

CODE OF CONDUCT FOR RECOVERY EXECUTIVES (IN HOUSE) & RECOVERY AGENTS (OUTSOURCED)

CODE OF CONDUCT FOR COLLECTION / RECOVERY STAFF INCLUDING OUTSOURCING AGENTS AND THEIR REPRESENTATIVE(S) REVIEWED AT THE BOARD MEETING HELD ON 25TH MAY 2024

01. Applicability

The “Code of Conduct” shall be applicable to all Company Executives recruited for field work including recovery of dues / repossession of the Assets etc., of the Company.

02. Code of Conduct

The duties, responsibilities and obligations of Recovery Executives and that of Recovery Agents including their authorized representatives was thoroughly detailed out which needs to be construed as Illustrative & Narrative and not as Exhaustive :-

The same was drafted keeping in mind the Reserve Bank of India (RBI's) guidelines for loan recovery agents which strictly prohibits harassment and ensure fair treatment of borrowers. These guidelines include:

- **Contacting borrowers**

Recovery agents should contact borrowers at reasonable hours, and at the borrower's preferred location. They should also respect the borrower's privacy and avoid calling at inappropriate times.

- **Identifying themselves**

Recovery agents should carry an authorization letter, a notice from the financial institution, and an ID card.

- **Being polite**

Recovery agents should interact with borrowers in a polite and civilized manner.

- **Avoiding harassment**

Recovery agents should not intimidate, harass, or humiliate borrowers. They should also avoid sending inappropriate messages or making threatening calls.

- **Being respectful**

Recovery agents should avoid making calls or visits during times of bereavement or other difficult times.

- **Being transparent**

Recovery agents should provide borrowers with information about their dues.

- **Resolving disputes**

Recovery agents should help resolve disputes in a mutually acceptable manner.

- **Reporting grievances**

NBFC's should address complaints about recovery efforts promptly.

Also all borrowers needs to be educated by the company that in any unfortunate instant of harassment by a recovery agent, they should bring it immediately to the notice of the company and have option to file a complaint with the local police station.

c) Conflict of interest

All Collection Executive and Outsourcing Agents shall disclose all cases of conflict of interest, if any, and shall neither participate in the activity and refrain himself from all such assignments.

d) Regulatory Compliance

All Collection Executive and Outsourcing Agent of the Company shall comply with guidelines issued by RBI in this regard and any divergence in this regard will be viewed seriously which will attract disciplinary action including termination of employment / termination of Outsourcing Agreement(s).

e) Cost Consciousness

All Collection Executive and Outsourcing Agent shall exercise their responsibilities and duties with utmost care and cost consciousness not only to the Company but equally to the borrowers.

g) Relationship with Company and Customers

All Collection Executive and Outsourcing Agents shall never compromise with the interest of the Company in their dealings with customers.

h) Collective Participation

All Collection Executive and Outsourcing Agent of the Company shall act collectively at the best interest of not only the Company but also the customers as part of professional ethics.

i) Confidentiality

All Collection Executive and Outsourcing Agent of the Company may during the course of their dealings with the Company and/or with the customers gain access to confidential information's about both the Company and/or the customers and they must maintain absolute secrecy and shall not part with such information except with the express approval of the concerned entity as required by law..

j) Ethical Conduct

All Collection Executive and Outsourcing Agent Company shall display professionalism, honesty and integrity conforming to high moral and ethical standards.

k) To give due consideration to the reports and recommendations of the Company & vice versa

All Collection Executive and Outsourcing Agent are responsible to ensure that the report and recommendations of the Company in this regard and recommendations of the Collection Executives and Outsourcing Agent receive due consideration.

l) Protecting Company assets

All Collection Executive and Outsourcing Agent of the Company shall ensure that the assets of the Company shall be deployed primarily and judiciously for the purpose for which they are approved.

3) Compliance with the Code

The Company is responsible to ensure compliance with the Code of Conduct by not only the Collection Executive on roll but also the Outsourcing Agents on contract.

4) Waiver and amendments to the Code

This Code is subject to the modifications and no amendment/waiver of any provision of the Code is possible unless revised guidelines are issued in that regard.

5) General

It is mandatory on the part of all Collection Executive and Outsourcing Agent to make a periodic disclosure affirming their adherence to the Code on demand or as and when need arises. Also it is mandatory on the part of all Collection Executive and Outsourcing agents to attend the 24 hours induction cum training programme at the Company before starting their assigned duties. Also a copy of this literature needs to be signed and submitted to the Company as token of acceptance by all the Collection Executives / Outsourcing Agents