

## **CODE OF CONDUCT**

### **1. OVERVIEW:**

#### **1.1 Preamble:**

This Code of Conduct for the Company, the Senior Management Personnel and Collection agency/Calling agency (hereinafter referred to as “the code”) has been framed and adopted by Sampati Securities Limited (SSL) (hereinafter referred to as “the Company”) in compliance with applicable Rules regulations and directions by the RBI.

The list of the code of conduct as relevant to the Company is mentioned here below:

#### **INTEGRITY AND ETICAL BEHAVIOUR**

Sampati Securities Limited (SSL) shall put strong systems and promote good governance practices within the organization

Sampati Securities Limited (SSL) shall adhere to the Fair Practice Code, Client Protection Principle, and Code of Conduct

All the compliances shall be regularly audited and presented in the ‘Board meeting’.

Sampati Securities Limited (SSL) shall follow International Finance Corporation (IFC)’s Social and Environmental Policy while lending to any clients and shall enquire about their business and activities

Sampati Securities Limited (SSL) shall design appropriate board approved policies and operating guidelines to treat clients and employees with fairness and dignity

The incentive structure for the staff shall aim at promoting good business and service practices towards customers.

Through Group/Centre meeting/Loan disbursement clients shall be educated on code of conduct and its adherence.

- I. The company shall maintain and follow the code of conduct as laid down by the RBI. The company shall not misuse and/or misinterpret the personal data of the customers/borrowers.

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Progressive Corporate Services Private Limited

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MONA SHAH  
DIRECTOR

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- II. The company shall never use any kind of abusive language, illegal means, threatening and arm twisting tactics, and harsh recovery process. The process of recovery shall be followed with complete due-diligence as well as transparency. Also, in the case of collection and recovery process, the company has the recorded lines in place.
- III. The company performs the periodical audit.
- IV. The company has in place the fixed operation time and the fixed working hours. The working hours shall be from 10:00AM to 8:00PM, Monday to Saturday, and last Sunday of each month.
- V. The Company shall maintain transparency and fairness while offering a suitable grievance mechanism to the customers.
- VI. Being a digital lending platform, all the data and information collected from the Customers shall be kept strictly confidential, encrypted and protected without any breach of privacy.

**Following points as per the formulated guidelines should be taken into consideration by the collection agency/calling agency:**

- The collections/calling agency/BPO to deploy human resource after a thorough background check and a minimum of one month of training period.
- The agents must be trained/made aware and adopt the best practices for debt collections from time to time.
- The collections/calling agency/BPO to have recorded lines for calling the customers of the NBFC/Lender.
- The collections/calling agency/BPO and the NBFC will conduct periodic audit of the calls.
- The call data to be stored on secure servers and should be made available for the purpose of audit as and when required by the company.
- The agents to conduct the calling/messaging activity from 10 am to 8pm from Monday to Saturday and last Sunday of every month.
- The agents should never try to contact the customers beyond the prescribed working hours.

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- The collections/calling agency/BPO and its agents/callers at no point in time should compromise the guidelines for recovery set by the lender.
- The collections/calling agency/BPO to get an approval from the lender of all the templates for the messages/calls/ emails it wishes to incorporate/to be sent to the NBFC's/lender's customers.
- The collections/calling agency and its agents should never use harsh/abusive language and illegal/unacceptable means to recover the dues from the customers of the NBFC/Lender.
- The collections/calling agency to follow the code of conduct for collections as laid down by the RBI and never misuse and or misinterpret the personal/sensitive data of the customer/borrower which may cause harm to them.
- The collections/calling agency to adhere to the fair practice code and outsourcing guidelines. All transactions undertaken on borrower's behalf by the Company will be on the basis of express instructions/consent and will be strictly on a non-discretionary basis.
- The collections/calling agency and its agents to never use arm twisting tactics and remain fair and transparent to collect money from the borrowers. They must always inform customers beforehand and always try to educate them.

**As per RBI Circular, Collections Executives shall not do the following things:**

1. Intimidate or harass customers in any way, either verbal or physical
2. Perform acts to humiliate customers publicly
3. Send inappropriate messages either on mobile or through social media
4. Do Not making threatening and/ or anonymous calls
5. Persistently call (calling repeatedly) the borrower
6. Make false and misleading representations, etc.

**Requirements from Collection Agency for maintaining and sharing Call recording CD's:**

I. Please note that as per RBI circular, all calls done by the agency / agency staff to SSL customers should be through recorded line.

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II. Agency should maintain records of all voice recording data and monthly, share the same with the Company. Call recording back-up for a period of 2 months should be accessible to the Company. Voice recording data to be shared with Collection HO through CD via speed post to the address provided in the communication sent by the Company.

**Mandatory Requirements from Agency for maintaining and sharing Call recording CD's**

- i. Call recording CD's should reach the HO office within 7 days from end of the month.
- ii. In case agency fails to share the call recording data to the Company within stipulated TAT, then agency's ALL unprocessed bill will be kept on hold also a warning with penalty of Rs. 5,000/- for each month will be levied for delay in sharing the CDs.
- iii. Blank CD/Incorrect CD /Error in CD will be considered as CD not received.
- iv. In addition, we would like to inform that in case agency has provided incorrect CD with Company and later shared correct CDs, then warning will be issued for sharing incorrect CD's at first place. However, if agency fails to share revised CD, then warning will be issued along with penalty of Rs. 1000/- each month.
- v. Please note penalty amount will be deducted from agency bills.
- vi. HO team will audit the call recordings and share the observations.
- vii. SSL will conduct regular review of sample call records provided by agency for quality and completeness of call records.
- viii. Agency shall declare all numbers used for calling customer.
- ix. Calling customer from undeclared line is not allowed.

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**Important Pointers to be noted:-**

- i. Kindly provide complete and proper call recording CD's with correct format and no password.
- ii. Ensure CD's do not contain personal conversations, calls of non-contactable customers and other Company calls.
- iii. Call recording CD's should reach the HO office within 7 days from end of month.
- iv. Kindly mention Name of the Agency, CD month, Cycle Manager, Bucket and Product name clearly on the CD
- v. Inside the CD, call recording to be stored in the format: Date/Time/ Mobile no/SSL Product as well as an excel sheet to be maintained in the below format.
- vi. The excel sheet has to be saved in the CD along with the call recordings.

<b>Customer Name</b>	<b>Customer Mobile No</b>	<b>Date &amp; Time of the Call</b>	<b>Product</b>	<b>Credit Card/ Loan No</b>	<b>Agent Name</b>

- vii. CD's should only contain the call recordings between agent and the customer.
- viii. CD recordings data to be shared with Mrs. Mona Shah through CD via speed post to the registered office address.

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