

## DSA CODE OF CONDUCT

### Background:

- The DSA and its Employee/ Representative must abide by the code of conduct prior to undertaking any direct marketing operation and distribution on behalf of the Client organization by signing declaration-cum-undertaking as specified in Annex-1.
- Any Employee / Representative of DSA found to be violating this code may be blacklisted and such action taken be reported to Client Organization from time to time by the DSA in Annex-2 format on email id [abhfl.cpudsaservicedesk@adityabirlacapital.com](mailto:abhfl.cpudsaservicedesk@adityabirlacapital.com) . The same will be consolidated on periodical basis and submitted to NHB by the client organization.
- Failure to comply with this requirement may result in permanent termination of business of DSA with HFC and may even lead to permanent blacklisting.

### 1 Leads:

- DSA and its Employee / Representative shall submit all the leads to the client organization in the format specified in Annex-3 for all cases being submitted to the client organization along with the required documentation.

### 2 Comply with local laws and regulations:

Always demand the highest ethical standards while carrying out the business activities:

- Do not take shortcuts to achieve revenue targets; the penalty for the same shall be severe
- Do not prioritize revenue opportunities over protecting the client's reputation
- Act with honesty and integrity in all circumstances and at all times

### 3 Prevent money laundering and Fraud:

- Comply with local laws and regulations on money laundering and fraud prevention
- Money laundering is used to disguise or launder the proceeds of criminal activity. This undermines client organization's integrity, damages its reputation, deters honest customers and exposes it to severe sanctions
- Checks & Balances have been put in place to prevent such activities & use of client organization for such activities by customers or other participants
- Speak up, if you suspect any actual, planned or potential behavior that may breach any laws and regulations
- Report any breaches of law, regulations, events resulting in reputational risk, frauds or other Criminal acts that you think have not already been reported or investigated appropriately

### 4 Gifts or Bribes:

- Do not accept any gifts or bribes of any kind from prospects/ customers. Further, if offered a bribe payment of any kind by prospects/ customers, it must be reported to his/her Management.
- Do not offer any gifts/ gratitude in cash or kind to the prospects/ customers to solicit business.

## **5 Avoid Conflicts of interest:**

Always take steps to avoid conflicts of interest. Identify potential areas as for conflicts of interest or cases of moral hazard & take action to resolve them in a transparent manner.

- Identify & declare all potential conflicts of interest to management
- Be transparent and open when you identify a potential conflict of interest
- Take prompt action to resolve it

## **6 Resolve customer complaints quickly and fairly**

A happy customer is a loyal customer, & a customer whose complaints are dealt with swiftly is generally a happy customer. Customer complaints must be dealt in:

- Courteous, efficient and timely manner
- In accordance with the client organization's policy

## **7 Do not trade when in possession of insider information or information relevant to a particular deal**

- Always Comply with the Client Organization's Personal Account Dealing Rules
- Insider Trading is dealing in Relevant Investments such as shares, bonds and options whilst in possession of non- public price sensitive information ("insider information"). Insider Trading includes giving tips to another person or dealing on behalf of relatives, friends or any other third parties based on insider information. Act with honesty and integrity

## **8 Respect Confidentiality and protect data**

Comply with standards, local laws and regulations governing confidentiality of information and data protection. Ensure that information is:

- Accurate and up to date, neither biased nor misleading Used only for the purpose for which it was given
- Kept only as long as necessary Held securely
- Only distributed, if proper authority has been given

## **9 No misleading statements/ misrepresentations permitted:**

- Always Comply with local laws, regulations and standards on mis-selling and advertising
- Always make efforts to ensure that the customer understands the product and its risks particularly with complex products
- Do not Mislead the prospect / customer on any product/ service offered by Client Organization
- Do not Mislead the prospect/ customer about their business or organization's name or falsely represent themselves as Client Organization's employee
- Do not make any false/ unauthorized commitment on behalf of Client Organization for any facility/ loan/ service.
- In the present competitive scenario, clear customer communication is an important tool for sustained business growth. Our associates and partners play a pivotal role in selling our products. Proper communication to the customer is critical towards adhering to the 'Treating Customer Fairly (TCF)' principles. Keeping this in mind, we have created a structured mis-selling mechanism to help reduce instances of mis-selling.

Please log on to:

[https://homefinance.adityabirlacapital.com/-/media/ABCL/Home\\_Finance/Regulatory\\_Disclosure/Misselling-Policy.webp?extension=webp](https://homefinance.adityabirlacapital.com/-/media/ABCL/Home_Finance/Regulatory_Disclosure/Misselling-Policy.webp?extension=webp)

to refer to our mis-selling policy.

## **10 Treat people fairly:**

- Treating colleagues with fairness and respect helps them to grow, to make a difference and to win
- Provide a healthy, safe and secure environment for all members of staff. As members of staff, ensure that all of them ok in a healthy and safe manner, ensuring that your actions or omissions do not put others at risk
- Encourage others to work in a healthy and safe manner
- Report all accidents and incidents

## **11 Be open and honest with the regulators:**

- Be committed to a high standard of ethics
- Be open and honest when dealing with the regulators
- Extend full co-operation to regulators at all times

## **12 Respect prospect's privacy:**

- Respect a prospect's privacy. The prospect's interest may normally be discussed only with the prospect and any other individual/family member such as prospect's accountant/secretary/ spouse, as authorized by the prospect.

