

Guidelines/Code of Conduct for Connectors/Direct Sales Agent/ Direct Marketing Agents/Collection Agents**1. Introduction**

- 1.1. The Code of Conduct for Connectors/Direct Sales Agents/ Direct Marketing Agents/Collection Agents Collection Staff, (hereinafter referred to as the “**Code**”) is built around dignity and respect to Company’s customers (“**Customers**”). All Customers (including Customers who are late in paying or in default) must be treated with respect, dignity, courtesy, and fairness in debt collection efforts. The Company believes in following fair practices as laid down in its Fair practices code also available on the website of the company and thereby fostering Customer confidence and long-term relationship.
- 1.2. It is imperative that all persons involved in sourcing and collection related activities follow this Code. All Connectors/Direct Sales Agent/ Direct Marketing Agents/Collection Agents (hereinafter referred to as “**Staff**” for this purpose) must agree to abide by this Code.
- 1.3. This Code applies to all the employees of the Company and / or other affiliates and employees / agents of companies or agencies or organisations engaged for the specified purposes that may be retained to source customers for the company and collect Customer debts on behalf of the Company. All the practices adopted by the Company for follow up and recovery of dues and repossession of security will be in consonance with the law.

2. General Guidelines

- 2.1. The Staff must identify himself / herself as a representative of the Company. The Staff should always inform the Customer or his/her appointed representative or blood relatives at the beginning of every interaction that such Staff is a representative of the Company.
- 2.2. Customers deserve to be treated with dignity. The Staff should always remain professional during telephone conversations and visits. The Staff are strictly prohibited from making telephone calls without meaningful disclosure of the caller’s identity. No written or verbal threats, abuse or rudeness is permitted. The Staff should use only acceptable business language, even if the other party does not.
- 2.3. The Staff deserve to be treated with dignity as well. They may refer the Customer to the management, or end calls when a Customer becomes abusive or threatening. Customers should be informed of the same prior to termination of such calls. All calls where the Customer becomes abusive or threatening should be appropriately documented by the Staff.
- 2.4. The Customer should be contacted at the address registered with the Company. In the absence of this, the Customer can be contacted at his/her business / occupation address or place of residence. The Staff shall leave a message if the Customer is unavailable at either of the above-mentioned places.
- 2.5. The Staff should, as far as possible, use the language which the customer is comfortable with. The Staff should not have any discussion of a personal nature with the Customer.
- 2.6. Customers and any persons related to the Customers are entitled to privacy and the Staff should respect this right.
- 2.7. The Staff should ensure that that all written and verbal communication with the Customers is in simple business language.
- 2.8. Customers should be called between 08:00 Hrs and 19:00 Hrs IST unless due to the special circumstance of Customer’s business or occupation or other engagements, the Customer has requested the Company to contact him/her at a different time. Customer requests to avoid calls at a particular time or at a particular place should be honoured as far as possible.
- 2.9. The Staff should endeavor to answer Customer’s queries and render assistance to resolve issues.
- 2.10. The Staff should use respectful language, maintain decorum, and show respect to social and cultural sensitivities.

- 2.11. The Staff should ensure that all communications to the Customer is through pre approved templates, and is done using phone numbers registered by The Staffs with the Company. The Staffs should not share bulk messages with the Customer without approval from the Company.
- 2.12. The Staff shall document the efforts made for the recovery of dues and the copies of communication, if any, sent to the Customers will be kept on record, for a period of 1 month.
- 2.13. Inappropriate occasions such as bereavement in the family of the Customer or such other calamitous occasions shall be avoided for making calls / visits to collect dues.
- 2.14. Giving notice to Customers / Repossession of Security: While written communications, telephonic reminders or visits by the Company's representatives to the Customer's place or residence will be used as loan follow up measures, The Staff will not initiate any legal or other recovery measures including repossession of security without obtaining the Company's due consent in writing. The Staff will deliver written notices or proceed with the repossession of security only after being duly authorized by the Company's officers at appropriate levels. Repossession of Security will be strictly done in accordance with the laid down process and as per the Company's Policy on Collection of Dues and Security Repossession.

3. No misleading statements/misrepresentation are permitted.

The Staff should not –

- 3.1. Mislead the Customer on the action proposed and consequences thereof.
- 3.2. Mislead the Customer about their true business or organization name, or falsely represent or imply that The Staff is an attorney (lawyer), government official, officer of any court etc.
- 3.3. Make any unauthorized commitments on behalf of the Company for any waivers /settlements/compromises/time extension.
- 3.4. Discuss loan details of the Customer with any third party without the Customer's consent, and should not disclose any information about the Customer to any person related to the Customer.
- 3.5. Send any inappropriate messages either on mobile or through social media or any other means, and / or make threatening and / or anonymous calls.
- 3.6. Use muscle power to recover loans from the Customers, and should ensure there is no coercion in the recovery process.
- 3.7. Threaten with imprisonment or even mention imprisonment unless legal action planned or currently underway could result in imprisonment.
- 3.8. Threaten with arrest/detention by the police unless, prima facie, the Customer's actions indicate criminal intent that could lead the police to arrest/detain – for example, if a Customer has sold the automobile financed or has falsified documents at the time of application, the Customer may be prosecuted leading to arrest/detention.

4. Gifts or bribes

The Staff should not accept gifts from Customers or bribes of any kind. Any The Staff offered a bribe or payment of any kind by a Customer must immediately report the offer to his/her management.

5. Precautions to be taken on visits:

The Staff should:

- 5.1. Respect personal space – maintain adequate distance.
- 5.2. Not enter the Customer's residence against his/her wishes or when they are told the Customer is not at

home.

- 5.3. Not restrict the Customer's movement or restrain him/her from entering or leaving their house/room.
- 5.4. Not remain in the Customer's house / place of business / or any other place of the Customer, if he/she were to leave for any reason including to collect money from a company /elsewhere.
- 5.5. Respect the Customer's privacy – do not embarrass the Customer in the presence of his/her neighbor's or relatives or any other person.
- 5.6. If the Customer is not present and only minors/elderly/infirm persons are present at the time of the visit, The Staff should end the visit with a request that the Customer call them back. The Staff should not enter the house / place of business / or any other place of the Customer, unless invited. The Staff should not wait for the Customer in the Customer's residence / place of business / or any other place of the Customer, unless specifically asked to do so by the Customer or their family or their colleagues.
- 5.7. Customers should be visited between 08:00 Hrs and 19:00 Hrs unless due to the special circumstance of Customer's business or occupation or other engagements, the Customer has requested the Company to visit him/her at a different time.

6. Non-payment by Customer:

- 6.1. If the Customer declines to pay, The Staff should explain the consequences of such decision to him / her, which shall include:
- 6.2. Impact on credit history
- 6.3. Possible inclusion in negative list of Credit Reference Agencies.
- 6.4. Possible legal action and its impact
- 6.5. Cost of defending legal action if such action is contemplated.
- 6.6. The Staff shall at all times respect the Customer's personal space, and maintain adequate distance from them.
- 6.7. Should the Customer refuse to pay on the account, such accounts must be referred to the Supervisor on a case-to-case basis. The Supervisor in charge shall, after discussing with the Agency Manager allocate the account appropriately.