7.1 PREAMBLE:
This policy is formulated to provide opportunity to employees and directors of the Company to have access in good faith, to the Whistle Blowing Investigation Committee (WBIC) in case they observe unethical and improper practices or any other wrongful conduct in the Company. This policy protects such employees from any adverse action being taken against them.

7.2 APPLICABILITY:
This policy applies to all permanent Jet Airways employees and directors of the Company.

7.3 POLICY:
In line with our vision and values, which we cherish in our organization and as a part of good corporate governance, this Whistle Blower Policy has been formulated. The Policy is meant to encourage employees to report to the Whistle Blowing Investigation Committee (WBIC) for addressing and redressing if they observe unethical and improper practices or any other wrongful conduct in the Company.

No adverse personal action shall be taken or recommended against an employee in retaliation to his disclosure in good faith of any unethical and improper practice or alleged wrongful conduct. This policy protects such employees from unfair termination and unfair prejudicial employment practices.

However, this policy does not protect an employee from an adverse action which occurs pursuant to poor job performance, or any other disciplinary action etc. unrelated to his disclosure in good faith of any unethical and improper practice or alleged wrongful conduct.

7.4 DEFINITIONS:
7.4.1 Alleged Wrongful Conduct
Alleged Wrongful Conduct shall mean violation of law, infringement of Company's Code of Conduct or Ethics policies, mismanagement, misappropriation of monies, actual or suspected fraud, substantial and specific danger to public health and safety or abuse of authority.

7.4.1.1 Alleged wrongful conduct as illustrated below may include but is not limited to:
- Forgery, falsification or alteration of documents
- Unauthorized alteration or manipulation of computer files and data
- Fraudulent reporting or willful material misrepresentation.
- Pursuit of a benefit or advantage in violation of the Company's interest
- Misappropriation/misuse of Company's resources, like funds, supplies, vehicles or other assets
- Authorizing/receiving compensation for goods not received/services not performed
- Authorizing or receiving compensation for hours not worked
- Improper use of authority
- Unauthorized release of Proprietary Information
- Accepting kickbacks, bribes, expensive gifts, directly or indirectly from business connections including vendors & contractors
- Theft of cash
- Theft of Goods/Services
- Unauthorized Discounts
- Falsification, Destruction of Company Records
- Fraudulent Insurance Claims
- Harassment
- Providing (unauthorized) confidential information to external agencies.

7.4.1.2 Matters pertaining to the following may be excluded as there are separate forums available for the same:
- Personal grievances – Refer to the “Grievance Handling” policy. PPP / Chapter2 Section 16
- Sexual harassment – Refer to the “Sexual harassment” policy. PPP / Chapter2 Section 17

7.4.2 WHISTLE BLOWING INVESTIGATING COMMITTEE (WBIC)
WBIC shall mean a Committee constituted which shall comprise of the Head of Legal function, the Head of Internal Audit and Assurance function and the Company Secretary. The investigation will be carried out by the Whistle Blowing Investigation Committee (WBIC) and the report will be submitted to the Audit Committee. In the interim, the findings of the investigation will be shared with the CEO for initiating immediate action.

7.4.3 COMPLIANCE OFFICER
The Compliance Officer shall be the Company Secretary. A dedicated phone line and an email id (jetethics@jetairways.com) will be assigned to facilitate Whistle Blowing. Both the phone line and email will be accessible to all members of the Whistle Blowing Investigation Committee. A log will be maintained by the Compliance Officer of all calls / emails logged to the Whistle Blowing Investigation Committee

7.4.4 GOOD FAITH
An employee shall be deemed to be communicating in `good faith’ if there is a reasonable basis for communication of unethical and improper practices or any other alleged wrongful conduct. Good Faith shall be deemed lacking when the employee knew or reasonably should have known that the communication about the unethical and improper practices or alleged wrongful conduct is malicious, false or frivolous.
7.4.5 MANAGERIAL PERSONNEL
Managerial Personnel shall include a Director, all Executives at the level of Manager and above, who has authority to make or materially influence significant personnel decisions.

7.4.6 UNETHICAL AND IMPROPER PRACTICES
Unethical and improper practices shall mean -
   a) An act which does not conform to approved standards of social and professional behavior;
   b) An act which leads to unethical business practices;
   c) Improper or unethical conduct;
   d) Breach of etiquette or morally offensive behaviour, etc.

7.4.7 WHISTLE BLOWER
An employee or director of the Company who discloses in good faith any unethical & improper practices or alleged wrongful conduct to the WBIC

7.5 GUIDELINES

7.5.1 Internal Policy & Protection under Policy
This Policy is an internal policy on disclosure by employees of any unethical and improper practices and access to the WBIC. This Policy prohibits the Company from taking any adverse action against its employees for disclosing in good faith any unethical & improper practices or alleged wrongful conduct to the WBIC. Any employee against whom any adverse personnel action has been taken due to his disclosure of information under this policy may approach the WBIC.

7.5.2 False Allegation & legitimate Employment Action
An employee who knowingly makes false allegations of unethical & improper practices or alleged wrongful conduct to the WBIC shall be subject to disciplinary action, up to and including termination of employment, in accordance with Company rules, policies and procedures. Further, this policy may not be used as a defense by an employee against whom an adverse personal action has been taken independent of any disclosure of information by him and for legitimate reasons or cause under Company rules and policies.

7.5.3 Disclosure & Maintenance of Confidentiality
Confidentiality of the Whistle Blower shall be maintained to the greatest extent possible.
7.5.4 Procedure

A perceived wrongdoing or an act for Whistle Blowing may be reported by a Whistle Blower in oral or written form. (by calling a dedicated no. with a recording facility 9920234567 ** between 9am-5.30 pm Mon – Fri or in writing to email id jetethics@jetairways.com) Anonymous calls will not be entertained.

Written complaints can also be sent to the Compliance Officer and/or any of the members of the WBIC by way of a confidential letter or may be personally handed over to them.

Any employee who observes any unethical & improper practices or alleged wrongful conduct shall make a disclosure as soon as possible but preferably not later than 60 consecutive calendar days after becoming aware of the same.

The investigation will be carried out by the Whistle Blowing Investigation Committee (WBIC) and the report will be submitted to the Audit Committee. WBIC shall appropriately and expeditiously investigate all Whistle Blower reports received. In the interim, the findings of the investigation will be shared with the CEO for initiating immediate action.

In case the matter concerns:

i. A member of the WBIC, then the matter will be investigated by the CEO and a report will be submitted to the Chairman of the Audit Committee.

ii. The CEO, the matter will be investigated by the WBIC and a report submitted to the Chairman of the Audit Committee.

** Notional number, the actual number will be advised subsequently.
The WBIC shall have the right to call for any information/document and examination of any employee of the Company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this policy. A report shall be prepared after completion of investigation and the CEO shall consider the same and report all instances and action taken to the Audit Committee.

7.5.5 Protection of the Whistle Blowers
The Management assures full protection to a Whistle Blower from any kind of harassment, victimization or unfair treatment and redress any Advance Personal action taken against the Whistle Blower. The decision of WBIC shall be final and binding. If and when the WBIC is satisfied that the alleged unethical & improper practice or wrongful conduct existed or is in existence, then the WBIC may –

a) Recommend to the CEO to reprimand, take disciplinary action, impose penalty, punishment, order recovery when any alleged unethical & improper practice or wrongful conduct of any employee is proved.

b) Recommend termination or suspension of any contract or arrangement or transaction vitiated by such unethical & improper practice or wrongful conduct. CEO shall pass necessary orders in consultation with HR / Head of Department concerned.

7.6 NOTIFICATIONS
All employees shall be informed about the policy by the HR department and statement in this regard should be periodically submitted to the Compliance Officer.
This policy as amended from time to time shall be made available on http://empower.jetairways.com and the PPP HR manual.

7.7 ANNUAL AFFIRMATION
The Company, through its CEO shall annually affirm that it has not denied any personnel access to the WBIC and that it has provided protection to Whistle Blower from adverse personal action. The affirmation shall form part of Corporate Governance report as attached to the Annual Report of the Company.

7.8 RETENTION OF DOCUMENTS
All Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of 3 years

7.9 AMENDMENT
The Company through its Audit Committee reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the employees unless the same is notified to the employees in writing.