



Unico Housing Finance Private Limited

CODE OF CONDUCT

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Policy Number: UNICO / Product /001

Prepared and Proposed By	Product Department
Reviewed and Recommended By	Business Committee
Approved By	Board of Directors
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PURPOSE

This policy document talks about the Code of Conduct for the Direct Selling Agencies (DSAs)/Direct Marketing Agents (DMAs)/Unico Growth Agents (UGAs) (*hereinafter referred to as 'Connector'*) whose services are availed by the company to generate leads, market products/ services which amongst other matters require them to identify themselves when they approach the customer for selling products.

SCOPE & APPLICATION

Scope of the Policy covers Code of Conduct to be followed by any person/ legal entity who are directly or indirectly involved in referring, generating leads, marketing and distribution for loan or other financial products or services to UNICO.

APPLIES TO

This policy applies to Direct Selling Agencies (DSAs)/ Direct Marketing Agents (DMAs)/ Unico Growth Agents (UGAs) *hereinafter referred to as 'Connectors'* involved in marketing and distribution of loans and other financial products and services on behalf of Company.

RESPONSIBILITY ASSIGNMENT MATRIX

Responsibility	Product Department
Consulted with	Internal discussions in Management Committee

VERSION CONTROL

Version Number	Date of Approval	Approval Authority
1.0	19 th July 2024	Board of Directors

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GLOSSARY PAGE:

RBI	Reserve Bank of India
NHB	National Housing Bank
Company	Unico Housing Finance Private Limited
NBFC	Non-Banking Financial Companies

A. PREAMBLE

Master Direction - Non-Banking Financial Company - Housing Finance Company (Reserve Bank) Directions, 2021 issued by The Reserve Bank of India stipulated that Housing Finance Companies that if HFCs avail the services of third parties for providing support services, HFCs shall require that such third parties handle customer's personal information (if any available to such third parties) with the same degree of confidentiality and security as the HFCs would. The Directions also stipulates that HFCs shall prescribe a code of conduct for their Direct Selling Agencies (DSAs)/ Direct Marketing Agents (DMAs) whose services are availed to market products/ services which amongst other matters require them to identify themselves when they approach the customer for selling products personally or through phone. Apart from these sourcing agents, there is another category namely connectors, we call them Unico Growth Associates (UGA). Unico Growth Associates also act as connectors within the housing finance ecosystem. They include managers in hardware stores, construction contractors, tile shops, real estate brokers, stamp duty vendors, priests and document writers. These individuals primarily earn from their core businesses, with additional income from referral commissions when they refer customers to Unico. Our Unico relationship managers handle all aspects from document collection to loan disbursement, relieving associates of these tasks. Over a period, this innovative approach will help us to track & assess patterns and guide future strategic sourcing decisions. Further it stipulates that HFCs shall adopt the Model Code of Conducts for Direct Selling Agents (DSAs)/ Direct Marketing Agents (DMAs) and Unico Growth Associate (UGA) with the approval of the Board of the Housing Finance Company.

B. SCOPE AND APPLICABILITY:

The Company, in line with the model code of conduct released by RBI, has framed the Code to be followed by DSAs/DMAs/UGAs hereinafter referred as Connectors involved in marketing and distribution of loans and other financial products and services on behalf of the Company.

Only those DSAs/DMAs/UGAs along with the employees and representatives (hereinafter referred to as 'Connectors') who agree to abide by the Code will be allowed to market and distribute financial products and services for the Company. The Connectors will be required to obtain a declaration as given in Annexure 1, from its employees and representatives that they agree to abide by the Code before engaging them in marketing and distribution of products and services on behalf of the Company.

Any employee/ representative of the Connector who is found to be violating the Code may be blacklisted by the Connector and action taken must be reported to UNICO from time to time. UNICO may terminate or permanently blacklist the Connectors failing to comply with the Code.

