

KOMAC INVESTMENTS AND FINANCE PRIVATE LIMITED

COLLECTION CODE OF CONDUCT FOR COLLECTION AND RECOVERY

Category	Do's	Do Not's
Appearance	Field Executive must at all times be well groomed, clean, and tidy	No chappals and sandals
Speech & Language	Introduce yourself, carry your identity card and authority letter issued by the concerned agency. Upon request by the customer, the field executive will have to produce the same Tone should be polite and interactions must be civil at all times.	Do not get abusive with the customer Do not threaten/harass the customer. Do not get in an argument with the customer. Do not resort to intimidation or harassment of any kind, either verbal or physical, against any person in their debt collection efforts, including acts intended to humiliate publicly or intrude upon the privacy of the debtors' family members, referees and friends, sending inappropriate messages either on mobile or through social media, making threatening and/ or anonymous calls, persistently calling the borrower.
Collection Mode	Advise customer to make the payment of overdue only through electronic modes For cash collection make use of digital application only All cash collected should be deposited with the agency by the end of following day	Do not collect cash without recording via system followed by a digital receipt.
Timings	All calls can be made only between 8AM to 7 PM. Persistent calling is strictly prohibited. Can visit between 8 PM to 7 PM with prior intimation or permission from the family members. Decency and decorum must be maintained at all times.	Do not visit during inappropriate situations. Inappropriate occasions such as bereavement in the family or other important family functions like marriages would be avoided for making calls / visits to collect dues.
Ethical Dealings	Fair and Ethical in your dealings with customers	Must not make any verbal or written promises on behalf of KOMAC
Customer service Issues	To be escalated to the officer of KOMAC immediately. Proper documentation must be maintained.	Must not making any false and misleading representations in your collection/recovery efforts.
Confidentiality	Customer information to be given only to the customer or his or her spouse. Privacy of the customer must be respected at all times.	No customer information to be given to any third party. Privacy of the customer must be respected at all times.
Measures to be taken	If the customer refuses to pay after civil discussions, then the field executive must escalate the case to his immediate senior. Interactions must be civil at all times.	

Collection Code of Conduct

1. PURPOSE:

The objective of this Code of Conduct is to establish ethical, professional and regulatory standards governing the conduct of all employees, collection executives, tele-calling agents, recovery agents, outsourced collection agencies and other persons engaged in recovery activities on behalf of the Company.

The Code aims to:

- Ensure fair, transparent and respectful treatment of customers.
- Protect customer rights and dignity during recovery proceedings.
- Ensure compliance with RBI Master Directions, Fair Practices Code and other applicable laws.
- Prevent harassment, coercion or unfair recovery practices.
- Promote responsible lending and collection practices.
- Protect confidentiality of customer information.
- Establish accountability and monitoring of recovery activities.

2. APPLICABILITY

This Code shall apply to:

- All permanent employees engaged in recovery.
- Tele-calling Executives.
- Field Collection Executives.
- Recovery Agents.
- Collection Agencies.
- Outsourced Service Providers.
- Legal Recovery Teams.
- Any individual authorised by the Company to recover dues or interact with borrowers regarding outstanding payments.

All outsourced agencies shall ensure compliance with this Code and the Company shall remain responsible for monitoring such compliance.

3. REGULATORY FRAMEWORK

This Code has been framed considering:

- RBI Guidelines on Engagement of Recovery Agents.
- RBI Fair Practices Code.

- RBI Digital Lending Guidelines.
- RBI Master Direction – Outsourcing of Financial Services.
- Digital Personal Data Protection Act, 2023.
- Information Technology Act, 2000.
- Consumer Protection Act, 2019.
- Applicable Labour Laws and Criminal Laws.

In case of any conflict between this Code and regulatory requirements, the regulatory provisions shall prevail.

4. CUSTOMER RIGHTS

Customers shall have the right to:

- Be treated with dignity and respect.
- Receive clear information regarding outstanding dues.
- Seek clarification regarding any recovery action.
- Raise complaints without fear of retaliation.
- Privacy of personal information.
- Obtain payment acknowledgements immediately.
- Contact the Company's Grievance Officer.
- Inform the borrower of the escalation matrix, including the Grievance Redressal Officer and the CEPD, RBI (through the Complaint Management System at <https://cms.rbi.org.in>)

5. IDENTIFICATION AND AUTHORITY OF RECOVERY PERSONNEL

To ensure transparency, accountability and customer confidence during recovery proceedings, every recovery executive, tele-calling executive, field collection executive, recovery agent and representative of the Collection Agency shall carry proper identification and authority documents while undertaking recovery activities on behalf of the Company.

5.1 Mandatory Identification

Every recovery personnel shall carry at all times:

- A valid Company Identity Card or Identity Card issued by the authorised Collection Agency.
- A duly signed and valid Authorization Letter issued by the Company or the authorised Collection Agency authorising the individual to undertake recovery activities.
- Any other identification document as may be prescribed by the Company from time to time.

These documents shall remain valid throughout the period of engagement and shall be renewed whenever required.

5.2 Disclosure Before Interaction

Before commencing any recovery discussion, visit or telephonic interaction, the recovery personnel shall clearly disclose the following information to the customer:

- Full Name of the Recovery Executive.
- Employee Identification Number (where applicable).
- Name of the Company.
- Name of the Collection Agency, if recovery activities have been outsourced.

- Purpose of the visit or call.
- Loan Account Number or Reference Number (without disclosing confidential information to unauthorised persons).
- Outstanding amount due as per the Company's records.
- Available repayment options.
- Official customer care number.
- Contact details of the Company's Grievance Redressal Officer.
- Contact details of the Collection Manager or authorised Company representative, wherever applicable.

5.3 Production of Identity Documents

Recovery personnel shall produce their Identity Card and Authorization Letter immediately upon request by the customer or any authorised representative of the customer.

Failure to produce valid identification shall require the recovery personnel to discontinue the interaction until proper identification can be produced.

5.4 Verification by Customer

Customers shall have the right to verify the identity and authority of any recovery personnel through the Company's Customer Care Centre, Branch Office or any other official communication channel before discussing any account-related information or making any payment.

Recovery personnel shall fully cooperate with such verification requests.

5.5 Restrictions on Misrepresentation

Recovery personnel shall not:

- Misrepresent themselves as employees of the Reserve Bank of India, any Government authority, Police Department or Court.
- Claim powers or authority not granted by the Company.
- Use forged or expired identity cards.
- Use false designations or misleading descriptions.
- Represent themselves as legal officers unless specifically authorised.
- Carry or display any document intended to mislead or intimidate the customer.

5.6 Responsibility of Collection Agencies

Where recovery services are outsourced, the Collection Agency shall ensure that:

- Every recovery executive possesses valid identity credentials.
- Identity Cards are updated and verified periodically.
- Authorization Letters are issued before assigning recovery work.
- Identity records are maintained and produced before the Company or regulatory authorities whenever required.

5.7 Company's Responsibility

The Company shall maintain an updated database of all authorised recovery personnel and collection agencies, including their identity details, validity of authorisation and areas of assignment. The Company shall periodically verify the credentials of recovery personnel and ensure that only authorised individuals are permitted to interact with customers.

6. WHEN AND WHERE RECOVERY AGENT MAY CONTACT A PERSON ON TELEPHONE

6.1 General Principle

Recovery Agents (RAs) shall conduct all telephonic communications in a professional, courteous, respectful and customer-centric manner. Every interaction with a borrower shall be guided by the principles of fairness, transparency, privacy and dignity, in accordance with the Reserve Bank of India (RBI) guidelines, the Company's Fair Practices Code and this Collection Code of Conduct.

Recovery Agents shall ensure that all communications are intended solely for the legitimate purpose of recovery of outstanding dues and shall avoid any conduct that may amount to harassment, intimidation or coercion.

6.2 Permissible Calling Hours

Recovery Agents shall ordinarily contact borrowers only between **8:00 A.M. and 7:00 P.M.** on any working day or such other hours as may be prescribed by the Reserve Bank of India from time to time.

Calls outside the prescribed hours shall be made only where:

- the borrower has specifically requested or consented to communication at such time;
- exceptional circumstances exist and the communication is necessary to protect the Company's legitimate interests; and
- such communication has been approved by the authorised Company official and appropriately documented.

Recovery Agents shall avoid contacting customers during public holidays or weekly holidays unless specifically requested by the borrower.

