



ORANGE CITY HOUSING
Finance Private Limited

(Formerly Known as ORANGE CITY HOUSING FINANCE LIMITED)

DSA Code of Conduct

Version 1.2

For Private Circulation Only

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I. Introduction

Orange City Housing Finance Private Limited (OCHFL) is a Housing Finance Company (HFC) Based at Nagpur, registered with the National Housing Bank New Delhi wholly owned by RBI and incorporated with Registrar of Companies, Mumbai under the Companies Act 1956. OCHFL is one of the 100 odd HFC license holder across India and only one in Central India. We provide affordable housing loans to all sections of the society. Since inception we have lead our clients on the path of success by lending home loans to individuals for Purchase / Construction / Extension / Renovation etc. eventually helping them to achieve their goals of owning their own home / house.

II. Company Philosophy

OCHFL has been incorporated with an intent to be an enabler in providing credit access to first time home buyers in EWS/LIG/MIG segment and aims to contribute meaningfully towards Government of India's mission "Housing for All". With an underlying philosophy of changing the status quo in the society, the Company intends to work on a philosophy of giving back to the society in a way and fashion that cause a sustainable change for the larger good of Indian populace without any discrimination based on religion, creed, caste, color or gender. The Company aims to undertake those initiatives which would bring about positive irreversible change for the betterment of the society and would help the beneficiaries quantitatively and qualitatively in their lives.

Our Vision is to be the leading Housing Loan provider in Central India known for

- Service Levels
- Loans Affordability
- Transparency of Operations
- Contribution to Society

OCHFL aims at fostering a maximum contented customer base in a mutually profitable way. It is therefore important to appraise the customer in unambiguous terms before offering a product or service to him. This Policy serves as a base document broad guideline to the fees / incentive payable to the loan origination team.

III. Mission of Policy

OCHFL Believes in and complies with the general practices that are in line with the Directions provided by National Housing Bank to housing finance companies. At OCHFL, we believe that an effective management and administration with proper accounting standards is imperative to ensure a long and healthy life of the company.

The purpose of this document is to define Lending Policy and guidelines for the company in accordance with the Company law and NHB Directions for housing finance companies. This is living documents and supposed to be updated on a regular basis. Any, regulatory change that would impact the accounting aspects of the company would be reflected here.

This document should not be seen in isolation but in conjunction with the other policy documents that define the overall working of the company. For the sake of simplicity and to avoid confusion, any matter covered in other policy documents is not repeated in this document.

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IV. Policy Statement

Direct Selling Agents (DSAs), Relationship Officer (ROs) / Relationship Manager (RMs) are major sourcing channels through which the business for OCHFL is originated. Association of DSAs with the Company is voluntary through requisition from DSA, subsequent approval from OCHFL and post that formal agreement between both. The terms and conditions and responsibilities of DSAs are specified in the agreement and are update from time to time through revisions to incentive policy and guidelines. This is duly communicated to all DSAs. It is primary responsibility of Branch Manager to meet and update DSAs regularly on developments.

V. Code of Conduct

As a part of the agreement with DSA, DSA along with his staff need to follow the code of conduct specified by OCHFL which is also part of the DSA agreement.

DSA need to ensure that all Policies/guidelines/ rules / regulations etc as communicated by OCHFL to DSA or as mandated by law are implemented/ followed and communicated all their staffs.

DSA their employees and representatives shall ensure that they deal fairly with customers at all times and in accordance with ethical business practices.

DSA ensure strict compliance of the code of conduct and maintaining good moral reputation.

This Code of Conduct is prepared for DSA who is/are appointed by OCHFL and is/are operating on behalf of OCHFL.

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

A declaration to be obtained from each employees /representative by the DSA before assigning them their duties as per the format provided by OCHFL.

1. Tele-calling a prospective customer

A prospective customer may be contacted for sourcing OCHFL product only under the following circumstances:

- DSA shall furnish the list of Telemarketers engaged by them along with the registered telephone numbers being used by them for making telemarketing calls to TRAI & all agents presently engaged by them register themselves with DoT as telemarketers.
- When a prospective customer desires to acquire a housing loan/ financial product through OCHFL website/call center / branch or has been referred by another customer/ prospective

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customer or is an existing customer of OCHFL who has given consent for accepting calls on other products of OCHFL.

