

## **CODE OF CONDUCT**

(For Service Provider/ Business Correspondent/ Direct Sales Agent  
providing collection and other services)

This Code of Conduct (“Code”) will apply to all the Service Providers/ Business Correspondents/ direct sales agents, its personnel, agents, affiliates and representatives involved in providing services under the agreement with RattanIndia Finance Private Limited (“RFPL”) and shall strictly agree to abide by this Code.

The fair practice code as prescribed by Reserve Bank of India (“RBI”) and this Code is a mandatory requirement for all individuals, persons, vendors, entities who contact the customers/ prospective customers on behalf of RFPL. The Code outlines minimum requirements that need to be adhered by Service Providers/ Business Correspondents/ direct sales agents, its personnel, agents and representatives of RFPL when contacting any customer for due payments or otherwise. These requirements are also aligned to the minimum standards as prescribed by the RBI from time to time.

Any Service Providers, Business Correspondents, direct sales agents, its personnel, agents and representatives found to be violating this Code may be terminated and/ or blacklisted and appropriate action shall be taken by RFPL.

### **A. Code of Conduct for collection of debt**

1. All customers (including the customers who are late in paying or in default) must be treated with respect dignity, courtesy and fairness in debt collection efforts.
2. Customers should be called only between 07 Hrs and 19 Hrs unless exceptional circumstances described in this Code warrants deviation from this timeframe. Under no circumstances, shall the customer be called beyond 21 Hrs.
3. Customers are entitled to privacy and privacy policies shall be applied to all conversations. The Service provider/ business correspondent/ direct sales agents, and its personnel/ agents/ representatives shall follow the dos and don'ts as specified in **Annexure- A.**
4. Collection representative shall always remain professional during telephone conversation and visits. No written or verbal threats, abuse or rudeness, false or misleading representation is permitted. Collection representatives shall use only acceptable business language, even if the other party does not.
5. All calls being made to the customers must be recorded as per requirements of the Code and/ or as stipulated by RBI from time to time. Collection representatives shall always identify themselves and the company/ entity that they represent at the very beginning of every interaction with customers and inform about the call being recorded.
6. Customer request that calls/ visits to place of work be stopped are to be honoured if s/he provides a suitable alternate where s/he may be reached during collection working hours. Such customer shall be asked to provide an alternate address/ phone number where they may be reached.
7. Customer shall be called no more often than is reasonable in the context of the debt, and the conversation logged on the system. The convenience of the customers to talk, shall be enquired at the beginning of each call.

8. The purpose of a collection call is to bring to the customer's notice the obligation to pay and to seek a commitment to pay on a specified date. Once a promise is elicited, a call may be made to serve as a reminder and for confirmation of payment. In the event, a commitment is not forthcoming or has been broken, calls may be made at reasonable frequency, based on amount owed, product, aging of debt and account history. Excessive number of calls or calls closely bunched together in the same day may be construed to be harassment.
9. In the event, the customer disputes only a part of the debt, collection calling may be continued for the balance/ undisputed part of the debt. The account must be referred to the Customer Care Department for resolution of the said dispute.
10. All collection activities shall be consistent with the guidelines provided by RFPL and in compliance with the Code of collection of dues stipulated from time to time by RBI.
11. Customer's questions shall be answered in full. The customer shall be provided with information requested, given assistance and issues resolved, Accounts with unresolved issues are to be escalated to the management of RFPL.
12. Collection representatives deserve to be treated with dignity. They must refer the customer to management, or end calls when a customer becomes abusive or threatening and customer shall be informed prior to terminating of such calls. All calls where the customer becomes abusive or threatening shall be appropriately documented.
13. Collection representative shall not act which intended to humiliate publicly or intrude the privacy of the Customer or its family members.
14. Collection representative shall issue and give receipt for all payments to the customer for the correct amount.
15. Zero tolerance for unethical practices i.e. funding from own pocket, collecting excess amount than the due amount or breach of any code by the collection representative.

**B. Code of Conduct for other activities/ services:**

1. Service Provider, Business Correspondent, Direct Sales Agents, its personnel, agents and representatives shall not:
  - (a) Mislead the prospective customer/ customer on any service/ products offered;
  - (b) Mislead the prospective customer/ customer about their business or organisation's name, or falsely represent themselves;
  - (c) Make any false/ unauthorised commitment on behalf of RFPL for any facility/ service/ product.
2. The prospective customer/ customer shall be informed about the product/ facility details in any one or more of the following languages- Hindi, English or the appropriate local language.
3. Customers are given clear information about RFPL's products and services, the correct terms and conditions, product life cycle, responsibilities of the customers and suitability of the products, interest rate and service charges, which apply to them.
4. Giving information about the facilities provided to the customers and how to avail of these facilities/ services and whom and how the customer may contact for addressing their queries.
5. The customers shall be informed specifically about RFPL which is actually offering the product/ service, wherever there are multiple group entities involved or any cross selling observed.
6. Tell the customer what information RFPL need from the customer, to prove identity and address, for RFPL to comply with legal, regulatory and internal policy requirements.

