

CODE OF CONDUCT OF SOURCING AGENTS / SERVICE PROVIDERS AND ITS DSA/DMA

PNB Housing Finance Limited (“the Company”) is engaged in the business of granting loans for purchase/ construction/ extension/ renovation/ of dwelling units/ non- residential premises and loan against property to individuals and others and as a part of business activity for resource mobilization, it accepts deposits from public under its deposit schemes. The Company has been appointing and engaging various service associates – Direct Selling Agents/ Direct Marketing Agents/ Deposit Agents both individual and corporate for availing their services for sourcing prospective customers for its various financial products. The Code is a set of guidelines designed to ensure that our agents act and conduct themselves in a manner in conformity with the laid down policies and procedures as set in the code for marketing and distribution of various financial products of the Company.

I. APPLICABILITY

- i. The Code will apply to all persons involved in marketing and distribution of any loan or other financial product of the Company viz. Direct Selling Agents/ Direct Marketing Agents/ Deposit Agents including their representatives and employees.
- ii. The Sourcing Agents and its employees/representatives must agree to abide by this code prior to undertaking any direct marketing or distribution activity on behalf of the Company. Any employees / representatives of the Sourcing Agent found to be violating this code may be blacklisted. The Company may consider termination or permanent blacklisting of Sourcing Agent who fails to comply with this requirement.
- iii. A declaration cum undertaking has to be provided by each Sourcing Agent to the Company. In this regard and shall be obtained by the Sourcing Agent from his employees / representatives before assigning them their duties. The format of the declaration is enclosed as per Annexure I.

II. TELE CALLING A PROSPECTIVE CUSTOMER

- A. Unsolicited Commercial Communications – National Do Not Call Registry:
 - i. Sourcing Agents who are involved in telemarketing activity should have a valid registration certificate from Department of Telecommunication (DOT), Government of India. Sourcing Agents should be registered in terms of guidelines issued by TRAI from time to time for all their promotional activities.
 - ii. Sourcing Agents should provide to the Company with the list of telemarketers engaged by them and the telemarketing numbers being used by them for carrying out their promotional activities from time to time.
 - iii. Sourcing Agents will ensure that all their sub agents / representatives engaged in tele marketing are registered with Dept. of Telecommunication (DOT) as tele marketers.
- B. A prospective customer may be contacted for sourcing a product of the Company only under the following circumstances:
 - i. When a prospective customer desires to acquire a housing loan / financial product through the Company’s website / digital platforms including mobile applications// call

center / branch or through the relationship manager at the Company or has been referred by another customer / prospective customer or is an existing customer of the Company who has given consent or accepting calls on other products of the Company.

- ii. When the prospective customer's name / telephone no/ address is available and obtained after taking his/her consent.
 - iii. The employees / representatives of the Sourcing Agent should not call a person whose name/number is flagged in any "Do Not Disturb" list made available to him/ her.
- C. Sourcing Agents shall make upfront disclosure to the Customer regarding the difference in fees / charges, interest rate, etc. in case the purchase of a Product / service is made through the DSA / DMA vis-à-vis the same made from the Company directly.
- D. Sourcing Agents shall not mislead the Customer about their business or organization's name or falsely represent themselves as the Company's employees.
- E. For the benefit of the Customers, the Sourcing Agent whilst being present in the premises of the Company shall be distinguishable from the employees of the Company, including clear 'on person' identification. Sourcing Agents shall always wear their employee card;
- F. Sourcing Agents shall not make any false / unauthorized commitment on behalf of the Company for any Product / service; Sourcing Agents shall only make the representations as authorized in writing by the Company;

III. WHEN TO CONTACT A PROSPECTIVE CUSTOMER ON TELEPHONE

- i. Sourcing agent before calling must share their contact details through message or any other written mode including his/ her name, contact number, sourcing agency they are employed with and the Company they are representing.
- ii. Telephonic contact must normally be limited between 0930 hours and 1900 hours. Calls / visits earlier or later than the prescribed time period shall be done only when the potential customer has expressly given a request or authorization to do verbally or otherwise. 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 under the following conditions when the prospective customer has expressly authorized the Sourcing Agent and its employees / representatives to do so earlier orally or in writing.
- iv. Residence / Business / Office address visit must normally be limited between 0930 hrs and 1900 hrs. Visit earlier or later than the prescribed time period may be made only when prospective customer has expressly authorized the Sourcing Agent and its employees / representative to do so either in writing or orally.

- v. do not call a customer regarding products already sold to him / her and if a customer calls for any such product, advise him / her to contact the customer service staff of the Company and provide the contact details.

IV. RESPECT PROSPECTIVE CUSTOMER'S PRIVACY

Sourcing Agent should respect the prospective customer's privacy and his/her interest may normally be discussed with him/her unless explicit consent or authorization is provided by the customer to discuss it with any other individual / family member of the customer such as prospect's accountant/ secretary / spouse etc..

V. LEAVING MESSAGES AND CONTACTING PERSONS OTHER THAN THE PROSPECT

- i. 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 the following:
- ii. *"Please leave a message that ***** (name of officer) representing ***** (name of the branch) 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 the Company."*

VI. NO MISLEADING STATEMENTS/ MISREPRESENTATIONS PERMITTED

Sourcing Agent and its employees / representatives should not:

- i. Mislead or coerce the prospective customer in purchase of any service / product offered by the Company;
- ii. Mislead the prospect about their business or organization's name, or falsely represent themselves as an employee of the Company;
- iii. Make any false / unauthorized commitment on behalf of the Company for any facility

/ housing loan / service.

