

Aadhar Housing Finance Limited

Code of Conduct for Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM) and Direct Selling Agent (DSA)

(Revision effective from 14th February, 2022)

(Version IV)

Code of Conduct for Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM) and DSA

This Code of Conduct is prepared for **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** who is/are appointed by Aadhar and is/are operating on behalf of Aadhar.

The code will apply to all persons involved in marketing and distribution of any loan or other financial product of Aadhar. The **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives** must agree to abide by this code prior to undertaking any direct marketing operations on behalf of Aadhar. **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives** found to be violating this code may be blacklisted and such action taken may be reported to Aadhar from time to time by the **Aadhar Mitra (AM)/ Mahila Aadhar Mitra (MAM)/ DSA**. Aadhar may consider termination or permanent blacklisting of **Aadhar Mitra (AM)/ Mahila Aadhar Mitra (MAM)/ DSA** who fail to comply with this requirement.

A declaration to be obtained from **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives** by the **Aadhar Mitra (AM)/ Mahila Aadhar Mitra (MAM)/ DSA** before assigning them their duties as per the format provided by Aadhar (Annexure 1).

1. Tele-calling a Prospect (a prospective customer)

1.1 Unsolicited Commercial Communications - National Do Not Call Registry (NCND)- Aadhar shall –

- i. not engage Telemarketers (AM/MAMs/DSAs) who do not have any valid registration certificate from Department of Telecommunication (DoT), Government of India, as telemarketers; HFCs shall engage only those telemarketers who are registered in terms of the guidelines issued by TRAI, from time to time, for any kind of engagement with customers;
- ii. furnish the list of Telemarketers (AM/MAMs/DSAs) engaged by them along with the registered telephone numbers being used by them for making telemarketing calls to TRAI;
- iii. ensure that all agents presently engaged by them register themselves with DoT as telemarketers

1.2 A prospective customer is to be contacted for sourcing Aadhar's product/ service only under the following circumstances:

- i. When a prospect has expressed desire to acquire any loan or other financial product or services through the Aadhar's internet site/ digital platforms including mobile applications/ call centre/ branch or through the Relationship Manager at the Aadhar or has been referred to by another prospect/ customer or is an existing customer of the Aadhar who has given explicit consent in writing/ digitally for accepting calls on other products/ services of the Aadhar.
- ii. When the prospect's name/ telephone number/ address is available and obtained after taking his/ her explicit consent in writing/ digitally on a separate document.

1.3 Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives should not call a person whose name/ number is flagged in any "Do Not Disturb" list.

2. When to contact a prospective customer on telephone:

- i. **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives** must introduce themselves and before calling must share their contact details through message or any other written mode including his/ her name, contact number, **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** they are employed with and the Aadhar they are representing.
- ii. Telephonic contact must normally be limited between 0930 Hrs and 1900 hours. However, it may be ensured that a prospective customer is contacted only when the call is not expected to inconvenience him/her.
- iii. Calls earlier or later than the prescribed time period may be placed only When the prospective customer has expressly authorized the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives** to do so either orally or in writing.
- iv. Residence/ Business/ Office address visit must normally be limited between 09:30 hours and 19:00 hours. Visit earlier or later than the prescribed time period may be made only when prospect has expressly authorized **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives** to do so either in writing or orally.

3. Respect prospective customer's privacy

Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives should respect the prospective customer's privacy and his /her interest may normally be discussed only with him /her and with any other individual /family member such as prospect's accountant /secretary /spouse only when authorised to do so by the prospective customer.

4. Leaving messages

Calls must first be placed to the prospective customer. If the prospective customer is not available, a message may be left for him /her. The aim of the message should be to get the prospective customer to return the call or to check for a convenient time to call again. Ordinarily, such messages may be restricted to:

"Please leave a message that _____ (name of person) representing **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** called and requested to call back at _____ (phone number)".

As a general rule, the message must indicate that the purpose of the call is regarding selling or distributing a product of Aadhar.

5. No misleading statements / misrepresentations permitted

Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives should not:

- i. mislead the prospective customer on any service / product offered by Aadhar;
- ii. mislead the prospect about their business or organization's name, or falsely represent themselves as Aadhar's employee;
- iii. Make any false / unauthorized commitment on behalf of Aadhar for any facility/housing loan/service.

6. Telemarketing Etiquette

6.1 Pre Call

- i. No calls prior to 0930 Hrs or post 1900 Hrs unless specifically requested.
- ii. No serial calling
- iii. No calling on lists unless list is cleared by the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** Leader.

6.2 During Call

- i. Identify yourself, your company and your principal.
- ii. Request permission to proceed
- iii. If denied permission, apologize and politely disconnect.
- iv. State reason for your call
- v. Always offer to call back on landline, if call is made to a cell number
- vi. Never interrupt or argue

- vii. To the extent possible, talk in the language which is most comfortable to the prospective customer
- viii. Keep the conversation limited to business matters
- ix. Check for understanding of "Most Important Terms and Conditions" by the customer if he plans to buy the product
- x. Reconfirm next call or next visit details
- xi. Provide your telephone number, your supervisor's name or the Aadhar's officer's contact details if asked for by the customer.
- xii. Thank the customer for his /her time

6.3 Post Call

- i. Customers who have expressed their lack of interest for the offering should not be called for the next 3 months with the same offer,
- ii. Provide feedback to Aadhar on customers who have expressed their desire to be flagged "Do Not Call"
- iii. Never call or entertain calls from customers regarding products already sold.
- iv. Advise them to contact the Customer Service Staff of the Aadhar.

7 Gifts or bribes

Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives will

- i. Not accept gifts from prospective customers or bribes of any kind. Any employee/representative of the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA**, who is offered a bribe or payment of any kind by a customer, must report the offer to his /her management.
- ii. not offer any gifts/ gratitude in cash or in kind to the prospect/ customer to solicit business

8 Precautions to be taken on visits / contacts

Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives should:

- i. Respect personal space, maintain adequate distance from the prospective customer;
- ii. ensure that prospect/ customer is not visited within a period of 3 months of expression of lack of interest for the offering by him/ her.
- iii. not enter the prospective customer's residence /office against his /her wishes;
- iv. Prospect's/ customer's residence/ business is visited by not more than one employee/ representative of **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** and one supervisor, if required;

- v. respect the prospective customer's privacy.
- vi. End the visit with a request for the prospect to call back, if the prospect/ customer is not present and only family members/ office persons are present at the time of the visit.
- vii. provide his /her telephone number, name of the supervisor or the concerned officer of Aadhar and contact details, if asked for by the customer; and
- viii. Limit discussions with the prospective customer to the business – Maintain a professional distance.

9. Other important aspects - Appearance & Dress Code

Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives must be in proper formal attire while meeting up with prospect/ customer. For men this means well ironed trousers, well ironed shirt, shirt sleeves preferably buttoned down. For women this means well ironed formal attire (saree, suit, etc.) and a well groomed appearance. Jeans and /or T- Shirt, open sandals are not considered appropriate.

10. Handling of letters & other communication

Any communication to be send to the prospective customer should be only in the mode and format approved by Aadhar.

11. Social Media Policy for Users:

Aadhar Confirm that the Social Media Policy for Users (the "Policy") is available on website of AHFL and the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM) and DSA** confirm that they have received/ read the policy and fully understood the AHFL's Policy and agree to comply with all the rules contained therein.

Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM) and DSA also agree that , AHFL reserves the right to initiate appropriate legal proceedings in the event of any breach/ violation of these guidelines/ other terms and conditions as may be specified by AHFL from time to time.

- 12. The **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** Shall not make available / share any information contained in the application form and or any other document submitted to Aadhar to any person at any point of time without written prior approval from Aadhar"

Note for Aadhar: Internal use:

- 1. Aadhar on regular interval review, the financial and operational condition of the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** to assess their ability to continue to meet their outsourcing obligations. Such due diligence reviews, which can be based on all available information about the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** should

highlight any deterioration or breach in performance standards, confidentiality and security, and in business continuity preparedness.

2. Aadhar should have in place a management structure to monitor and control its outsourcing activities. It should ensure that outsourcing agreements with the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** contain provisions to address their monitoring and control of outsourced activities.
3. Regular audits by either the internal auditors or external auditors of the Aadhar should assess the adequacy of the risk management practices adopted in overseeing and managing the outsourcing arrangement, the Aadhar's compliance with its risk management framework and the requirements of these guidelines.
4. In the event of termination of the agreement for any reason, this should be publicized so as to ensure that the customers do not continue to deal with that **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA**.
5. Aadhar should constitute a Grievance Redressal Machinery within the company and give wide publicity about it through electronic and print media. The name and contact number of designated grievance redressal officer of Aadhar should be made known and widely publicised. The designated officer should ensure that genuine grievances of customers are redressed promptly without involving delay. It should be clearly indicated that Aadhar's Grievance Redressal Machinery will also deal with the issue relating to services provided by **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA**.
6. Generally, a time limit of 30 days may be given to the customers for preferring their complaints / grievances. The grievance redressal procedure of Aadhar and the time frame fixed for responding to the complaints should be placed on the Aadhar's website.
7. No payment to **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** shall be made in Cash. The Payout /fee/ incentive etc shall be made only by way of direct credit to Bank account of **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA**. (Annexure 2 forms part of respective DSA Agreement)
8. Aadhar may prescribe the operational area for **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** within which they can work.
9. The lead shall be shared by the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** in the illustrative format given at Annexure 3.
10. By virtue of contract/ agreement, the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA or/and its employees / representatives** may have access to personal and business information of Aadhar and/or Aadhar's customer. **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** shall ensure the preservation and protection of the security and confidentiality of the customer information or data which are in the custody or possession.

11. **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** should acknowledge that he/ she/ it has read the said Model Code of Conduct and has fully understood all the terms and conditions mentioned there in and declare that the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** shall agree to abide by the said Code of conduct in letter and spirit.
12. The **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** shall report the fraud committed by erring employees/ representatives periodically to Aadhar and consolidated data/ information on the same shall be submitted by Aadhar to NHB. The information shall include name of the person, address, name of the **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** associated with and nature of fraud. Such employees/ representatives shall be barred permanently for doing the business of **Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM), DSA** in future with Aadhar.

Signed, sealed and delivered by

by the hand of

Mr. _____

ANNEXURE 1

Declaration–Cum-Undertaking to be obtained by the Aadhar Mitra (AM), Mahila Aadhar Mitra (MAM) and DSA

Re: Code of Conduct

Dear Sir,

I am working in your company as a _____. My job profile, inter-alia, includes offering, explaining, sourcing, and assisting documentation of products and linked services to prospective customers of Aadhar Housing Finance Limited.

In the discharge of my duties, I am obligated to follow the Code of Conduct, I confirm that I have read and understood and agree to abide by the Code of Conduct supplied to me. I further confirm that the full facts have been explained to me in full.

I further confirm that the full facts have been explained to me and I will obligate to explain this to my employees/ representatives in full.

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_____

ANNEXURE 3

(Name of Loan Product) – CUSTOMER INFORMATION

Name of the Applicant/s :

Mobile Number :

Email ID :

Address :

Select which is applicable : Looking for property

☐

: Property identified

☐

Details of property, if identified :

Loan Amount :

Income Bracket (per annum) :

Upto ₹5 lakh

Above ₹5 lakh to ₹10 lakh

Above ₹10 lakh

Income Based on : Income Tax Return
Other (specify the same)

AM/MAM/DSA Code

Signature of AM/MAM/DSA





CHANNEL PARTNER/ AADHAR MITRA/ DSA ANTI-CORRUPTION POLICY CERTIFICATION

This is to acknowledge that I/ We have received/ read the policy on website of AHFL and fully understood the Company's Anti-Corruption Compliance Policy (the "Policy"). I/We agree to comply with all the rules contained therein. I/We agree to report any potential violations to Company Secretary/ Compliance Officer. I/We will participate in the Company's anti-corruption training on a periodic basis, as may be required. I/We understand that failure to comply with the Policy, and all applicable anti-corruption laws in countries where the Company does business may result in immediate termination and prosecution, with penalties including fines and/or imprisonment. Should I/We have any questions regarding the Policy or find any deviations or violations, I/We will contact Company Secretary/ Compliance Officer (email id: complianceofficer@aadharhousing.com)

Signature: _____

Name (print): _____

Company/ Agency: _____

Designation: _____

Date: _____

(Note: For detailed Anti-Corruption Policy of the Company please refer the website link- <https://aadharhousing.com/customer-relations/unauthorized-individuals-entities-disclaimer.php>)