

# Code of Conduct

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## Message from Our CEO and Whole-time Director



Every day, thousands of people put their trust in IndiGo for their travel needs. Our strong market position is a testament to it. But, building this trust has not been easy. We have worked tirelessly, efficiently and ethically for years on end; consistently offering low fares, being on-time and delivering courteous and hassle-free experience. Overtime, we have gained the reputation of being among the leading low-cost airlines globally.

While it takes years to build such reputation, it takes just an instance to lose it. Nothing damages reputation more than unethical or unlawful behaviour. Therefore, our values of maintaining highest levels of ethics and integrity are critical to protect our reputation. Ethics and integrity serve as the bedrock of our value system and are key to ensuring sustainable growth of the Company.

Acting with ethics and integrity means doing the right thing the right way. It means that we all conduct our business honestly and within the law, each and every day. To that end, we are committed to building an open, fair, and transparent work culture that encourages ethical behaviour.

Our Code of Conduct provides a guiding framework on ethical behaviour and establishes high standards of ethics and integrity. The Code clearly defines the way we put our values into action. We must all commit ourselves to following the Code consistently. Doing this will not only strengthen our ethical culture, but will also enhance trust of our stakeholders.

I would urge each and everyone to read the Code and adhere to the principles not only in form, but also in spirit. If you have questions or believe that the principles of the Code are being violated in any way, you must speak up. Any actual or potential violation of the Code, however insignificant, is a matter of serious concern for IndiGo. Timely reporting of such violations could avoid or minimise reputational damage or financial losses.

I thank you for doing your part by living the Code every day and taking personal responsibility for taking IndiGo to even greater heights.

Sincerely,  
Ronojoy Dutta

## Ethics and Integrity in Everything We Do

Ethics and integrity are fundamental to InterGlobe Aviation Limited and its subsidiaries ("IndiGo" or "the Company"). Being ethical and integral means not just doing the right thing, but doing it the right way. As responsible representatives of IndiGo, all of us should do the right thing – for our stakeholders, the Company, and ourselves.

IndiGo's Code of Conduct ("6E Code" or "the Code") provides a guiding framework to help us do the right thing. The Code sets forth our shared responsibilities, our commitments and defines the way we conduct ourselves on a day-to-day basis.

The Code enables us to work in a manner that is consistent with our values and to ensure that IndiGo is compliant with laws and regulations that apply to us. The Code governs all decisions we make and all actions we perform – whether in our offices, workplace, at airports, on our aircraft, working outside office premises on Company work or inside the boardroom. Also, it addresses our responsibilities to the Company, to each other, and to our stakeholders.

However, the 6E Code cannot possibly address every situation we face at work. Therefore, the Code is by no means a substitute for good judgement. The Code encourages a culture of value-based decision making and helps us in making ethical decisions based on guidelines contained in it. We are all responsible for our own actions and doing our work with ethics and integrity.

### Who Should Comply With the Code

The 6E Code applies to [senior management](#) and officers of the Company and all employees of IndiGo in India and around the world (including full-time, part-time, fixed-term, permanent or trainees, and employees of subsidiaries).

### What is Expected of Everyone

#### Ensure Compliance with the Code

All of us are individually responsible for complying with the 6E Code. We all are expected to follow not only the letter of the 6E Code, but its spirit as well. This means that we:

- understand the Code, Company policies and procedures, and laws that apply to us and our jobs;
- undertake relevant training on the Code as required by the Company from time to time;
- are up to date with latest updates to the Code as and when applicable;
- comply with the Code and applicable laws at all times;
- conduct ourselves in ways that are consistent with the Code; and
- report (in a timely manner) any violations of the Code or the law.

In addition to the 6E Code, the [senior management](#) of the Company is also required to comply with the [Code of Conduct for Directors and Senior Management](#).



## Evaluate Your Actions and Seek Guidance

As a general guidance, we must use good judgment in day-to-day operations and avoid even the appearance of improper behaviour. This means that we carefully consider the potential consequences of our actions and make decisions appropriately. We can evaluate the consequences of our actions by asking ourselves:

- Is the action unethical and non-compliant with values and culture embedded in the 6E Code?
  - Is it illegal?
  - Would we be unwilling or embarrassed to tell our family, friends, or co-workers about it?
- If the answer to any of the above questions is "yes" – do not do it.

Whenever in doubt, refer to the 6E Code to seek clarity. If you are still unsure, seek guidance from your line manager, your Human Resources ("HR") partner or the [Ethics and Compliance Team](#).

## What is Expected of Managers

### Be a Role Model of Ethical Behaviour

Managers have the additional responsibility of acting as role models of ethical behaviour for employees reporting into them. All managers are expected to model appropriate conduct at all times, set a strong tone from the top, and demonstrate deep understanding of the 6E Code.

### Promote Ethical Culture

In addition to acting as role models, managers should take steps to promote ethical behaviour by:

- nurturing the culture of ethics and integrity in their work areas;
- ensuring that staff reporting into them have read the 6E Code, undertaken related trainings, and understand their responsibilities under the Code;
- creating an environment where employees feel comfortable raising concerns without fear of retaliation;
- discouraging employees from achieving business results at the expense of ethical conduct;
- considering violations of the Code while evaluating the performance of their direct reports; and
- acting promptly on issues/concerns reported to them.

### Provide Guidance and Respond to Concerns

Managers are expected to listen carefully when an employee approaches them with a question or concern related to the Code. Seek clarification and additional details relating to the query or concern, if necessary.

In case of a query, respond appropriately if you can. If you are not sure of the response, seek clarity from the [Ethics and Compliance Team](#).

Ensure that concerns raised are taken seriously and addressed promptly, treating related information with discretion, to determine the appropriate course of action.

#### NOTE:

Throughout the 6E Code, certain words or phrases will appear in [blue](#). These words have been defined in the Glossary, which is provided at the end of this document.



## The 6E Code



## Commitment to our Stakeholders

### Safety First

IndiGo is committed to the well-being of all its stakeholders. No matter where we work or what we do for the Company, we are expected to put safety first. Compliance with safety laws, regulations, policies and work rules ensures that we work in a safe work environment, which, in turn, provides for safe and reliable business operations for our customers.

All of us are required to comply with the relevant safety rules and regulations at all times. We are responsible for creating a safe work environment and can contribute to solutions that promote safety. We all must act responsibly, avoid taking unnecessary risks, and be alert to such hazards at workplace. We must only undertake work in which we are trained, have competency, are medically fit, sufficiently rested, and alert enough to do. An instance of non-compliance, hiding non-compliance, gross negligence, or deliberate violation of such regulations, must be reported immediately.

Always be on the look-out for:

- Unsafe or hazardous conditions at workplace due to a vehicle or piece of equipment not operating properly or if the person operating it is not authorised or trained to operate it
- Unauthorised or untrained staff carrying out safety checks or procedures
- Safety hazards arising out of routine or unplanned operations
- Deviations from Standard Operating Procedures – even if these deviations have become a practice
- Lapses in safety procedures or emergency preparedness
- Fabrication of documentation with the intention to show compliance
- Improper use of tools, equipment and other assets leading to safety hazards
- Any actual or near miss safety incident, accident or injury, illness, unsafe or unhealthy condition

See our [Safety Policy](#)

### Compliance with Laws

As an Indian airline with a rapidly growing global footprint, IndiGo has operations, customers and [suppliers](#), located across several countries. It is critical for us to be compliant with not only Indian laws, but also with those that govern our people and operations in international locations.

Although we are not expected to know the details of all laws that govern IndiGo in India and other geographies, we are expected to be familiar with those laws that have a bearing on our job profile and day-to-day operations.

In case you have questions in relation to the laws or regulations that apply to you, contact the legal department. It is your duty to report any actual or suspected violation of laws.

### Aviation Regulatory Excellence

Aviation is a highly regulated industry. Various international, national and local aviation regulations apply to IndiGo across all its operating locations. While IndiGo complies with all applicable aviation regulations without exception, many of our internal procedures exceed regulatory requirements.

It is our responsibility to know and comply with all regulations including aviation regulations that apply to our jobs. No excuses are acceptable for violating aviation regulations, be it on account of pressure of managers, peers, or business performance. It is important to remember – even the appearance of non-compliance or misconduct can harm the reputation of the Company.



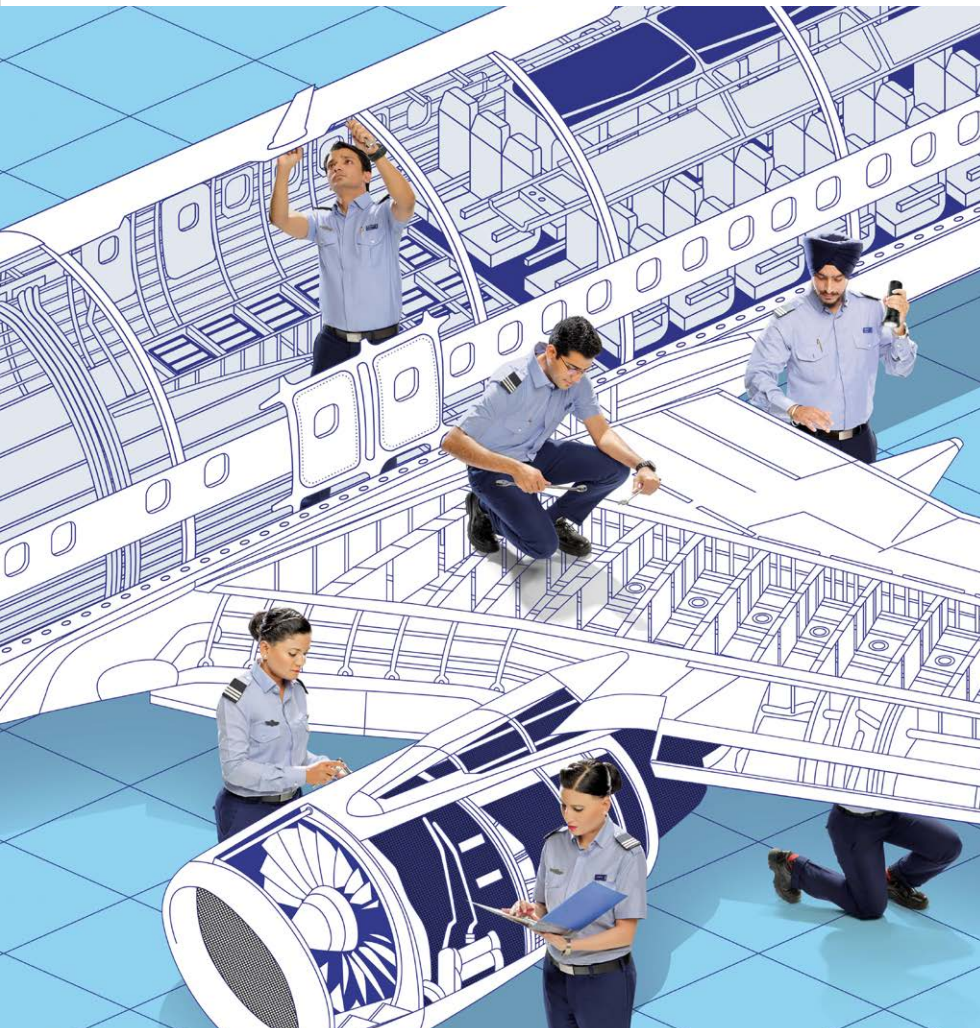
## Environmental Sustainability

At IndiGo, we are driven to reduce our carbon footprint and pursue environmental sustainability. We make every possible effort to conserve scarce natural resources and reduce pollution. To this end, we invest in environment-friendly technologies where feasible and deploy our resources as efficiently as possible. We also ensure compliance with various environmental laws and regulations that apply to our business operations.

We all have a responsibility to operate our business in an environmentally responsible manner. And therefore, we must engage with our colleagues, business partners and [suppliers](#) to find ways to reduce the impact on the environment. At work, we must practice:

- recycling where available
- reducing consumption of water, energy, and other resources
- conserving paper by limiting printing and reusing boxes or other containers, when possible
- disposing waste, hazardous and electronic products properly
- prompt reporting of any actual or near miss spill or release of material to the environment so that steps can be taken to correct, prevent or control those conditions immediately

If you are responsible for providing or obtaining data used for environment or sustainability reporting, make sure that all data submitted is complete and accurate. Never misrepresent environmental performance or knowingly compromise the integrity of the Company's environmental disclosures.





# Integrity in Dealing with Outsiders

## Free and Fair Competition

IndiGo thrives on free and fair competition in all markets across its operations. This means that we act and take business decisions independently and without any collusion, only keeping in mind our best commercial interests. We do not make business decisions by coordinating, communicating, indulging or having any understandings or agreements (implied or express) with our [competitors](#), [suppliers](#) or agents that stifle or hinder free and fair competition. We also never engage in any anti-competitive acts nor exchange any prohibited competition-sensitive information (for e.g., pricing, capacity or cost data of any kind, etc.) at any point of time.

Competition laws prohibit cartelisation or any other anti-competitive arrangements or understandings between competitors. Therefore, IndiGo's employees and agents should not directly or indirectly enter into any understanding or arrangement, receive or disclose any information or undertake any acts with our [competitors](#) or their representatives or agents, etc., whether in person, electronically or at industry meetings, to:

- fix pricing, or price increases, or other similar terms;
- distribute or disclose details of markets, where we currently operate or plan to operate in future;
- share information on profits, profit margins, costs, sales and marketing measures, etc.
- share or submit quotes in competitive bidding;
- boycott a supplier, or distributor; or
- restrict free and fair competition in any other way.

Always ensure that before participating in any meeting or event where representatives of our [competitors](#) may be present, you have reviewed the agenda and are comfortable that the topics are appropriate. Also, ensure that you understand the rules that govern your conduct and communications in such meetings and events. If, during your participation in an event, you find that anti-competitive topics are raised, raise your concern and leave immediately and noticeably.

Most competition laws globally also prohibit any action or behaviour that can be construed as abuse of dominant market position. Specific rules prohibit such [vertical agreements](#) (or specific provisions in them) with agents, distributors, suppliers and customers that restrict, prevent or distort competition. Those involved in negotiating and contracting terms and conditions of [vertical agreements](#) should ensure such agreements do not include provisions, which can be construed as an act of abuse of dominant position and restrict free and fair competition in any manner.

If you have any questions or concerns about competition compliance, you must consult the Legal department before making any decision or taking any action. If you suspect that another organisation has approached you for a possible anti-competitive activity, you should duly report the matter.

## Information of Competitor

We can research and gather information on [competitors](#), however, we must ensure that the information is taken from public domains/sources and is not acquired using deceptive or other unacceptable practices. Acquiring information by theft, trespassing, eavesdropping, misrepresentation, corporate espionage, etc., are unacceptable practices that should never be used. In addition, we must never seek to acquire or use information that, if disclosed, would lead to breach of any confidentiality agreement between a third party and a competitor.