VII. TELEMARKETING

A. Etiquette: Pre Call

- i. No calls prior to 09:30 hours or post 1900 hours unless specifically and explicitly requested.
- ii. No serial calling.
- iii. No calling on lists unless list is cleared by the team leader.

B. During call

- i. Identify yourself, your Company and your principal.
- ii. Request permission to proceed.

- iii. If denied permission, apologies 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 branch official’s contact details if asked for by the customer.
- xii. Thank you customer for his/her time.

G. 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 the branch head 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 branch concerned or the corporate office.

VIII. GIFTS OR BRIBE

- i. Employees/ representatives of Sourcing Agent must not accept gifts or bribes from prospective customers. Any employee / representative of the Sourcing Agent, who is offered a bribe or payment of any kind by a customer, must report the offer to his/ her management / branch concerned.
- ii. Employees/ representatives of Sourcing Agent must not offer any gifts/gratitude in cash or in kind to the prospective customer to solicit business.

IX. PRECAUTIONS TO BE TAKEN ON VISITS / CONTACTS

Employees / representatives of Sourcing Agent should:

- i. Respect personal space - maintain adequate distance from the prospective customer;
- ii. Ensure that the prospective 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/business/office against his /her wishes and without his/her explicit consent;
- iv. Not visit in large numbers, i.e. not more than one employee /representative of the Sourcing Agent and one supervisor, if required;
- v. Respect the prospective customer's privacy;
- vi. If the prospective customer is not present and only family members/office persons are present at the time of the visit, he /she should end the visit with a request for the prospective customer to call back;
- vii. 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; and
- viii. Limit discussions with the prospective customer to the business - Maintain a professional distance.

X. OTHER IMPORTANT ASPECTS- APPEARANCE & DRESS CODE

Employees/ representatives of Sourcing Agent must be appropriately dressed i.e. a formal attire should be there while meeting a client. 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.

XI. HANDLING OF LETTERS & OTHER COMMUNICATION

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

XII. QUALIFICATIONS FOR SOURCING AGENT

No specific qualification is required for individuals. However corporate Sourcing Agents depending upon the nature of the entity, shall ensure that their Partnership Deed, MOA or any other document evidencing the constitution of the entity shall contain as one of its main objects soliciting or procuring the DSA/DMA business.

XIII. TRAINING TO AGENTS

The Sourcing Agents are required to ensure that they attend training sessions as and when conducted by the Company for the purpose of maintaining high standards of services to be rendered to the prospects/customers of the Company. Sourcing agents are required to attend the two day preliminary training and a day training every year organised by the Company.

XIV. GENERAL CLAUSES

- i. The Company Sourcing Agent agree to provide the services as per the terms and conditions set out in Standard Agreement.
- ii. The Sourcing Agent shall protect the interest of the Company and ensure that the Company shall not suffer any reputational risk or loss due to any acts, deeds or actions or lack of the same, undertaken / supposed to be undertaken by the Sourcing Agent.
- iii. The Sourcing Agent shall not furnish any misleading/wrong information to any prospective customer on the policies and the terms and conditions of the product.

- iv. The Sourcing Agent shall co-operate with Company's officials in case of any investigations or inquiry.
- v. The Sourcing Agent have an obligation to conduct themselves in an honest and ethical manner and act in the best interest of the Company. The Sourcing Agent shall ensure that the Sourcing Agent, their employees and representatives shall avoid all situations that present a potential or actual conflict between their interest and the interest of the Company.
- vi. The Sourcing Agent, their employees and representatives shall ensure that they deal fairly with customers at all times and in accordance with ethical business practices.
- vii. The Sourcing Agent shall not collect any amount in cash or in any form or any other fee from the customer for providing services to Company.
- viii. The Sourcing Agent shall not share any internal communication received from the Company with the customer, whether in print, electronic or any other medium of communication.
- ix. The Sourcing Agent or any person on his behalf or his employees/representatives cannot accept any kind of gratuitous payment / benefit from any customer / potential customer in any form or manner for any services being performed for the Company.
- x. Any acceptance of such gratuitous payment accepted by the employees / representatives of the Sourcing Agent should be immediately reported to the Company and in such cases, the Company may in its discretion undertake any action which it deems fit. The Sourcing Agent shall not engage in discussing the customer interest with any other persons other than those authorized by the customer and/or Company.
- xi. The Sourcing Agent should adhere to all the terms and conditions as stipulated under model code of conduct issued by Master Direction – Non Banking Financial Company – Housing Finance Company (Reserve Bank) Directions, 2021 (RBI Directions).
- xii. Leads / cases should be shared with Company in a prescribed format as per Annexure

II. Format can also be taken from their allocated branch of the Company.

- xiii. The sourcing agent shall report the fraud committed by erring employees/ representatives to Company on immediate basis.

DECLARATION:

I hereby declare that I have read the aforesaid code of conduct and confirm that I shall abide by the same in my day to day working with PNBHFL as sourcing agents.

Place: Service Provider (DMA)



Sign & stamp(s) : _____(DMA-5)

Date:

