with us, we also thank you for understanding the same.