



Conflict of Interest Policy

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Policy Approver	P. Balaji
Policy Reviewer	P. Balaji
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Air India Limited

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Version Control

Ver No	Remark	Date	Prepared by	Approved by
1	Original Document	13 th April 2023	Ajoy Jauhar	Gurjot Malhi
1.1	Revised Air India Format & present signatory	1 st September 2024	Ajoy Jauhar	P. Balaji

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OBJECTIVE:

The Conflict-of-Interest policy establishes guidelines governing conflict of interest matters related to employees, to avoid compliance risk and misconduct.

The **conflict-of-interest** clauses guide 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 in the Tata Code of Conduct 2015 ('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 the Annexure 1).

SCOPE

This guideline is applicable to all employees, associates, contractors, consultants and Directors of the company (together referred as "Employee" in this document).

DEFINITIONS

- **Employee:** Includes all employees, associates, contractors, consultants and Directors of the company
- **Business associate:** It includes suppliers, customers, vendors, dealers, distributors, franchisees, lessors, lessees or other such persons with whom Air India has any business or transactional dealings
- **Competent authority:** For the purpose of this policy, in case of employees the competent authority would be Head of the department or above.
- **Conflict of Interest:** A conflict of interest could be any known transaction, relationship or service engaged by an employee, his/her immediate family/relatives, 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.

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- **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.

POLICY DETAILS

I. Clauses of Conflict of interest

Conflict of interest includes situations:

- Where an employee's private affairs or financial interests are in 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.
- Where the actions of an employee would compromise or undermine the trust of stakeholders.

A conflict of interest, actual or potential, arises where, directly or indirectly an employee:

- proposes to engage in a personal business transaction or a personal relationship with the business associates of our Company;
- is offered/derives undue benefit, personally or for any Immediate family member, by making or influencing decisions relating to any transaction;
- is in a position to influence a decision with regard to the company's business with a business associate where an Immediate family member/relative is a proprietor/director/ partner or representative;
- 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 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.

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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. 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'.
- iii. 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 or executive director is a principal officer or representative, resulting in a personal benefit or a benefit to the relative.
- iv. Referring a relative or a person in 'close personal relationship' for a job opportunity to a vendor, supplier, customer, or a business partner.

B. Conflict of Interest due to financial interest in a third party (Competitors/ Value-chain 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 vendor, supplier, business partner or customer.
- iv. Requesting a customer, supplier, vendor, or 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. Position of responsibility in business activities outside primary employment.
- iii. Association with social or civic causes independently, or through an entity.

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D. Association with political process/ entity

- i. Participation as a candidate in the election process to public office, or to bodies deemed as public office.
- ii. Participation as volunteer/campaigner in an election process.

III. Conflict of Interest disclosure and mitigation procedures

Conflict of Interest declaration

1. 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 to the competent authority every financial year. Declarations with conflict of interest will be sent to the competent authority for approval.
2. The competent authority shall revert to the employee within a reasonable time, so as to enable the concerned employee to take necessary action as advised to resolve or avoid the conflict in an expeditious manner.
3. In case there is any change in actual or potential conflicts of interest, the concerned person must immediately declare such conflicts and seek approval from competent authority.

Employees must be fair and transparent in all of 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.*

Employees are required to 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.

Persons who fail to comply with these standards during the course of their employment will be subject to appropriate disciplinary action.

This policy applies to all employees of Air India Ltd and its' associate companies. If stricter norms are prescribed under any applicable law with respect to conflict of interest, then, employees shall comply with such stricter norms.

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?

2. Who

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

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- 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 Conflict-of-Interest disclosure in the past should 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 at the levels N-2 (Heads of Departments) and above shall submit an annual Conflict of Interest declaration every year in the month of April.

4. How

- How should the disclosure and subsequent review/approval process be managed?
 - A 'Workflow-based' process for disclosure and its review is outlined in section VII A to address timely and documented mitigation of the Conflict of Interest.
 - The process should be aligned with, and follow 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.

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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	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.	<ul style="list-style-type: none"> Name of the relative Relationship Position/ department/ entity name applied for and name of the reporting manager 	<ul style="list-style-type: none"> Review – HR Consultation – NA Decision – HR 	Decisions of recruitment may not be objective or may be regarded as 'influenced' by others. <u>These conflicts of interest situations must be avoided or mitigated with safeguards</u>
2	Personal Relationship	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 – HR Consultation – Reporting Manager Decision – HR 	Decisions of recruitment may not be objective or may be regarded as 'influenced' by others. <u>These conflicts of interest situations must be avoided or mitigated with safeguards</u>

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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
3	Personal Relationship	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 Reporting Manager Consultation – NA Decision – CEC/ Apex/ Ethics Committee/ Audit Committee 	<p>Decisions of recruitment may not be objective or may be regarded as 'influenced' by others.</p> <p><u>These conflicts of interest situations must be avoided or mitigated with safeguards</u></p>
4	Financial Interest in third party (Competitor/ Business Partner/ Vendor)	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 – Reporting Manager 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 conflicts of interest situation must be avoided or rescinded (including by way of disinvestment).</u></p>

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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
5	Financial Interest in third party (Competitor/ Business Partner/ Vendor) by immediate family, relatives or a close personal relationship	Employee is in a position to derive an improper 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 between the company and third party.	<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 – Reporting Manager Decision – CEC/ Apex/ Ethics Committee/ Audit Committee 	Decision post review by the Reviewing authority
6	Outside employment/ External mandate	Membership/ position of responsibility in educational/ professional/ Industry Association bodies, government committees/ bodies/ organization (including Social or Civic causes). 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) Remuneration (if any) Time period 	<ul style="list-style-type: none"> Review – HR Consultation – CEC/ Reporting Manager/ Legal Decision – HR 	Acceptance of a position of responsibility (whether for remuneration or otherwise) 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.

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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
7	Outside employment/ External mandate	Position of responsibility in business activities outside the employment.	<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) Renumeration (if any) Time period 	<ul style="list-style-type: none"> Review – HR Consultation – CEC/ Reporting Manager Decision – HR 	An external position of responsibility (with/without remuneration) 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.
8	Outside employment/ External mandate	Position of responsibility with third parties related to the company as vendor/ business partner/ supplier/ customer etc.	<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) Renumeration (if any) Time period 	<ul style="list-style-type: none"> Review – HR Consultation – CEC/ Reporting Manager Decision – HR/Legal 	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 situation must be avoided.</u>
9	Association with Political process/ entity	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 – HR/CEC Consultation – CEC Decision – HR/Legal 	Each disclosure to be evaluated and considered independently in the context of the disclosed association.

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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
10	Association with Political process/ entity	Participation as volunteer/campaigner 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 activity 	<ul style="list-style-type: none"> Review – HR/CEC Consultation – CEC Decision – HR/Legal 	

IV. Disclosure and Mitigation

A. Disclosure process

Employees are required to make timely written disclosure of potential or existing Conflicts of Interest in accordance with the company's disclosure review matrix.

S.No	Types of Conflict of Interest	Approval Required
1	Personal Relationship	HR
2	Financial Interest in third party (Competitor/ Business Partner/ Vendor)	HR + CEC/ Apex/ MC / Ethics Committee/ Audit Committee
3	Outside employment/External mandate/involvement in social causes independently or through an entity	HR
4	Association with political process or civic causes independently or through an entity	HR

If the employee needs clarifications whether Conflicts of Interest exist in a particular situation or not, the employee must discuss it with the Reporting Manager/ HR Manager/ CEC/ Local Ethics Counsellor 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.

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B. 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 could take a serious view of the matter and may take suitable disciplinary action as per the employee's terms of employment and the applicable disciplinary action guidelines.

C. 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/ MC/ Ethics Committee 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 Board of Directors 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.

V. Responsibilities

A. 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.

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- 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 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.
- Should any actual or potential Conflicts of Interest arise, the concerned person must immediately report and seek approvals as required by applicable company policy.

B. Reporting Manager, HR, and CEC

- 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.
- Treat the information disclosed by the employee with appropriate confidentiality and without bias.
- Fairly evaluate the Conflict-of-Interest situation disclosed by the employee including risks to business interests and the reputation of the company.
- Seek guidance if needed from the (Head of Department/ Function, Legal, HR) and the Ethics team.
- 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.
- 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.
- 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.

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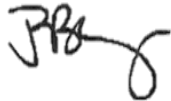
AUDITING & COMPLIANCE

Compliance with this Policy is subject to audit and monitoring.

POINT OF CONTACT

Local Ethics Counsellor and Local HR can be contacted in case of any questions.

Approved by



(P. Balaji)

Group Head – GRC & Corporate Affairs and Chief Ethics Counsellor

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Annexures

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

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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

1. 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.
2. 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.
3. 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 are 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.

