Whistleblowing options at Tata AIA Life

000 800 100 4382 (Tollfree 24x7) An Independent Ethics Hotline for Employees, Agents and Vendors

tataiaindia@tip-offs.com

Website: Log a complaint at https://whistleblower.tataaia.com/, or on the Internet (Quick links).

Contact: SVP and Head - Legal, Compliance & Company Secretary, 14th Floor, Peninsula Business Park, Lower Parel, Mumbai - 400013.

For further details, please refer the Whistleblower Policy available on the Intranet.

We have a strong Non-retaliation Policy for all genuine complaints.

For internal circulation only.
Dear Colleagues,

As we continue to pursue our Vision - “To be the pre-eminent protection provider – enabling dreams, inspiring healthier and happier lives”, and the Mission- “To provide the best and simplest life and health insurance solutions”, each one of us has a role to play in this journey and we must commit ourselves to re-inforce our credo - Doing the Right Thing, in the Right Way, with the Right People and the Right Results will come.

This handbook provides an overview of the principles of conduct for all business units and employees, as elucidated in “Tata AIA Life Code of Conduct”, in a simple and easy to understand manner.

Note that it is the responsibility and duty of each one of us to:

- Comply with all applicable laws and regulations.
- Observe and promote high ethical business standards and be honest.
- Respect and treat fairly; all our colleagues, consumers, suppliers, other business partners and our stakeholders.
- Be loyal to the Company and protect our assets, confidential information, data and know-how.
- Secure the health and safety of our colleagues and neighbours.
- Protect the overall reputation of the Company.

It is only by observing these values and duties that we will be able to ensure the long-term success of the Company.

Non-compliance to the Code is a violation and we will continue to take tough action against those who do not comply.

Please join me in strengthening our great legacy and demonstrate the values we share in everything we do.

With kind regards,

Rishi Srivastava
Managing Director & Chief Executive Officer
Our Vision
To be the pre-eminent protection provider - enabling dreams, inspiring healthier and happier lives.

Our Mission
To provide the best and simplest life and health insurance solutions.

Our Values

Consumer Obsession
Consumer is paramount in everything we do.
• Innovate solutions and services to delight our customers.
• Transparently deliver on promise.

Passion for Excellence
Set and achieve the highest standards.
• Do the Right things in the Right way.
• Take accountability and drive results.
• Pioneer Change.

People - Our Core
Inspire myself & my colleagues to be and deliver the very best.
• Create and take distinctive opportunities for development.
• Demonstrate courageous leadership at all times.
• Exceptionally reward outstanding performance and right behaviour.
What is the Code of Conduct?

The Code of Conduct is a set of principles, standards or expected behaviour, which every employee is required to adhere to and which guide the decisions, procedures and systems at Tata AIA Life.

What is in it for employees?
- It is important that honesty, integrity, accountability and respect for colleagues as well as for consumers and stakeholders, should be constantly reflected in the behaviour of the employees at all levels across the Organisation.
- Every employee shall be responsible for adhering to the Code in his/her professional capacity.
- These will help maintain ethical business standards and build public confidence.

What are the consequences of violation of the Code?
Failure to adhere to the Code may attract disciplinary action, including loss of employment.

Report violations of the Code to the Management
Employees are encouraged to report violations to the Management. Details for Whistleblowing are provided at the last page of this Handbook.

Non-Discrimination and Non-Harassment

What is Non-Discrimination and Non-Harassment?
All employees have the right to work in an environment, free from harassment of any nature. Harassment in any form, whether physical, verbal or psychological; is a violation. Harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion towards an individual and that has the purpose or effect of creating an intimidating, hostile or offensive environment.

What is in it for employees?
- All business decisions shall be considered on merit.
- Every employee should respect each other’s opinions and should not treat others in a harassing or a threatening manner.
- Any employee found to be engaging in any type of unlawful discrimination or harassment; will be subject to disciplinary action including termination of employment.
- All employees must refrain from any action or conduct which could be viewed as prohibited, including offensive and inappropriate behaviour or language at work and other kinds of harassment.

How should the employees report?
Any employee who believes that he/she has been a victim of discrimination or harassment, or who has been a witness to any such incident should report to the Management on the Whistleblow mechanism provided at the last page of this Handbook.

Tata AIA Life is an equal opportunity Employer. The Company firmly believes in treating everyone with respect and does not discriminate on the basis of race, colour, caste, religion, ancestry, gender, origin, age, nationality, disability, military service, marital status or sexual orientation.
How to identify Conflict of Interest?

A conflict of interest, actual or potential may arise, either directly or indirectly in circumstances such as:

- An employee of Tata AIA Life in his/her personal capacity engages in a business, relationship or activity that is conflicting with the interests of the Company.
- An employee is in a position to derive a personal benefit or a benefit to any of his/her relatives by making or influencing official decisions relating to any transaction.
- Any employee who has a financial interest in any firm which is an actual or potential competitor, supplier, consumer or distributor of the Company.
- An employee, who is in a position to influence a decision with regards to the Company's business with a supplier or a consumer represented by his/her relative.
- Award of benefits such as an increase in salary, other remuneration or favourable service/recruitment conditions to a relative of an employee who is in a position to influence such decisions.
- Business dealings, where the interests of the Organisation or the Group can be compromised, diluted or defeated.

Employee’s Role

Employees are required to make a full disclosure of any interest which they or their immediate family may have in a business or a company or a third party which is a competitor, supplier, consumer, distributor of or has any business dealings with the Organisation to their Reporting Manager and the Compliance Department.

Consequences of violations

If an employee fails to make a disclosure as required and an instance of conflict of interest arises, suitable disciplinary action may be initiated against the employee.

Who is a Whistleblower?

Whistleblower is a person who exposes any kind of information or activity that is deemed illegal, unethical, or inappropriate within an Organisation. The information of alleged wrongdoing may relate to a violation of the Company’s policy, rules, regulations, or threat to public interest, as well as fraud, and corruption.

- Any employee, agent or third-party associated with us are encouraged to Whistleblow.
- The Company has a strong Non-Retaliation Policy for all genuine and bona-fide Whistleblows.

Why is the Whistleblower Policy instituted?

There may be circumstances in which employees may feel uncomfortable in raising concerns directly with their supervisors. Hence, the Whistleblower Policy provides a mechanism to raise, in good faith, such issues confidentially and directly with an independent person in the top Management of the Company.

The identity of the Whistleblower shall be kept confidential. A Whistleblower will not be at a disadvantage or treated unfairly or discriminated against for the reason of such Whistleblowing. Any other person assisting in the investigation arising out of Whistleblow will also be protected to the same extent as the Whistleblower.
Anti-Fraud Policy

The Anti-Fraud Policy of the Company covers various elements like prevention, detection and responding to various types of frauds. Fraud, as defined in the Anti-Fraud Policy involves intentional dishonest acts committed to secure an unfair or unlawful gain for oneself or another, or a loss to another, and can include misuse or conversion of corporate property or resources for personal non-corporate use.

What is in it for employees?
- The Company has a Zero Tolerance approach to any instance of fraud.
- It is expected that all employees, agents, insurance intermediaries, vendors and interested parties act with honesty and integrity.
- Every employee is expected to be vigilant and is responsible for timely reporting of suspected frauds.
- All suspected and reported fraud cases will be investigated and disciplinary actions shall be taken against parties involved.

As per Section 4 of the Prevention of Money Laundering Act, 2002, Punishment for Money Laundering includes:
- Rigorous imprisonment for a minimum term of 3 years, which may extend up to 7 years
- Monetary Penalty

Anti-Money Laundering Program

The Anti-Money Laundering (AML) Program is a framework towards co-operating with the administration in fighting the evils of black money. Tata AIA Life would like its employees, agents and intermediaries to adhere to all the applicable laws, rules and regulations generally in relation to AML norms and the specific requirements mentioned in the Policy.

What is Money Laundering?
- Money Laundering is the process by which proceeds of crime are transformed into legitimate money or other assets.
- Anti-Money Laundering refers to a set of procedures, laws and regulations designed to stop the practice of generating income through illegal actions.
- Terrorist Financing refers to the processing of funds to sponsor or facilitate terrorist activity.

What is it for employees?
- Employees should read and understand the Anti Money Laundering Policy of the Company and also clear the mandatory AML Test.
- Employees should strictly follow the AML Policy.
- They should follow strict adherence to KYC Procedures, assess risks and report suspicious activities.
- Any violation of the AML Policy will be viewed as a regulatory violation and will attract severe disciplinary action.

If you spot it, Report it.
- Suspicious activities/financial transactions, counterfeit currency, etc. should be reported to aml.officer@tataaia.com

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- Rigorous imprisonment for a minimum term of 3 years, which may extend up to 7 years
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Prevention of Sexual Harassment Policy

“Sexual Harassment” means unwelcome acts or behaviour (whether directly or by implication), physical contact or advances; a demand or request for sexual favour; making sexually coloured remarks; showing pornography; or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Some examples of behaviour that constitute sexual harassment:

- Making sexually suggestive remarks or teasing related to a person’s body or appearance.
- Offensive comments or jokes.
- Displaying offensive pictures, posters, texts.
- Intimidation, threats or blackmail around sexual favours.
- Physical contact such as touching inappropriately.
- Stalking an individual.
- Abuse of authority or power to seek sexual favours.

Who can register a complaint?
The aggrieved person, who alleges to have been subject to any act of sexual harassment can raise the complaint.

How to raise a complaint?
Complaints must be reported on posh@tataaia.com or on the Whistleblowing mechanism provided at the last page of this Handbook.

Consumer Privacy and Data Security Policy

Consumer Privacy, involves the handling and protection of sensitive personal information that individuals provide in the course of insurance business. Laws have enforced high standards of data privacy protection of consumer data.

What is in it for employees?

- Every employee shall ensure at all times, the integrity of data or information furnished to him/her by the Organisation.
- He/she shall be entirely responsible in ensuring that the confidentiality of data is retained and in no circumstance transferred outside in the course of normal operations, without necessary approvals.
- Never compromise consumers’ trust by disclosing private information, other than to those with a legitimate business requirement.
- Personal information, if required to be shared under obligation with government agencies or officials, must be shared only with approval of the Compliance Department.
- The employee should protect consumer and business data and not misuse the same. Unauthorized downloads, printouts or passing data to a third person are serious violations.
- When misused or inadequately protected, it can result in identity theft, financial fraud and other problems that collectively lead to irreparable loss to the Company and further results in regulatory and/or legal action.

We at Tata AIA Life respect the personal information of employees and consumers. Access to personal information of employees and consumers is only authorized for appropriate personnel with a legitimate reason to access such information.

Sexual Harassment at workplace can be in the form of Visual or Verbal or Written acts or a combination of these. Tata AIA Life has a ZERO TOLERANCE policy towards Sexual Harassment at the workplace and offenders will face strict punitive action. In case of frivolous/false allegations, the Company may take necessary action on the complainant.
Tata AIA Life's Social Media Policy is applicable to all employees, agents, business associates, contractual consultants (retainers), academic interns associated and third parties performing services on behalf of Tata AIA Life.

What is in it for employees?

- Only few nominated officials are authorized to represent the Organisation on social media. Any representation by any unauthorized person is a violation of the Code of Conduct.
- Do not entertain/respond to any media/or address social media queries, on your own. Consult Corporate Communications and the Compliance Department.
- Whether you publish a personal blog or use any other form of social media, make it explicitly clear that the views and opinions you have presented are personal and that the Organisation does not subscribe to your views.
- Be cautious and careful not to mix your personal and business lives, and keep in mind at all times the global audience of social media.
- Personal participation on social media, should in no way be done in a manner prejudicial to the interest of the Company.
- Do not refer financials, achievements, strategies, or other confidential information of the Organisation on social media.
- Use of social media for grievance redressal related to business is prohibited.

Reporting social media crisis - very crucial!

Every employee of Tata AIA Life is a brand custodian and as such is responsible for safeguarding the interest of the Company. Any damaging or negative comment in the social space must immediately be brought to the notice of your superior or the Communications Team at corpcomm@tataaia.com. This is very critical as it will define how effectively the Organisation manages to avert a potential crisis before any damage is caused to individuals, public, the business or the Company’s reputation.

Gifts and Entertainment Policy

What is a Gift?

- A gift is anything of value and includes tangible items and/or intangible benefits and rights that are not generally available.
- A “gift” also includes meals, entertainment, hospitality, vacations, trips, use of vacation homes, tickets to sporting or music events, outings, vendor familiarization trips, and use of recreational facilities.

What is in it for employees?

- Offering gifts in order to win or keep business is unethical and, in many cases, illegal.
- No person should accept or solicit any personal benefit from anyone in the course of business in a manner that might compromise, or appear to compromise their objective assessment.
- Gifts received by any employee of the Organisation should promptly and humbly be returned with gratitude.
- If declining a gift would be offensive or hurt a business relationship, accept the gift on behalf of Tata AIA Life and submit a written gift report to your reporting manager within 30 days or to the Compliance Officer on compliance@tataaia.com. Managers are responsible for collecting gift reports and filing them with the Compliance Department.
- Gifts of cash/cash equivalents must never be accepted. In case the gift contains perishable food items like sweets, chocolates, etc. the same must be distributed amongst employees, with a request to the person offering such gift to avoid such future practices.
- As a general guide, the giving or receiving of gifts or hospitality up to ₹ 2,500/- may be acceptable if it meets all the conditions as given in the Gifts and Entertainment Policy.