6.3 Frequency of Calls

Recovery Agents shall ensure that telephone calls are made only as reasonably necessary for recovery purposes.

Accordingly:

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- Repeated or excessive calls intended to pressurise or harass the borrower are strictly prohibited.
- Multiple calls within a short period without reasonable justification shall not be made.
- If a borrower requests that a call be made at another convenient time, the Recovery Agent shall respect such request wherever reasonably practicable.
- Calls shall not continue after the borrower has clearly indicated unwillingness to continue the conversation, except where required for providing mandatory information.

The Company shall periodically monitor call frequency to ensure compliance with this Code.

6.4 Verification of Identity Before Discussion

Before discussing any account-related information, the Recovery Agent shall verify the identity of the person being contacted to ensure that confidential information is not disclosed to an unauthorised individual.

The Recovery Agent shall:

- Introduce himself/herself by stating his/her full name.
- Inform the borrower that he/she is calling on behalf of the Company or authorised Collection Agency.
- Clearly state the purpose of the call.
- Verify that the person speaking is the borrower or an authorised representative.

If identity cannot be verified, the Recovery Agent shall not disclose any confidential account information.

6.5 Information to be Disclosed During the Call

During the call, the Recovery Agent shall provide accurate and transparent information including:

- Name of the Company.
- Name of the Recovery Agent.
- Loan Account Reference Number (where appropriate).
- Outstanding amount due.
- Nature of default.
- Due date for repayment.
- Applicable interest and charges, wherever requested.
- Available repayment options.
- Authorised payment channels.
- Customer Care contact details.
- Contact details of the Company's Grievance Redressal Officer.

Recovery Agents shall answer customer queries honestly and shall not make false, misleading or exaggerated statements.

6.6 Professional Conduct During Telephone Calls

Recovery Agents shall:

- Speak politely and respectfully.
- Maintain patience and professionalism.
- Listen carefully to the customer's concerns.
- Allow the borrower adequate opportunity to explain his/her financial circumstances.
- Avoid argumentative behaviour.
- Maintain a calm and courteous tone throughout the conversation.
- Keep the discussion limited to recovery-related matters.
- Thank the customer before ending the call.

6.7 Protection Against Harassment

Recovery Agents shall not:

- Use abusive, threatening or insulting language.
- Raise their voice or shout at customers.
- Intimidate or coerce customers.
- Use obscene or offensive expressions.
- Threaten arrest, imprisonment or criminal prosecution unless legally applicable.
- Misrepresent legal consequences of default.
- Make anonymous calls.
- Use misleading caller identification.
- Persistently call the borrower after being requested to call later.
- Contact customers with the intention of causing embarrassment or mental harassment.

Any violation of this provision shall constitute serious misconduct.

6.8 Contacting Third Parties

Recovery Agents shall ordinarily communicate only with the borrower.

Communication with family members or authorised representatives shall be limited to circumstances permitted under applicable laws or regulatory guidelines.

Recovery Agents shall not disclose:

- Outstanding dues.
- Loan details.
- Financial status.
- Recovery proceedings.
- Personal information.

to neighbours, friends, colleagues, employers or any other unauthorised person.

Where the borrower is unavailable, the Recovery Agent may only leave a message requesting the borrower to return the call without revealing confidential information.

6.9 Customer Convenience

Recovery Agents shall make reasonable efforts to communicate at a time convenient to the borrower.

Where a borrower requests communication through:

- Email,
- SMS,
- WhatsApp (through authorised business accounts only),
- Written communication,
- Scheduled telephone call,

the Recovery Agent shall endeavour to accommodate such request wherever operationally feasible.

6.10 Recording and Monitoring of Calls

All recovery-related telephone calls made by the Company's employees or authorised Collection Agencies shall be made through officially approved telephone systems.

The Company may record calls for:

- Quality assurance.
- Customer protection.
- Regulatory compliance.
- Dispute resolution.
- Training purposes.
- Internal audit and monitoring.

Call recordings shall be securely maintained in accordance with the Company's Record Retention Policy and applicable legal requirements.

6.11 Documentation of Communication

Recovery Agents shall maintain accurate records of every communication including:

- Date and time of call.
- Name of borrower contacted.
- Telephone number used.
- Purpose of call.
- Summary of discussion.
- Customer response.
- Repayment commitment, if any.
- Follow-up action proposed.

