

## **EPIMONEY PRIVATE LIMITED**

### **Policy on Code of Conduct for Direct Selling Agents / Direct Marketing Agents**

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Detailed Policy Document

**EPIMONEY PRIVATE LIMITED**

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<b>Version</b>	<b>Policy changes</b>	<b>Document Author</b>	<b>Approval Date</b>	<b>Approved By</b>
V1	Initial Policy	Epimoney Compliance Team	March 21, 2024	Board of Directors
V2	Annual Review	Epimoney Compliance Team	February 6, 2025	Board of Directors
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## **1. 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 read along with Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025 vide which NBFCs are required to put in place a Board Approved Code of Conduct for Direct Sales Agents (DSA)/ Direct Marketing Agents (DMA). Accordingly, Epimoney Private Limited (the Company) has put in place this document.

## **2. APPLICABILITY**

This Code shall be applicable to all the arrangements between Epimoney Private Limited (“the Company” or “Epimoney”) and the DSAs/ DMAs/ TMEs (Tele-Marketing Executives). This Code will apply to all the persons involved in marketing and distribution of any loan or other financial product of Epimoney or third-party having tie-up with Epimoney. The DSA, its TMEs and field sales personnel, i.e., Business Development Executives (BDEs), must agree to abide by this code prior to undertaking any direct marketing operation on behalf of the Company. Any TME / BDE violating this code may be blacklisted and concerned DSA/ DMA/TME 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/TME with the Company.

## **3. ETHICS AND FAIR PRACTICE CODES**

### **i. Principles:-**

#### **a) Ethics:**

Epimoney expects all its internal employees and external representatives to behave in a professional and ethical manner.

- a. Act with dignity, integrity and competence while dealing with the public, business associates and colleagues.
- b. Behave responsibly while conducting oneself in public so that there is no damage to the reputation of the Company.
- c. Practice and encourage others to behave in a professional and ethical manner.
- d. Use reasonable care and exercise independent professional judgement at work.

#### **b) Protecting the Company’s Interests:**

Employees and external representatives must protect the interests of the Company by avoiding any action that would damage the Company’s goodwill or its reputation. Activities that may harm the Company’s interest can be:

- a. Misuse of information and other assets received as a result of one’s position in the organisation.
- b. Use of customer contacts for other than intended purposes.
- c. Use of electronic facilities provided by the Company for other than intended purposes.

#### **c) Discrimination & Harassment:**

##### **Discrimination:**

- a. All employees and external representatives shall be treated equally.
- b. Any discrimination on the basis of sex, age, religion, or caste is strictly prohibited.

##### **Harassment:**

Harassment against individuals in any form which includes unsolicited, unwelcome, and offensive verbal, physical, visual, or sexual behaviour is strictly prohibited.

#### **d) Abuse of Supervisory Authority:**

Supervisors must uphold the principles of the Code of Conduct through their own behaviour, conduct and communication.

Supervisors cannot use authority to forcibly involve subordinates or junior staff to engage in any unethical or prohibited practices.

**e) Conflict of Interest:**

There is no restriction to refer a family member for job vacancies at Epimoney. Employees and external representatives are, however, required to declare details of their relatives employed with the Company, irrespective of whether they are employed with the Company (permanent or temporary), or on contract.

**f) Safeguarding Classified Company Information:**

Sharing Company-related confidential information with your spouse, family members, acquaintances and others are strictly prohibited.

**g) Media Relations:**

For all Epimoney related references, employees and external representatives are required to redirect all letters, emails, faxes, telephone calls from the media to the designated personnel and communication addresses at Epimoney.

**h) Legal Proceedings**

The Legal department should be consulted before making any commitment to a legal authority on behalf of Epimoney.

**ii. Fair Practice Code for Direct Selling Agents DSAs / Direct Marketing Agents (DMAs)**

This Fair Practice Code is aimed 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’.

**a) Objectives :-**

The objectives of the Code is:

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

**b) General Fair Practices**

Fair Practices Code is uploaded on Epimoney’s website at <https://flexiloans.com/regulatory>.

**c) Fair Practices for Business Operations**

**i. Loan Initiation**

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 information about the receipt of the loan application and how the process of information about the various stages of loan application shall be received by the customer.

**ii. Dos and Don’ts**

<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 Epimoney 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 Epimoney
Always comply with the Company's policies as communicated by the Company from time to time.	Do not mislead about their business or organization's name, or falsely represent Epimoney.
Always process the case within the acceptable timelines and maintain TAT.	Do not make any false / unauthorized commitment on behalf of Epimoney for any facility / service.
Any communication sent to the prospect should only be in the mode and format as approved by Epimoney	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 Epimoney.
	DSA and its employees / representatives should not offer any gifts/gratitude in cash or in kind to prospect/customer to solicit business.

