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# TATA AIG GENERAL INSURANCE COMPANY LIMITED BUSINESS ASSOCIATES & SUPPLIERS CODE OF CONDUCT

# I. SCOPE AND PURPOSE OF THIS CODE:

The Tata Group has always epitomized the true spirits of Business Ethics in its interactions with all its stakeholders – be it the Customers, Suppliers, Employees, Shareholders, the Government or the Society at large.

Tata AIG General Insurance Company Limited (TAGIC) vendor's, service providers and business partners serve as extension of TAGIC and therefore must not act in a manner that is considered prohibited or deemed improper.

For the purpose of this Code, "Business Associates & Suppliers" means suppliers, intermediaries, vendors, distributors, or such other persons with whom TAGIC has any business or transactional dealings including the Business Associate's employees, agents, and other representatives.

This Code of Conduct is designed to guide TAGIC's Business Associates & Suppliers along the appropriate course of action during and after their engagement with TAGIC. The objective of this code of conduct is to ensure minimum performance standards that are to be adhered by the business associates of TAGIC.

# II. CODE OF CONDUCT:

# a. PRODUCT AND SERVICES

The Business Associates & Suppliers shall be committed to supplying products and services of high quality that meet all applicable standards. The Business Associates & Suppliers shall market our products and services on merits and not make unfair or misleading statements about the products and services of competitors.

#### b. REGULATORY COMPLIANCE

The Business Associates & Suppliers shall comply with all applicable laws and regulations, both in letter and in spirit, in all the territories in which they operate.

#### c. BRIBERY AND CORRUPTION

Business Associates & Suppliers shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favours for the conduct of our business.

#### d. ANTI MONEY LAUNDERING

Business Associates & Suppliers must fully comply with applicable laws and TAGIC policies and procedures related to anti-money laundering initiatives as outlined in the TAGIC Anti-Money Laundering Policy.

#### e. NON-DISCRIMINATION

TAGIC embraces diversity and equal opportunity as fundamental principles and key components of its Code of Conduct. Business Associates & Suppliers must not engage in discrimination on any basis prohibited by applicable law, including but not limited to, race, colour, religion, age, gender, sexual





orientation, gender identity and expression, national origin, disability, family or marital status, citizenship status, veteran status or military status.

#### f. ZERO TOLERANCE FOR HARASSMENT & INTIMIDATION

Business Associates & Suppliers must not engage in intimidating or bullying behaviour, which can occur as a single instance or repeated inappropriate behaviour.

#### g. HEALTH AND SAFETY

The Business Associates shall strive to provide a safe, healthy, and clean working environment for their employees.

#### h. HUMAN RIGHTS

The Business Associates & Suppliers shall not employ children at their workplaces and shall not use forced labour in any form. They shall follow fair employment practices.

#### i. CONFIDENTIAL INFORMATION

Business Associates & Suppliers must keep confidential all TAGIC proprietary and non-public information, including non-public personal information received from, processed on behalf of, or disclosed by TAGIC. Business Associates & Suppliers must take appropriate precautions to safeguard this information.

#### i. PROTECTING COMPANY ASSETS

The assets of TAGIC should not be misused but employed for the purposes of conducting the business for which they are duly authorised. These include tangible assets such as systems, facilities, materials, resources as well as intangible assets such as proprietary information, intellectual property, and relationships with value chain partners of TAGIC.

#### k. THIRD PARTY REPRESENTATION

The Business Associates & Suppliers shall represent TAGIC (including Tata Brand) only with duly authorised written permission from TAGIC.

While using social media, the Business Associate & Supplier should prohibit the following:

- Make disparaging or defamatory statements about TAGIC, it's employees, clients, customers, suppliers or stakeholders.
- > Harass, bully or unlawfully discriminate in any way.
- ➤ Use data obtained in the course of business with TAGIC in any way that breaches the provisions of Data Protection Act 1998.
- ➤ Disclose any intellectual property, confidential or commercially sensitive information relating to our business.
- Make statements which cause, or may cause harm to the reputation or otherwise be prejudicial to the interests of TAGIC.

#### I. GIFTS AND HOSPITALITY

Business gifts & 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 & hospitality given or received should be modest in value, and appropriate and compliant with the law and company policies. TAGIC Code of Conduct on Gifts and Hospitality has limited the value





of gifts and hospitality to INR 5,000 and associated party of TAGIC should not accept any gift or hospitality that does not comply with this provision.

#### m. CONFLICT OF INTEREST

The Business Associate & Supplier shall not enter into a financial or any other relationship with a TAGIC employee or other Business Associate & Supplier that creates any actual or potential conflict of interest for TAGIC. The Business Associate & Supplier understands that a conflict of interest arises when the material personal interests of the TAGIC employee are inconsistent with the responsibilities of his/her position with the company. All such conflicts must be disclosed and corrected. Even the appearance of a conflict of interest can be damaging to TAGIC and to the Business Associate & Supplier, and are to be disclosed and approved in advance by TAGIC management.

#### n. COMPLIANCE MANAGEMENT

TAGIC expects that Business Associate & Supplier will maintain a training program adequate to ensure that management and employees comply with all regulatory requirements and expectations set forth in Business Associate & Supplier's contracts with this Code of Conduct.

Business Associates & Suppliers are responsible for the development, implementation, and testing of appropriate business continuity plans and incident management plans for operations supporting TAGIC business to validate effectiveness.

Business Associates & Suppliers must take all reasonable steps to ensure that their sub-suppliers are incompliance with applicable laws and regulations as well as applicable requirements in Business Associate & Supplier's contracts with TAGIC and Code of Conduct.

# o. DOCUMENTATION & MONITORING

Business Associates & Suppliers should maintain records and documents to demonstrate their compliance with the Code. In order to ensure that the Code is abided and practiced in letter and essence, TAGIC may carry out inspections and audits of premises or operations carried out by Business Associates & Suppliers. Inspections and Audits can also be made by an independent third party duly authorized by TAGIC. Business Associates & Suppliers shall cooperate fully in facilitating such inspections and audits by providing documents as may be required.

# III. REPORTING VIOLATIONS

The Business Associates & Suppliers shall notify TAGIC of any known or suspected improper behaviour by TAGIC employees through any of the following means:

Email: conduct@tataaig.com

#### **Letter to Chief Ethics Counsellor:**

Mr. Jitesh Bawa,

Tata AIG General Insurance Company Limited, 15th Floor, Tower A - Peninsula Business Park, GK Marg, Lower Parel, Mumbai- 400 013