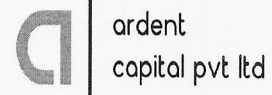


# ARDENT CAPITAL PRIVATE LIMITED

CIN: U65999TN2021PTC143375

Regd. Office: N. NO.55 (O.NO.32) 3RD FLOOR, AMBICA COMPLEX, N.S.K. SALAI (ARCOT ROAD), KODAMBAKKAM, CHENNAI - 600024, TAMIL NADU, INDIA Tel: +91 82204 33381 / E-mail: [customercare@ardentcapital.in](mailto:customercare@ardentcapital.in)



## Code Of Conduct for Direct Selling Agent(S)/ Direct Marketing Agents/Collections- Recovery Agents/ Channel Partners.

### => Introduction

The Reserve Bank of India (RBI) has issued Directions on Managing Risks and Code of Conduct in outsourcing of Financial Services by NBFCs under reference DNBR. PD. CC. No. 090/03.10.001/2017-18 dated Nov. 09, 2017, vide which NBFCs are required to put in place a Board Approved Code of Conduct for Director Selling Agents (DSA)/ Direct Marketing Agents (DMA)/ Collection Agents. Accordingly, Ardent Capital Private Limited ("ACPL/Company") has put in place this document.

### => Applicability

This code shall be applicable to all the arrangements between ACPL and the DSAs/DMA/RAs/CPs and their employees/representatives who is representing the Company. This Code will also apply to all the people involved in marketing and distribution of any loan or other financial product of the ACPL or third party having tie up with ACPL. And applies to all activities undertaken for sourcing, soliciting or marketing loans or financial products of the Company.

### PART I: CODE OF CONDUCT FOR DIRECT SELLING AGENTS(DSAs)/DIRECT MARKETING AGENTS (DMAs)/CHANNEL PARTNERS (CPs)

### => Conduct Guidelines

The DSAs/DMA/CPs and its personnel shall adhere to the following standard of conduct:

#### (a) General Conduct

- Act with honesty, integrity, and professionalism in all dealings with customers and the Company.
- Represent only approved products and use the Company's name clearly during every customer interaction.
- Carry valid identification cards issued by the Company during customer visits.
- Not make any false, misleading, or exaggerated representations about the Company or its products.
- Maintain confidentiality of all customers and Company information.
- Avoid any behavior that may harm the Company's reputation or customer trust.

#### (b) Customer Interaction

- Be courteous, polite, and respectful always.
- Make calls or visits only between **9:00 a.m. and 7:00 p.m.**, unless otherwise requested by the customer.
- Clearly explain product features, interest rates, fees, and repayment terms.
- Do not use coercive or aggressive sales tactics.
- Provide accurate information regarding documentation and KYC requirements.
- Inform customers of the Company's **grievance redressal mechanism** for any queries or complaints.

#### (c) Gifts or Bribes:

One must not accept the gifts from prospects or bribes of any kind. In case any customer offers a bribes or payment of any kind, them must promptly report to his/her management.

#### (d) Appearance and Dress Code:

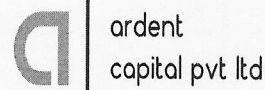
DSAs/DMA/RAs are required to always maintain a professional and respectable appearance while representing the Company. Attire must be neat, clean, and appropriate for client interactions. Casual clothing such as



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jeans, T-shirts, and open sandals is not permitted during any business meetings, client visits, or when visiting the Company's premises.

## **For Men:**

Formal, well-pressed trousers  
Well-ironed formal shirt, with sleeves preferably buttoned  
Clean and groomed personal appearance

## **For Women:**

Well-pressed formal attire such as saree, salwar suit, or other business-appropriate clothing  
Neat, presentable, and well-groomed appearance

DSAs/DMA's are expected to adhere to this standard consistently in order to maintain professionalism and uphold the Company's image.

## **=> Regulatory Compliance**

The DSA/CPs shall strictly comply with RBI's Guidelines on outsourcing, Fair Practice Code, DNCR/NCPR, TRAI and other relevant regulations.

Tele-calling or digital outreach must be carried out only through registered numbers and in compliance with TRAI DLT regulations. The DSA/CPs must not make unsolicited calls or messages to customers who have opted out under DNCR (Do Not Call Registry). Records of all customer interactions must be maintained as per Company and Regulatory requirements.

## **=> Confidentiality and Monitoring**

All DSA/CPs shall protect all customer data and information collected during business interactions. No data shall be shared, transferred, or sold to any third party. Any breach or suspected data leak shall be immediately reported to the Company.

## **=> Misconduct**

Any of the following shall constitute misconduct:

- Misrepresentation or falsification of documents.
- Misuse of customer data.
- Violation of DNCR/NCPR or RBI guidelines.
- Fraudulent or unethical practices

The Company reserves the right to terminate empanelment and take legal or regulatory action for any misconduct.

## **=> Indemnity**

The DSA/CPs shall indemnify and keep indemnified Ardent Capital Private Limited from and against any losses, penalties or damages arising due to breach of this code, regulatory guidelines or misconduct by the DSA/CPs or its personnel.

## **PART II: CODE OF CONDUCT FOR COLLECTION RECOVERY AGENTS**

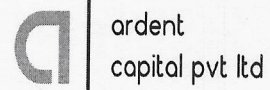
The Collection – Recovery Agents engaged by ACPL must adhere to the below mentioned guidelines in the course of performing their duty as a Collection- Recovery Agents.



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## => Contact with Customer

- Customers should be contacted at an appropriate time.
- 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.
- Customer privacy should be respected.
- Interaction with the customer should be in a polite and civilized manner.
- Customer requests to avoid calls at a particular time or at a particular place should be honored as far as possible.
- Customers should be provided with the information regarding his dues
- Reasonable notice would be given before repossession of security and its realization.
- All assistance should be given to resolve disputes or differences in a mutually acceptable and in a normal manner.
- During visit to the customer 's place for collection of dues, decency and decorum should be maintained
- Inappropriate occasions such as bereavement in the family or such other calamitous occasions should be avoided for making calls/ visits to collect dues.
- Strictly avoid any appearance which may suggest any criminal intimidation or threat or violence.
- A collection agent or its employee/s while collecting the amount due should not:
  - Resort to any false, deceptive or misleading representation,
  - Falsely represent or imply that he or she is connected with or affiliated with any of the governmental or judicial authorities,
  - Falsely represent the character, amount, or legal status of the debt.
  - 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.
- Collection Agents or their employees should be appropriately dressed and well groomed.

## => DO's and DON'Ts for Collection- Recovery Agents (CRAs): -

### DO's: -

1. Appearance: Well-groomed with proper haircut • Clean shave • well maintained beard
2. Dress Code: Light color shirts • well ironed shirt • shirt sleeves preferably buttoned down • Well ironed, creased trousers of dark shade • In winter, a coat / plain pullover • Formal Shoes
3. Belonging: Daily Collection Run Rate (DCR) Sheet • Receipt Book • Minimal Stationary • Code of Conduct
4. Process/Product Discipline: Collection agent(s) will perform their role within the framework of the instructions issued to them in terms of process notes and specifics of collection action based on the product.
5. Maximize Effectiveness: Collection Agent/s will strive to maximize the effectiveness of the visits by pre visit preparation and result orientation in order to improve results. Will document result in visit/action taken.
6. Proximity: maintaining a reasonable distance from the customer

### DON'T: -

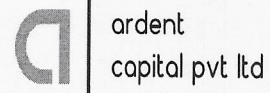
7. Ethics: Collection Agents should not make any verbal or written promises to customers without supervisor / company on matters outside his preview or an ad hoc settlement / product feature.



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8. Confidentiality: Unauthorized information written or verbal cannot be divulged to any customer/competitor/any other person (for eg: Photocopy of stat card, showing previous trails of customers.)
9. Proximity: No physical contact with the customer. • No obstruction to customer movement.

## => Customer Communication Guidelines for ACPL Representative:

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 ACPL for collection of dues from the customers. In case of failure to comply with these guidelines, appropriate and strict disciplinary action shall be taken against such person.

- 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.
- 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 threatening the customer.
- In case any customer resorts to abusive or threatening tactics, the Representatives should document it and promptly inform name of such customer to ACPL.
- Representatives are not authorized to send any written communication to customers by any mode (e-mail, letter, electronic messages, social media, etc.) to ACPL Customers. If customers are required to communicate on e-mails / electronic messages, Representatives should send a request to ACPL along with reasons and requirements for any written communication.
- Representatives should not promise or commit any type of written communication on behalf of ACPL.
- Representatives should not mislead the customer about the action proposed and consequences thereof.
- Representatives 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.
- Without prior permission from ACPL, Representative should not make any promise or commitment to any customer on behalf of ACPL.

Approved by

**Board of the Company**

**ARDENT CAPITAL PRIVATE LIMITED**

A handwritten signature in blue ink, appearing to be 'Sivaraman S.', is written over the stamp.



**SIVARAMAN S**  
**(CHAIRMAN/MANAGING DIRECTOR)**  
**DIN:08788060**