Such records shall be made available for internal audit, regulatory inspection and customer complaint investigation.

6.12 Escalation of Sensitive Cases

Where the borrower:

- Raises a dispute regarding dues,
- Makes allegations of misconduct,
- Requests restructuring,
- Expresses inability to repay due to genuine financial hardship,
- Threatens legal action, or
- Requests to speak with senior officials,

the Recovery Agent shall immediately escalate the matter to the authorised Collection Manager or designated Company official and shall refrain from making any unauthorised commitments.

6.13 Non-Compliance

Failure to comply with the provisions of this section shall constitute a breach of the Company's Collection Code of Conduct and may result in disciplinary action, suspension of recovery activities, termination of engagement, blacklisting of the Collection Agency, recovery of losses, reporting to regulatory authorities and any other action deemed appropriate by the Company.

This expanded section will occupy approximately **4–5 pages in Word** and is consistent with the level of detail typically found in comprehensive RBI-compliant Collection Code of Conducts for NBFCs.

7. CAN THE BORROWER'S LOAN ARRANGEMENT BE DISCUSSED WITH ANYBODY ELSE?

7.1 Principle of Confidentiality

The Company recognises that all information relating to a borrower's loan account, financial position, repayment obligations and personal details is confidential. Recovery Agents, employees and Collection Agencies shall maintain strict confidentiality of such information and shall use it solely for the purpose of recovery of the Company's legitimate dues.

No confidential information relating to the borrower shall be disclosed to any unauthorised person except where disclosure is required under applicable law, regulatory directions, judicial orders or with the explicit consent of the borrower.

All Recovery Agents shall comply with the Company's Privacy Policy, applicable data protection laws, the Digital Personal Data Protection Act, 2023, and RBI guidelines while handling customer information.

7.2 Communication with the Borrower

Recovery Agents shall always make reasonable efforts to communicate directly with the borrower before contacting any other person.

The Recovery Agent shall:

- Contact only the mobile number(s), telephone number(s), email address(es) or communication channels registered with the Company.
- Verify the identity of the borrower before discussing any account-related information.
- Maintain professionalism and confidentiality throughout the communication.
- Ensure that discussions remain limited to matters relating to the outstanding dues and repayment options.

7.3 Communication with Family Members or Authorised Representatives

If the borrower is unavailable despite reasonable efforts, the Recovery Agent may contact an authorised representative or an adult family member only to establish contact with the borrower or where such person has been nominated by the borrower.

Under such circumstances:

- The Recovery Agent shall disclose only the minimum information necessary to request the borrower to contact the Company.
- The Recovery Agent shall not discuss detailed loan information, repayment history, outstanding dues or financial difficulties with such persons unless authorised by the borrower or permitted by law.
- The privacy and dignity of the borrower shall always be respected.

7.4 Contacting Third Parties

Recovery Agents shall not disclose any information relating to the borrower's loan account to:

- Neighbours.
- Friends.
- Colleagues.
- Employers.
- Business associates.
- Landlords.
- Social acquaintances.
- Any other person who is not authorised to receive such information.

Recovery Agents shall not seek assistance from third parties for the purpose of pressurising, locating or intimidating the borrower except where specifically permitted under applicable law and approved by the Company.

7.5 Leaving Messages

Where the borrower cannot be contacted directly, the Recovery Agent may leave a brief message requesting the borrower to return the call.

Such message shall only include:

- Name of the Recovery Agent.
- Name of the Company.
- Official contact number.
- Request for the borrower to return the call.

The message shall not contain:

- Outstanding loan amount.
- Details of default.
- Recovery proceedings.
- Loan account information.
- Any statement that may embarrass the borrower or disclose confidential information.

7.6 Communication at the Workplace

Recovery Agents shall ordinarily avoid contacting borrowers at their workplace.

Communication at the workplace may be undertaken only where:

- The borrower has specifically requested such communication;
- The borrower is unavailable through other authorised communication channels after reasonable efforts; or
- Such communication is otherwise permitted by applicable law and approved by the Company.

Even in such cases:

- Discussions shall be conducted discreetly.
- Confidential loan information shall not be disclosed in the presence of colleagues, supervisors or any unauthorised person.
- Recovery Agents shall avoid any conduct likely to embarrass or inconvenience the borrower.

