

## **COLLECTION AND RECOVERY POLICY (Ver 1.0)**

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## **A. BACKGROUND, OBJECTIVES, SCOPE AND APPLICABILITY**

### **1. Background**

Collection Risk is an inherent part of any lending business and has both financial and non - financial implications. Recovery is an important tool to lower the collection risk by recovering the dues in case of non-repayment of dues.

Sankalp Capital Private Limited (“ Company”), while conducting its business as a Non - Banking Financial Company (“ NBFC”), shall be required to undertake collection and legal measures for recovery of dues. Accordingly, to define a framework within which the Company and its employees/ agents/ representatives which includes lending services providers, would carry-out activities to recover dues, it is proposed to adopt this Collection and Recovery Policy (“Collection Policy” or “Policy”).

### **2. Objectives**

The primary objective of this Collection Policy is to define a framework for the collection and recovery activities of the Company. The Collection Policy endeavors:

- 2.1 To put in place a governing framework for collection and recovery activities of the Company.
- 2.2 To standardize and facilitate understanding of collection and recovery activities of the Company.
- 2.3 To put in place standardized policy and procedures in collection & recovery operations and associated legal matters to be adopted by the Company.

### **3. Applicability**

The Collection Policy shall be effective from the date of its approval by the Board. The Collection Policy will apply to employees and agents/ representatives, including Lending Service Providers and Recovery Agents.

### **4. Collection Philosophy**

The Company and its employees/ representatives will follow principles of courtesy, fair treatment and persuasion. The Company shall inform its borrowers regarding various terms and conditions of the Loan, including terms relating to repayment, rate of interest, penal charge, through Sanction Letter, Key Fact Statement, Loan Terms / Agreement etc. However, if a borrower does not adhere to the agreed repayment terms, a defined process in accordance with the law shall be followed for recovery of dues.

## **B. ROLES AND RESPONSIBILITIES**

### **5. Board of Directors of the Company**

To review and approve the Collection Policy including Code of Conduct.

### **6. Responsibilities of the Collection Department including the Agents empaneled**

- 6.1 To effectively manage collection and recovery efforts to minimize delinquency of financial assets and to minimize credit loss.

- 6.2 To monitor delinquency of financial assets and take required legally valid actions for recovery.
- 6.3 To educate & counsel customers to maintain proper repayment habits.
- 6.4 To give continuous feedback to the Credit departments on emerging risks of credit markets and portfolio.
- 6.5 To contribute to revenue/ income of the Company, minimize the losses by collecting various dues from the borrowers including penal Charges and other charges, as applicable.
- 6.6 To display a high level of transparency, objectivity, integrity in dealing with customers or stakeholders.
- 6.7 To adhere to “Code of Conduct”, Procedures, Policies and guidelines of the Company and also the regulatory requirements.

## C. COLLECTION STRATEGY

### 7. Collection Strategy to be based on profiles of the Borrowers

From a collection perspective, the borrowers may be categorized in the following categories:

- 7.1 Borrowers who pay promptly on the due date or before.
- 7.2 Borrowers who are habitually late, while they pay but are always late.
- 7.3 Borrowers facing financial hardship (highly leveraged, loss of job/ business etc).
- 7.4 Borrowers facing some family exigency like death or permanent / partial disability or critical illness of the income earning family member.
- 7.5 Borrowers who may be intentionally and willingly defaulting the payments.

Based on the above categories, the Company may adopt different strategies as detailed below.

*Note: Habitually Late means customer not clearing Equated Monthly Installments & Charges (Delay+Bounce) on cycle dates for more than 60 days in calendar year.*

### 8. Collection Strategy

The objective of the collection strategy shall be to ensure timely collection efforts for all delinquent accounts in order to minimize losses in a cost-effective manner. The Company shall aim to initiate collection efforts immediately after the account is classified as delinquent to prevent any loss.

As per the terms of repayment, the borrowers are required to repay the loan without delay, demur or default on respective due dates. In the event of any default in repayment of loan, the Company through its in-house collections team or its agents/ representatives shall approach, via calls, SMS, WhatsApp and email, the customer for collection of overdue amounts. In this process, the defaulting borrowers shall be informed in every communication / correspondence about the repercussions relating to accrual of penal charges, and also about impact on their credit history to be filed with the credit information companies/ credit bureaus.

