



Business Partner Code of Conduct

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POLICY STATEMENT AND PURPOSE

One of the core principles set out in the Tata Code of Conduct (**TCoC**) states: 'We are committed to operating our businesses conforming to the highest moral and ethical standards. We do not tolerate bribery or corruption in any form. This commitment underpins everything we do.'

As a Tata Group Enterprise, Air India Group Companies ("Company") are committed to doing business ethically and responsibly and to ensure compliance of the core Values & principle enshrined in the Tata Code of Conduct, we select our Supply Chain Partners (Business Partners) and service providers fairly and transparently and we seek to work with such Business Partners/ Suppliers, Service Providers, Agents, Contractors, sub-contractors and their employees/ representatives, who can demonstrate that they share similar values & principles. We expect them to adopt ethical standards comparable to our own.

In support of this commitment, Air India Group has developed this **Business Partner Code of Conduct** (hereinafter referred to as '**Code**') to convey its expectations of its Business Partners with regards to compliance with laws, ethical business practices and fair treatment of people and surroundings.

DEFINITIONS

Business Partner: any person or entity who is in a business relationship with Air India Group Companies for supplying products and/ or services or acting on behalf of the Company including but not limited to vendors, suppliers, contractors, agents, service providers, their sub-contractors and employees/ representatives, advisors/ consultants, manufacturers, distributors, sales representatives, channel partners, intermediaries, etc.

Air India Group: Includes Air India, Air India Express and any other company which may be added to the AI Group.

SCOPE

The **Business Partner Code of Conduct** is applicable to all Business Partners who are in business relationship with Air India Group Companies for supplying of products and/ or services or acting on behalf of the Company. The **Code** set forth the expectations from all its Business Partners. It is expected of them:

- To ensure that this **Code** is communicated to their employees and subcontractors and that it is done in the local language and in a manner that is understood by all.
- To establish and maintain appropriate management systems whose scope is related to the content of this **Code** and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this **Code**.
- To encourage and work with their own Business Partners and subcontractors to ensure that they also strive to meet the principles of this **Code** or equivalent set of principles.

OBJECTIVE

All supply chain partners of Air India Group Companies are valued Business Partners and integral stakeholders in the success of the Company and shall always maintain the highest standards of ethical

conduct and should comply with all the applicable local, national, and multi-jurisdictional laws and regulations related to the conduct of its business.

This document highlights the means of achieving a perfect balance in business economics with environmental and social responsibility in a transparent ethical manner to minimize business continuity risks; regulatory, reputational, market business acceptance and consumer requirement risks for all stakeholders in the business.

This document also intends to establish sustainability expectation in the supply chain outlining the safeguards to be adopted in labour engagement, occupational safety and health, environment and ethical conduct by our partners as a united effort towards lowering risks. The document further elucidates the process for continual improvement through documentation, evaluation and monitoring which shall ensure a sustainable effort in risk management.

POLICY DETAILS – Principles of Business Partner Code

This policy has been segregated into three principles:

Principle 1 – Business Ethics

Principle 2 - Labour Practices and Human Rights

Principle 3 - Environment, Health, and Safety

Principle 1 – Business Ethics

Regulatory Compliance: The Business Partner shall always maintain the highest standards of ethical conduct and is expected to comply with all the applicable local, national, and multi-jurisdictional laws and regulations (broadly and collectively, the “**Laws**”) related to the conduct of its business.

In case the standards mentioned in the Business Partner Code differ from any legal requirements provided by such Laws, the stricter of the standards of the Code or the Laws shall apply.

Integrity and Transparency: Business Partner shall uphold integrity and transparency while doing business with the Company. Business and services delivered must meet the timelines, quality, specifications, terms agreed and comply with applicable Laws concerning importing, exporting, re-exporting or transfer or packaging or labelling or sales or after sales of products and services.