7. When a customer or third party requests for supervisor's name or request to speak with supervisor, it shall always be honoured.
8. Acknowledgement and/ or receipts towards payment at its outlet (if any).
9. Ensuring that its advertising and promotional literature is clear and not misleading.
10. Prominently display in bilingual/ trilingual at all its branches about the documents required for availing the facilities, as provided by RFPL.
11. Customer/ prospective customer shall be fairly treated and shall not discriminate customers on the basis of age, race, gender, marital status, religion, disability or financial status.
12. If a customer complaint has been received in writing, it shall immediately inform RFPL and share the copy of the letter/ complaint immediately. If the complaint is over phone at the designated telephone helpdesk or customer service number, it shall provide the customer a complaint reference number and keep the informed of the progress within a reasonable time and shall immediately inform RFPL.
13. The Service Provider shall not resort to invasion of privacy, viz. persistently bothering the Customers/ prospective customers at odd hours, violation of "do not call" code, etc. nor shall call on Do Not Call Number (DNCN) and it shall regularly update its own list with the updated list maintained by the Department of Telecommunications under National Do Not Call Registry before making any telecalls.
14. The Service Provider shall always remain professional during telephone conversation and visits.

**Annexure- A**

Do's and Don'ts

<b>PARAMETERS</b>	<b>DO'S</b>	<b>DON'TS</b>
<b>Appearance</b>	<ul style="list-style-type: none"> <li>• Well Groomed</li> <li>• Clean &amp; Tidy</li> </ul>	<ul style="list-style-type: none"> <li>• No long unkept hair</li> </ul>
<b>Dress Code</b>	<ul style="list-style-type: none"> <li>• Formal</li> </ul>	<ul style="list-style-type: none"> <li>• Shirt's sleeves should not be rolled up.</li> <li>• No chappals or sandals allowed.</li> </ul>
<b>When and Where to call or Visit</b>	<ul style="list-style-type: none"> <li>• First call at Residence (Salaried) or at Shop (Self-Employed)</li> <li>• Customers should be called only between 07 Hrs and 19 Hrs unless in exceptional circumstances, when you have tried to contact the customer and found that the customer is normally only available before 7am or after 7pm and no alternate telephone number is available to contact the customer. Under no circumstances, shall the customer be called beyond 21 Hrs.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not call before 7am or after 7 pm in the first few calls/ visits.</li> </ul>
<b>How to start and continue the call/meeting</b>	<ul style="list-style-type: none"> <li>• Introduce yourself and the company</li> <li>• Ask for reason for non-payment</li> <li>• Stay professional, use the language the customer is comfortable.</li> <li>• If customer refuses to pay, state impact/ consequences- negative credit history, difficulty of future credit including legal implications of non- payment.</li> <li>• Stay professional and do not abuse or shout even if the customer is abusing. If required leave the customer's place</li> </ul>	<ul style="list-style-type: none"> <li>• Do not use false identity to get through to the customer</li> <li>• Even if the customer abuses or gets abusive, do not abuse/threaten.</li> <li>• Do not visit the customer in large groups.</li> <li>• Do not stand in presence of others discussing the customer's debt/ overdue amount where others can overhear</li> <li>• Do not discuss information about the customer with anyone other than the customer</li> <li>• Do not discuss personal matters with the customer/s</li> </ul>

	immediately in case the customer is threatening.	<ul style="list-style-type: none"> <li>Do not accept bribes/gifts from the customer/s, report such instance immediately to the collection managers.</li> </ul>
<b>When Collecting and depositing</b>	<ul style="list-style-type: none"> <li>Issue and give receipt for all payments to the customer for the correct amount</li> <li>Deposit the collected payments at the RFPL branch or designated bank branch or other centre within 24 hours of payment collected/ receipt issued date</li> </ul>	<ul style="list-style-type: none"> <li>Do not pay the customer's EMI or dues from your own money (No EMI Funding)</li> <li>Do not pocket the customer's money for personal use or used it to fund another customer's EMI</li> <li>Do not make corrections in the receipt without customer countersigning them</li> <li>Do not fudge receipts or not issue receipts or make alterations in the reconciliation</li> </ul>
<b>If customer is non-contactable</b>	<ul style="list-style-type: none"> <li>Leave a message with an adult member of the family asking customer to call back</li> <li>Ask when &amp; where customer can be contacted</li> </ul>	<ul style="list-style-type: none"> <li>Do not discuss amount overdue or status of customer with any other person</li> <li>Do not threaten the family members or shout outside the customer's house to embarrass them.</li> </ul>
<b>If PTPs are broken</b>	<ul style="list-style-type: none"> <li>Highlight consequences (impact on credit history, inclusion in CIBIL, cost of legal route) to the customer. Intensify collection visits and update trails on collections system</li> </ul>	<ul style="list-style-type: none"> <li>Do not shout, give written or verbal threats</li> </ul>