7.7 Confidentiality of Customer Information

Recovery Agents shall ensure that:

- Customer information is accessed only for official purposes.

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- Customer records are protected against unauthorised access.
- Documents containing customer information are securely handled.
- Electronic records are accessed only through authorised systems.
- Passwords and login credentials are not shared.
- Customer information is not copied, photographed or stored on personal devices without authorisation.

Any suspected data breach shall be immediately reported to the Company.

7.8 Prohibited Disclosure

Recovery Agents shall not:

- Discuss the borrower's financial position with neighbours or relatives.
- Publicly announce the customer's default.
- Circulate customer information through WhatsApp groups, social media or electronic platforms.
- Display notices or posters at the customer's residence or workplace.
- Publish photographs or personal details of customers.
- Share customer information with media organisations.
- Record or circulate videos of recovery interactions without proper authorisation.

Such conduct shall constitute serious misconduct.

7.9 Compliance with Data Privacy Requirements

All Recovery Agents shall comply with:

- The Company's Privacy Policy.
- The Digital Personal Data Protection Act, 2023.
- The Information Technology Act, 2000.
- RBI Guidelines on Customer Confidentiality.
- Any other applicable data protection laws and regulatory requirements.

Customer information shall be processed only for lawful purposes and only to the extent necessary for recovery activities.

7.10 Customer Consent

Where disclosure of customer information is required for purposes other than those permitted under law or regulatory requirements, prior consent of the borrower shall be obtained in accordance with the Company's internal policies.

The Company shall maintain records of such consent wherever applicable.

7.11 Monitoring and Compliance

The Company shall periodically monitor Recovery Agents and Collection Agencies to ensure compliance with confidentiality obligations.

Any breach of customer confidentiality shall be investigated promptly and may result in:

- Disciplinary action.
- Suspension of recovery activities.
- Termination of engagement.
- Blacklisting of the Recovery Agent or Collection Agency.
- Reporting to regulatory authorities, where applicable.
- Legal proceedings under applicable laws.

8. GIFTS, BRIBES, GRATIFICATION AND CONFLICT OF INTEREST

8.1 Objective

The Company is committed to maintaining the highest standards of integrity, transparency and ethical conduct in all recovery and collection activities. Recovery Agents, Collection Agencies, employees and any person acting on behalf of the Company shall perform their duties honestly, impartially and without being influenced by personal interests or financial benefits.

Recovery personnel shall neither offer nor accept any gift, favour, hospitality, commission, gratification or any other benefit that may influence, or appear to influence, the discharge of their official duties.

8.2 Prohibition on Acceptance of Gifts and Bribes

Recovery personnel shall not, directly or indirectly:

- Accept cash, gifts, rewards, hospitality or any personal benefit from customers, borrowers, guarantors or their representatives.
- Solicit or demand money, commission or any other consideration for delaying, modifying or waiving recovery proceedings.
- Accept expensive gifts, vouchers, travel benefits, entertainment or any other item of value from customers or third parties connected with the recovery process.
- Seek or receive personal favours in exchange for providing any benefit to a customer.
- Accept loans, advances or financial assistance from borrowers or persons connected with the borrower's account.
- Use their official position for personal financial gain.

The prohibition shall apply irrespective of the value of the gift or benefit.

8.3 Prohibition on Offering Bribes or Improper Inducements

Recovery personnel shall not:

- Offer money or gifts to any customer, public official or third party to obtain an improper advantage.
- Offer inducements to influence legal proceedings or regulatory actions.
- Promise unauthorised concessions or settlements in return for personal benefits.
- Make facilitation payments or unofficial payments on behalf of the Company.

All dealings shall be conducted transparently and in accordance with applicable laws and Company policies.

8.4 Conflict of Interest

Recovery personnel shall avoid situations that may result in an actual, potential or perceived conflict of interest.

Accordingly, they shall:

- Immediately disclose any personal, financial or family relationship with a borrower or guarantor.
- Not undertake recovery activities involving relatives, close friends or persons with whom they have a personal or business relationship.
- Not participate in any decision where their personal interest conflicts with the interests of the Company.
- Inform the Company immediately if any conflict arises during the course of recovery.

