

AXIS FINANCE LIMITED

Code of Conduct for Recovery Agents

FY 2026-27

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 and Outsourcing of Financial Services - Responsibilities of regulated entities employing Recovery Agents under reference RBI/2022-23/108 DOR.ORG.REC.65/21.04.158/2022-23 dated August 12, 2022 vide which NBFCs are required to put in place a Board Approved Code of Conduct for Collection/Recovery Agents.

Accordingly, Axis Finance Limited (AFL / the Company) has put in place this document. This Code of Conduct for Collection/Recovery Agents is based of RBI guidelines on Fair Practice Code for NBFCs.

Applicability

The Code is adopted and deemed to be included in the Agreement between Axis Finance Limited (AFL) and the Collection/Recovery agency (Agency). This code will apply to all persons involved in collection/recovery of any loan or other financial product of AFL. This code is applicable to agency and its employees engaged in any collection/ recovery of loan on behalf of AFL.

Any employee of the agency found to be violating this code may be blacklisted and such action taken be reported to AFL from time to time by the agency. Failure to comply with this requirement may result in permanent termination of business of the agency with AFL and may even lead to permanent blacklisting by the industry.

A declaration to be obtained from employees of the agency before assigning them their duties is annexed to this Code.

The Collection-Recovery Agents engaged by AFL must adhere to the below mentioned guidelines in the course of performing their duty as a Collection-Recovery Agent:

Contact with Customer

- i. Customer should be contacted at an appropriate time i.e. from 8:00 a.m. and up to 7:00 p.m.
- ii. 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;
- iii. Customer privacy should be respected;
- iv. Interaction with the customer should be in a polite and civilised manner;
- v. Customer request to avoid calls at a particular time or at a particular place should be honored as far as possible;
- vi. Customer should be provided with the information regarding his dues
- vii. Reasonable notice would be given before repossession of security and its realization;

- viii. All assistance should be given to resolve disputes or differences in a mutually acceptable and in a normal manner;
- ix. During visit to the customer's place for collection of dues, decency and decorum should be maintained;
- x. Inappropriate occasions such as bereavement in the family or such other calamitous occasions should be avoided for making calls/ visits to collect dues.
- xi. Strictly avoid any appearance which may suggest any criminal intimidation or threat or violence.
- xii. A collection agent or its employee/s while collecting the amount due should not:
 - Resort to any false, deceptive or misleading representation,
 - Resort to any intimidation or harassment of any kind either verbal or physical, against any person including acts intended to humiliate publicly or intrude upon the privacy of the debtors family members, referees and friends, sending inappropriate messages either on mobile or through social media, making threatening and/or anonymous calls, persistently calling the borrower and/ or calling the borrower before 8:00 a.m. and after 7:00 p.m.
 - Falsely represent or imply that he or she is connected with or affiliated with any of the governmental or judicial authority,
 - 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.

- xiii. Collection Agents or their employees should be appropriately dressed and well groomed.

Other important aspects

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| i) Appearance | <ul style="list-style-type: none"> • Well groomed with proper haircut • Clean Shave / well maintained beard |
| ii) Dress Codes | <ul style="list-style-type: none"> • 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 |
| iii) Belongings | <ul style="list-style-type: none"> • Receipt Book • Minimal Stationary • Code of Conduct • Employee id • Authorisation letter |
| iv) Confidentiality | <p>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.)</p> |

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| v) 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. |
| vi) Maximize effectiveness | Collection Agent/s will strive to maximize the effectiveness of the visitations by pre visit preparation and result orientation in order to improve results. Will document result in visit/action taken. |
| vii) Proximity | <ul style="list-style-type: none"> • Maintain a reasonable distance from the customer • No physical contact with the customer. • No obstruction to customer movement. |

Customer Communication Guidelines for Representatives of AFL

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

- i. 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.
- ii. Use the language which the customer understands and use the language of customer’s choice. The representative shall not resort to any intimidation or harassment of any kind either verbal or physical, against any person in debt collection efforts, including acts intended to humiliate publicly or intrude upon the privacy of the debtors family members, referees and friends, sending inappropriate messages either on mobile or through social media, making threatening and/or anonymous calls, persistently calling the borrower and/ or calling the borrower before 8:00 a.m. and after 7:00 p.m. for recovery of overdue loans, making false and misleading representations.
- iii. In case any customer resorts to abusive or threatening tactics, the Representatives should document it and promptly inform name of such customer to AFL.
- iv. Representatives are not authorized to send any written communication to customer by any mode (e-mail, letter, electronic messages, social media, etc.) to AFL Customers. If customers are required to be communicated on e-mails / letters / electronic messages, Representatives should send a request to AFL along with reasons and requirement for any written communication.
- v. Representatives should not promise or commit any type of written communication on behalf of AFL.
- vi. Representative should not mislead the customer on the action proposed and consequences thereof.
- vii. Representative 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.
- viii. Without prior permission from AFL, Representative should not make any promise or commitment to any customer on behalf of AFL.

Annexure -1**Declaration-Cum-Undertaking**

(to be obtained by the Collection-recovery agency from their employees)

Re: Axis Finance Ltd.'s Code of Conduct for Collection/Recovery Agent

Dear Sir / Madam,

I am working in your company as a _____.

My job profile, inter-alia, includes collection/recovery of outstanding loan/charges/penalty provided by Axis Finance Limited.

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

I confirm that I have read and understood and agree to abide by the Code of Conduct.

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 _____