Modest gifts and appropriate entertainment can help strengthen business relationships, but these business courtesies, whether given or received by Tata AIA Life employees, must never improperly influence business decisions.
Anti-Trust and Fair Competition Policy

Tata AIA Life competes vigorously and fairly across the industry. We seek to maintain and grow our business through superior products and services - not through improper or anti-competitive practices. We strive to understand and comply with Competition and Anti-Trust laws.

What is in it for employees?
- Compete vigorously and lawfully in every market in which Tata AIA Life participates, making all business decisions independently in the best interest of Tata AIA Life.
- Comment on competitors or their products or services based only on factual information.

Guidance to Employees
- Don’t agree formally or informally with a competitor to fix prices or other terms of sale or allocate consumers, markets, or territories.
- Don’t discuss with a competitor on prices, consumers, sales, commissions, and terms of sale, profits, margins, costs, marketing plans or other competitively sensitive information.
- Don’t attend meetings with competitors at which competitively sensitive information, including the subjects mentioned in the above two points, are discussed.
- Don’t agree with others outside of Tata AIA Life, as to which suppliers or consumers to do business with.

Employees who are unsure of appropriate practices should consult with the Compliance Department for additional information and clarification.

Anti-Bribery and Anti-Corruption Policy

What is bribery?
Bribery means giving, offering or receiving an improper benefit with the intention of influencing the behaviour of someone to obtain or retain a commercial advantage. Bribery can take a variety of forms – offering money or money’s worth.

What is corruption?
Corruption is dishonest behaviour by a person or an Organisation entrusted with a position of authority, often to acquire illicit benefit.

What is in it for employees?
- It is unlawful to offer to give/give bribes for the purpose of obtaining or retaining business or obtaining an unfair advantage in any business dealing or transaction and Tata AIA Life employees must never use improper means to influence another’s business judgement.
- No Tata AIA Life employee, agent, or independent contractor may provide bribes or rebates or other improper benefits to another person in order to obtain or retain business or an unfair advantage in any business interaction that involves Tata AIA Life, our consumers or employees.

Who can raise a complaint?
Any employee may report concerns or Whistleblow any violations in line with the Whistleblower Policy of the Company.

The Anti-Bribery and Anti-Corruption Policy expressly prohibits any employee of the Company from indulging in any corrupt practices with any public/government official/political party or organisation and any private individual. Bribery and Corruption in any form and manner will not be tolerated. All facilitation payments and kickbacks are corrupt payments, and any such payment in the course of our Company’s business is strictly forbidden.
Political Activities

Tata AIA Life is committed to and supports a functioning democratic Constitution and system with a transparent and fair electoral system in India. The Company shall not support, directly or indirectly, any specific political party or candidate for political office.

What is Tata AIA Life’s political alignment?
- The Company’s conduct shall preclude any activity that could be interpreted as mutual dependence/favour with any political body or person.
- The Company shall not offer or give any Company funds or property as donations, directly or indirectly, to any specific political party, candidate or campaign.
- Tata AIA Life employees may in their personal capacity participate in community affairs and may support the political party or candidate of their choice, pursuant to the rights bestowed to the citizens of India under the Constitution of India.

What is in it for employees?
- A Tata AIA Life employee, wishing to run for a political office or accept a political appointment, must obtain prior written approval from the Compliance Department and the Managing Director & CEO.
- Tata AIA Life employees are not permitted to use Tata AIA Life’s name in connection with any political campaign other than to state that they are employed by or associated with Tata AIA Life.
- Tata AIA Life funds or any other Tata AIA Life asset shall not be used for any political purposes.
- It is important that personal political activities or interests do not conflict with responsibilities at Tata AIA Life or imply Tata AIA Life’s support.
- Specifically, Tata AIA Life’s name should never be used by employees running for a political office.

Holding or campaigning for political office by Tata AIA Life employees must not create, or appear to create, a conflict of interest with Tata AIA Life duties.

Acknowledgement

I acknowledge that I have read the Tata AIA Life Code of Conduct and have access to all the Policies referred to in this Handbook.

I acknowledge that as a Tata AIA Life employee, I am expected to comply with the Tata AIA Life Code of Conduct and failure to do so may subject me to disciplinary action, up to and including termination (and loss of employee benefits) and if applicable, to criminal and/or civil proceedings.

I understand that if I have a concern about a violation of the Tata AIA Life Code of Conduct, I must promptly report the violation using the Whistleblow mechanism.

Signature:........................................
Date DD/MM/YYYY
Name:........................................
Emp ID:....................................
Tata AIA Life Insurance Company Limited
Department:................................
Address:....................................