

EPIMONEY PRIVATE LIMITED

(FORMERLY KNOWN AS URMILA INVESTMENT & SECURITIES (P) LTD.)

REGD. OFF: NO. 119, 2ND FLOOR, GREENWAYS TOWERS, ST. MARY'S ROAD, ABHIRAMAPURAM, CHENNAI – 600 018

CIN: U71309TN1995PTC030536

Epimoney Private Limited (hereinafter referred to as the “Company”) lays down the following Code of Conduct & Ethics that the Service Provider shall strictly adhere to. The Company is committed to following ethical and fair practices in regard to collections of dues and expects all its vendors to strictly adhere to the Company's policies on ethical collections detailed hereunder:

COLLECTION CODE OF CONDUCT **FOR EPIMONEY PRIVATE LIMITED**

1. Identification

All interactions with the Borrower/ customer shall necessarily commence with a clear and cogent identification of the purpose of the call. Service Provider/ Company executives shall fully identify themselves and represent themselves in the capacity in which they have been engaged by the Company to collect dues. During face-to-face interactions, the Collection Agency personnel shall always carry an Identity Card issued by the Company. This same will be displayed on his person while interacting with the Company's Borrower/ customers.

2. Dress Code

The Service Provider personnel shall be formally dressed in a presentable manner while interacting with the Company's Borrower/ customers.

3. Hiring & Training of Collection Agency's

Collection agency should ensure that:

- Agents / Collection Agents with prior work experience in a field job like debt collections, sales etc. will be preferred.
- Agent have good knowledge of the local geography & is able to travel interiors of the remote villages.
- Agent is hard working & has good negotiation & Communication skills.
- Agent is high on Integrity & does not have criminal or adverse complaints findings in background checks.
- Agent is conversant with English or Hindi or any local spoken language/dialect.
- Mandatory training is provided to the new joiners of the company and regular refresher to the existing employees of the Collection agency.
- Agents undergo on job training & refresher training on the Code of Conduct on regular basis.
- Adequate number of Recovery Agent s are in place to handle the collectable cases.
- Code of conduct adherence trainings are given by agency supervisor & collection managers on a regular interval to Recovery Agent of outsourced Recovery Agencies.

4. Customer Interaction Guidelines

Our Company's collections policy is built on courtesy, fair treatment, and persuasion. The Service Provider personnel's speech, gestures, general disposition, approach, and demeanor shall be polite and presentable while interacting with the Company's customers. Under no circumstances will the Company condone customer interaction that is offensive, threatening, or

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abusive. Any Service Provider personnel found guilty of such transgressions would be reprimanded with penalties extending to summary dismissal.

- 3.1 The Service Provider personnel shall make telephone calls or personal visits to the Company's Borrower/ customers' residences or offices, or such other places mutually agreed upon, taking into account the customers' availability and convenience of both the time and the place.
- 3.2 Borrower/ customer privacy would be respected and requests to avoid calls at a specific time or place would be honored as far as reasonably possible.
- 3.3 In the event the Borrower/ customer speaks or behaves with the Service Provider personnel in a manner that may be or seem to be offensive, threatening, or abusive, the Service Provider personnel shall immediately cease such interaction and move out of the vicinity of such Borrower/ customer. There will be no attempt at retaliation whether by way or retort or warning whatsoever. The Service Provider personnel shall immediately inform the Company of the same.
- 3.4 In the event the Company's Borrower/ customers either by themselves or with the help of some external agency attempt to physically attack or manhandle the Service Provider personnel, the Service Provider personnel shall immediately move out of the vicinity of such Borrower/ customer/place and register a complaint to the nearest Police Station. The Collection Agency shall keep the Company informed of the same.
- 3.5 In the event the Company's Borrower/ customer is unavailable on phone or at the place of visit, the Collection Agency personnel shall leave a polite message regarding the call/visit and shall request the cardholder to be in touch with the Company. They shall not disclose or share information regarding the Borrower/ customer's account or his conduct with any third party.
- 3.6 The Service Provider personnel shall not under any circumstances be directly or indirectly involved in dispossessing the Company's Borrower/ customers of their (immovable or movable) property. They shall also not be party to pawn, pledge, mortgage, sale, transfer or disposal of any property (immovable or moveable) of the Company's Borrower/ customer.
- 3.7 In the event the Service Provider personnel comes to possess unknowingly or otherwise, cash in excess of the amount that the Borrower/ customer is due or cash in excess of the amount quoted in the receipt issued to the Borrower/ customer for such payment he/she shall forthwith return such excess cash to the Borrower/ customer and keep the Company informed of the same.
- 3.8 The Service Provider personnel shall not make any promise or give any assurance either verbal or written with respect to waivers, concessions, settlements on fees, interest or any other dues owed to the Company to Borrower/ customers, without prior written consent of the Company. All such letters, telegrams and other communication must be in the format approved by the Company.