**d) Code for Tele-Calling**

- (i) Epimoney shall not engage any Telemarketers who do not have any valid registration certificate from Department of Telecommunications (DoT).
- (ii) A prospect customer is to be contacted for sourcing the Company's product / service only under the following circumstances:
  - a. When the prospective customer expressed the desire to avail a facility through Epimoney's internal site/ digital platforms including mobile applications/ call centre/ branch or through relationship manager.
  - b. When he/ she has been referred by any existing/ prospective customer or who is an existing customer and has given explicit consent in / digitally for accepting calls on other products and services of Epimoney.
  - c. When the Prospect name, contact no or address is available and obtained after taking his/ her consent in writing/ digitally on a separate document.
  - d. When the prospect is an existing borrower of Epimoney and has given his consent to be contacted for new offers or products.
  - e. When a prospect is generated, post marketing campaign by Epimoney or an affiliate DSA/ DMA.
  - f. The marketing campaign can be an on-call campaign for databases procured by DSA/ DMA.
- (iii) DSAs/ DMAs/TMEs 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 Epimoney.

- a. DSAs/ DMAs/ TMEs 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.
- (iv) Telephonic calls must normally be limited to between 08:00 hrs and 19:00 hrs 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 (Whatsapp / SMS / Email / Letter etc.) or orally.
  - (v) DSA/ DMA/TMEs or/ and 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.
  - (vi) 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 Epimoney along with the purpose of the call indicated.
  - (vii) No serial calling and no calling on lists of prospective customer or existing customers unless cleared by Epimoney or DSAs/ DMAs leader.
  - (viii) TMEs shall identify themselves, the DSA/ DMA, Epimoney and request permission to proceed. If customers denied to proceed, TMEs shall apologize and politely disconnect the call.
  - (ix) The reason for the call should be stated and the customer should never be interrupted or argued with.
  - (x) The conversation should be in a language which is most comfortable to the customer and limited to business matters.
  - (xi) The conversation should include checking of understanding of “Most Important Terms and Conditions” by the customer if he/ she plans to buy the product.
  - (xii) The caller’s telephone number, supervisor’s name or the Epimoney officers contact details should be provided if asked for by the customer.
  - (xiii) 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.
- e) Code for personal meetings**
- (i) Residence/ Business/ Office visit must normally be limited between 08:00 hours and 19:00 hours. 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 (Whatsapp / SMS / Email / Letter etc.) or orally.
  - (ii) 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.
  - (iii) 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.
  - (iv) End the visit if the customer is not present after providing the contact details with a request for the customer to call back.

- (v) Limit discussions with the customer to the business and maintain a professional distance & respect personal space.
- (vi) Provide his/ her telephone number, name of the supervisor or concerned officer of Epimoney, if asked for, by the customer.

**f) Appearance & 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.

**g) Handling of letters & Other communication**

Any communication to the prospects should be only in the mode and format approved by Epimoney.

**4. REVIEW OF POLICY**

The policy will be approved/ amended/ reviewed by the Board of Directors. This Policy shall be reviewed at least once in a year or in between, if required, as per changed market scenario and /or statutory guidelines including applicable directions, instructions, guidelines or orders issued by the RBI.

**Annexure I - Declaration–Cum-Undertaking (applicable for DSAs/DMA/TMEs)**

**Epimoney Private Limited**

7th Floor, South Annexe, Tower 2,  
One World Centre, 841, Senapati Bapat Marg,  
Elphinstone, Saidham Nagar, Lower Parel,  
Mumbai-400013, Maharashtra, India.

**Re: Code of Conduct**

Dear Sir,

I/We am/are associated with your company as a Channel Service Provider/DSA/DMA. My/Our job profile, inter-alia, includes offering, explaining, sourcing, and assisting documentation of products and linked services to prospective customers of Epimoney Private Limited (“**Epimoney**” or “**Company**”).

In the discharge of my/our duties, I / We am/are obligated to strictly follow Epimoney’s model Code of Conduct (“COC”) as annexed hereto and applicable to DSA/DMA, Epimoney’s COC as applicable to DSA/DMA & the Fair Practices Code as available on the website of Epimoney. The copy of the same is available on the website <https://flexiloans.com/regulatory>. In case of any conflict between the model COC annexed hereto and uploaded on the website, the COC available on website shall prevail.

I/We confirm that I/We have read and understood and agree to abide by the Code of Conduct. I/we confirm that we will also ensure adherence to the Code of Conduct by all sub-contractors (if any) used in relation to provide Services to Epimoney.

I/We agree, confirm, and undertake to abide by and ensure compliance of all the amendments/ modification of this Code of Conduct as conveyed to us and/ or updated on the website of Epimoney, from time to time.

In case of any violation, non-adherence to the said Code, you shall be entitled to take such action against me/us as you should deem appropriate.

I hereby agree to abide by all the conditions mentioned above:

Name & Signature of executive \_\_\_\_\_

Date:

Sign & Stamp: