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1. INTRODUCTION

The Reserve Bank of India (RBI) has issued Directions on Managing Risks and Code of Conduct in outsourcing of Financial Services by NBFCs under reference DNBR PD, CC. No. 090/03.10.001 2017-18 dated Nov. 9, 2017 vide which NBFC are required to put in place a Board Approved Code of Conduct for Direct Sales Agent (DSA)/ Direct Marketing Agents (DMA)/ Collection-Recovery Agents (RA)

Accordingly, SGROYAL Capital Private Limited (SGCPL/ the Company) has put in place. This Code of Conduct is based on Indian Bank Association's Model Code of Conduct for DSAs for Banks and the code of Conduct for Collection-Recovery Agents is based of RBI guidelines on Fair Practice Code for NBFCs.

PART 1: Code of Conduct for Direct Selling Agents (DSAs)/Direct Marketing Agents (DMA)

This Code shall be applicable to all the arrangement between SGROYAL Capital Private Limited (SGCPL) and the DSAs/DMA. This Code will apply to all the persons involved in marketing and distribution of any loan or other financial product of the SGCPL, or third party having tie-up with SGCPL. The DSA, is Tele-Marketing Executives (TMEs) and fields sales personnel, i.e. Business Development Executives (BDEs), must agree to abide by this prior to undertaking any direct marketing operation on behalf of SGCPL Any TME/BDE violating this code may be blacklisted and concerned DSA shall promptly report to SGCPL any violation. Failure to comply with this requirement may result in permanent termination of business of the DSA with SGCPL

2. Tele-calling a Prospect (a prospective customer)

A prospect is to be contacted for sourcing a SGCPL product or SGCPL related product only under the following circumstances:

When a prospect has expressed a desire to acquire a product through SGCPL's Internet website / Call-center/Branch or through a Relationship Manager at SGCPL or has been referred to by another prospect/customer or is an existing customer of SGCPL who has given consent for accepting calls on other products of SGCPL and/or third-party products marketed by SGCPL;

When the prospect's Name/Tel. No. Address is available & has been taken from one of the lists /directories/databases approved by the DSA Manager/Team leader, after taking his/her consent,

The TME should not call a person whose name/number is flagged in any "do not disturb" list made available to him/her.

The Declaration to be obtained from TMEs/ BDEs by the DSAs before assigning them their duties is as per the **Annexure A**.

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3. When you may contact a prospect on telephone

Telephonic contact must normally be limited between 0900 Hrs. and 1900 Hrs. However, it may be ensured that a prospect is contacted only when the call is not expected to inconvenience him/her. Calls earlier or later than the prescribed time may be placed only when the prospect has expressly authorized TME/BDE to do so either in writing or orally.

4. Can the prospect's interest be discussed with anybody else?

DSA should respect a prospect's privacy. The prospect's interest may normally be discussed only with the prospect and any other individual/family member such as prospect's accountant/secretary/spouse, authorized by the prospect.

4.1. Leaving messages and contacting persons other than the prospect

Calls must first be placed to the prospect. In the event the prospect is not available, a message may be left for him/her. The aim of the message should be to get the prospect to return the call or to check for a convenient time so call again. Ordinarily, such messages may be restricted to:

Please leave a message that Mr. Aaditya Jain representing SGCPL called and requested to call back at +91 9773379217 (Phone Number)

As a rule, the message must indicate that the purpose of the call is for selling or distributing a SGCPL product and/or its third-Party product.

5. No misleading statements/misrepresentations permitted

TME/BDE should not:

- Mislead the prospect on any service/product offered;
- Mislead the prospect about their business or organization's name, or falsely represent themselves;
- Make any false/unauthorised commitment on behalf of SGCPL for any facility/service.

6. Telemarketing Etiquettes

PRE-CALL

- No calls prior to 0900 Hrs or post 1900 Hrs unless specifically requested;
- No serial dialing;
- No calling on lists unless list is cleared by team leader.

DURING CALL

- Identify yourself, your company and your principal;
- Request permission to proceed.;
- If denied permission, apologize and politely disconnect;
- State reason for your call;
- Always offer to call back on landline, if call is made to a cell number,

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- Never interrupt or argue;
- To the extent possible, talk in the language which is most comfortable to the prospect,
- Keep the conversation limited to business matters,
- Check for understanding of "Most Important Terms and Conditions" by the customer if he plans to buy the product,
- Reconfirm next call or next visit details:
- Provide your telephone no, your supervisor's name or SGCPL officer's contact details if asked for by the customer.
- Thank the customer for his/her time.

