



POLICY ON COLLECTION OF DUES

1. INTRODUCTION

The debt collection policy of the **Richa Holdings Limited (“RHL”)** is built around dignity and respect to customers. RHL will not follow policies that are unduly coercive in collection of dues. The policy is built on courtesy, fair treatment and persuasion. The RHL believes in following fair practices with regard to collection of dues and repossession of security and thereby fostering customer confidence and long-term relationship.

In the matter of recovery of dues, the collection code of RHL adheres the extant instructions on Fair Practice Code for lenders (circular DBOD.Leg.No.BC.104/09.07.007/2002-03 dated May 5, 2003) as also BCSBI’s Code of Bank’s Commitment to Customers.

YOU MUST READ, UNDERSTAND AND AGREE TO ABIDE BY THESE GUIDELINES PRIOR TO BEGINNING THE ACTIVITY OF COLLECTIONS ON DEBTS OWED BY THE CUSTOMERS.

The following are core underpinnings of the collection process:

1. Customers deserve to be treated with dignity. Customer Assistance Specialists should always remain professional during telephone conversations and visits. No written or verbal threats, abuse or rudeness is permitted. Customer Assistance Specialists should use only acceptable business language, even if the other party does not.
2. Customer Assistance Specialists deserve to be treated with dignity. They may refer the customer to management, or end calls when a customer becomes abusive or threatening. Customers should be informed prior to termination of such calls. All calls where the customer becomes abusive or threatening should be appropriately documented.
3. All calls being made to the Customer(s) must be recorded as per requirements of the Code of Conduct stipulated by the Reserve Bank of India. No calls may be made by any of the Agents unless there is recording facility for the same, especially by Customer Assistance Specialists from their individual mobile phones unless the said call is absolutely necessitated for checking on the availability of the Customers or for directions to the location of the Customers’. Customer Assistance Specialists should always identify themselves and the company/entity that they represent at the very beginning of every interaction with customers and the Customers must be informed that the call is being recorded.



4. Customers are entitled to privacy. Privacy policies apply to all conversations with agents of the RHL. Unrecorded calls to Customers are to be avoided.
5. Customers should be called only between 0700 Hrs and 1900 Hrs unless exceptional circumstances as described in this Code warrant deviation from this timeframe. Under no circumstances, customer can be called beyond 2100 hrs
6. Customers should be called only to the extent reasonable in the context of the debt and the convenience of the Customer(s) to talk, should be enquired at the beginning of each call. Such conversations should be logged on the system for record purposes.
7. Customer or related party requests for supervisor names or requests to speak with supervisor should always be honored.
8. Update done by the Customer Assistance Specialist on the collection system should be clear, concise and accurate. All attempts, contacts, conversation and actions for a particular case are to be recorded on the collection system.

Why you may contact a customer

A customer is to be contacted for debt collection only under the following circumstances:

1. When not contacting the Customer may lead to the imposition of an additional cost on the customer or may impact the customer's credit history/rating – e.g. customer spending pattern indicates that the customer may be about to breach his/her credit line;
2. When the customer has not paid on payment date (including grace days) and this is likely to impact the customer's credit history and/or is likely to cause a financial loss to RBI.

Which language should we use in the interaction?

A Customer Assistance Specialist should try and use the language with which the customer is comfortable. The Customer Assistance Specialist must not attempt to force the customer to speak in English, if he/she is not comfortable as this may be offensive to some customers. The Customer Assistance Specialist should always try to communicate in the vernacular language.

Leaving messages and contacting persons other than the customer at the telephone numbers/addresses provided by the borrower or made available to RHL, during the time when attempts are being made to contact the borrower

Calls must first be placed to the customer. In the event the customer is not available, a message may be left for the customer to an adult family member. The aim of the message should be to elicit a return call from the customer. Ordinarily, the message text should be



restricted to: “Please leave a message that XXXXX (Name of officer) calling on behalf of RHL and request the customer to call back at (phone number)”.

No misleading statements/misrepresentation are permitted

Customer Assistance Specialists should not –

1. Mislead/misrepresent customer on the action proposed and consequences thereof;
2. Mislead /misrepresent customer about their true business or organization name, or falsely represent or imply that the Customer Assistance Specialist is an attorney (lawyer), government official, officer of any court etc.;
3. Threaten with any dire consequences or imprisonment or even mention imprisonment unless legal action planned or currently underway could result in imprisonment;
4. Threaten with arrest/detention by police or prosecution by any court of law

What is to be done if the customer declines to pay?

If the Customer declines to pay, the consequences of such a decision may be explained to him/her:

1. Impact on credit history;
2. Possible inclusion in negative list of Master Card / Bank records;
3. Possible legal action and its impact;
4. Cost of defending legal action, if such action is contemplated.

What is to be done if the Customer disputes the debt?

The account must be escalated for resolution of the dispute through the Supervisor. In the event, the customer disputes only a part of the debt, collection calling may continue for the balance/undisputed part of the debt.