

CODE OF CONDUCT FOR DIRECT SELLING AGENTS (DSA)/DIRECT MARKETING AGENTS (DMA)

National Housing Bank (NHB) through its circular no. NHB (ND)/DRS/Pol-No.24/2008 dated July 14, 2008 stipulated the Model Code of Conduct for DSA/DMA (the Code) to Housing Finance Companies (HFCs). The Code was reviewed and updated by NHB through its Circular NHB (ND)/DRS/Policy Circular No.82/2017-18 for DMA/DSA dated October 17, 2017. Paragraph number 88 and 5.7 of Annexure XXV of Reserve Bank of India (RBI) 'Master Direction-Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016' dated September 01, 2016 had prescribed similar Code for Non-Banking Financial Companies (NBFCs). These guidelines became applicable to HFCs through Master Direction – Non-Banking Financial Company – Housing Finance Company (Reserve Bank) Directions, 2021 dated February 17, 2021.

The Code will be applicable to person/legal entity involved in marketing and distribution of any loan or other financial products or services on behalf of the Company.

The Company, in line of the model code of conduct released by RBI, has framed the Code to be followed by DSAs/DMAs involved in marketing and distribution of loans and other financial products and services on behalf of Company.

Only those DSAs/DMAs along with the employees and representatives (hereinafter referred to as 'intermediaries') who agree to abide by the Code will be allowed to market and distribute financial products and services for the Company. The DSA/DMA will be required to obtain declaration as given in Annexure A, from its employees and representatives that they agree to abide by the Code before engaging them in marketing and distribution of products and services on behalf of Company

Any employee/representative of the DSA/DMA who is found to be violating the Code may be blacklisted by the DSA/DMA and action taken has to be reported to the Company from time to time by DSA/DMA. The Company may terminate or permanently blacklist DSA/DMA failing to comply with the Code.

Code of Conduct

The Code of Conduct to be followed by DSA/DMA and its employees/representatives for marketing and distribution of loan and other financial product or services on behalf of the Company to existing and prospective customer is outlined below.

I. Norms for Tele-calling to Customer

Tele-calling

Employee/ representative of DSA/DMA, if doing out-bounding call then they shall register themselves with Department of Telecommunications (DOT), Government of India as telemarketers for any kind of engagement with customers. A customer may be contacted for sourcing Company's product or service only:

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

Before contacting, the DSA/DMA should ensure that the data base of the customer to be contacted is washed against TRAI's 'Do Not Call' registry.

Time of tele-calling

Call to the customers should be made only at the time when it is not expected to cause any inconvenience or at the time specifically mentioned by the customer. The ideal time to be followed by the intermediaries of the Company would be between 09:30 hrs to 19:00 hrs. However, it may be ensured that a customer is contacted only when the call is not expected to inconvenience him/ her. Calls earlier or later than the prescribed time period may be placed only when the customer has expressly authorized the DSA/ DMA or/and its employees/ representatives to do so either in writing or orally.

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 customer has expressly authorized DSA or/and its employees/ representatives to do so either in writing or orally

Respect Customer's privacy

DSA/ DMA should respect a customer's privacy and his/ her interest may normally be discussed only with the customer and with any other individual/ family member such as customer's accountant/ secretary/ spouse only when authorized to do so by the customer

Leaving messages

Call for the product of the Company should be made to the customer only. In case the customer is not available or is not able to attend the call, a message may be left for the customer. The message must indicate that the purpose of call is regarding selling or distributing the Company's product with a request to the customer to call back or asking

for a convenient time to call again.

Example:

Please leave a message that Mr./Ms.***** (name of officer) from ICICI Home Finance had called for ***** and requested you to call back on Telephone No. *****.

No misleading statements/misrepresentations permitted

The intermediaries should not:

- mislead the prospect/customer about the product and services offered by the company.
- mislead the prospect/customer about the organization's name or the business carried on by the organisation or falsely represent themselves as the company's employee.
- make false or unauthorised commitment on behalf of the Company for any facility/ loan/ service

Telemarketing Etiquette

Pre call

- Call to the customer should not be made prior to 0930 hrs or post 1900 hrs unless specifically authorized by the customer
- The databases of the customer to be contacted is washed against TRAI's 'Do Not Call' registry List of the customer, to be contacted, should be cleared by the DMA/DSA / appropriate official, as applicable
- No serial or continuous dialing

During call

- Identify yourself, your company and your principal
- Request permission to proceed
- If denied permission, apologize and politely disconnect
- State reason for your call
- Always offer to call back on landline, if call is made to a cell number
- Never interrupt or argue
- To the extent possible, talk in the language which is most comfortable to the prospect/customer
- Keep the conversation limited to business matters
- Check for understanding of 'Most Important Terms and Conditions' by the prospect/customer if he plans to buy the product
- Reconfirm next call or next visit details
- Provide your telephone number, your supervisor's name or the Company officer's contact details if asked for by the prospect/customer
- Thank the prospect/customer for his /her time

Post call

- Prospects/Customers who have expressed their lack of interest for the offering should not be called for the next 3 months with the same offer
- Provide feedback to prospects/customers who have expressed their desire to be flagged 'Do Not Disturb'
- Never call or entertain calls from customers regarding products already sold. Advise customer to contact the Customer Service Staff of the Company.

II. Payment

DMA/DSA should not accept any payment in cash. All fees, incentive etc. shall be made through the designated bank account as per extant process of ICICI HFC

III. Gifts or Bribes

- a. Representatives/ Employees of DMA/DSA's should not accept gift or bribe from the customer either in cash or kind in consideration of product offered or services rendered to the customer. Any attempt by the customer to offer gift or bribe to employee should be reported to the DSA/DMA and DSA/DMA to report to the Company.
- b. no offer should be made of any gifts/gratitude in cash or in kind to the prospect/customer to solicit business.

IV. Appearance and Dress Code

DSA/ DMA or/and its employees/ representatives must be in proper formal attire while meeting up with prospect/ customer.

V. Precautions to be taken on visit/contact with customer

Employees/representatives of DSA/DMA should:

- respect personal space – maintain adequate distance from the prospect/customer;
- 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
- not enter the customer's residence/ office against his/ her wishes;
- not visit in large numbers, i.e. not more than one employee/representative of the DSA/DMA and one supervisor, if required;
- respect the customer's privacy;
- provide his/her telephone number, name of the supervisor or the concerned officer of the Company and contact details, if asked for by the customer;
- 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;
- limit discussions with the customer to the business – Maintain a professional distance.

VI. Handling of Letter and other communication

Communication with the customer should only be in the mode and format approved by the Company.

VII. Reporting of Fraud

DSA/DMA shall report the fraud by erring employees/representatives periodically to Company with all the required details, like name, address, name of the DSA associated, nature of fraud and such employee/DSA/DMA shall be barred permanently for doing business of DSA/DMA with the Company in future.

Declaration Cum Undertaking to be obtained by the DSA/DMA from its employees/representatives

To,

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 customer of ICICI Home Finance Company Ltd.

In the discharge of my duties, I am obligated to follow the Code of Conduct attached to this declaration cum undertaking.

I confirm that I have read and understood and agree to abide by the Code of Conduct. I further confirm that that trainer mentioned below has explained the contents of the Code of Conduct in full to me.

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 _____.

Signature of Trainer _____ Name _____ Company _____.