POST CALL

- Customers who have expressed their lack of interest for the offering should not be called for the next 3 months with the same offer
- Provide feedback to the SGCPL on the customers who have expressed their desire to be flagged "Do Not Disturb"
- Never call or entertain calls from customers regarding products already sold. Advise them to contact the Customer Service Staff of the SGCPL.

7. Gifts or Bribes

Any TME/BDE must not accept gifts from prospects or bribes of any kind. In case any customer offers a bribe or payment of any kind, such TME/BDE must promptly report it to his/her management.

8. Precautions to be taken on visits/contacts

BDE should:

- Respect personal space maintain adequate distance from the prospect;
- Not enter the prospect's residence/office against his/her wishes;
- Not visit in large numbers - ie. not more than one BDE and one supervisor, if required.
- Respect the prospect's privacy.
- If the prospect is not present and only family members /office persons are present at the time of the visit, he/she should end the visit with a request for the prospect to call back
- Provide his her Telephone No., Supervisor's name or SGCPL officer's contact details, if asked for by the customer,
- Limit discussions with the prospect to the business and maintain a professional distance.

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9. Other important aspects Appearance & Dress Cods

BDE's must be appropriately dressed. (Jeans and/or T-Shirt, open sandals are not considered appropriate)

For men this means

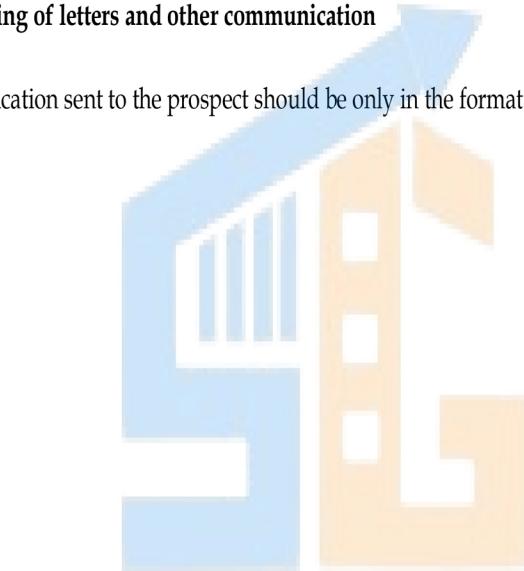
- Well ironed trousers;
- Well ironed shirt, shirt sleeves preferably buttoned down.

For men this means

- Well ironed formal attire (Saree, Suit, etc.)
- Well groomed appearance.

10. Handling of letters and other communication

Any communication sent to the prospect should be only in the format approved by SGCPL.



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PART-II: Code of Conduct for Collection - Recovery Agents (CRAs)

11. The Collection-Recovery Agents engaged by SGROYAL Capital Private Limited (SGCPL) must adhere to the below mentioned guidelines in the course of performing their duty as a Collection-Recovery Agent:

Contact with Customer

- i. Customer should be contacted at an appropriate time.
- ii. Customer should be contacted ordinarily at the place of his choice and in the absence of any specified place at the place of his residence and if unavailable at his residence, at the place of business/ occupation;
- iii. Customer privacy should be respected;
- iv. Interaction with the customer should be in a polite and civilized manner;
- v. Customer request to avoid calls at a particular time or at a particular place should be honored as far as possible;
- vi. Customer should be provided with the information regarding his dues
- vii. Reasonable notice would be given before repossession of security and its realization;
- viii. All assistance should be given to resolve disputes or differences in a mutually acceptable and in a normal manner;
- ix. During visit to the customer's place for collection of dues, decency and decorum should be maintained;
- x. Inappropriate occasions such as bereavement in the family or such other calamitous occasions should be avoided for making calls/ visits to collect dues.
- xi. Strictly avoid any appearance which may suggest any criminal intimidation or threat or violence.
- xii. A collection agent or its employee/s while collecting the amount due should not:
 - Resort to any false, deceptive or misleading representation,
 - Falsely represent or imply that he or she is connected with or affiliated with any of the governmental or judicial authority,
 - Falsely represent the character, amount, or legal status of the debt.
 - Abstain from using any identification which can lead to wrong representation.

In case of non-adherence to above terms, agency will be solely responsible consequences, if any, arising therefrom.

- xiii. Collection Agents or their employees should be appropriately dressed and well groomed.