Business Partners must accurately record and maintain information regarding its operations, financial transactions, labour, health, and safety in relation to the Company’s business transaction, as per accepted accounting practices, to ensure regulatory compliance and conformity to Company requirements along with appropriate confidentiality to protect privacy and shall disclose such information to the Company or entities as and when reasonably requested by the Company and/or as required by the Laws.

Business Partners who undertake marketing or promotional activities for, on behalf of, or with the Company shall do so without making unfair or misleading statements and in compliance with the Laws.

Business Partners shall responsibly source their raw materials/ products/ services by implementing appropriate mechanism for due diligence of its own value chain partners and supply chain traceability to support Company’s effort to mitigate ethical and/ or sustainability risks.

Anti-Bribery Anti-Corruption: Business Partner shall not engage in any form of bribery or corruption, including offering, promising, giving, or receiving anything of value to obtain or retain business or gain an unfair advantage. Business Partner shall comply with the Laws for anti-bribery and anti-corruption.

Business Partner shall establish systems and processes to monitor and report on their compliance with applicable Laws related to anti-bribery and anti-corruption, and promptly address and report any non-compliance as required under relevant Laws. Business Partner shall conduct due diligence on their business partners to ensure that they comply with anti-bribery and anti-corruption regulations.

Anti-Money Laundering: Business Partner shall not engage in any activities that facilitate money laundering and/ or engaging in transactions with individuals, groups or entities known to be involved in money laundering or terrorism or criminal activities.

Sanctions and Trade Controls: Business Partner shall comply with applicable sanctions and trade restrictions imposed by the governments in the countries in which they operate. This would include and relate to restrictions on trade with embargoed countries, entities, or individuals, as well as restrictions on the use or transfer of certain technologies or products.

Competition and Anti-Trust: Business Partner shall comply with applicable anti-trust Laws in the countries in which they operate. This includes but not limited to the Laws related to price-fixing, market allocation, or any other kind of anti-competitive behavior.

Business Partner shall compete fairly and honestly in the market. They shall not engage in any activities that could be considered anti-competitive including but not limited to predatory pricing, bid rigging, cartelization, or restrictive trade practices etc.

Gifts and Hospitality: Business gifts and hospitality are sometimes used in the normal course of business activity. However, if offers of gifts or hospitality (including entertainment or travel) are frequent or of substantial value, they may create the perception of, or an actual conflict of interest or an 'illicit payment'. Therefore, gifts and hospitality which are customarily given or received and are of commemorative nature for special events, should be modest in value and appropriate, and in compliance with Air India Group Gifts and Hospitality policy. The Business Partners shall neither receive nor offer or make, directly or indirectly, any illegal payments, remunerations, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its business with Air India Group.

Conflict of Interest: The Business Partner shall not engage into a financial or any other relationship with an Air India Group's employees that creates any actual or potential conflict of interest. The Business Partner shall understand that a conflict of interest arises when the personal interests of an employee are inconsistent with the responsibilities of his/ her position with the Company. All such conflicts must be disclosed. Even the appearance of a conflict of interest can be damaging to Air India group and to the Business Partners and are required to be disclosed and approved in advance by Air India Group.

The Company expects that the transactions with Business Partner shall be objective, fair and avoid even the appearance of a conflict of interest.

A conflict of interest exists when personal or financial relationships or activities impair, or even appear to impair the ability to make objective and fair decisions. This includes but is not limited to Business Partner's Key Management Personnel's immediate family (including parents, siblings, spouse,

partners, and children), relatives or a close personal relationship employed with the Company. The Business Partner is therefore required to give full disclosure of its personal or financial relationship with any employee of the Company, which could lead to an actual or potential conflict of interest.

Business Partner shall avoid engaging in any activity that would create an actual or apparent conflict of interest that would impact their business transaction with the Company. In the event an actual or potential conflict of interest does arise, Business Partner shall immediately report it to the Company.