## **13 Tele-calling a prospective customer (prospect):**

- Register themselves with DoT for all their Promotional/ Telemarketing activities.
- Furnish the list of Tele marketers to TRAI along with the registered telephone numbers used for making telemarketing calls.
- All agents presently engaged by DSA should be registered with DOT as Tele marketers.
- Calls to be made to Perspective customer only if the prospect has expressed desire to acquire any loan or other financial product or service.
- A prospect is to be contacted for sourcing Client Organizations product/ service or related product/ service only when a prospect has expressed desire to acquire any loan or other financial product or services and has given his/her consent for accepting calls on such products/ services.
- No call to be made to prospects flagged in any 'Do not disturb' list.

## **14 When you may contact a prospect on telephone:**

### **Pre- call:**

- No call prior to 0930 hours or post 1900 hours unless specifically requested in writing or orally. However, it may be ensured that a prospect is contacted only when the call is not expected to inconvenience him/ her.
- Calls 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.
- No serial dialing.
- No calling on lists unless the list is cleared by the DSA leader.

### **During a call:**

- Identify yourself, your company and client organization. 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. 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 no, your supervisor's name, 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.
- Provide feedback to the client organization on customers who have expressed their desire to be flagged "Do Not Disturb".
- For products already sold advise the customers to contact the Customer Service Staff of the client organization.

#### **15 Leaving messages and contacting persons other than the prospect:**

- Calls must be first placed to the prospect. In the event the prospect is not available, a message may be left for him/her. The aim of the message should be to get the prospect to return the call or to check for a convenient time to call again. Ordinarily, such messages should be restricted to "Please leave a message that <name of officer> representing XXXX<Client Organization> called and requested to call back at XXXXX (phone number)".
- As a general rule, the message must indicate that the purpose of the call is regarding selling or distributing Client Organization product.

#### **16 Precautions to be taken on visits/ contacts:**

DSA or/and its employees/ representative should

- 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.
- Respect personal space and maintain adequate distance from the prospect/ customer.
- Ensure that prospect/ customer is not visited again within a period of 3 months of expression of lack of interest for the offering by him/ her.
- Don't enter the prospect's/ customer's residence/ office against his/her wishes. Don't use more than one Executive and one supervisor, if required, for the visit
- If the prospect /customer is not present and only family members/office persons are present at the time of the visit, end the visit with a request for the prospect/ customer to call back
- Provide your telephone number, supervisor's name, and contact details or concerned Client Organization officer's contact detail, if asked for by the customer
- Limit discussions with the prospect to the business and maintain a professional distance.

#### **17 Appearance and Dress Code:**

The representative must be in a proper Formal Attire while meeting up with prospect/ customer.

#### **18 Handling of letters and other communication:**

You are not authorized to communicate any details to the prospects on behalf of the client organization. Only communication which is authorized by the client organization has to be shared with the customer using approved branding guidelines (Approval will be provided or to be sought on case to case basis).

## Annex-1 Declaration-Cum-Undertaking

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### 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 prospects of Aditya Birla Housing Finance Ltd.

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. I further confirm that the 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.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Agency Name: \_\_\_\_\_

Seal of DSA: \_\_\_\_\_

Trainer Signature: \_\_\_\_\_

Trainer Employee Code: \_\_\_\_\_

Trainer Name: \_\_\_\_\_

Trainer Company: \_\_\_\_\_

**Annex-2**

**Violation of Code of Conduct / Fraud Report**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Re: Violation of Code of Conduct/ Fraud Report**

Dear Sir,

Employee/ Representative Name: \_\_\_\_\_

Address: \_\_\_\_\_

—

\_\_\_\_\_

—

PAN: \_\_\_\_\_

AADHAR: \_\_\_\_\_

Mobile No.: \_\_\_\_\_

Date of Violation: \_\_\_\_\_

Summary of Violation / Fraud:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Action taken by DSA:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date: \_\_\_\_\_

DSA Code: \_\_\_\_\_

Signature of DSA: \_\_\_\_\_

Seal of DSA: \_\_\_\_\_

**Annex-3**  
**Lead Sheet - Customer Information**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Name of the Applicant/s : \_\_\_\_\_

Mobile Number: \_\_\_\_\_

Email ID: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Select which is applicable :      Looking for property ☐  
   Property identified ☐

Details of property, if identified: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Loan Amount : \_\_\_\_\_

Income Bracket (per annum) :      Upto Rs.5 lakh ☐  
   Above Rs.5 lakh to Rs. 10 lakh ☐  
   Above Rs.10 lakh ☐

Income Based on :      Income Tax Return ☐  
   Other (specify the same) ☐ \_\_\_\_\_

DSA Code: \_\_\_\_\_

Signature of DSA: \_\_\_\_\_

Seal of DSA: \_\_\_\_\_

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**Aditya Birla Housing Finance Limited**

**Regd. Office:** Indian Rayon Compound, Veraval - 362 266, Gujarat.

**Corporate Office:** 9<sup>th</sup> Floor, Tower 1, One World Centre, Jupiter Mill Compound, 841, Senapati Bapat Marg, Elphinstone Road, Mumbai - 400 013.  
Tel No: 91-22-6279 9505 | CIN: U65922GJ2009PLC083779. For more information, please visit: [homefinance.adityabirlacapital.com](http://homefinance.adityabirlacapital.com)

Loans applied or originated or booked with Aditya Birla Housing Finance Limited (ABHFL) are subject to (a) credit appraisal and other internal approvals at the sole discretion of ABHFL and (b) the terms and conditions as agreed under the respective loan agreement, KFS, sanction letter, MITC and other related documents.

We may use the services of our authorised agencies in servicing your requirements.