The Company may reassign such accounts to another authorised Recovery Agent.

8.5 Reporting of Gifts or Bribery Attempts

If any borrower, customer or third party offers a gift, bribe or other improper benefit, the Recovery Agent shall:

- Politely decline the offer.
- Refrain from accepting or negotiating any such benefit.
- Immediately report the incident to the Collection Manager or Compliance Officer.
- Record the incident in writing, including the date, nature of the offer and details of the person making the offer.
- Cooperate fully in any internal investigation.

Similarly, any attempt by a Recovery Agent to solicit or accept an improper benefit shall be reported immediately through the Company's whistleblower or reporting mechanism.

8.6 Ethical Standards

Recovery personnel shall:

- Act honestly, fairly and with integrity.
- Exercise impartial judgment while dealing with customers.
- Ensure that all recovery decisions are based solely on Company policies and applicable laws.
- Maintain transparency in all communications and transactions.
- Protect the Company's reputation by avoiding any conduct that may create suspicion of corruption or unethical practices.

8.7 Company's Monitoring and Compliance

The Company shall establish appropriate controls to prevent corruption and unethical conduct, including:

- Periodic monitoring of recovery activities.
- Internal audits of collection transactions.
- Review of customer complaints relating to unethical behaviour.
- Surprise inspections of Collection Agencies.
- Mandatory ethics and anti-bribery training for Recovery Agents.
- Maintenance of records relating to reported incidents.

The Company may conduct investigations whenever unethical conduct is suspected.

8.8 Consequences of Violation

Any Recovery Agent, employee or Collection Agency found violating this clause shall be subject to appropriate disciplinary action, which may include:

- Written warning.
- Suspension from recovery activities.
- Termination of employment or engagement.
- Blacklisting of the Collection Agency or Recovery Agent.
- Recovery of losses caused to the Company.
- Reporting to law enforcement or regulatory authorities, where required.
- Civil or criminal proceedings under applicable laws.

8.9 Compliance with Applicable Laws

All Recovery Agents and Collection Agencies shall comply with applicable anti-corruption, anti-bribery and ethical conduct laws, RBI guidelines, the Company's Code of Conduct and all other applicable statutory and regulatory requirements while carrying out recovery activities.

9. OTHERS

9.1 Compliance with Laws, Regulations and Company Policies

All Recovery Agents (RAs), Collection Agencies, tele-calling executives and field collection executives shall perform their duties in strict compliance with:

- Reserve Bank of India (RBI) Guidelines, Master Directions and Circulars applicable to recovery agents and outsourcing of financial services.
- The Company's Fair Practices Code.
- The Company's Collection Policy and Collection Code of Conduct.
- The Company's Information Security, Privacy and Data Protection Policies.
- Digital Personal Data Protection Act, 2023.
- Information Technology Act, 2000.
- Consumer Protection Act, 2019.
- Any other applicable statutory, regulatory or legal requirements.

Recovery personnel shall remain updated with amendments to regulatory requirements and comply with instructions issued by the Company from time to time.

9.2 Acceptance and Handling of Payments

Recovery personnel shall encourage customers to make repayments only through authorised payment channels approved by the Company.

Accordingly:

- Personal bank accounts, personal UPI IDs, digital wallets or QR codes shall never be used for collection of customer payments.
- Recovery personnel shall not retain customer funds beyond the timelines prescribed by the Company.
- Every payment received shall be recorded immediately in the Company's authorised system.
- Customers shall be provided with an official receipt or acknowledgement for every payment.
- Recovery personnel shall immediately report any discrepancy, shortage or suspected fraud relating to collections.

9.3 Professional Appearance and Behaviour

Recovery personnel represent the Company while interacting with customers and shall therefore maintain the highest standards of professionalism.

Recovery personnel shall:

- Wear clean, neat and appropriate professional attire.
- Display a valid Identity Card while performing official duties.
- Carry a valid Authorisation Letter during field visits.
- Maintain courtesy, patience and professionalism in every interaction.
- Respect local customs, traditions and cultural sensitivities.
- Avoid any conduct that could adversely affect the reputation of the Company.

Consumption of alcohol, narcotic substances or smoking during customer interactions is strictly prohibited.