Information Security and Data Privacy: Business Partner shall take appropriate steps to protect Company's proprietary or confidential information, financial data, intellectual properties and trade secrets, including the privacy of information and data of Company's employees and customers. Business Partner shall:

- only collect, process, and use data for the purposes specified in their contract with the Company and comply with applicable Laws relating to information security and data privacy and ensure that their own Value Chain Partners also comply with such Laws.
- implement appropriate access controls to prevent unauthorized access to data and systems.
- have a plan in place to respond to data breaches or other security incidents and shall notify the Company promptly in the event of such an incident within the time frame prescribed under the applicable Laws or 24 hours of having knowledge of the breach, whichever is earlier and provide all the necessary information and assistance to investigate and mitigate the breach.
- adhere to the Company data retention and destruction policies. They shall not retain data longer than necessary for the purposes specified in their contract and as per Laws and shall securely return or dispose off data when it is no longer needed.

Intellectual Property and Company Assets: Business Partner shall not use any intellectual property including trademarks, logos, patents, copyrights, trade secrets and other Company's assets physical or digital or intangible without obtaining proper licenses or permissions from the Company.

Business Partner is expected to take necessary measures to protect the Company's physical, digital and intangible assets including but not limited to confidential and proprietary information, trade secrets, intellectual property.

Reputation, Image and Brand: The Business Partner shall not take any action that compromises or could be detrimental to the Company name, its reputation, brand, and/or its product trademarks. Business Partner or its constituents and representative, shall not make any disparaging, derogatory, defamatory, inflammatory, disrespectful, obscene, threatening, abusive and/ or malicious statements, releases/ posts, including on social media, about Air India Group, its affiliates and group companies, and/ or their shareholders, promoters, directors, officers or employees.

Third Party Representation: The Business Partner shall represent Air India Group only with duly authorized written permission from the Company. They are expected to abide by this Code in their interactions with, and on behalf of Air India Group, including respecting the confidentiality of information shared with them.

Insider Trading: Business Partner and their personnel shall not use any confidential information or non-publicly disclosed information, or unpublished price sensitive information obtained during their business relationship with the Company as the basis for trading or for enabling others to trade in the stock or securities of the Company. Such information shall include but not be limited to information

about the Company's financial information, new product development/launches, investment decisions and acquisition/divestiture of businesses.

Provision of High-Quality Products and Services: The Business Partner will need to demonstrate that they have quality management systems. Business Partners within the food value chain need to have robust food safety systems in place.

Principle 2 - Labour Practices and Human Rights

Business Partners should recognize and be committed to upholding the human rights of workers. Workplace must have an environment that treats all employees with dignity and respect as understood by the international community. Business Partner shall ensure:

Non-Discrimination: Business Partner shall not discriminate against any worker or employee based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by Laws, in hiring and other employment practices.

Anti-Harassment and Respectful Workplace: Business Partner shall always uphold the dignity of its employees, workers, contractors and shall work towards establishing and reinforcing a respectful work culture.

Business Partner shall prohibit harsh or inhumane treatment, violence, sexual harassment or abuse, corporal punishment, mental or physical coercion, bullying, verbal abuse, or any form of threat to their employees or workers or contractors.

Child and Forced Labour: Business Partner shall not employ, engage, or otherwise use any form of child labour at their workplace. The company encourages Value Chain Partners to participate in industry efforts aimed at the elimination of such practices wherever they exist in their supply chain.

Business Partner shall not engage in any instance of forced, bonded or compulsory labor and/or slavery or human trafficking at their workplace. All employment with Business Partner shall be voluntary and employees shall be free to leave their employment in compliance with Laws and contracts. Employees or workers will not be required to surrender any government-issued identification, passports or work permits as a condition of employment.