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12. Do's and Don'ts for Collection- Recovery Agents (CRAs):

Key Areas	Do's	Don'ts
i) Appearance	<ul style="list-style-type: none"> Well-groomed with proper hair cut Clean shave, well maintained beard 	
ii) Dress Codes	<ol style="list-style-type: none"> Light color shirts, well ironed shirt, shirt sleeves preferably buttoned down. Well ironed, creased trousers of dark shade In winter, a coat / plain pullover Formal Shoes 	
iii) Belongings	<ul style="list-style-type: none"> Daily Collection Run Rate (DCR) Sheet Receipt Book Minimal Stationary Code of Conduct 	
iv) Ethics		Collection Agent/s should not make any verbal or written promises to customer without supervisor/company on matters outside his preview or an ad hoc settlement/product features.
v) Confidentiality		Unauthorized information written or verbal cannot be divulged to any customer/competitor/any other

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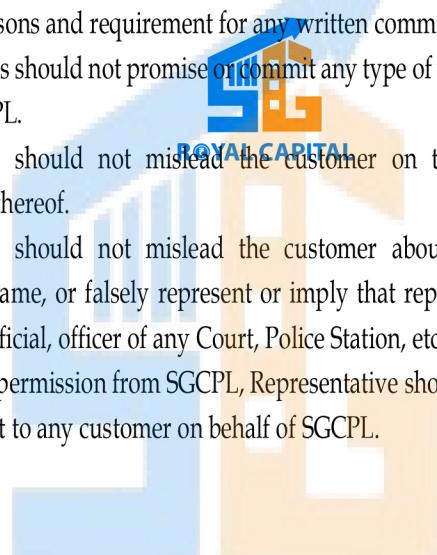
		person (for eg: Photocopy of stat card, showing previous trails of customers.
vi) Process/Product Discipline	Collection agent(s) will perform their role within the framework of the instructions issued to them in terms of process notes and specifics of collection action based on the product.	
vii) Maximize Effectiveness	Collection Agent/s will strive to maximize the effectiveness of the visitations by pre visit preparation and result orientation in order to improve results. Will document result in visit/action taken.	
viii) Proximity	Maintain a reasonable distance from the customer.	<ul style="list-style-type: none"> • No physical contact with the customer. • No obstruction to customer movement.

13. Customer Communication Guidelines for Representatives of SGCPL

In addition to the Code of Conduct guideline, the following guidelines should be adhered to by all the individuals/ persons/associates/agents/entities (hereinafter referred to as "Representatives") authorized to represent SGCPL for collection of dues from the customers. In case of failure to comply with these guidelines, an appropriate and strict disciplinary action shall be taken against such person.

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- i. Treat the customer with dignity. During all the conversations communication (over telephone / in writing/ during visits) professionalism and transparency should be displayed and the Representatives should not treat it as personal.
- ii. Use the language which the customer understands and use the language of customer's choice. Strictly avoid use of tough/aggressive/threatening / abusive language, either verbal or in writing. Care should be taken to strictly avoid threaten/harass /irritating the customer.
- iii. In case any customer resorts to abusive or threatening tactics, the Representatives should document it and promptly inform name of such customer to SGCPL.
- iv. Representatives are not authorized to send any written communication to customer by any mode (e-mail, letter, electronic messages, social media, etc.) to SGCPL Customers. If customers are required to be communicated on e-mails/letters/electronic messages, Representatives should send a request to SGCPL along with reasons and requirement for any written communication.
- v. Representatives should not promise or commit any type of written communication on behalf of SGCPL.
- vi. Representative should not mislead the customer on the action proposed and consequences thereof.
- vii. Representative should not mislead the customer about their true business or organization name, or falsely represent or imply that representative is an attorney, government official, officer of any Court, Police Station, etc.
- viii. Without prior permission from SGCPL, Representative should not make any promise or commitment to any customer on behalf of SGCPL.



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Declaration-Cum-Undertaking

(To be obtained by the DSA from TMEs/ BDEs employed by them)

Re: Code of Conduct

Dear Sir/Madam,

I am working in your company as a_____. My job profile, inter-alia, includes offering, explaining, sourcing, and assisting documentation of products and linked services to prospects of SGROYAL Capital Private Limited.

In the discharge of my duties, I am obligated to follow the Code of Conduct attached to this document.

I confirm that I have read and understood and agree to abide by the Code of Conduct. I further confirm that the trainer mentioned below has explained the contents in full to me.

In case of any violation, non-adherence to the said Code, you shall be entitled to take such action against me as you may deem appropriate.

Signed on this _____ Day of _____ 20____

Signature _____ Name _____

Agency _____

Signature of Trainer (DSA) _____

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