

Preamble

Prompt and continuing collection of customer receivables in an efficient manner is the goal of the collection organization. This document sets out the principle followed during customer interactions in the consumer finance business. The actual policies and procedures governing the collection of receivables are governed by SOP's. All such policies or SOP's are prepared in compliance with the prevailing and relevant regulations in the country.*

* Version 1.0 dated 21st January,2008

CODE OF CONDUCT FOR COLLECTIONS

It is the policy of Cholamandalam DBS and its affiliates that all debt collection activities be conducted in a courteous, professional and lawful manner at all times. It is the responsibility of all employees & associates to ensure compliance with the instructions provided in this document. The broad guideline for all persons associated with the collections activity would be as under,

DO:

- ☑ Comply with all applicable laws, regulations and policies, with particular emphasis on those laws, regulations and policies that govern the time, place and manner of customer contact.
- ☑ Comply with all applicable data privacy requirements in all collection activities.
- ☑ Apply a consistent approach in all collection activities. Collection activities may be based on individual customer circumstances only to the extent permitted by applicable laws, regulations and policies.
- ☑ Create and maintain a set of collections operating instructions for each business that reflect current local laws, regulations and policies.
- ☑ Create for each consumer finance vertical a mandatory collections training program that reflects current local laws, regulations and policies.
- ☑ Ensure third-party providers of collections servicing agree in writing to comply with all applicable laws, regulations and CDFL policies.
- ☑ Ensure a process is developed for monitoring the compliance performance of internal and external collectors.

DO NOT:

- ☒ Instruct or permit any authorized representative of CDFL to engage in any form of harassment, intimidation, coercion or threatening behavior in the course of conducting collection activities.
- ☒ Seize or take possession of any property of the customer, except to the extent permitted by local laws, regulations and policies.

Collection being a diverse activity, the process runs at various levels within the organization. Hence it is imperative that all the employees and outsource staff adhere to a strict code of conduct when engaging the collection activity. Such a code is as given below,

SR.NO.	PARAMETER	DO'S	DON'T'S
1	APPEARANCE	The person visiting the customer must be appropriately dressed, neat & tidy.	Long hairs and chappals should be avoided.
2	CONTACT PLACE	Customer should ordinarily be contacted at residence or mailing address.	Do not visit the customer at any place which they specifically want to avoid
3	IDENTITY	We should always identify ourselves and the company we are representing when speaking to the customer	Do not visit the customer without proper identity cards and do not give fake names.
4	PRIVACY	For the initial delinquency customer to be visited through prior appointment	Do not enter the customer's premises without his consent and unless necessary. Avoid occasions such as accidents & bereavement.
5	LANGUAGE	Treat the customer with dignity and be polite in your speech to the cust.	Avoid communications bordering with abuse and rudeness.
6	CONTACT TIME	Customer should be ideally contacted between 7.00 am to 7.00 pm	Customer's request to avoid a call at a specified time to be honored.
7	DETAILS OF DUES	The customer to be provided all relevant details of his dues .	Do not provide any incorrect information or make false promises to the customer.
8	CONFIDENTIALITY	The customer's debt obligations should not be discussed with anyone else without the customers consent.	In case the customer is not available no discussion should be done with minors, elderly persons or a third party.
9	DISPUTES	In case of any disputes raised by the customer all necessary assistance should be provided to resolve the same amicably.	The customer should not be mislead or avoided.
10	COMPANY CONTACTS	Provide proper tel. no. and address to the customer in case he wants to contact the company.	Do not provide just the agency no. or incorrect no.

The collections activity substantially relies on vendors or agents appointed by the company to visit the customer and collect the payment. Thus such affiliates become the company representative and hence must imbibe the company culture and ensure total compliance to the company's policy. In addition to the guidelines stated above the following points must be adhered to by all the affiliates,

Broad Guidelines for Collections Agents/Affiliates

Dos: The Service Provider shall:

1. Render services strictly in accordance with the terms stipulated in the Service Provider Agreement (entered into between the Company and the Service Provider) and instructions/guidelines/ procedures/ process prescribed by the Company, from time to time and to conform in all respects and all times to the instructions, procedures, processes, guidelines laid down from time to time by the Company for the purpose of effectively performing the services mentioned herein.
2. Issue suitable receipts to the customers of the Company from whom it has Collected amounts
3. Shall exercise utmost care, circumspection and caution in employing his employees so as to ensure that such appointees do not have any criminal background, conviction by any Court of Law for any offense or their conduct and character is not of such a nature that has rendered them unworthy of any such appointment.
4. Shall ensure that the task of collection/repossession of the vehicle, article or product shall be exercised in a peaceful manner only without giving any opportunity to the hirer his representative agents or occupiers of the vehicle to make any allegation against the Service Provider.
5. Shall ensure to advise them to peacefully deliver the vehicle, article or other product without using any force causing any bodily injury, physical harm or attack on the person in occupation of the vehicle including the hirer / lessee / borrower his agent, representatives etc.
6. Shall ensure that all identity cards of its field collectors/employees engaged in collection Services mention the name/entity of the Agency clearly, as associate of the Company.
7. Shall identify yourself as a representative of the Company and shall not use any false, deceptive or misleading representation while providing Collection Services under this Agreement and shall not make any false statements and/or claims of being affiliated with any governmental agency, or being a

- solicitor, or produce any written communication that would imply such affiliation or indicate that the same is from a solicitor.
8. It shall perform Collection Services, through itself, its employees/agents in a lawful manner and shall not engage in any unfair or misleading practices or resort to any forcible, oppressive vindictive, unfair, illegal or criminal means and shall not engage in any conduct or practice which harasses, oppresses or abuses the Customer or any person in connection with Collection services.
 9. Shall immediately notify the Company in writing of any event which may result in or which give reason to believe that there may be a work stoppage, slowdown or other impediments or disruptions in the due performance of the obligations of the Service Provider under this Agreement.
 10. Shall use only lawful measures and on no account shall commit violence to the person or the property of anyone
 11. Ensure courteous service and maintain the service standard as laid down by the Company.
 12. Shall contact the customers of the Company only at the place of his choice, whether office or residence. In the absence of any specified place, customers to be contacted only at their residence.
 13. Shall ensure the privacy of the customer is respected during the visit.
 14. Shall contact the customers only at the appropriate time, unless the special circumstances of the customer's business or occupation demands otherwise.
 15. Shall honour the request of the customers in cases where the customer wants to avoid calls at a particular time or place.
 16. Shall document the number and time of calls made to the customers.
 17. Shall provide the relevant information to the customers regarding the amount outstanding enabling them to discharge their dues.
 18. Shall provide the customer all assistance to resolve disputes or differences, if any, as regards the dues, in a mutually acceptable and amicable manner.
 19. Shall speak only in formal and professional language while interacting with the customers.
 20. Shall maintain the decency and decorum during visits to the Customer's place.

21. Shall avoid making calls or visits during in appropriate occasions such as bereavement in the family or such other calamitous occasions.

Don'ts: The Service Provider:

1. Shall not use any additional trade name or symbol nor do or permit anything to be done which is not in accordance with the system without the prior consent in writing of the Company.
2. Shall not use any abusive language or use any force in any manner whatever against the hirer / lessee / borrower or any person whether connected or unconnected with the transaction.
3. Shall not permit the duplication or disclosure of the Confidential Information
4. It will not falsely state the character, amount or legal status of any Outstanding or imply that the Customer has committed a crime in order to disgrace and/or humiliate the Customer.
5. It shall not collect or attempt to collect any amount that he is not authorised to collect.
6. It shall not use violent or any criminal means to harm the physical person, reputation or property of the Customer or any person.
7. To be courteous, polite to the Customer and shall under no circumstances use obscene, profane or abusive language or hold out any threats that cannot be legally carried out.
8. It shall not use the name of any other company or organization other than its own name or the Company's name.

Escalation:

When in doubt please contact the nearest CDFL office and talk to our Area/Regional Managers. Alternatively you can contact our customer service desk at the head office or the National Collections Manager.