Wages and Benefits: Business Partner shall comply with Laws related to minimum wages, duration of payment, overtime hours, equal remuneration and other elements of compensation. All legally mandated benefits like leaves, social security, insurance, healthcare etc. shall be provided by the Value Chain Partner to its employees, workers, or contractors. Deductions, if any, from wages shall be made solely in strict compliance with the Laws.

Working Hours: Business Partner shall comply with Laws and industry standards related to working hours including maximum daily and weekly work hours, overtime, and rest breaks.

Principle 3 - Environment, Health, and Safety

Provide a Safe Working Environment: The Business Partner shall provide to its employees and contracted service providers a safe, clean, and healthy working environment, systems and tools that are necessary to ensure compliance with all relevant laws, rules and regulations. At a minimum, Business Partner shall:

- comply with all Laws and industry standards relating to the environment.
- develop and implement practices that reduce negative environmental impacts and have processes in place to optimize the use of natural resources, reduce the release of harmful emissions, solid waste, wastewater in the environment and produce environmentally compatible products and services.
- strive for environmental sustainability, particularly regarding the reduction of greenhouse gas emissions, water use, energy consumption, minimum/no use of toxic substances, and minimum and environmentally compatible and recyclable packaging.
- adopt responsible use of natural resources – energy, raw materials and water and environment friendly and clean technologies. Use of primary energy and direct non-renewable raw materials shall be judicious and should be replaced by renewable or recycled resources, wherever possible. Usage shall be monitored, reviewed on periodic basis and use of alternative resources and alternative environment friendly technology shall be applied with the objective of reducing consumption. Air emissions of volatile organic chemicals, aerosols, corrosive particulates, ozone depleting chemicals and combustion byproducts generated from operations to be characterized, monitored, controlled and treated as required prior to discharge. Wastewater and solid waste generated from operations and sanitation facilities to be monitored, controlled and treated as required prior to discharge or disposal. Waste of all types, including water and energy to be reduced or eliminated at the source or by practices such as modifying maintenance and facility processes, materials substitution, conservation, recycling and re-using materials and use of cleaner technologies

Hazardous Material Management: Business Partner shall identify, label, and responsibly manage hazardous materials, such as chemicals, industrial waste, and other hazardous substances, in accordance with Laws and ensure that their handling and disposal do not harm the environment, public health or safety.

Any material safety information for hazardous or toxic substances shall be written in the primary language of the workforce. The employees and workers who encounter such materials shall be trained to handle such hazardous substances.

Health and Safety Management: Business Partner shall provide a safe and healthy workplace for their workforce, comply with Laws and industry standards for health and safety, and adopt measures to prevent accidents, injuries, and illnesses.

Business Partner shall take adequate steps to minimize the causes of hazards inherent in the working environment and provide adequate training to all its employees, workers and contractors on health and safety matters, and their overall wellbeing.

Emergency Preparedness and Response: Business Partner shall develop and implement emergency response plans and maintain high level of preparedness to address potential accidents, natural disasters, and other emergencies that could impact the environment, health, and safety of their employees, communities, and other stakeholders.

BUSINESS PARTNER RESPONSIBILITY AND ACCOUNTABILITY

The Business partner should strictly observe and comply with relevant provisions of the Tata Code of Conduct and with all the fundamental principles of this **Code**. An Acknowledgement/ Undertaking, to this effect, attached to this **Code** as **Annexure-I**, is required to be signed by all Business Partners. Further, Business Partner shall:

1. develop adequate documentation, covering important areas like human rights, occupational health, and safety, labour rights, environmental protection, information security, data privacy, anti-corruption and any other areas mandated by Laws, to demonstrate that they share the same values and principles as expressed in the Tata Code of Conduct and this document. Business Partners should also apply these or similar values & principles to the sub-contractors and contractors they work with in providing goods and services to Air India Group.
2. ensure suitable communication on the principles highlighted in this **Code** to its employees, associates, subcontractors, and others involved in providing products and/ or services to the Company.
3. take an integrated approach to identify and assess risks, opportunities, and its impact, covering operations, supply chain, human rights; occupational health and safety; labour rights; environmental protection and anti-corruption issues.
4. manage the risks adequately including but not limited to business continuity plans in the event of disruptions.
5. self-monitor and demonstrate its compliance with **the Code**. Business Partner shall actively audit and manage their day-to-day management and share relevant reports with the Company upon request.
6. voluntarily disclose to the Company any failure to adhere to the standards specified in this **Code** or the contract.

