

Code of Conduct for Collection – Recovery Agents (CRAs)

A. Background

Accretive Cleantech Finance Pvt Limited (hereafter referred to 'the Company') is a Private Limited company incorporated under the provisions of the Companies Act, 2013 and is a Reserve Bank of India (RBI) registered Non-Banking Financial Company.

1. Code of Conduct for Collection – Recovery Agents (CRAs)

The Collection-Recovery Agents engaged by The Company must adhere to the below mentioned guidelines in the course of performing their duty as a Collection-Recovery Agent:

1.1. Contact with Customer

1. Customer should be contacted at reasonable hours.
2. 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
3. Customer privacy should be respected
4. Interaction with the customer should be in a polite and civilised manner
5. Customer's request to avoid calls at a particular time or at a particular place should be honoured as far as possible
6. Customer should be provided with the information regarding his dues
7. All assistance should be given to resolve disputes or differences in a mutually acceptable and in a normal manner
8. During visit to the customer's place for collection of dues, decency and decorum should be maintained
9. Inappropriate occasions such as bereavement in the family or such other calamitous occasions should be avoided for making calls/ visits to collect dues.
10. Strictly avoid any appearance which may suggest any criminal intimidation or threat or violence.
 - a) A collection agent or its employee/s while collecting the amount due should not:
 - 1) Resort to any false, deceptive, or misleading representation,
 - 2) Falsely represent or imply that he or she is connected with or affiliated with any of the governmental or judicial authority,
 - 3) Falsely represent the character, amount, or legal status of the debt.
 - 4) 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.

- b) Collection Agents or their employees should be appropriately dressed and well groomed including:

For men:

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

For women: Well-ironed formal attire (saree, suit, etc.).

Jeans, open sandals, and t-shirts are considered inappropriate

1.2. Customer Communication Guidelines for Representatives of the Company

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 the Company 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.

1. 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.
2. 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
3. In case any customer resorts to abusive or threatening tactics, the Representatives should document it.
4. Representatives are not authorized to send any written communication by any mode (e-mail, letter, electronic messages, social media, etc.) to The Company's Customers. If customers are required to be communicated on e-mails / letters / electronic messages, Representatives should send a request to The Company along with reasons and requirement for any written communication.
5. Representatives should not promise or commit any type of written communication on behalf of The Company.
6. Representative should not mislead the customer on the action proposed and consequences thereof.
7. 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.
8. Without prior permission from the Company, Representative should not make any promise or commitment to any customer on behalf of The Company.

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

1. Do's:
 - a) The Code of Conduct to be strictly followed at all times.
 - b) Always greet the customers and identify yourselves.

- c) Always authenticate yourself as representatives of The Company
- d) Always authenticate yourself with requisite identity proof
- e) Authenticate the identity of the customers and discuss the account details with the customers only.
- f) Customers to be called on their registered mobile numbers and bureau numbers only.
- g) Call or visit the customers between 8:00 a.m. to 7.00 p.m., unless the special circumstances of your business or occupation require otherwise.
- h) Appropriate language to be used while conversing with the customers.
- i) Be fair and ethical in your dealings with the customers.
- j) Actively listen to and understand the customers' requirements.
- k) Collections' interaction should be based on courtesy, fair treatment and persuasion.
- l) Collection agent should, as far as possible, use the spoken language which the customer is comfortable with.
- m) Customers are entitled to privacy and the collection agent would respect this right.
- n) Update all interactions with the customers on the collections system.
- o) Use only recorded lines while interacting with the customers.
- p) In case text messages/ WhatsApp messages need to be sent to the customers, please make use of only those templates that have been validated by the Legal Team for the specific scenarios.
- q) Provide assistance for resolution of disputes or differences regarding dues in a mutually acceptable and orderly manner.
- r) In case of any grievances raised by the customers, please communicate all the available channels so that they can raise their concerns. Assistance to be provided in this regard.

2. Don'ts:

- a) Do not reach out to any contacts/family members of the customer except for helping to track any uncontactable customers
- b) Do not disclose any customer related information to the third party (family or others).
- c) Do not make any promises to the customers on the settlement amount, change in the bureau status or issuance of No Dues Certificate without prior approval from the authorized approver.
- d) Do not use non-recorded lines/ personal mobile numbers to converse with the customers.
- e) Do not use any unacceptable methods to reach out to the customers.
- f) Do not indulge in any illegal activity
- g) Do not use any Social Media partner to reach out to the customers.

2. Annexure - A

Declaration-Cum-Undertaking

(To be obtained from Collection Staff / Collecting Agents attached to the Collecting Agencies)

To,

Re: The Company Code of Conduct for Collection Staff/Agents

Dear Sir / Madam,

I, Mr./Ms. _____ working with _____ as Collection Agent. My job profile includes collection of dues from the borrowers of The Company. In discharge of my duties, I am obligated to follow the Company Code of Conduct for Collection Staff/Agents.

I confirm that I have read and understood and agree to abide by the Code of Conduct.

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 _____