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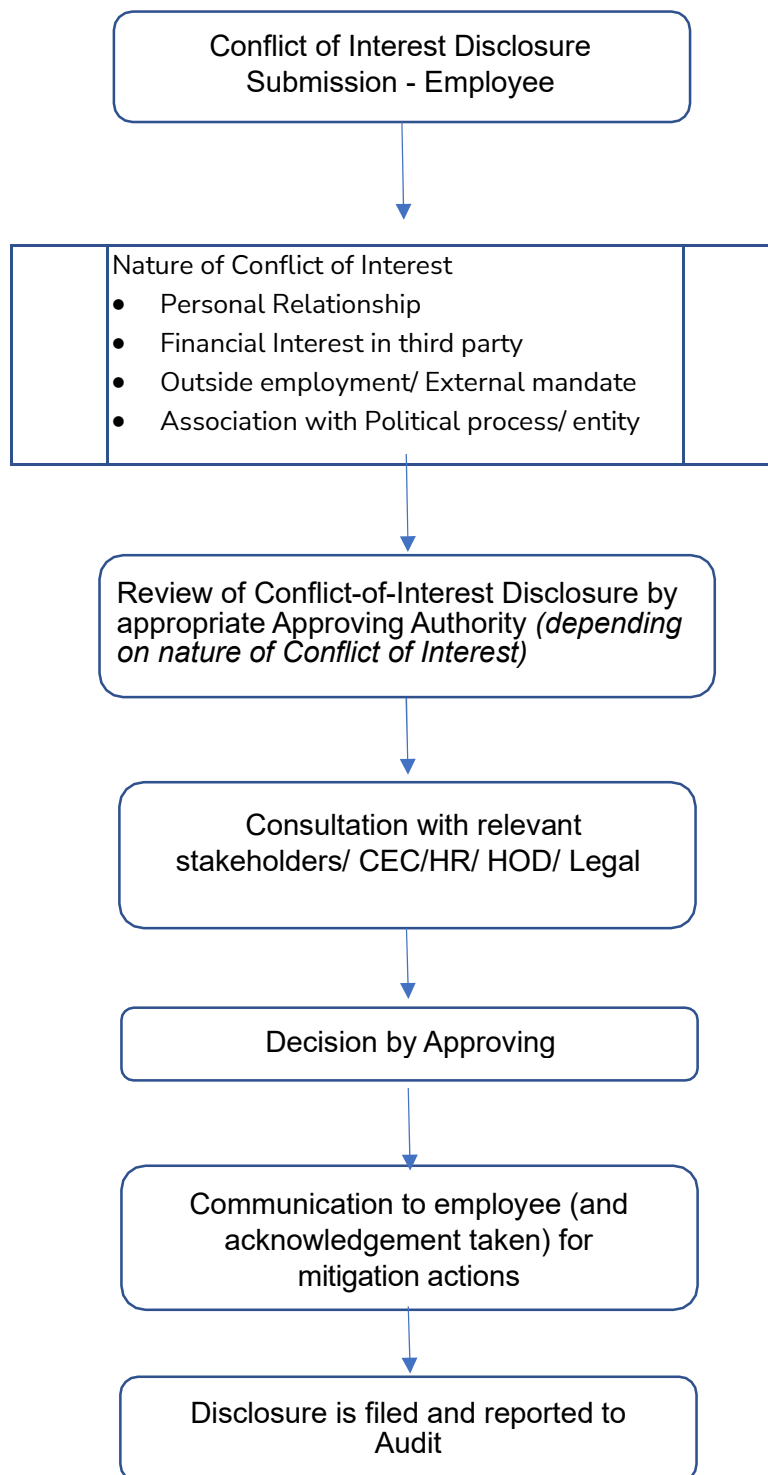
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Annexure 2 - Workflow for disclosure and approval



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Annexure 3 - 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 Conflict of Interest Policy.

Employee Details

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

Declaration:

- I am aware that I am required to report Conflicts of Interest (potential/ actual) under the Tata Code of Conduct.
- To the best of my knowledge, I have no Conflict of Interest to be reported or the Conflict of Interest is already reported.

Response:

☐ Yes ☐ No

If Response is 'No', please fill the following:

DISCLOSURE DETAILS

The actual, potential or perceived conflict of interest relates to: (tick all appropriate box/s)	
<input type="checkbox"/> Relationship with family or friends	<input type="checkbox"/> Recruitment of staff
<input type="checkbox"/> Outside work activities/ External mandate (paid/ unpaid)	<input type="checkbox"/> Financial Interest in third party (Competitor/ Business Partner/ Vendor)
<input type="checkbox"/> Financial interest	<input type="checkbox"/> Disposal of assets
<input type="checkbox"/> Gifts/benefits	<input type="checkbox"/> Provision of external consultancy services

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<input type="checkbox"/> Provision of private tuitions/ coaching class	<input type="checkbox"/> Association with Political process/ entity
<input type="checkbox"/> Procurement of goods and services	<input type="checkbox"/> Other (please provide details)

Kindly provide the following details:	
Is this a temporary assignment or long term?	
If temporary, how long?	
How many hours/days do you spend every week/month on this activity?	
Are there any remuneration/honoraria you receive for this activity?	
If response to point 4 is YES, then please specify how much.	
Does this activity require you to share internal Company information?	
Does your activity / your position use the TATA or Air India brand as a leverage/ reference to solicit business?	
Does your position / rank at Air India play as a leverage/ reference in this activity?	
For Flying Crew	
Do you undertake this activity during your working hours or during your off days?	
Does this activity disrupt your required FDTL?	

Air India Limited

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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 |

Acknowledgement

To the best of my knowledge and belief any actual, perceived or potential conflicts between my duties as an employee and my private and/or business interests have been fully disclosed in this form in accordance with the requirements of the Air India Conflict of Interest Policy.

I acknowledge, and agree to comply with, any approach identified in this form for removing or

The following actual, potential, or perceived conflict of interest has been identified. *(Please insert all relevant details)*

Describe any factor(s) that you believe would reduce the impact of Conflict of Interest.

managing an actual, perceived or potential conflict of interest.

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	Name	Designation	Signature	Date
Employee				
Reporting Manager				
Approving Authority				

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

UNDERTAKING to Air India 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 value chain partners (suppliers, vendors, service providers, sales distributors, retailers), 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:

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