REPORTING VIOLATIONS

The Business Partner shall notify Air India Group regarding any known or suspected improper behaviour/ act by their employees, their sub-contractors or its' employees or by Air India Group's employees, relating to their dealings with Air India Group, through **Ethicsline** as per details below:

Call: India (Toll-free) Number at: 1800-102-6969 - 24/ 7 IST (for English and Hindi)
10:00 am- 7:00 pm IST for Marathi, Gujarati, Telugu, Kannada and Tamil (Monday - Friday)

Off-office hours:	Voicemail facility available		
US Toll-free Number:	+1 (888) 436-0393	-	24/ 7 (English)
Poland Toll-Free Number:	+(48) 800088123	-	24/ 7 (English)
UK Toll-free Number:	+(44) 8083044704	-	24/ 7 (English)
Germany Toll-free Number:	+(49) 80018017222	-	24/ 7 (English)

Accessibility: These Toll-free numbers can only be dialled from within the respective countries.
Rest of the World Toll Number: (+91) 9595-146-146 - 24/ 7 (English)

Web: <https://airindiagroup.integritymatters.in>

Email: airindiagroup@integritymatters.in

Post: Air India Group, C/o Integrity Matters, Unit 1211, CENTRUM, Plot No C-3, S.G. Barve Road, Wagle Estate, Thane West – 400604, Maharashtra, India.

Reported violations will be treated confidentially without retaliation

Any Business Partner who raises a genuine concern in good faith, is doing the right thing. We seek to maintain an atmosphere of open discussion so problems can be identified and quickly addressed. Air India Group takes all claims of retaliation seriously and, if substantiated, those responsible will be subject to strict disciplinary action.

AUDITING & COMPLIANCE

Compliance with this **Code** is subject to audit and monitoring. Air India Group expects Business Partners to implement systems and controls to promote compliance and reserves the right to assess and monitor Business Partners' compliance with this **Code** through audits/ inspections. The Business Partner shall extend all necessary support and co-operation to the Company and/ or its representatives for such audit. Business Partners, who are not in compliance with this policy, are expected to implement corrective actions or they may not be considered for future business, including but not limited to termination of the existing contract/ business relationship with the Company.

POINT OF CONTACT

Head of Procurement & Supply Chain (P&SC) / Head of Ethics can be contacted in case of any question/ dilemma.

Reviewed by



(P. Balaji)

Group Head-GRC & Corporate Affairs and Chief Ethics Counsellor

Approved by

Air India Management Committee

Annexure - I

ACKNOWLEDGEMENT / UNDERTAKING BY BUSINESS PARTNER

I/ We hereby acknowledge that I/ we have received and read the '**Tata Code of Conduct**' (TCoC) and undertake to abide by the relevant provisions, applicable to me/ us.

I/ We hereby acknowledge that I/ we have received and read '**Air India Group Business Partner Code of Conduct**' (BPCoC) and undertake to abide by the terms & conditions mentioned in the Air India Group Business Partner Code of Conduct.

I/ We understand that Air India Group reserves the right, upon reasonable notice, to check the compliance of the BPCoC.

I/ We understand that Air India Group encourages its Business Partners to implement their own binding Code of Conduct and agree that I/ we will be responsible for complying obligations under this Code and that failure to adherence to this Code would attract the disciplinary consequences, including but not limited to termination of the contract.

Signature: _____

Name of the Authorized Signatory: _____

Organization: _____

Date: _____