- When the prospective customer's name/telephone no. /address is available and obtained after taking his /her consent.
- The employees /representatives of the DSA should not call a person whose name /number is flagged in any "do not call" list made available to him /her.

2. When to contact a prospective customer on telephone

DSA must introduce themselves and before calling must share their contact details through message or any other written mode including his/ her name, contact number, DSA they are employed with and the OCHFL they are representing.

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. 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 DSA and its employees / representatives to do so either orally or in writing.

Further, 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 DSA or/and its employees/ representatives to do so either in writing or orally.

3. Respect prospective customer's privacy

DSA should respect the prospective customer's privacy and his /her interest may normally be discussed only with him /her and with any other individual / OCHFL 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 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 OCHFL.

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5. No misleading statements / misrepresentations permitted

DSA and its employees / representatives should not:

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

6. Telemarketing Etiquette

Pre Call

- No calls prior to 0700 Hrs or post 1900 Hrs unless specifically requested.
- No serial dialing

No calling on lists unless list is cleared by the Head of DSA.

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 prospective customer
- Keep the conversation limited to business matters
- Check for understanding of "Most Important Terms and Conditions" by the 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 OCHFL's officer's contact details if asked for by the customer.
- Thank the customer for his /her time

Post Call

- Customers who have expressed their lack of interest for the offering should not be called for the next 3 months with the same offer

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- Provide feedback to OCHFL on customers who have expressed their desire to be flagged "Do Not Call"
- Never call or entertain calls from customers regarding products already sold.
- Advise them to contact the Customer Service Staff of the OCHFL.

7. Gifts or bribes

Employees /representatives of DSA must not accept gifts from prospective customers or bribes of any kind. Any employee/representative of the DSA, who is offered a bribe or payment of any kind by a customer, must report the offer to his /her management.

8. Precautions to be taken on visits / contacts

Employees/representatives of DSA should:

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

9. Inspection and Right to Audit

- a. The Company reserves the right to inspect and audit at any time the operations, service locations and the levels of service performed by the Service Provider and its employees and personnel and their performance against all requirements including the related quality standards. The Service Provider shall fully co-operate with such inspections and audit. The Company may communicate the results of such inspections and audits in writing to the Service Provider.
- b. The Service Provider shall keep complete and accurate books, records and information of all the operations and expenses in connection with the Services provided to the company in a manner satisfactory to the company.

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- c. The Service Provider shall, upon reasonable notice allow the company, its management, its auditors (both internal auditors and external auditors), RBI, Statutory Regulators and any other nominee of the company, to inspect, examine and audit the records. The Service Provider shall provide unrestricted access to the premises and its employees and any other assistance as may be required in relation to the inspection and audit as specified herein.
- d. The Service Provider shall co-operate with the company's internal or external auditor, RBI/ NHB to assure a prompt and accurate audit. The Service Provider shall also co-operate in good faith with the Company and/or its nominee to correct any practices, which are found to be deficient as a result of any such audit within a reasonable time after receipt of the Company's audit report

10. Access to Books and Accounts and Preservation of Documents

- a. The Company shall have the right of continuous monitoring and assessment of the Service Provider so that any corrective measure can be taken immediately.
- b. The Service Provider undertakes and agrees to ensure all Contingency plans to ensure business continuity. In case the Service Provider is not in a position to ensure such contingency plans for business continuity, the service provider shall inform the Company, accordingly.
- c. The Company have the right to access all books, records and information relevant to the outsourced activity available with the service provider if any.

11. Appearance and Dress Code

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

12. Handling of letters and other communication

Any communication sent to the prospect shall only be in the mode and format approved by the HFC.

13. Qualifications for DSA

There is no specific qualification requirement for individuals, corporate entities. Depend upon the entity Partnership Deed, Memorandum of Association or any other document evidencing the constitution of the entity shall contain as one of its main objects soliciting or procuring DSA business.

14. Empanelment

DSA requested to make an application in the prescribed format.

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VI. Amendment

The Company has the right to update or modify parts of this policy or totally from time to time. The Audit Committee and the Chairman will also review this Policy and suggest amendments to make it more relevant and responsive so as to protect the reputation of the Company and minimize the business loss emanating from any misconduct / fraudulent activities.