**8.1 Collection strategy based on the type and stage of delinquency:** The Company shall adopt different collection strategy depending on the type and stage of delinquency as under:

#### 8.1.1 Default Reasons:

8.1.1.1 Borrowers who are habitually late and are not financially disciplined

8.1.1.2 Financial Issues:

- Loss of job/ income/ business

- Over Leveraging due to too many loans/ liabilities
- Bankruptcy

8.1.1.3 Circumstances beyond control

- Terminal or major illness / disability
- Death of income earner or Quick Mortality cases
- Closure of the educational/ professional course
- Dispute with the educational institution

8.1.1.4 Borrowers who may be intentional defaulters

8.1.2 Stage of Delinquency and Collection Approach:

8.1.3 Buckets Strategy and Reporting Structure:

Bucket	Strategy	Responsibilities
1-30 (DPD) (refer Note 1)	Soft Calling, WhatsApp and IVR Reminder	LSP
31-60 (DPD) (refer Note 2)	Soft Calling, WhatsApp and IVR First Reminder Notice	LSP + Inhouse Team
61-90 (DPD) (refer Note 3)	Soft Calling, WhatsApp and IVR Second reminder Notice	LSP + Inhouse Team
90+ (DPD) (refer Note 4)	Soft Calling, WhatsApp and IVR Final reminder notice	LSP + Inhouse Team

8.1.3.1 **Note 1:** Soft Calling Team can refer Not Resolved cases to the Collection Agency Team, which is 15% to 25% of their total outstanding principal amount (POS), after 1DPD on the daily basis. Not Resolved Cases means & includes the following:

- 8.1.3.1.1 Not Contactable (NC)
- 8.1.3.1.2 Refuses To Pay (RTP)
- 8.1.3.1.3 Institute Issue Cases/Cancellation Issue (ISS1)
- 8.1.3.1.4 Wrong Number (WN)
- 8.1.3.1.5 Soft Notice to be initiated on all cases which are Not Resolved.

8.1.3.2 **Note 2:** Collection Agency- Cases having DPD 1+ is allocated to the Collection agency. The executive will make best efforts to collect the over dues (EMIs + charges) amount in accordance with the provisions of current Code of Conduct of the Company. In case if the executive fails to recover or collect overdue amount then following rationale or reasons shall be recorded and immediately forwarded to the LSP or to the Company:

- 8.1.3.2.1 Notice to be initiated on all cases which are Not Resolved in 90 DPDs.
- 8.1.3.2.2 **In case of Death**, executives will take the death certificate from the relatives and legal heirs, via email and report to the CICs as deceased of that case.
- 8.1.3.2.3 **In case of Disability (Partial / total / severe / mental illness) of any nature**, executives will take medical certificate or any other certificate keep it in our records.

- 8.1.3.2.4 In case of legal hardship due to the involvement of the community / public / police authorities.
- 8.1.3.2.5 Legal action to be taken against the customer
- 8.1.3.2.6 For Settlement & Write Offs, Company will adhere & follow latest board approved "Policy For Settlement And Write Off"

## 8.2 Tele Calling:

Tele calling is an important tool for collecting effectively and cost efficiently in early bucket, While the primary objective of tele calling is to get a commitment for representation of payment instrument on a stipulated date, get commitment for payment pick up on a stipulated date and time, other objectives of tele calling shall be as under:

- 8.2.1 The borrower should be intimated about the EMI bounce. If the borrower is not available, this information may be provided to the family member available on the given Emergency contact number.
- 8.2.2 If payment is ready and the same needs to be collected, the tele caller will guide the customer to clear the overdue amount through LSP.
- 8.2.3 If payment is not ready, then the tele caller may obtain promise to pay commitments. The Promise to Pay ("PTP") commitments should not be later than 3 days from the date of call.
- 8.2.4 The tele caller will follow up again with the customer on or before the date for payment.
- 8.2.5 There could be a possibility that the tele caller is not able to establish contacts with the borrower. The tele caller will continue to make attempts to establish contact.
- 8.2.6 After each call, the tele caller shall update the tracker with the action to be taken. The Collections Manager will record tele calling efforts and the same can be captured from the system through various reports. Dialer reports, various other reports available in the collection system shall give information. The performance review of tele callers shall be on the basis of such reports/ performance.
- 8.2.7 This strategy is important in controlling delinquency as this activity has less turnaround time to touch base the customer. Normally the behavior of the customer is to pay promptly to the creditors who constantly follow up. Tele calling could be done either by a dedicated tele calling team or by respective collection official/ manager.
- 8.2.8 The tele calling as one of the follow up tool shall be structured, result oriented, focused, well documented (Enclosed as Annexure-1) in the collection follow-up viz., Contact Ratio, Promise To Pay (PTP) Conversion ratio.
- 8.2.9 With respect to awareness calling and tele calling , the Company, its employees/ representatives shall follow the Code of Conduct.

## 8.3 Strategy for the Borrowers Overdue DPD:

If despite the awareness of calling, a borrower does not pay on the due date then the cases shall be allocated to the respective overdue collection team within 24 hours of getting the information about non-payment on due date. Further, the following actions shall be taken:

- 8.3.1 The collection team will follow up with the borrower till the payment is received
- 8.3.2 Promise To Pay (PTP's) shall be collated on a daily basis and circulated to the relevant officials of the Company.
- 8.3.3 Review of various allocated cases with respective collection official/ manager shall be conducted on a weekly basis.

8.3.4 If a borrower does not pay even after tele calling efforts, after try various channel for the follow-up till repayment.

**8.4 Strategy for the Borrowers beyond 90 DPD:**

The Company shall take the following actions for the Borrowers beyond 90 DPD:

8.4.1 The collection team shall initiate legal process by sending Legal notice.

**9 Collection Management Information System (“MIS”)**

To allocate adequate resources and develop appropriate collection strategies, the MIS needs to be developed and produced regularly. The following MIS shall be periodically reviewed for effective and collection follow-up, tracking and measuring performance:

MIS	Frequency	Review Authority
Delinquency MIS	Daily	Collection Head
Legal Cases MIS with tracker	Once, after 30 DPD of the following month	Team leader, Manager
Monthly Review of collection cases	By every month End	Head of operation & Business head

**10 Mode of Payment:**

- 10.1 **E-NACH (Auto Debit):** At the time of loan processing customer will sign NACH (National Automated Clearing House) document E-Nach. Based on the Company criteria customer EMI due date will be fixed. As per the customer EMI due date the NACH presentation will be processed.
- 10.2 **Application Payment:** Customer can pay through Netbanking / Debit Card / UPI on the app or other permitted modes.
- 10.3 **Payment Link:** At customer request link can be generated through Console & shared with customer for payment through Netbanking/Debit Card/UPI.

**11 Contest and Incentive Plan**

- 11.1 To boost the collection efforts, the Company may roll out a collection incentive.
- 11.2 The collection incentives plans may be rolled -out after approval from the CEO/ Director/ Head of operation.
- 11.3 All the Incentive payout shall be considered only if the employee is associated with the Company on the day of credit payment.

**12 Engagement of Collection and Recovery Agencies/ Agents**

The Company may engage collection and recovery agencies or agents for the purpose of collecting outstanding dues and facilitating recoveries. Prior to engaging any recovery agency, the Company will conduct thorough due diligence to assess the agency's qualifications and practices.

Additionally, it is imperative that all recovery agents comply with the Company's Code of Conduct for Recovery Agents, which is included herein as Annexure-3. Recovery agents must also adhere to the Company's Outsourcing Risk Management Policy and their respective agreements to ensure that all collection activities are conducted in accordance with the established standards and ethical guidelines. Recovery agents must also adhere to the Company's Outsourcing Policy to ensure that all collection activities are conducted in accordance with the established standards

- 12.1 **Training-** The Company shall ensure that the recovery agents and collections team are adequately trained to handle their responsibilities with care and sensitivity, in particular aspects like the applicable Code of Conduct of Recovery Agents, hours of calling, privacy of customer information etc.

