

CODE OF CONDUCT

MODEL CODE OF CONDUCT FOR COLLECTIONS & RECOVERY AGENT

1. APPLICABILITY

The Model Code of Conduct for the agent will be applicable to all agents appointed by Whizdm Innovations Private Limited "moneyview/Company". The Code of Conduct shall form part of the agreement between the Company and the agent. The agent must agree to abide by this code prior to undertaking any recovery assignment. If the agent is found violating this code, It may be blacklisted and appropriate legal/disciplinary action will be initiated.

Note:

1. The word agent includes the Individual agent, agency and employees of the agency involved in the activity of collections and recovery.
2. The term borrower shall mean and include the borrower of the lending partner with whom the Company has an agreement to provide services related to collections and recovery.

2. WHEN AND WHERE TO CONTACT

- Telephonic contact should be limited to between 08.00 hrs and 19.00 hrs unless the special circumstances of the borrower's business or occupation demand otherwise and the borrower has authorised to do so in writing or orally.
- The agent must ensure that a borrower is contacted only when the call is not expected to inconvenience him/her.
- Time and number of calls and contents of the conversation should be documented.
- The borrower would be contacted ordinarily at the place of his/her choice and in the absence of any specified place, he will be contacted at his/her residence or the place of employment/business as the case may be.
- Inappropriate occasions such as bereavement in the family or other calamitous occasions would be avoided for making calls/visits

3. GENERAL

- Agents should not accept any kind of gift or bribe in any form, including but not limited to cash and kind.
- Recoveries from the customer shall be deposited as per the instruction as provided by the Company.
- Agent must be appropriately dressed, decorum and decency should be maintained.
- Agent would resort to only the legally permissible modes during the course of recovery.
- Agent shall not communicate with customers in a threatening or abusive manner
- Agent shall not copy or duplicate customer's personal data or information, for personal use
- Agent shall not disclose any confidential data of the borrowers, to a third party
- Agent shall not promise, fee discount or waiver of financial charges
- Agent shall not misappropriate borrowers' money for personal use or use to fund another borrowers loan.

Summarising the key do's and don'ts

Key Areas	Do's	Don'ts
Tele calling Etiquettes	<ul style="list-style-type: none"> ● At the start of the conversation, check if it is the right time to speak with the customer ● While addressing the customer, an executive should identify himself/herself and must state that he/she is representing/calling on behalf of moneyview ● Customers need to be contacted between 08:00 hrs and 19:00 hrs only unless otherwise requested by the customer ● The agent must try and converse in the language preferred by the customer ● Customers' requests to avoid calls during a particular time or place should be honoured in all possible cases ● The customer should be treated with dignity and the agents are to stay professional at all times ● If the customer refuses to pay state the impact or consequence like negative credit history, difficulty of future credit 	<ul style="list-style-type: none"> ● Agents must not begin abruptly, get into an argument or use abusive words/language. Failure to adhere to these will lead to penalization and/or termination of the collection agent/agency ● Do not have any discussion of a personal nature with the customer ● The agent must not retort even if the customer is aggressive/abusive. Do not use false identity to get through to the customer ● Avoid inappropriate occasions such as bereavement in the family or such other calamitous occasions for making calls to collect dues ● Do not persistently call the borrower and/or call the borrower before 08:00 hrs and after 19:00 hrs for recovery of overdue loans
Field Visit Etiquettes	<ul style="list-style-type: none"> ● The executive visiting on the field should respect the privacy of the customer ● The customer should be reached out at the place of his/her choice. In the absence of any specified place, the visit should be at the customer's residence and only if still unreachable, the place of his/her business/occupation ● Leave a message if the customer is unavailable at the visiting address ● All calls made before and after the purpose of the field visit must be recorded as a part of the audit requirement. 	<ul style="list-style-type: none"> ● Unbefitting occasions such as bereavement in the family, natural calamity, etc, should be avoided for making visits for dues collections ● The agents should not make any unauthorised commitments on behalf of the Company or lending partner for any waivers/settlements/compromises/time extension ● Agency/Agent/Executive should not impersonate any law enforcement personnel. ● If the customer is threatening, the executive must leave the customer's place immediately ● Do not visit the customer in large groups or accompany unknown persons

Audit Requirements	<ul style="list-style-type: none"> • All the call records need to be maintained for 180 days and must be produced for call auditing. Non-compliance will lead to immediate termination of agency/agent services • All communication records with the customer should be maintained for a period of 12 months and must be produced for call auditing. Non-compliance will lead to immediate termination of agency/agent 	
3rd party Contact	<ul style="list-style-type: none"> • Agents must act with respect and dignity when interacting with the third-party/blood relative of the customer. The purpose of establishing third-party contacts should only be to learn the whereabouts of otherwise non-contactable customers 	<ul style="list-style-type: none"> • Borrower's loan details should not be discussed with anyone without his/her consent • The agents must not send messages to third-party/reference contacts disclosing customer information. • The agent should not engage in any arguments with third-party contacts
Communication	<ul style="list-style-type: none"> • All communications to the customer should be through pre-approved templates • All communications to the customer must be done using phone numbers registered by the agency with moneyview 	<ul style="list-style-type: none"> • Agency/agents are not allowed to share bulk messages with the customer without approval from moneyview. Failure to comply will attract penalties and service termination • Agency/agents are not authorized to send legal notices to the customer without approval from moneyview.
General	<ul style="list-style-type: none"> • Agents shall 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. 	<ul style="list-style-type: none"> • Do not pocket the customer's money for personal use or use to fund another customer's EMI.