5. General Guidelines:

Repossessing the asset from the Borrower/ customers for non-payment of their dues to the Company on written instructions from the Company & to deposit any such vehicle / product

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repossessed from the Borrower/ customers on the same day or within one working day of repossessing the same. All members of staff or any person authorized to represent the Company in security repossession will follow the guidelines set out below:

1. The debt collection policy of the Company is based on the principle of dignity and respect to customers (including customers who are late in paying or in default).
2. The Company believes in following fair practices regarding collection of dues and repossession of security thereby fostering customer confidence and long-term relationship and thereby ensures that there is no coercive practice followed while collecting the dues.
3. The Code aims at recovery of dues in the event of default and is not aimed at whimsical deprivation of the property of the Borrower. The policy recognizes fairness and transparency in repossession, valuation and realization of security.
4. Any security repossession should be undertaken only after attempting to discuss with the Borrower the ways and means to overcome the financial hurdles/default in payment have failed.
5. The Collection Agency shall follow recovery procedure based on good manners, impartial treatment, and persuasion.
6. The Collection Agency will document the efforts made for the recovery of dues, as far as possible and the copies of communication sent to customers, if any, will be kept on record.
7. Collection Agency shall not make false, deceptive, or misleading claims for the purpose of collecting repayments. This includes misrepresenting his/ her identity or falsifying facts about debt status or consequences of non-repayment or claiming any monetary or non-monetary awards or incentivizing the customer in any manner to make payments.
8. The Collection Agency shall initiate any legal or recovery measures including repossession of the security only after receiving due notice from the Company and shall follow all such procedures as required under law for recovery/repossession of the security.
9. Borrower/ customer's questions should be answered in full. They should be provided with the information requested, given assistance and issues raised by them resolved. Accounts with unresolved issues are to be escalated to the Company's Collections Officer.

6. Valuation and Sale of Secured Assets:

Valuation and sale of property repossessed by the collections Agency on behalf of the Company will be carried out as per the law and in a fair and transparent manner.

7. Dispute Resolution

All Borrower/ customers grievances that the Service Provider personnel is unable to satisfactorily resolve shall be escalated to the supervisor/Collections Officer concerned giving details and reasons for the same. The Collections Officer/supervisor shall then undertake to resolve such grievances within reasonable timeframes.

Any breach or violation of the said Code of Conduct & Ethics, shall be viewed seriously by the Company and may be considered as grounds for termination of the Agreement with the Service

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Provider and the Service Provider shall be held responsible and accountable for consequences, including monetary loss, directly or indirectly arising out of such breach or violation.

The Service Provider undertakes to ensure all its staff/operatives adhere to the Code of Conduct & Ethics laid down by the Company, as amended from time to time. Any a copy of the Code of Conduct & Ethics shall be made available at the Service Provider premises during the subsistence of this Agreement.

All guidelines issued by the Company from time to time shall be adhered to in all Borrower/ Customer interactions on the Company's portfolio by the Service Provider.

8. An indicative list of do's and don'ts to be followed by the Collection Agency is as follows:

DO'S	DON'TS
First call at officially registered contact number with the Company.	Do not make the first call at office or residence.
Do dress in formal clothes and carry the identity card issued by the Company during work hours.	Do not get personal, tough, or aggressive or abusive.
Be punctual and available at meetings organized by the Company.	Do not discriminate based on caste, gender and/ or religion
Visit and analyze the customer situation.	Do not humiliate Borrowers in public places by discussing their loan over dues with third parties/neighbors.
Ask for reasons for non-payment of EMI / Dues.	Do not abuse, threaten or use muscle power or misrepresent or present information to threaten borrower.
Do talk in a pleasant, polite and non-aggressive manner always. Answers should be factual and to the point	Do not go for collections in a group of more than three staff members at a time
Collection interactions should be based on fair conduct and persuasion	Do not visit the customers on weekly or public holidays
Present all the information required by the Borrower/ customer in an appropriate manner.	Present all the information required by the Borrower/ customer in an appropriate manner.
Do answer Borrower's query to the satisfaction of the Borrower.	Do not humiliate the customer, lose temper, get angry or irritated irrespective of the situation
Keep records of written communication/ interactions with the customer.	Tone should not be harsh or loud.
Do provide a valid receipt for each loan instalment payment received (partial or full) and record the payment in the Borrower's loan passbook/loan card immediately after the transaction and educate customers to keep all the receipts for all future references.	Do not make false promises to customers like promising higher loans in case of part payments or such other incentives.
If the borrower refuses to pay update on impact or consequence - negative credit history, difficulty of future credit.	Do not discuss the borrower's debt/ overdue amount where others can overhear.
Visit the Borrower/ customer on dates on which he/she has promised to make payments.	Do not seize customer assets or any personal documents e.g. Voter ID,

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	ration card etc.
Maintain a reasonable distance from the customer	Do not share customer's information with other customers.
Contact/ visit customer at appropriate hrs. Timings: Earliest--- 8.00 AM & 7.00 PM	Do not call Borrowers at inappropriate times such as bereavements, illness, social occasions such as marriages, births etc.
Do keep Borrower information confidential and use it only for permissible purposes defined by the Company.	

I hereby agree to abide by all the conditions mentioned above:

Name & Signature of executive _____

Agency name _____ Locations _____

Agent Contact Number _____ Date _____

Sign & Stamp of agency _____