Owner	Audience	Frequency	Assessment	Regular Update
Collection Manager	a) New joiners  b) New vendors including its employees  c) Existing employee  d) Existing vendor including its employees	1st day 1st day  Half Yearly basis Half Yearly basis	MCQ based via google form	As and when required

- 12.2 The Company, on its website, will publish up to date details of collection agency name engaged by it. The collection/ recovery agency will be required to observe strict customer confidentiality, quarterly to be given to Product IT team for updation on website.

The Company shall ensure that the terms of contract with its recovery agents do not induce adoption of uncivilized, unlawful and questionable behavior or recovery process. Further, a recovery agent of the Company may engage a sub -agent for collection of dues/ over dues / penal charges from the Company's borrowers, only after receiving consent from the Company.

Any complaint/ grievance against a recovery agent shall be addressed through the customer grievance redressal mechanism adopted by the Company.

- 12.3 **Periodical Review, Monitoring and Control-** The Company shall conduct periodical review of these agencies/ agents as per the Outsourcing Policy adopted by the Company.

Periodicity	Review Authority	Control	Control Description	Owner
Monthly	RMC	Preventive & Detective	a) Training Update (New Joinees and Existing Joinees)  b ) Delinquency Report	Collection manager, head of operation Lega

			c) Collection Report d) Legal cases report e) Agreement and code of conduct	
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**13 Review of the Policy:** The Policy shall be reviewed at least annually or at a shorter interval as and when, required by the applicable rules and regulations or in case of any changes deemed necessary.

--- End of the Policy ---

## **Annexure-1 Collection Telling Script:**

Dear Sir/Mam,

Greetings to the customer (Good Morning/Afternoon/Evening)

Am I Talking to XXXXXXXX Customer Identification (Ensure the receiver is 18+)

This is XXXX from ABC (Recovery Agent), calling on behalf of your Sankalp regarding of your partnership loan (Institute Name).

This call will be recorded for Quality and Training purpose.

Purpose of this call is to inform you that your loan repayment date ( ) with LSP.

Requesting you to please arrange the money today (or date to be agreed with customer), we will share a dedicated Sankalp dashboard link to your email ID and you can pay the EMI amount via Online. Amount will be updated to your Loan account immediately.

- NACH - Also observed that the last XXX -date e-NACH/Payment Mandate is bounced. Please be aware that the e -NACH/Payment Mandate bounce will report on your credit report and impact credit score (CIBIL).

-NACH- Due to this, your future loans will be rejected; therefore, i request you to please maintain a sufficient balance in your bank account one day prior to your EMI date XXX.

I hope you will maintain a sufficient balance in your account next month onwards and no bounces will occur from now onwards.

### **Call Script Strategy Examples Scenario Wise**

**1. Medical:** If a customer is hospitalized or experiencing difficulties and refuses to pay the loan amount, the executive should respond with empathy:

"Sir, I'm really sorry to hear about your situation. How are you feeling now? May I ask about your illness? I understand this is a challenging time, but it's important to repay your loan. After that, you can apply for your next loan, which could help cover your medical expenses or buy medicine. Please keep in mind that extending the payment period could negatively affect your credit profile and score."

**2. Salary Issue:** If a customer says to the executive, "I have not received my salary, and I will pay when I get my salary," the executive should respond with empathy:

"Sir, it's important to make your loan payment on time. If you extend the payment period, it could negatively impact your credit score. You may have friends or family who can help you arrange the amount, and I encourage you to repay the loan now. After that, you can apply for your next loan. "

If the customer responds, "I do not have friends or family," the executive can say:

"Okay, sir. There are other applications similar to ours that allow you to take a loan. You can repay your current loan by taking a loan from another application and then using those amount to repay the current loan amount."

I check executive show sympathy or not. Many customers has many issue so show sympathy to the customer

**Closing script:**

At the end of the call, the executive should properly greet the customer with a phrase such as, "Thank you, sir. Have a nice day," or a suitable greeting in the customer's preferred language. Ensure that the executive delivers this closing greeting appropriately before ending the call.

