



Objective Towards Consumer Safety:

As one of India's largest and most trusted e-commerce platforms, **Cleartrip Private Limited** (collectively referred to as "Cleartrip", "us", "our" or "we"), recognizes its immense responsibility it carries towards Indian consumers. The organization is committed to ensuring that every interaction is built on fairness, transparency, and trust, while prioritizing consumer safety at every stage of the shopping journey.

Cleartrip continuously invests in robust policies, controls, ethical design practices, and transparent communication to empower consumers with clarity and confidence in their choices. Beyond meeting regulatory requirements, Cleartrip has consistently sought to uphold the highest standards of compliance, accountability, and consumer protection, reinforcing our role as a responsible digital marketplace dedicated to safeguarding consumer rights and strengthening trust in e-commerce.

In furtherance of this commitment, we have also aligned our practices with evolving regulatory expectations. The **Central Consumer Protection Authority (CCPA)**, under the **Consumer Protection Act, 2019**, released the **Guidelines for Prevention and Regulation of Dark Patterns, 2023**, effective **30 November 2023**, with the objective of prohibiting manipulative design practices in digital interfaces and safeguarding consumer interests. Subsequently, on **05 June 2025**, the CCPA issued an **Advisory on Self-Audit and Compliance Declarations**, requiring digital platforms to undertake structured reviews of their websites and mobile applications and submit a self-declaration confirming compliance with the Guidelines.

Cleartrip's approach towards maintaining Ethical UI/UX Design:

A. Compliance with the CCPA Guidelines on Dark Patterns issued on 30th November: To ensure compliance with the Guidelines for Prevention and Regulation of Dark Patterns, 2023, effective 30 November 2023 we undertook the following steps:

1. **Dark Pattern Guidelines:** Flipkart Group Dark Pattern Guidelines also applicable to Cleartrip were developed and circulated to UI/UX, Category, and Product teams across B2C platforms to ensure all the relevant teams are aware of the examples as mentioned in the CCPA guidelines.
2. **Training & Awareness**
 - i. Workshops and Internal sessions on guideline reading and understanding among the UI/UX, product and category teams
 - ii. Regular communications sent out from ethics and compliance to the UI/UX, product and category teams to make them aware of the examples as mentioned in the CCPA guidelines.

Controls built

- i. Integrated Product Design Review (UI/UX, Product and Category) i.e unintended dark pattern identification and elimination by UI/UX, product and category teams prior to any new feature launch.
- ii. Continuous Monitoring of our platform to ensure they are free from unintended dark patterns.

B. Compliance with the CCPA Advisory on Self-Audit and Compliance Declarations Guidelines issued on 5th June, 2025: To ensure compliance with the CCPA advisory on self-audit and compliance declarations we undertook the following steps:

Cleartrip Private Limited CIN: U63040MH2005PTC153232

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Independent Review:

- a. In compliance with the June 2025 directive of the CCPA requiring e-commerce entities to conduct a self-audit, we engaged Deloitte Touche Tohmatsu India LLP ("Deloitte" or the "Reviewer") to undertake an independent assessment of potential and unintended Dark Patterns across Cleartrip Platform
- b. The review covered the UI/UX interfaces of both mobile applications and websites of the above platforms. In addition, key consumer-facing policies such as Terms & Conditions, Cancellation Policy, Refund Policy, and related documents were examined to assess alignment with consumer protection standards
- c. All potential and unintended dark patterns that were identified by Deloitte were thoroughly remediated by our internal teams to ensure compliance with the CCPA Guidelines on Dark Patterns, 2023.

Awareness & Training: We conducted dedicated sensitization workshops (3 in number) for our internal teams to strengthen their understanding of the Dark Patterns, ethical UX design standards, and the regulatory expectations under the CCPA framework. These initiatives form part of our ongoing efforts to further strengthen our compliance-driven and consumer-centric culture within the organization."

Through the above measures, we reaffirm our commitment to consumer welfare and protection. We remain fully aligned with the policies and objectives of the Government of India and the Central Consumer Protection Authority, and shall continue to uphold the highest standards of fairness, transparency, and accountability in all consumer interactions. We are dedicated to proactively adopting ethical practices, thereby strengthening consumer trust and reinforcing our role as a responsible digital marketplace.

This Declaration is made voluntarily, *in good faith, and in furtherance of a trustworthy, consumer-centric e-commerce ecosystem*, solely for the purpose of recording the self-audit conducted pursuant to the Advisory issued by the Central Consumer Protection Authority dated 05 June 2025, and shall not be deemed or construed as an admission of liability, fault, or wrongdoing by any party in any manner whatsoever.

**For and on behalf of
Cleartrip Private Limited**

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Senior Vice President
[05.09.2025]

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