C. APPOINTMENT OF DSA/DMA/UGA (CONNECTOR):

Empanelment- DSA/DMA/UGA (Connector) seeking empanelment/engagement with UNICO shall submit the application for empanelment as per prescribed format shared by UNICO. The agreement executed with DSAs/DMAs/UGAs (Connectors) will be sufficiently flexible to allow UNICO to retain appropriate level of control over the outsourcing firm.

Training of DSA/DMA/UGA (Connector)

The Branch Business Head of UNICO at the time of empanelling the Connector & from time to time gives inputs on

- i) The way UNICO functions/products/credit norms
- ii) customer segments & documentation.
- iii) what is expected from the DSA/DMA/UGA (Connector) along with the Do's & Don'ts which acts a suitable training & guideline.

D. CODE OF CONDUCT:

The Code of Conduct to be followed by DSA/DMA/UGA hereinafter referred to as 'CONNECTORS' and its employees/representatives for marketing and distribution of loan and other financial product or services on behalf of the Company to existing and prospective customer is outlined below:

1. CONNECTOR and its employees / representatives will contact the prospective customer however he will not contact anyone who is in the Do not Disturb List.
2. While contacting a prospect on the telephone:
 - a) Telephonic contact must normally be between 09:30 hours and 19:00 hours. However, it may be ensured that a prospect is contacted only when the call is not expected to inconvenience him/her.
 - b) Calls earlier or later than the prescribed period may be placed only when the prospect has expressly authorized the CONNECTOR and its employees/representatives to do so either in writing or orally.
 - c) Residence / Business / Office Address visits must normally be limited between 09:30 hours and 19:00 hours. Visit earlier or later than the prescribed period may be made only when a prospect has expressly authorized CONNECTOR and/or its employees/representatives to do so either in writing or orally.
3. Respect the prospect's privacy
CONNECTOR/and/or its employees/representatives should respect a prospect's privacy and his/her interest may normally be discussed only with the prospect and with any other individual/family member such as the prospect's accountant/secretary/spouse only when authorized to do so by the prospect.
4. Leaving messages and contacting persons other than the prospect
Calls must first be placed to the prospect. If 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 may be restricted to:
"Please leave a message that XXXXX (name of officer) representing UNICO called and requested to call back at ZZZZZ (phone number)". As a rule, the message must indicate that the purpose of the call is regarding selling or distributing a product of UNICO.
5. No misleading statements/misrepresentations permitted. CONNECTOR and/ or its employees/representatives should not:
 - a) Mislead the prospect on any product/service offered by UNICO.
 - b) Mislead the prospect about their business or organization's name or falsely represent themselves as UNICO's employee.
 - c) Make any false/unauthorised commitment on behalf of UNICO for any facility/loan/service.
6. Telemarketing Etiquette:

PRE-CALL

- a) No calls before 09:30 hours or post 19:00 hours unless specifically requested.
- b) No serial calling.
- c) No calling on lists unless list is cleared by UNICO.

DURING CALL

- a) Identify yourself, your company and your principal.
- b) Request permission to proceed;
- c) If denied permission, apologize and politely disconnect;
- d) State reason for your call;
- e) Always offer to call back on landline, if call is made to a cell number;
- f) Never interrupt or argue;
- g) To the extent possible, talk in the language which is most comfortable to the prospect / customer;
- h) Keep the conversation limited to business matters;
- i) Check for understanding of "Most Important Terms and Conditions" by the prospect / customer if he plans to buy the product;
- j) Reconfirm next call or next visit details;
- k) Provide your telephone no., your supervisor's name or UNICO's officer contact details if asked for by the prospect / customer;
- l) Thank the prospect / customer for his/her time.

POST CALL

- a) Prospects / Customers who have expressed their lack of interest for the offering should not be called for the next 3 months with the same offer.
- b) Provide feedback to UNICO on prospects / customers who have expressed their desire to be flagged "Do Not Disturb"
- c) Never call or entertain calls from customers regarding products already sold. Advise them to contact the Customer Service Staff of UNICO.

7. Gifts or Bribes

CONNECTOR and/or its employees / representatives will:

- a) not accept gifts or bribes of any kind from prospects / customers. Further, if he / she is offered a bribe or payment of any kind by the prospect / customer, it must be reported to his/her management.
- b) not offer any gifts / gratitude in cash or in kind to the prospect / customer to solicit business.

8. Precautions to be taken on visits / contacts

CONNECTOR and its employees / representatives should:

- a) respect personal space, maintain adequate distance from the prospect / customer;
- b) 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.
- c) not enter the prospect's / customer's residence / office against his / her wishes.
- d) prospect's / customer's residence / business is visited by not more than one employees / representative of CONNECTOR and one supervisor, if required;
- e) respect the prospect's privacy;
- f) end the visit with a request for the prospect to call back, if the prospect/customer is not present and only family members / office persons are present at the time of the visit.
- g) provide his / her telephone number, name of the supervisor or the concerned UNICO officer's contact details, if asked for by the prospect / customer; and
- h) limit discussions with the prospect to the business and maintain a professional distance.

9. Appearance and Dress Code

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

10. Handling of letters and other communication

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

E. TERMINATION OF DSA/DMA/UGA (CONNECTOR):

UNICO may consider termination or permanent blacklisting of Connectors who fail to comply with UNICO's requirements.

Any violation of the code of conduct will amount to an act of misconduct and the concerned Connector will be subject to disciplinary action/termination.

F. MONITORING MECHANISM:

The Company has the right to conduct audits on the service provider whether by its internal or external auditors, or by agents appointed to act on its behalf and to obtain copies of any audit or review reports and findings made on the service provider in conjunction with the services performed for the HFC.

G. AMENDMENTS/MODIFICATIONS:

This policy will be reviewed on yearly basis by the Board of Directors for any changes required on grounds of regulatory norms, audit observations and business requirements.

ANNEXURE - 1

Declaration-Cum-Undertaking for MODEL CODE OF CONDUCT

Dear Madam/Sir,

Sub: Code of Conduct adherence by "UNICO GROWTH ASSOCIATE"/ ("UGA")/ DIRECT SELLING AGENT("DSA")/DIRECT MARKETING AGENT (DMA) collectively referred as "CONNECTORS" in its engagement with "UNICO Housing Finance Pvt Ltd" ("UNICO"), having its Registered Office at 8th Floor, The Oval No. 10 & 12, Venkata Narayana Road T Nagar Chennai Tamil Nadu; 600017.

I/we are providing services for your company as a Connector. My/Our job profile, inter-alia, includes the following:

- Generate & refer Lead of the prospective/potential borrower of Home Loan (HL)/Loan Against Property (LAP) or any other products to UNICO.
- To advise & guide the customers on the products of UNICO & share details of UNICO Customer care helpline and UNICO Branches to customer for any other information.
- Supporting the Distribution & Marketing mechanism of UNICO

In the discharge of my/our duties, I/we are obligated to follow the Code of Conduct & Other Terms (Annexure-2). I confirm that I have read and understood and agree to abide by the Model Code of Conduct. I further confirm that UNICO has explained the contents of the Code of Conduct in full to me. In case of any violation, or non-adherence to the said Code, UNICO shall be entitled to take such action against me/us as UNICO may deem appropriate.

ANNEXURE - 2

- a. Ownership of Property: I/We acknowledge that all documents obtained by me in the course of my work for clients of UNICO, shall be the property of UNICO's client, and I/We shall retain no ownership, interest, or rights therein.
- b. I/We, will follow and abide to the 'Model Code of Conduct', 'Fair Practices Code' and any other such policy shared by UNICO from time to time.
- c. I/We will generate customer leads by capturing the customer's name, mobile no, date of lead generated, email and willingness to avail loan or not
- d. I/We understand that the UNICO can assign my proposal to any entity/client