**Process steps:**

1. Greetings to the customer
2. Customer Identification
3. Tape Disclosure
4. Purpose of the call
5. Educate the customer about the importance of paying EMIs on time
6. Explain how Credit Scores affect your future loan requests.
7. Request to maintain a sufficient balance on the bank account at least 1 day prior.
8. Get the customer's assurance that no bounces will occur in the future.
9. Process Completed.

Note: Ensure customer age is 18+ for sharing the loan details, below 18 should not share any loan details. If the receiver age is below 18, please ask them to handover over the phone to elder person.

**Annexure-2 Legal Notice**

Reference ID:

Date:

Full Name:

Address

Email:

Phone:

Reference: Loan Account Number ID\_\_\_\_\_

Sub: Demand for payment of overdue EMI amount

Dear Sir/Madam,

Under the instructions from our Client SANKALP CAPITAL PRIVATE LIMITED, having its corporate office at ..... also known as “NBFC” (hereinafter referred to as “Our Client”), we do hereby serve you this legal notice as under.

- 1** You had approached our Client for availing loan through their Channel/Disbursement partner “UpCash” an online platform. That, on your request and relying upon the representations and warranties made by you, our Client duly sanctioned and disbursed the loan of Rs. \_\_\_\_\_/- in the designated bank account in accordance with the terms and conditions as specified in the Loan Agreement dated \_\_\_\_\_ and other Loan Documents executed between you and our Client ( “Loan Agreement” ).
- 2** It is pertinent to mention that despite specific representation and agreement to abide by the terms and conditions as set out in the Loan Agreement, you have acted in breach of the terms and conditions of the Loan Agreement and have failed to repay the aforesaid loan in accordance with the terms of Loan Agreement and consequently, your EMI/Overdue amount as on \_\_\_\_\_ is Rs. \_\_\_\_\_/-
- 3** You are, accordingly, hereby called upon to pay the EMI/overdue amount of Rs. \_\_\_\_\_/- as on \_\_\_\_\_ along with all costs, charges and expenses, within a period of Seven (7) days from the date of this notice
- 4** Please note that for any query/clarification regarding the loan details kindly contact (Collection Manager Name) at (Manager Contact No) and ignore this notice if already paid.

## **Annexure-3 Code of Conduct for Recovery Agents**

This Code of Conduct is applicable to and shall be abided by all the operational personnel engaged in collection of dues for the Company and/or on behalf of our Company.

### **I. Contact Methods:**

1. **Telephonic contact:** Telephonic contact to a customer may normally be limited to between 08.00 am to 19:00 pm unless the special circumstances of the customer's business or occupation demands otherwise. However, it may be ensured that a customer is contacted only when the call is not expected to inconvenience him/her. Personnel shall converse in a decent and civilized manner.
  - a. Calls earlier or later than the prescribed hours may be placed only when the customer has authorized to do so in writing or orally.
  - b. Time and number of calls and contents of conversation shall be documented.
  - c. Copies of communications sent to the customers shall be maintained and provided to Company.
  - d. Code to be adopted by the operational personnel during the call:
    - i. The personnel shall identify themselves to the customer and will apprise them of the authority to represent.
    - ii. State the reason for the call.
    - iii. Apprise the customer with all the information regarding dues.
    - iv. Offer to call back, if the customer is busy.
    - v. Talk in language which is most comfortable to the customer.
    - vi. Keep conversation limited to business.
    - vii. Any demeanor that suggests criminal intimidation or threat of violence is strictly not tolerated.
2. **Messaging Contact:** Written messages to the customer through SMS, emails and whatsapp may be made to facilitate the recovery process and offer the necessary assistance.
  - a. Keep conversation limited to business.
  - b. Message shall be decent and civilized.
  - c. Any message that suggests criminal intimidation or threat of violence is strictly not tolerated.

### **II. Secrecy regarding Customer's Loan Arrangement:**

Personnel should maintain the customer's secrecy. However, the customer may be contacted via the reference numbers provided, if the customer is unresponsive and/or the response of the customer is unsatisfactory.

### **III. Gifts or Bribes:**

Personnel should not accept any gifts from customers or bribes of any kind. Any Personnel offered a bribe or payment of any kind by customer must report the same to the Company.

