

**CODE OF CONDUCT FOR DIRECT SELLING AGENTS/DIRECT MARKETING AGENTS**

Document name	CODE OF CONDUCT FOR DIRECT SELLING AGENTS/DIRECT MARKETING AGENT
Version	V1.0
Document author	Compliance & Risk Team
Release date	26th May 2025
Last updated on	26th May 2025
Review frequency	Annual
Approved by	Board of Directors



---

**TABLE OF CONTENTS**

<b>1. INTRODUCTION</b>	<b>3</b>
<b>2. APPLICABILITY</b>	<b>3</b>
<b>3. FAIR PRACTICES CODE FOR DSA/DMA</b>	<b>3</b>
<b>4. REVIEW OF THE POLICY:</b>	<b>8</b>



**1. INTRODUCTION**

The Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023, as amended from time to time (RBI Master Directions) requires NBFCs to put in place a Board Approved Code of Conduct for Direct Sales Agents (DSA)/ Direct Marketing Agents (DMA). Accordingly, Tenmark Capital Private Limited (herein referred to as 'company') has put in place this document.

**2. APPLICABILITY**

This Code shall be applicable to all the arrangements between the Company and the DSAs/ DMAs. This Code will apply to all the persons involved in marketing and distribution of any loan or other financial product of the Company or third-party having tie-up with the Company. The DSA/ DMA must agree to abide by this code prior to undertaking any direct marketing operation on behalf of the Company. Any DSA/ DMA violating this code may be blacklisted and concerned DSA/ DMA shall promptly report to the Company any violation. Failure to comply with this requirement may result in permanent termination of business of the DSA/ DMA with the Company.

**3. FAIR PRACTICES CODE FOR DSA/DMA**

In line with the Fair Practice Code of the Company, this policy aims to provide all the stakeholders, especially customers and external representatives an effective overview of the practices followed by the Company in respect of the financial facilities and services offered by the Company to its customers. This Fair Practice Code has been revised taking into account the Directions issued by RBI that include guidelines on 'Fair Practice Code for NBFCs.

**I. Objectives**

The objective of the code is:

- To promote good practices and ensure good practices in dealing with customers.
- To promote a fair relationship between the customer and the company.
- To ensure compliance with legal norms in matters relating to recovery of advances.
- To strengthen mechanisms for redressal of customer grievances.

**II. General Fair Practices**

Fair Practices Code is uploaded on the Company's website at [www.tenmarkcapital.com](http://www.tenmarkcapital.com)

**III. Fair Practices for Business Operations****● Loan Intimation**

It is important to make the customer feel comfortable by communicating in a language that he/ she best understands.



The customer should be provided with an acknowledgement of the receipt of the loan application. The time frame within which the loan application will be disposed should also be indicated in the acknowledgement.

• **Do's and Don't's**

<b>Dos</b>	<b>Don'ts</b>
Always be courteous and friendly with the customer.	Do not indulge into any act of forced selling/ mis-selling of products and services to the customer.
Always communicate in the language which is comfortable with the customer while dealing with him/ her during the entire loan application process.	Do not get any blank agreement/ form signed from the customer. Always fill in the details before getting the signatures.
Always explain the application process, documentation, fee & charges, and timelines to the customer properly and correctly.	Do not take any unaccounted cash from the customers for processing of loan application. In case any customer offers you the money, please refuse and report the same to your the Company's counterpart.
Always check the original documents of the customers while collecting the documents.	Do not forge/ miscommunicate any information provided to the customer. Do not mislead the customer on any service/ product offered by the Company
Always perform OSV (Original Seen and Verified) of the documents.	Do not mislead about their business or organization's name, or falsely represent the Company.
Always comply with the Company's policies as communicated by the Company from time to time.	Do not make any false / unauthorized commitment on behalf of The Company for any facility / service.
Always process the case within the acceptable timelines and maintain Turn Around Time.	DSA and its employees / representatives should not accept gifts or bribes of any kind from prospects/ customers. Anyone offered a bribe or payment of any kind by a customer, must report the offer to the

	Service Provider's management who in turn should report the matter to the Company.
Any communication sent to the prospect should only be in the mode and format as approved by the Company	DSA and its employees / representatives should not offer any gifts/ gratitude in cash or in kind to prospect/ customer to solicit business.

● **Code of Conduct for Tele Calling**

- The Company shall not engage any DSAs/ DMAs who do not have any valid registration certificate from Department of Telecommunications (DoT).
- The Company will furnish the list of DSAs/ DMAs engaged by them along with the registered telephone numbers being used by them for making calls to Telecom Regulatory Authority of India.
- A prospect customer is to be contacted for sourcing the Company's product/ service only under the following circumstances:
  - When the prospective customer expresses the desire to avail a facility through the Company's internal site/ digital platforms including mobile applications/ call centre/ branch or through relationship manager.
  - When he/ she has been referred by any existing/ prospective customer or who is an existing customer and has given explicit consent in writing or digitally for accepting calls on other products and services of the Company.
  - When the Prospect name, contact number or address is available and obtained after taking his/ her consent in writing/ digitally on a separate document.
  - When the prospect is an existing borrower of the Company and has given his consent to be contacted for new offers or products.
  - When a prospect is generated, post marketing campaign by the Company or an affiliate DSA/ DMA.
  - The marketing campaign can be an on-call campaign for databases procured by DSA/ DMA.
- DSAs/ DMAs and /or its employees/ representatives shall not call to a person whose name/ number is flagged in any known "Do Not Disturb" register unless otherwise explicit consent is recorded with the Company.
- DSAs/ DMAs shall ensure that the executives/ representatives are trained particularly on aspects such as soliciting customers, hours of calling, maintenance



and privacy of customer information and conveying correct terms and conditions of the respective product.

- Telephonic calls must normally be limited to between 08.00 a.m. and 07.00 p.m. and only when the call is not expected to inconvenience the customer. Calls outside this time slot could be made only on the express request from the customer in writing or orally.
- DSA/ DMA 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 prospect's accountant/ secretary/ spouse only when authorized to do so by the prospect.
- Calls must first be placed to the customer and if not available, a message should be left for the customer to return the call or to check for a convenient time to call again. Such a message must include the name and position of the person calling, empanelled with the Company along with the purpose of the call indicated.
- No serial calling and no calling on lists of prospective customer or existing customers unless cleared by the Company or DSAs/ DMAs leader.
- The DSA/ DMA shall identify themselves, the Company and request permission to proceed. If customers denied to proceed, they shall apologize and politely disconnect the call.
- The reason for the call should be stated and the customer should never be interrupted or argued with.
- The conversation should be in a language which is most comfortable to the customer and limited to business matters.
- The conversation should include checking of understanding of "Most Important Terms and Conditions" by the customer if he/ she plans to buy the product.
- The caller's telephone number, supervisor's name or the Company's officer's contact details should be provided if asked for by the customer.
- The conversation should close with reconfirmation of next call or visit details or flagged as "Do Not Disturb" as requested by the customer and thanks to the customer for the courtesy extended.

- **Code for Personal Meetings**

- Residence/ Business/ Office visit must normally be limited between 09.30 a.m. and 07.00 p.m. Visit earlier or later than the prescribed time period may be made only when prospect has expressly authorized DSAs/ DMAs or/ its employees / representatives to do so either in writing or orally.



- The DSA/ DMA and his representatives/ employees should respect the customer privacy and discuss the deal only with the customer or a person authorized by the customer.
  - Not enter the residence/ office against customer's wishes and not visit in large numbers, i.e., not more than one person and a supervisor, if required.
  - End the visit if the customer is not present after providing the contact details with a request for the customer to call back.
  - Limit discussions with the customer to the business and maintain a professional distance & respect personal space.
  - Provide his/ her telephone number, name of the supervisor or concerned officer of the Company, if asked for, by the customer.
- 
- **Appearance and Dress Code**  
Employees/ representatives of DSA/ DMA must be appropriately attired – men in well ironed trousers & shirt with sleeves preferably buttoned down and women in well ironed formal attire (Saree, suit, etc.) Jeans and/ or T-shirt.
  - **Handling of Letters & other Communication**  
Any communication to the prospects should be only in the mode and format approved by the Company.

#### 4. REVIEW OF THE POLICY:

A review shall be done on a periodic basis, at least annually. Any change in this Policy shall be approved by the Board of Directors of the Company.