## International Trade Compliance

As IndiGo's operations span across multiple international locations, our business operations are subject to various trade controls and laws that regulate export and import. We must comply with these laws at all times. Because these laws vary greatly, employees with job responsibilities involving international trade or business activities should consult the Legal department frequently regarding these matters.

In addition, we are committed to comply with boycotts, embargoes and economic sanctions against certain countries to which India is a signatory. Such restrictions would prohibit the Company from engaging in certain business activities in specified countries, and with specified individuals and entities. Any instance of non-compliance could result in penal actions, including fines and imprisonment for responsible individuals.

## Anti-bribery and Corruption

IndiGo forbids bribery and corruption in all business dealings around the world – whether with government or private entities. All employees, [suppliers](#), business partners, or anyone acting on behalf of IndiGo are prohibited from directly or indirectly offering, authorising or promising to give or receive [anything of value](#), which could be construed as a [bribe](#) or [facilitation payment](#). Any demand for, or offer of, a [bribe](#) or [facilitation payment](#) must be rejected and reported immediately.

Being an airline with a growing global footprint, we often need to interact with government officials and regulators in multiple countries. Our dealings with government officials and regulators are governed by special laws on bribery and corruption, many of which apply internationally to breaches committed beyond borders. And therefore, our dealings with governments should be handled with extra caution. A minor incident of non-compliance of such laws could result in significant fines for IndiGo, damage to our reputation, and personal fines for individuals involved or even imprisonment.

IndiGo's operations are governed by various anti-bribery laws. IndiGo has a zero tolerance approach to bribery and corruption and will not (directly or indirectly) offer, pay, seek, or accept payment, gift or favour or improperly influence a business outcome. IndiGo respects and endeavours to comply with all laws related to prevention of bribery and corruption, as applicable.

As a rule, only authorised and trained individuals should interact with government officials and regulators. We must not offer or promise anything to a government official – directly or indirectly – in return for favourable treatment, regardless of local business practices. The definition of government officials includes, but is not limited to:

- Any officer or employee of any Indian central, state, or local government, ministry, department, agency, or branch of government
- Any member of parliament, legislative assembly or local self-government
- Any officer or employee of a foreign government, including local, state or federal offices
- A director, officer or employee of a regulatory body, government-owned or government-controlled company (for e.g., Air India), or a quasi-government organisation

As IndiGo could be held responsible for bribes paid by a third-party agent, those involved in dealing with third party agents should take particular care in evaluating prospective third party agents. Do not engage a third party agent if there is reason to believe that it may attempt to [bribe](#) a government official. Also, make sure that all third party agents agree to abide by IndiGo's Third Party Code of Conduct, which contains anti-bribery provisions.

If your roles and responsibilities at IndiGo require regular interaction with government officials and regulators, it is important that you fully understand relevant anti-bribery regulations.

## Anti-money Laundering

IndiGo prohibits the use of its resources to carry out [money laundering](#). In particular, we must ensure that neither the Company nor any employee should receive the proceeds of criminal activities, as this can amount to the criminal offence of [money laundering](#). Even an innocent error of judgement in associating with criminal activities of others could lead to significant reputation damage and criminal liability for IndiGo.

We are committed to complying with global and local laws on anti-money laundering. We carry out our business by entering into relationships only with those business partners who have legitimate business activities. We have incorporated controls in our processes to prevent and detect any such suspicious activity.

## Political and Charitable Activities

IndiGo does not prohibit employees to participate in their communities by involving themselves in political or charitable activities. However, we are only permitted to offer support and contributions for such political or charitable activities in our personal capacity. The decision to spend our own time and money for any political or charitable cause is entirely personal and voluntary.

In pursuing our individual political or charitable activities, we must always ensure that we do not:

- Use Company funds or other resources (such as, using Company vehicles for a political rally, canvassing within Company premises, etc.)
  - Claim reimbursement for any expenses incurred or contributions made to political or charitable organisations
  - Perform such activities during Company time
  - Let our involvement in such activities affect our performance or objectivity at work
  - Cause a conflict of interest between the Company and any outsider
  - Use IndiGo's reputation in any way for personal benefit or benefit of others
  - Give an impression that such activities are connected to IndiGo
  - Engage in any kind of anti-social or illegal activities
- If an employee plans to seek or accept a public office, he/she must obtain prior approval. IndiGo complies with all applicable laws in promoting the Company's position and in making political contributions.

## Audits, Investigations and Litigation

We may be asked to participate in an audit or investigation conducted by our external auditors, internal auditors, or the [Ethics and Compliance Committee](#). We must always extend our full cooperation and communicate truthfully during our interactions. If asked to produce information, be prompt, honest, transparent and unbiased.

In case of litigation proceedings or investigations by statutory bodies, we may be requested to provide documents, appear before courts or statutory bodies or meet with lawyers. We should contact the Legal department immediately upon receiving such a request for assistance.



# Ethics in our Business Activities

## Integrity in Business and Financial Reporting

The integrity of business and financial reporting is critical to the operations of our business. Recording of accurate business and financial information enhances the trust of our shareholders and ensures that we meet our legal and regulatory obligations. Additionally, as a listed company, we are bound by certain higher standards of financial reporting and are required to have adequate internal controls and procedures commensurate with the size and scale of our operations.

We must always ensure that all Company business and financial records are accurate and complete. This includes not only financial accounts, but other business information such as flight and engineering logs, inventory records, quality reports, expense reports and submissions such as benefits claim forms, etc.

It is everyone's responsibility to ensure accuracy and completeness in our business and financial records, and not just the personnel working in the Finance department. Those involved in recording, compiling and reporting business and financial records must:

- Record all transactions accurately, completely and promptly
- Always record and classify transactions in the proper accounting period and in the appropriate account and department. Do not delay or accelerate the recording of revenue or expenses to meet budgetary goals
- Ensure that all reports to regulatory authorities are full, fair, accurate, timely and understandable
- Never conceal or distort the true nature of any transaction
- Never falsify a document
- Co-operate fully, openly and honestly with internal or external auditors, tax authorities and other regulators
- Comply with all applicable laws, for example, those regarding financial statements, tax and environmental requirements

## Avoiding Conflict of Interest

Always act in the best interest of IndiGo. This means that your actions must be free from any actual or perceived conflict of interest. Even the appearance of a conflict has the potential of damaging your and/or the Company's reputation.

A conflict of interest may arise when your personal activities or relationships have an influence on your judgement to act in the best interest of the Company. You must always avoid actual conflicts of interest and take steps to mitigate potential or perceived conflict of interest situations.

You may be in a conflict of interest situation if you:

- Work for or are also employed by someone else
- Engage in activities that compete with Company's interests
- Have personal relationship with a colleague
- Transact with a passenger who is a relative, friend, or colleague
- Select or manage a supplier who is owned by or employs a relative or friend
- Have investment or a financial interest in a competitor, customer, or supplier
- Are offered personal discounts or other benefits from suppliers or customers if those are not available to the general public or to all other employees of IndiGo
- Serve on the Board of another company or hold a public office or in an NGO

The sections below provide guidance on some common conflict of interest situations. As every potential conflict of interest situation cannot be captured in the 6E Code, you are advised to use your conscience and common sense.

See our [Conflict of Interest Policy](#)

## Other Employment and Activities

As a general rule, employees are not permitted to engage in any other employment, since this prevents them from carrying out their duties in the best interests of the Company, regardless of whether such other employment is with or without compensation. This includes self-employment, independent contracting services, consulting services, or employment with a third party. In particular, employees are restricted from being employed by, or otherwise provide services for or receive payments from, any customer, supplier, consultant, agent or competitor of IndiGo.

However, IndiGo recognizes that some employees may want to engage in other activities or engagements (such as pursuing hobbies, working with a non-governmental organisation, or conducting training sessions, etc.) that do not conflict with their duties at IndiGo or the interests of the Company. Employees may be permitted to engage in such activities and engagements, subject to the following conditions.

- Prior to accepting such engagements/activities, employees must seek a written approval. This approval must be renewed annually.
- Employees must ensure that their engagements/activities do not compete with, conflict with or compromise IndiGo's interests. Employees are prohibited from performing services that are normally performed by IndiGo.
- Employees must ensure that such engagements/activities do not interfere or conflict with their work and responsibilities at IndiGo (for example, scheduled hours, overtime when required, performance of Company assignments, etc.).
- Employees are not permitted to solicit or conduct any outside business during their work hours at IndiGo.
- Employees are not permitted to use IndiGo's assets and resources (for example, supplies, facilities, computer systems, including but not limited to, Company's e-mail and Internet) in connection with their outside engagements/activities. This restriction extends to the unauthorized use or application of any Company confidential information.
- Employees must carefully consider the efforts and level of involvement that such engagements/activities will require before accepting them. Such engagements/activities shall not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel, or refusal to work overtime or at different hours. In addition, employees are not permitted to use their paid sick leaves with IndiGo to perform work for their outside engagements/activities. If such engagements/activities of an employee cause or contribute to job-related problems at IndiGo, the employee will be asked to discontinue such engagements/activities.
- If at a subsequent time, an employee's outside engagements/activities present a conflict of interest with IndiGo, or if such engagements/activities have the potential for negative impact on the Company, the employee will be asked to discontinue such engagements/activities.

## Outside Investments

In general, employees are advised to avoid investments that could influence their actions or decision making on behalf of the Company. In particular, employees or their family members are not permitted to hold or maintain a substantial direct or indirect investment or financial interest in, or any financial relationship, management or advisory position with such suppliers, customers, consultants, agents or competitors of IndiGo for whom they have decision-making authority to transact with on behalf of the Company.

Transactions conducted based on standard commercially available terms (for example, mutual fund holdings) are not considered conflicts of interest. In case an employee has a pre-existing financial interest in a company that has recently become a supplier, customer, agent or competitor of IndiGo, the employee must promptly disclose it in writing.

<sup>1</sup> A financial interest is considered substantial if it is more than 1% of the equity of a company.

## Serving on a Board or Public Office or Not for Profit Organisation

Employees must seek a written approval prior to accepting a position on the Board of another company, non-governmental organisation, non-profit institution or trade organisation. If an employee holds a board position prior to joining the Company, he/she must disclose it within one month of joining the Company. Prior to accepting a public office, public position or political appointment, employees must seek a written approval. Employees must renew their approvals annually.

While serving on a board or in a public office, employees must ensure that their work or decisions do not compete with, conflict with or compromise IndiGo's interests. Also, they must ensure they will not have access to commercially sensitive information concerning actual or potential IndiGo [competitors](#).

[Senior management](#) personnel of the Company are required to disclose their board positions to the [Board of Directors](#) at the time of joining the Company and annually. Additionally, they must seek written approval from the [Board of Directors](#) prior to accepting a new position on the Board of another company.

## Dealing with Third Parties

IndiGo values its relationship with all its third parties (such as [suppliers](#), customers, consultants, and agents). Employees must always deal with them fairly and honestly. Employees must never provide or commit to provide anything to a third party in exchange for an inappropriate benefit for the Company.

Employees are not permitted to participate in or conduct any business dealings on behalf of IndiGo with any third party owned/controlled by the employee or a [family member](#) or a person who has a close personal relationship with the employee, to avoid any conflict of interest situation. In case their involvement in such a transaction is unavoidable, the employee must fully disclose his/her relationship in writing so that appropriate steps can be taken to mitigate the risk of conflict of interest.

A conflict of interest situation may also arise if a decision involves a third party that employs a [family member](#) or close friend of an employee. Before making a decision about doing business with such a third party, the employee must disclose his/her relationship and take prior approval.

IndiGo employees are not permitted to seek or receive any direct or indirect personal benefits while transacting with third parties. Employees must never solicit commission, fees, personal compensation, rebates or rewards from third parties for performing their job responsibilities.

## Friends and Family Members as Customers

We must take due care in dealing with customers who are our [family members](#), friends, colleagues, or persons with whom we have close personal relationships.

When dealing with such customers, we are restricted from extending any form of preferential treatment. This includes but is not limited to unauthorised deviation from Company policies relating to pricing, issuance, exchange or refund of tickets; withholding seats from inventory; waiver of charges (such as charges for excess baggage, flight move, XL seats, etc.); preferential seat allocation; and inappropriate upgrades. In case there is a valid business justification for any policy deviation, the respective employee must seek approval from her/his supervisor or manager prior to taking such action/decision.



## Relationship between Employees

We must ensure that our personal relationships at work do not influence our ability to act in the best interest of the Company. We must not be involved in employment-related decisions such as hiring, defining job roles and responsibilities, duty allocation, performance evaluation or compensation of other employees with whom we have personal relationships. In any case, there should not be any reporting relationship directly or indirectly in such cases that could be perceived as conflict of interest. Employees are expected to disclose if their [family members](#) or someone with whom they have a significant personal relationship also work at IndiGo.

See our [Guidelines for Hiring and Placement of Immediate Relatives of Employees](#)

## Benefitting from Your Position

IndiGo employees are not permitted to use their employment to benefit personally. Do not seek personal discounts or other benefits from [suppliers](#), agents or customers if they are not available to general public. Employees are not permitted to take for themselves or divert to their friends or [family members](#), any business opportunities, which they discover by virtue of their employment, association or position at IndiGo. Also, employees must not compete against the Company, either directly or indirectly.

## Dealing with Fraud

IndiGo does not tolerate any kind of fraudulent activity – whether perpetrated by an outsider or an employee. This includes any act of intentional deception, concealment, alteration, falsification or omission of information, or abuse of position, for personal benefit or for the benefit of others. It also includes any fraudulent act perpetrated in the name of IndiGo to deceive outsiders.

Examples of fraud include:

- Skimming of ticket revenues, in-flight sales, or excess baggage charges, etc.
- Falsifying expense reports by claiming personal or fictitious expenses
- Falsifying flight or engineering records
- Manipulating ticket fares for personal gains or for benefit of others
- Misstating or wrong categorisation of revenues

We are expected to conduct ourselves with honesty and integrity at all times and avoid even the appearance of fraud. Anyone found involved in a fraudulent activity will be liable for appropriate disciplinary action and/or criminal prosecution.

See our [Anti-fraud Policy](#)

## Protecting Company Resources

We are all responsible for protecting Company resources, and therefore, we must ensure that we use them honestly, efficiently and only for business purposes. Company resources include tangible assets (for e.g., aircraft, vehicles, facilities, cash, equipment, machinery, spare parts, inventory, Information Technology ("IT") hardware, scrap, etc.) and intangible assets (for e.g., company time, IT software, [intellectual property](#), trade secrets, etc.).

All Company resources (whether tangible or intangible), must be protected from theft, damage, wastage or misuse at all times. Improper use of Company resources includes taking supplies for personal use, using Company vehicles for personal transportation, selling scrap for personal gain, browsing social media sites on Company provided laptop during office hours, etc.

Employees having spending or approval authority or those responsible for managing budgets and accounts have the additional obligation to protect Company funds. They must always ensure that:

- Funds are used for designated purposes only
- Required approvals are in place before expenses are incurred
- Expenses are recorded accurately under the right account heads
- Expenses submitted for reimbursement are business-related and comply with our policies

## Protecting from Theft or Misappropriation

Theft or misappropriation of resources owned by the Company or property belonging to customers or [suppliers](#) is unacceptable and could lead to stringent disciplinary action or criminal prosecution. Theft of personal items of employees at the Company's workplace is also treated as theft of Company assets.

Examples of theft or misappropriation include:

- Theft of inventory, consumables, IT hardware, etc.
- Misappropriation of mishandled baggage or lost and found items
- Taking items deposited by passengers (for e.g., liquor or power bank) for personal use
- Embezzlement of funds
- Taking items marked as "scrap" or "garbage", or those that are destined for recycling
- Intentional misreporting of time or expenses

## Avoiding Misuse

Company resources are provided to enable us to perform our jobs in the best possible manner. We must ensure that these resources are used judiciously and for intended use only.

We must never:

- Use Company resources for personal activities or benefit. However, the occasional, reasonable and nominal personal use of Company's IT assets is permitted, provided such personal use does not compromise Company's interests, have material financial implications, or hinder the user from performing her/his job responsibilities. Apply good judgement while using Company resources. For instance, the occasional personal use of Company-provided laptop or printer is acceptable. Excessive personal use is a misuse of such assets
- Engage in personal activities during Company time such that it restricts us from performing our job responsibilities
- Use IT assets for outside activities or employment, or for illegal or unethical activities such as accessing, publishing, distributing or storing sexually explicit, obscene, defamatory or illegal material, trading in securities for personal benefit, gambling, playing games, etc. Refer to Company's Acceptable Usage Policy for further guidance. All information stored on IndiGo's IT systems or within its premises is considered Company property, regardless of whether it is work-related or 'personal'. To protect from theft or misuse, IndiGo may log, monitor, access, or inspect activity on its systems or at its premises at any time, to the extent permitted by existing laws and agreements.

See our [Acceptable Usage Policy](#)

## Business Gifts and Entertainment

The practice of giving or receiving gifts or entertainment requires careful consideration by all employees. When making gifts, or paying for meals or entertainment, you must make sure that the gift supports the business interests of the Company, is reasonable and appropriate under the circumstances and cannot be construed as a bribe.

Employees are especially restricted from giving or offering gifts and entertainment of any value to government officials, as even a simple gift or meal to a government official can be considered as a bribe. Any improper or unreasonable giving or receiving of gifts or entertainment could create situations of actual or perceived conflicts of interest, lead to breach of laws, and can potentially impact our reputation.

### Gifts

Prior to exchanging any gift, we must determine if it is permitted under the 6E Code and the Company's Gift and Business Courtesies Policy. Employees are restricted from giving, offering or receiving gifts and business courtesies that serve to, or appear to, inappropriately influence business decisions or gain an unfair advantage.

Employees can, however, exchange business gifts that are intended to generate goodwill, provided such gifts:

- Are reasonable, and do not exceed the monetary limits defined in IndiGo's Gift and Business Courtesies Policy and are one-time, irregular and of a consumable nature (employees must keep their own records of such gifts for inspection);
- Are given or received in good faith, without expecting any return favour or improper benefit or business advantage;
- Are given or received on behalf of IndiGo and not on behalf of any individual;
- Do not comprise cash or cash equivalent (such as lottery tickets, gift certificates, vouchers, loans, gold, silver, guarantees or any other granting of credit, shares or options); and
- Are permitted under the laws that apply to the recipient and the recipient is authorised to accept the gift subject to the limits defined.

In case an employee is offered a gift that exceeds the monetary limits defined in the Gift and Business Courtesies Policy, he/she must politely decline and explain IndiGo's gift policy. In exceptional situations where such a gift has to be accepted to avoid causing serious offence, or in circumstances where the gift cannot be returned, the employee must:

- disclose the gift;
- record the details such as circumstances in which the gift was accepted, description and value of gift, and details of the giver; and
- where appropriate, take steps for the gift to be donated to charity or distribute it to a large group of employees within the Company.

See our [Gift and Business Courtesies Policy](#)

### Entertainment

As with gifts, employees must never request for entertainment from [suppliers](#) and customers or offer them entertainment to fulfil their request. However, in case [suppliers](#) and customers or employees themselves offer entertainment, such entertainment is acceptable, provided it is:

- moderate (not excessively extravagant) and its value does not exceed the monetary limits defined in the Company's Gift and Business Courtesies Policy;
- necessary to further goodwill and successful business relations of the Company;
- voluntary and not in response to any request;
- one-off or irregular in nature; and
- has the host present throughout the event.

Employees must not offer or accept any entertainment involving overnight stays or foreign travel without prior written approval.

See our [Gift and Business Courtesies Policy](#)



## Protection of Information

### Preventing Insider Trading

We may learn about [Unpublished Price Sensitive Information](#) ("UPSI") of the Company, its customers, [suppliers](#) or another third party in the course of performing our jobs. Trading in securities based on UPSI is commonly referred to as 'insider trading'. Inside (or price sensitive) information means information that is not available to the public and that a reasonable investor would probably consider important in deciding to buy or sell a company's shares.

Insider trading is illegal and could result in criminal prosecution under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. We are restricted from trading based on UPSI, or disclosing UPSI to outsiders (including [family members](#) and friends) so that they may trade, in securities of IndiGo or any other publicly traded company.

We must never share UPSI with an outsider unless it is necessary for IndiGo's business activities and proper controls are in place (such as a confidentiality agreement or non-disclosure agreement with consultant). Even within the Company, we must ensure that we share UPSI only with authorised personnel, on a need-to-know basis.

We must not buy or sell shares of the Company or any listed company when in possession of inside information related to those securities including trading at times when there are market rumours we know are false. We should also not pass any information about any company to anyone within IndiGo or outside IndiGo including [family members](#), or friends.

For further information, please refer to IndiGo's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and Code of Practices and Procedures for Fair Disclosure of UPSI.

See our [Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons](#) and [Code of Practices and Procedures for Fair Disclosure of UPSI](#)

## Privacy of Personal Data

Our customers, employees and business partners entrust us with their personal data, such as credit card numbers, bank account numbers, identity numbers, or passport information, etc. We respect their privacy rights and are committed to use, maintain, protect and transfer personal data in accordance with applicable global regulations (such as General Data Protection Regulation ("GDPR"), etc.), local laws, our Privacy Policy and Information Security Policy.

We only gather, process and use personal data that is directly related to our business operations, in a lawful manner, and for clearly-defined and legitimate purposes. We have also put in place systems and processes of the highest standards to ensure secure use, retention, storage and protection of personal data.

Leaders responsible for processes that require gathering of personal data must ensure that we:

- obtain (from the individual) the level of consent required by law;
- collect such information that is necessary for business or legal purposes only;
- do not retain personal data for longer than necessary to achieve the business or legal objective;
- limit access to only those who have a legitimate business purpose for accessing it; and
- take all necessary steps to prevent unauthorized disclosure.

Employees who gather or manage personal data must ensure that we:

- collect, use and process such information for legitimate business or legal purposes only;
- do not share it, internally or externally, unless that is required by any statutory authority in accordance with law or for the purpose for which the personal data is collected; and
- do not transmit personal data outside the country in which it is collected, without approval from Legal department.

See our [Privacy Policy](#)

## Safeguarding Company Information

During the course of our everyday work, we will have access to various types of [confidential information](#) of the Company. [Confidential information](#) includes all information (regardless of its source) that might be used to harm the Company or can be used by its competitors. As confidential information is a valuable asset for the Company, we must exercise due care in handling such information and use it for Company business purposes only.

We must ensure that Company's [confidential information](#) is never made public or revealed to outsiders, including to family and friends, without authorisation and proper business justification. In case disclosure of such information is necessary for business reasons or as required by any statutory authority in accordance with law, adequate measures must be taken to protect confidentiality of the information. One way of doing this is to execute a confidentiality agreement with the outsider to prevent misuse of information, which should be duly approved by the Legal department.

We must not disclose confidential information to others within the Company unless they have a business reason to know it. Do not discuss about Company's [confidential information](#) near anyone who should not be privy to the information.

We are obligated to safeguard Company's [confidential information](#) at all times, including outside our workplace and work timings, and even after we end our employment with IndiGo. For instance, be careful when interacting with outsiders at conferences and at informal occasions outside of company hours.

Confidential or proprietary information about our customers, our organisation, or other parties which has been gained through our employment or affiliation with IndiGo, may not be used for personal advantage or for benefit of the third parties.

See our [Information Security Policy](#)

<sup>2</sup> Securities include shares, equities and related derivatives or spread bets.

## Protecting Intellectual Property

IndiGo vigorously protects its **Intellectual Property** ("IP") by enforcing its rights on any unauthorised use of its IP. The Company's IP is a result of ideas and hard work of its employees, which is an asset that provides great value to the Company. And therefore, special care needs to be taken while using, accessing or sharing it.

We are permitted to use the Company's IP only for authorised business purposes, and not for personal gains. We are not permitted to take, access, provide access to, or use IndiGo's proprietary information or other IP without authorization, particularly after leaving IndiGo. Any unauthorised use of Company's IP is a violation of the 6E Code and law.

We must also take adequate measures to restrict unauthorised use of Company's IP by others. This includes ensuring that Company's IP is classified and labelled accordingly, stored in a safe location, and access is granted only to individuals with a legitimate need. IndiGo respects the IP rights of others and restricts any kind of unauthorised use of IP belonging to other people or organisations. We must use IP of others, such as software, only if they have appropriate license or approvals and ensure that such IP is used only in accordance with its license. Using unlicensed IP of others constitutes copyright infringement and could lead to legal action by the IP owner, eventually leading to reputation damage and financial losses for IndiGo.

## Ensuring Retention of Records

We are not permitted to destroy any business or financial records of the Company, whether in written or electronic form for a minimum period of eight years without seeking prior written approval from the Legal department. This is especially so when it is known that the information is related to or required for an impending litigation or an enquiry by regulatory authorities.

We are also restricted from making copies or retaining Company records for private use. In case you have any queries on retention of records, please seek appropriate guidance from the Legal department.

## External Communications

External communications demand specialist skills and experience to ensure that we protect **confidential information** and communicate only authorized and accurate information about IndiGo to outsiders. Which is why, IndiGo has authorised certain individuals, who have the requisite briefing, experience and training, to communicate with investment communities and the media on behalf of IndiGo (referred to as "Authorised Spokesperson").

All Authorised Spokespersons of the Company must ensure that they comply with the conditions attached to their authorisation, such as constraints on when and/or with whom they may communicate. They must consult the authorising functions about the content of their message before releasing it. They must also be sure to distinguish between their personal views and those of the Company.

Those who are not Authorised Spokespersons of the Company must always ensure that they do not:

- Directly or indirectly engage or communicate with investment communities and the media, verbally or in writing
- Make any forward-looking statements, provide UPSI or divulge **confidential information** in front of general public or during a speaking engagement
- Speak to the media on no-names, off-the-record or anonymous basis
- Publically make any negative remarks about IndiGo and its employees, service, reputation, business operations, customers and **suppliers**

The above guidance also applies at external speaking engagements, seminars, trade association events or social occasions.



## Regulating Access Control

IndiGo has laid down elaborate procedures for physical access control at all its operating locations and virtual access control across all its IT systems. This is to ensure we safeguard privacy of third party information and confidentiality of Company information, and protect Company assets from theft and misuse.

We are responsible to comply with access control and other security policies at all times. Also, it is our responsibility to prevent unauthorised access to Company premises or its IT systems. We must always keep our Company access cards, passwords, or other security codes securely and never share them with anyone, to avoid any misuse. We must not evade, circumvent, or cause to defeat the purpose for which access controls have been implemented.

See our [Acceptable Usage Policy](#)



## Respect and Dignity at Workplace

### Ethical Labour Practices

IndiGo adheres to and promotes fundamental human rights and applicable labour and social standards. And, we hold our [suppliers](#) and partners to the same high standards.

We nurture a work environment where employees are treated with dignity and respect, and are provided safe and humane working conditions. We respect that our employees have the right to freedom of opinion and expression. We ensure that our employees are compensated fairly and equitably, and have the right to rest and take regular leave of absence.

IndiGo does not tolerate any form of labour exploitation. In particular, we are strongly against exploitative practices such as child labour, forced labour, slavery, bonded labour, human trafficking, and exploitation of any other kind. We are committed to complying with all applicable labour laws and to take all necessary measures to prevent such exploitation.

### Diversity and Inclusion

We proudly embrace and value our rich diversity of ethnicities, cultures, ideas, and lifestyles in all aspects of our business operations. We recognise that our diversity is one of our biggest strengths, which enables us to provide class-leading services to an equally diverse set of customers. We must celebrate this diversity by acknowledging individual differences and capitalising on each other's strengths.

We all play an important role in cultivating an inclusive work environment where differences of individuals are respected and embraced. All of us are expected to treat co-workers, customers, suppliers and anyone else with whom we interact, with dignity and respect. Always be sensitive to cultural differences and be careful to avoid offensive behaviour and unwelcome remarks. It is the responsibility of each one of us to create and maintain a work environment where each individual is valued.

### Anti-discrimination

We are committed to following fair employment practices that provide equal opportunities to all our employees. We do not discriminate based on gender, race, colour, religion, caste, creed, ethnic origin, language, economic or social status, sexual orientation, disability, marital status, nationality, age, family status, maternity status, and any other category protected by law. Taking business decisions or interacting with each other based on any of these personal characteristics is against our policies and is illegal under the laws of many countries.

All employment decisions must be made based on merit and business factors only.

We must always act fairly and give qualified individuals the chance to perform to their abilities and advance within the Company based on merit. This means providing equal opportunities in hiring, promotion, transfers, compensation, benefits, leaves of absence, and decisions about discipline or termination of employment.



## Free from Harassment

IndiGo follows an anti-harassment policy and prohibits harassment by an employee of the Company towards other employees as well as customers and [suppliers](#). We are all responsible for creating a professional work environment where every individual is valued and treated with dignity and respect. Harassment or any other offensive or disrespectful conduct at workplace is unacceptable and will not be tolerated.

Workplace harassment includes any unwelcome verbal, visual, physical or written acts or conduct, carried out by an individual or group, which is offensive, humiliating or intimidating.

An illustrative list of unacceptable behaviour includes (but is not limited to):

- Offensive language, including jokes
- Making demeaning, belittling or degrading remarks
- Racial, religious, ethnic, gender-based slurs
- Intimidating, threatening or hostile behaviour
- Bullying based on economic or social status
- Displaying, emailing, texting, or otherwise distributing, offensive material
- Spreading malicious rumours or jokes

If you or someone else is the subject of discrimination or harassment, speak up and report it.

## Prevention of Sexual Harassment

IndiGo prohibits sexual harassment in any form, whether direct or implicit. We view all incidents of sexual harassment very seriously and take strict disciplinary action against anyone found involved in such conduct.

Sexual harassment involves verbal, visual or physical conduct or gestures of sexual nature (whether directly or by implication) that is unwelcome and offensive. This includes any one or more of the following behaviour:

- physical contact and advances
- a demand or request for sexual favours
- making sexually coloured remarks
- sexually oriented jokes, pictures, text or email messages
- showing sexually suggestive pictures or pornography
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature

We strive hard to ensure that our work environment is free from sexual harassment and to comply with applicable laws. In compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, IndiGo has set-up an Internal Committee to resolve complaints against such conduct in a fair and timely manner. IndiGo has a gender-neutral policy for sexual harassment. Employees or any third person of any gender can initiate a complaint of sexual harassment.

See our policy on [Prevention of Sexual Harassment at Workplace](#)

## Free from Violence and Unprofessional Conduct

IndiGo assures a safe place to work for all, which is free from violence or such other unprofessional conduct. Any act that could cause another individual to feel threatened or unsafe is considered violence. This includes verbal or physical assaults, threats or any expressions of hostility, intimidation, or aggression. Workplace violence in any form and towards anyone (especially customers) is prohibited and will be dealt with strictly. We also prohibit the possession of weapons in the workplace.

We must ensure that our customers, co-workers, [suppliers](#), agents, and other persons we interact with, are treated with respect and professionalism at all times. We must never engage in violent or unprofessional behaviour on Company premises or while engaged in Company business anywhere in the world outside of our premises.



## Responsible Use of Social Media

IndiGo understands that many employees actively use personal social media (such as Facebook, Twitter, Instagram, TikTok, YouTube, LinkedIn, etc.) to broadcast their personal feelings, actions and opinions. The Company respects their right to privacy and freedom of speech. However, if while using personal social media, we show IndiGo branding by posting pictures or videos wearing Company uniform or lanyards, or Company branding in the foreground or background, our posts may be associated with the brand "IndiGo". Even when no harm is intended, this creates the risk of regulatory breach and reputational damage for IndiGo.

And therefore, it is important that we all act responsibly when using personal social media, as we are all accountable for the pictures, videos, comments and views that we post on it. Ideally, we must avoid mentioning any information about our employment with IndiGo in our personal social media profiles. If we choose to do so, we must always ensure that we:

- clearly signify that we do not speak on behalf of the Company
- do not represent or leave the impression that the views we express are the views of the Company
- never violate the law (e.g., posting pictures clicked during any phase of a flight, harassment, hurting religious sentiments, bullying or copyright laws)
- do not degrade others (especially our colleagues, customers, [competitors](#) or [suppliers](#))
- never post negative comments about IndiGo and its employees, service, reputation, business operations, customers and [suppliers](#)
- do not disclose any [confidential information](#) or UPSI pertaining to the Company or its business partners

See our [Social Media Policy](#)

## Against Substance Abuse

In addition to being a regulatory violation, working under the influence of drugs or alcohol poses unacceptable safety risks to everyone. We are prohibited from consuming or being under the influence of alcohol or drugs while performing Company duties on or off Company premises. IndiGo also prohibits possession, sale, transportation and distribution of drugs at work or on the Company premises. Drugs include illegal drugs, controlled substances or misused prescription medication.

In addition to being a regulatory violation, working under the influence of drugs or alcohol poses unacceptable safety risks to everyone. If you suspect a colleague to be working under the influence of drugs or alcohol, you must report this immediately.





# Reporting Violations

## How to Report

We all have the obligation to question and report a situation that we reasonably suspect to be illegal, unethical or a violation of the 6E Code. Failure to report a violation will be considered a violation of the Code. Also, we must be prompt in reporting violations as timely action can help in protecting IndiGo's brand and reputation.

If and when a violation is noted, we must immediately report it to the Ethics and Compliance Committee through any of the following channels:

Email: [ethics@goindigo.in](mailto:ethics@goindigo.in)

Mail: Head – Governance Risk and Compliance  
InterGlobe Aviation Limited,  
Third Floor, Tower C, Global Business Park  
Gurgaon, Haryana, India – 122001

In exceptional or appropriate cases, the complainant can also directly report her/his concern to the Chairman of the [Audit Committee](#) of IndiGo, at [damodaran@goindigo.in](mailto:damodaran@goindigo.in).

## Anonymity and Confidentiality

You can choose to report your complaint anonymously, although you are encouraged to identify yourself to facilitate communication. If you choose to stay anonymous, it is important that you provide sufficient information about the complaint so that IndiGo can conduct a thorough investigation to address the concern. Also, the contents of anonymous complaints should be verifiable, and not of a general nature.

All complaints reported and the identity of the complainant will be kept strictly confidential. The identity, phone number or IP address of the complainant will not be recorded or included in any report related to the matter, unless the complainant voluntarily provides such information. The [Ethics and Compliance Committee](#) and other personnel involved in investigations will take every precaution to keep the complainant's identity confidential. Also, IndiGo shall ensure that only its authorised representatives have access to the reporting channels and information is shared strictly on a 'need to know' basis throughout the complaint resolution process.

## Protection of Complainant

IndiGo prohibits victimisation or retaliation of any kind against a complainant or anyone who participates in an investigation. Retaliation against an employee for reporting an issue in good faith is itself a violation of the 6E Code. IndiGo shall ensure that a complainant is not disadvantaged in any manner for reporting under the 6E Code, including (but not limited to) discrimination, harassment, transfer, demotion, refusal of promotion, or the like.

If at any time, a complainant perceives or apprehends that he/she is being unfairly victimized or harassed due to the act of complaining, he/she shall have the right to approach the [Ethics and Compliance Committee](#), and if not satisfied by the Committee, the Chairperson of the [Audit Committee](#), who will review the complainant's complaint and take appropriate action, as applicable, to ensure that the complainant is not so subjected to any unfair or prejudicial employment practices.

## Malicious Complaints

We are committed to protect the complainant who raises a concern honestly. By honest reporting, we mean that the complainant has to believe that the information he/she is providing is accurate. It does not mean that the complainant has to be right when he/she reports a concern.

However, if it is ascertained at any time during the course of investigation of a complaint that the complainant knowingly lodged a false complaint, or made malicious or wrongful accusations, the complainant shall be liable to appropriate action to be initiated by the [Ethics and Compliance Committee](#).



## Administration of the Code

### Ethics and Compliance Committee

The Company has formed an **Ethics and Compliance Committee** comprising senior management personnel, which is responsible to oversee all complaints reported under the 6E Code and is empowered to take corrective actions as it deems fit.

**Ethics and Compliance Committee** shall comprise the following senior members of the Company's management team:

- Senior Vice President – Human Resources;
- Chief Financial Officer;
- Head – Governance, Risk and Compliance;
- General Counsel; and
- Company Secretary.

### Ethics and Compliance Team

IndiGo has set-up the **Ethics and Compliance Team** to assist the **Ethics and Compliance Committee** in reviewing and investigating complaints, and reporting its findings. The team is also accountable for promoting, monitoring and enforcing our 6E Code.

The **Ethics and Compliance Team** or Head of Governance Risk and Compliance can be approached for any questions on the 6E Code, Company policies, or to discuss any concerns about potential violations of the 6E Code.

For all approvals and disclosures, as required under several provisions of the Code, contact the **Ethics and Compliance Team** at [eco@goindigo.in](mailto:eco@goindigo.in).

### Investigations

All complaints of suspected violations are taken seriously and reviewed promptly. If preliminary evaluation indicates that a detailed investigation needs to be carried out, the **Ethics and Compliance Committee** will appoint the **Ethics and Compliance Team** or other investigator(s) to conduct such investigation.

The investigator(s) will:

- Conduct objective evaluation of facts and evidences
- Interview employees who may have knowledge about the alleged incident(s)
- Report their findings to the **Ethics and Compliance Committee** and recommend corrective actions and/or disciplinary measures

The investigator having responsibility for conducting the investigation in a free, fair, transparent and lawful manner will be free to determine what is appropriate. Complainants are advised not to take it upon themselves to conduct investigations. Complainants may note that the Company may require them to provide a statement as part of the investigation process.

If an employee of IndiGo or any other person becomes involved in an investigation, he/she is expected to cooperate fully and answer all questions completely and honestly. During the investigation, if any employee is found to be coaching witnesses, tampering with evidence, or covering-up facts, then the Company can take severe disciplinary action, including termination of employment.





## Disciplinary Action

Based on the results of an investigation, the [Ethics and Compliance Committee](#) will make a determination whether a violation has occurred. The [Ethics and Compliance Committee](#) will take appropriate disciplinary or corrective action against all violations of the law, the 6E Code and our policies.

Disciplinary actions could be up to and including termination of employment, depending on the nature and severity of the violation. The final decision of the [Ethics and Compliance Committee](#) and a copy of the letter or document evidencing disciplinary action will be placed in the personnel files of employees found to be in violation of the 6E Code.

## Our Code is Not a Contract of Employment

The 6E Code is not a contract to convey any specific employment rights or guarantee employment for any specific period of time.

## Issuance of and Amendments to the Code

The [Board of Directors](#) of IndiGo is responsible for approving and issuing the 6E Code. The effective date of the 6E Code is 02 June 2020. The [Ethics and Compliance Committee](#) and the Governance, Risk and Compliance department reviews the Code periodically to determine if any changes are required in the Code due to changes in the law or regulations, or changes in our business or the business environment. All changes in the 6E Code must be approved by the [Board of Directors](#).

## Acknowledgement

IndiGo requires for all its existing employees and [senior management](#) to review the 6E Code regularly. We also conduct online Code of Conduct training for employees with Internet and email access at regular intervals. Those who train online are required to provide an online acknowledgement that they understand the Code and agree to abide by it. Others are required to review the Code in hard copy and sign an acknowledgement form. All new employees are provided the Code to review at the time of their joining, and they are required to sign an acknowledgement form. All employees are also required to disclose any potential conflict of interest or any other possible exception to compliance with the Code.

Failure to complete the acknowledgement process will be treated as a violation of the Code and/or impact your performance reviews at the Company's discretion. In no circumstance does the failure to read the Code, sign an acknowledgement or certify online, exempt us from our obligation to comply with the 6E Code.





## Resources

### Ethics and Compliance Site

IndiGo has developed an Ethics and Compliance site, which is available on the intranet. The site contains additional information about the 6E Code, related policies and guidelines, FAQs, e-learning courses, and other ethics and compliance matters. If you have any questions about information contained in the site, contact the [Ethics and Compliance Team](#) for more information.

### Company Policies

The 6E Code does not address all matters related to workplace conduct in detail. IndiGo has framed various policies and guidelines that provide additional guidance on matters covered in the Code and also address conduct not covered by the Code. A list of specific policies, which have also been referred elsewhere in this document, is given below.

All these policies are available on "My 6E World" intranet site for your reference.

- Acceptable Usage Policy
- Anti-fraud Policy
- Code of Conduct for Directors and Senior Management
- Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons
- Code of Practices and Procedures for Fair Disclosure of UPSI
- Conflict of Interest Policy
- Gift and Business Courtesies Policy
- Guidelines for Hiring and Placement of Immediate Relatives of Employees
- Information Security Policy
- Policy on Prevention of Sexual Harassment at Workplace
- Privacy Policy
- Social Media Policy
- Safety Policy
- Whistleblower Policy

## Glossary

**Anything of Value** is interpreted literally and refers to anything that could be of value to the individual receiving it or his/her relative. This includes (but is not limited to) flight tickets, holding fares, excess baggage waivers, meals, revenue seat waivers, entertainment, employment, gifts, offers of employment, and business opportunities.

**Audit Committee** means the audit committee of the Company constituted by the **Board of Directors** of the Company.

**Board of Directors** means the board of directors of the Company.

**Bribe** constitutes giving **anything of value** to an individual, or to anyone else, with the knowledge that the payment will be passed on to the individual, for influencing an act or a business decision, gaining improper advantage, or inducing the individual to do something illegal.

**Competitors** include scheduled and non-scheduled airlines (both domestic and international), cargo airlines, travel agents, tour operators, other distribution channels, maintenance repair organizations and/or any entity engaged in a business similar to that of the Company and/or its subsidiaries.

**Confidential Information** includes all non-public information (regardless of its source) of the Company. Typical examples include copyrights, patents, trademarks, trade secrets, passenger information, financial information and results, marketing or strategic or expansion plans, internal standard operating procedures, software, systems, contracts, pricing information, etc.

**Directors** means directors on the **Board of Directors** of the Company.

**Ethics and Compliance Committee** refers to a committee comprising senior leaders of IndiGo to undertake remediation and/or disciplinary action in relation to complaints reported under the 6E Code.

**Ethics and Compliance Team** is comprised of IndiGo employees who assist the Ethics and Compliance Committee to review and investigate Complaints, and report its findings.

**Ethics Helpline** is the Company's whistleblowing helpline, which is administered by a third party, through which employees and others can raise concerns about the 6E Code or other ethics and compliance matters.

**Facilitation Payments** are small payments made to someone to expedite routine administrative actions or functions, which they are otherwise obliged to perform anyway.

**Family Members** include spouse or spouse equivalent, children (including adopted children), grandchildren including step children, parents, grandparents, siblings including step sisters and brothers, in-laws and persons living with you and financially dependent on you.

**Intellectual Property** includes patents, trade secrets, trademarks, copyrights and designs created and owned by IndiGo.

**Money Laundering** refers to the covert introduction of illegally acquired assets into the legitimate financial system, thereby concealing the criminal origin of the money.

**Suppliers** include all vendors of product or services to the Company, including consultants, contractors and agents. The definition also includes any supplier that the Company is actively considering using, even if no business ultimately is awarded.

**Senior Management** includes personnel of the Company who are members of its core management team excluding Board of Directors comprising all members of management one level below the executive directors, including the functional heads.

**Unpublished Price Sensitive Information** means any information, relating to a company or its securities, listed or to be listed, that is not generally available, which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily include without limitation, information relating to financial results, dividends, change in capital structure, mergers and acquisition, changes in key managerial personnel, etc.

**Vertical Agreement** is a term used in competition law to denote agreements between firms at different levels of the supply chain.





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