### **IV. Personnel Undertaking:**

Personnel shall resort only to legally permissible activities during the course of recovery. They shall not resort to intimidation or coercion of any kind either verbal or physical against any person in their debt collection efforts, including acts intended to humiliate publicly or intrude the

privacy of the customers' family members, referees and friends, making threatening and anonymous calls or making false and misleading representations.

**V. Grievance Redressal:**

Personnel must provide the borrower upon request, with the Company's grievance redressal contact information.

**VI. Non-Compliance & Disciplinary Action Violations of this Code will result in:**

- a. Immediate termination of the agency's engagement
- b. Blacklisting from future Company assignments
- c. Further action as deemed necessary

The operational personnel authorized to represent the Company for recovery shall be required to adhere to the Code of Conduct and the below mentioned general guidelines provided for collection of dues:

- a. Privacy of the customers to be of utmost importance and to be safeguarded.
- b. All written and verbal communication with the customer shall be in simple business language and civil manners shall be adopted for interaction with customers.
- c. Assistance shall be given to resolve disputes or differences regarding dues in a mutually acceptable and in an orderly manner.
- d. Identity and authority of persons authorized to represent Company for followup and recovery of dues would be made known to the customers at the first instance.
- e. No undue harassment and/or discourteous and disrespectful demeanor towards the
- f. customers.

## **CODE OF CONDUCT FOR FIELD COLLECTION AGENTS**

### **Objective**

This Code of Conduct outlines ethical and professional standards for all field collection agents engaged in the collection of dues from borrowers. The objective is to ensure respectful, lawful, and fair treatment of borrowers while protecting the reputation and compliance obligations of the NBFC.

**Scope:** This Code applies to:

- All in-house and outsourced collection agents
- Activities related to loan recovery, repayment follow-ups, and delinquency management
- Interactions with borrowers or their family members present at the physical location

### **General Conduct Expectations Collection agents must:**

- Always carry and display a valid ID card and authorization letter.
- Be courteous, polite, and professional in their interactions.
- Wear appropriate attire and maintain personal hygiene.
- Avoid any behaviour that is intimidating, threatening, or aggressive.
- Always carry and record the conversation with the borrower.
- Not accept any kind of gift or bribes from the borrower.

### **Borrower Communication**

- Contact timing must be between 8:00 AM and 6:00 PM, unless the borrower consents to other hours.
- Agents must clearly identify themselves, disclose their purpose, apprise borrower of the authority to represent and mention the name of the NBFC and Digital Lending Application they represent.
- Talk in language understandable to the borrower.
- Use of respectful and non-abusive language is mandatory.
- Refrain from making false, misleading, or coercive statements.
- Communication must preserve borrower privacy and dignity.

### **Behavioural Guidelines**

- Do not harass or intimidate borrowers or their family members.
- Do not physically visit a borrower more than once a day, unless requested by the borrower.
- Avoid public shaming or any act that may cause embarrassment to the borrower.
- Do not use threats of arrest or criminal intimidation; only legal remedies should be mentioned accurately.

### **Confidentiality & Data Privacy**

- Borrower data must be handled with strict confidentiality.

- Personal or financial information must not be shared with unauthorized persons.
- Use of recording devices (audio/video) is permitted with explicit prior intimation to the borrower.

### **Use of Technology**

- Collections through digital means (e.g., apps, links, UPI) must be secure and RBI-compliant.
- Field agents must not mislead borrowers into unauthorized digital payments.
- Any data collected digitally must be stored securely and used only for its intended purpose.

### **Training and Certification**

All field agents must undergo mandatory training on:

- RBI regulations on fair practices
- Ethical conduct
- Handling vulnerable or distressed borrowers
- Periodic refresher training must be conducted.
- DRA registered agents ONLY are allowed to do field collection
- Police Verification Certificate to be carried along at the time of Field Collection.

### **Grievance Redressal**

- Borrowers must be informed of their right to raise complaints.
- Agents must provide the borrower upon request, with the NBFC's grievance redressal contact information.

### **Non-Compliance & Disciplinary Action Violations of this Code will result in:**

- Immediate termination of the agent's engagement
- Blacklisting from future NBFC assignments
- Legal action if necessary

All recovery agencies must acknowledge and sign relevant Code of Conduct before undertaking collection duties.

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