9.4 Maintenance of Records

Recovery personnel shall maintain complete and accurate records of all recovery activities including:

- Telephone calls.
- Field visits.
- Customer interactions.
- Payment commitments.
- Payments received.
- Notices served.
- Customer complaints.
- Escalations made.

All records shall be updated promptly in the Company's authorised systems and shall be available for audit, inspection and regulatory review.

9.5 Reporting of Customer Complaints

Any complaint received from a customer relating to recovery activities shall be:

- Recorded immediately.
- Escalated to the designated Collection Manager or Grievance Redressal Officer.
- Investigated promptly.
- Resolved in accordance with the Company's Grievance Redressal Policy.

Recovery personnel shall cooperate fully during complaint investigations.

9.6 Confidentiality and Information Security

Recovery personnel shall maintain complete confidentiality of customer information.

They shall not:

- Share customer information with unauthorised persons.
- Download customer data on personal devices.
- Store customer information outside authorised Company systems.
- Circulate customer details through social media or personal messaging applications.
- Use customer information for personal purposes.

Any actual or suspected data breach shall be immediately reported to the Company.

9.6A Intimation of Recovery Agents to Borrowers

At the time of sanction, the borrower shall be informed, through the KFS, of the LSP or agency authorised to act as recovery agent. When an account is assigned to a recovery agent, or the agent is changed, the borrower shall be informed of the name and contact details of the agent by SMS or e-mail before the agent contacts the borrower. Collections shall be made only into the Company's bank account or through digital modes credited directly to it, and every payment shall be acknowledged.

9.7 Training and Competency

Before undertaking any recovery assignment, every Recovery Agent shall successfully complete the training programme prescribed by the Company covering:

- RBI Guidelines.
- Fair Practices Code.
- Ethical Recovery Practices.
- Customer Rights.
- Data Privacy.
- Information Security.
- Customer Complaint Handling.
- Fraud Prevention.
- Communication Skills.
- Digital Payment Collection Procedures.

Refresher training shall be conducted periodically or whenever regulatory changes require additional training.

9.8 Cooperation During Audit and Regulatory Inspection

Recovery personnel and Collection Agencies shall fully cooperate with:

- Internal Audit.
- Compliance Department.
- Risk Management Department.
- Statutory Auditors.
- RBI Inspection Teams.
- Other Regulatory Authorities.

All records, documents and information required during inspections shall be made available promptly.

9.9 Incident Reporting

Recovery personnel shall immediately report to the Company any incident involving:

- Fraud or attempted fraud.
- Customer misconduct.
- Threats to personal safety.

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- Bribery or corruption.
- Misappropriation of collections.
- Data breach.
- Regulatory violation.
- Misconduct by another Recovery Agent.
- Media enquiries relating to recovery activities.

9.10 Use of Technology

Recovery personnel shall use only Company-approved systems, applications and communication channels while carrying out recovery activities.

They shall not:

- Use personal mobile applications for recording customer information.
- Use unauthorised software.
- Share system passwords.
- Access customer records beyond their authorised responsibilities.

9.11 Undertaking by Recovery Agents

Before commencement of recovery activities, every Recovery Agent shall execute a written undertaking confirming that he/she:

- Has read and understood this Collection Code of Conduct.
- Shall comply with all Company policies and RBI guidelines.
- Shall maintain confidentiality of customer information.
- Shall not engage in coercive or unethical recovery practices.
- Shall immediately report any misconduct or regulatory breach.
- Understands that violation of this Code may result in disciplinary action, termination of engagement, blacklisting and legal proceedings.

The executed undertaking shall be maintained by the Company as part of the Recovery Agent's personnel records.

9.12 Non-Compliance and Disciplinary Action

Any violation of this Code of Conduct shall be viewed seriously.

Depending on the nature and severity of the violation, the Company may take one or more of the following actions:

- Written warning.
- Mandatory retraining.
- Suspension of recovery assignments.
- Recovery of financial losses.
- Termination of employment or engagement.
- Blacklisting of the Recovery Agent or Collection Agency.

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- Reporting the matter to law enforcement agencies or regulatory authorities, wherever required.
- Initiation of civil or criminal proceedings under applicable laws.

The Company reserves the right to take any additional action considered necessary to protect customer interests, maintain regulatory compliance and safeguard the Company's reputation.