

## **Fair Practice Code**

This Code has been formulated by Flaps Aviation Private Limited ("FAPL") to bring in transparency in its dealings with Members on various aspects.

### **1. Objectives & Application**

#### **1.1 Objectives**

- a) To promote good and fair practices by setting minimum standards in dealing with members.
- b) To increase transparency so that the member can have a better understanding of the services expected.
- c) To promote a fair relationship between the company and the member.
- d) To encourage market forces, through fair competition, to achieve higher operating standards.
- e) To foster confidence in the business overall.

#### **1.2 Application of the Code**

All parts of this Code apply to all the products and services, whether they are provided by FAPL across the counter, over the phone, by post, through interactive electronic devices, on the internet or by any other method.

### **2. Acting fairly and in a transparent manner**

FAPL will act fairly and reasonably in all dealings with members, by ensuring that:

- a) FAPL meets the commitments and standards in this Code for the products and services they offer and, in the procedures, and practices their staff follows.
- b) FAPL's products and services meet relevant laws and regulations in letter and spirit.
- c) FAPL's dealings with members' rest on ethical principles of integrity and transparency.
- d) FAPL transparently discloses to the member all information about fees/charges payable for taking the membership program and any other matter which affects the interest of the member. In other words, the FAPL will disclose 'all in cost' inclusive of all charges involved taking up the membership program in a transparent manner. It will also be ensured that such changes/fees are non-discriminatory.

### **3. Advertising, Marketing and Sales**

FAPL:

- a) ensures that all advertising and promotional material is clear, and not misleading.
- b) Shall in any advertising in any media and promotional literature that draws attention to a service or product and includes a reference to the membership fees. FAPL shall also indicate whether other fees and charges will apply and that full details of the relevant terms and conditions are available on request.
- c) Shall provide information on charges, fees, refund of fees and cancellation of flights before ETD by putting up such matters in Terms and Conditions on website through telephone or help-lines; through designated staff / help desk

- d) If avails of the services of third parties for providing support services, FAPL will require that such third parties handle member's personal information (if any available to such third parties) with the same degree of confidentiality and security as FAPL would.
- e) FAPL may, from time to time, communicate to members various features of their products availed by them. Information about its other products or promotional offers in respect of products/services, may be conveyed to members only if he/she has given his/her consent to receive such information/service either by mail or by registering for the same on the website or on member service number.
- f) has prescribed a code of conduct for its Channel Partners (CPs), used to market products/services, which amongst other matters will require them to identify themselves when they approach the member for selling products personally or through phone.
- g) In the event of receipt of any complaint from the member that FAPL's representative/courier or CP has engaged in any improper conduct or acted in violation of this Code, FAPL initiates appropriate steps to investigate and to handle the complaint and to make good the loss.

#### **4. Membership Program**

##### **4.1.1 Applications for Membership and their processing**

- a) Application forms will include necessary information which affects the interest of the member, so that a meaningful comparison with the terms and conditions offered by any other airline operator(if any)can be made and informed decision can be taken by the member. The Member application form will indicate the list of documents required to be submitted with the application form.

##### **4.1.2 Membership and terms/conditions**

- a) Normally all particulars required for processing the loan application shall be collected by the FAPL at the time of application. In case it needs any additional information, the member will be told that he would be contacted immediately again.
- b) The FAPL shall convey in writing to the member by means of membership letter letter or otherwise, the features of the product and a membership card or e card.

#### **4.2 Privacy and Confidentiality**

All personal information of members will be treated as private and confidential (even when the members are no longer members), and will be guided by the following principles and policies. FAPL will not reveal information or data relating to member accounts, whether provided by the members or otherwise, to anyone, including other entities in FAPL's group, other than in the following exceptional cases:

- a) If the information is to be given by law;
- b) If there is a duty towards the public to reveal the information;
- c) If FAPLS's interests require them to give the information (for example, to prevent fraud) but it will not be used as a reason for giving information about member or member accounts (including member name and address) to anyone else, including other companies in the group, for marketing purposes;
- d) If the member asks FAPL to reveal the information, or with the member's permission;
- e) If FAPL is asked to give a reference about members, it will obtain his written permission before giving it;
- f) The member will be informed the extent of his rights under the existing legal framework for accessing the personal records that FAPL holds about him;
- g) FAPL will not use member's personal information for marketing purposes by anyone including itself unless the member specifically authorizes to do so.

### **4.3 Renewal of Membership fees**

- 431 When membership is taken, FAPL will explain to the member the annual renewal process. The process will involve reminding the member by sending him notice or a telephone call.
- 432 FAPL's renewal policy will be built on courtesy, fair treatment and persuasion, and will be aimed at fostering member confidence and a long-term relationship. FAPL's staff or any person authorized to represent it in getting renewal done will identify himself. FAPL will provide members with all the information regarding membership renewal and will endeavour to give sufficient notice for renewal.
- 433 All the members of the staff or any person authorised to represent FAPL in collecting renewal of membership fees will follow the guidelines set out below:
- a) Members will be contacted ordinarily at the place of his choice and in the absence of any specified place at the place of his residence and if unavailable at his residence, at the place of business / occupation.
  - b) Identity and authority to represent FAPL will be made known to the member at the first instance.
  - c) Member's privacy will be respected.
  - d) Interaction with the member will be in a civil manner.
  - e) FAPL's representatives will contact members between 0930 hrs and 1900 hrs, unless the special circumstances of the member's business or occupation require otherwise.
  - f) Member's request to avoid calls at a particular time or at a particular place will be honored as far as possible.
  - g) Time and number of calls and contents of conversation will be documented.
  - h) All assistance will be given to resolve disputes or differences regarding any inconveniences caused during the year in a mutually acceptable and in an orderly manner.

### **4.4 Complaints and Grievances**

FAPL shall make available facility on its website to submit members grievances complaints, if any. FAPL has framed Member Grievance Redressal Policy providing details of contact and escalation.

## **5 Periodic review of the code**

The Board of Directors of FAPL may provide for periodic review of the compliance of the Fair Practices Code and the functioning of the grievances redressal mechanism at various levels of management. A consolidated report of such reviews will be submitted to the Board of FAPL at regular intervals, as may be prescribed by it.