

CODE OF CONDUCT
FOR
DSA / DMA / RECOVERY AGENTS
OF
HYTONE MERCHANTS PRIVATE LIMITED

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Registered Office	87, Diamond Harbour Road, Kolkata - 700038

Board Approved Policy Document

SUMMARY OF POLICY

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1. INTRODUCTION

This Code of Conduct for DSA / DMA / Recovery Agents ("Code") has been adopted by Hytone Merchants Private Limited ("Company" / "Hytone") to ensure that all direct selling agents, direct marketing agents, recovery agencies, recovery agents, collection representatives, tele-callers, field executives and other persons acting on behalf of the Company conduct themselves in a fair, transparent, professional, lawful and borrower-sensitive manner.

The Company recognizes that DSAs, DMAs and Recovery Agents interact directly with existing and prospective customers and therefore their conduct reflects the standards, ethics and regulatory culture of the Company. Any improper conduct, misrepresentation, harassment, misuse of borrower data, coercive recovery action, breach of privacy or unlawful communication by such persons may expose the Company to legal, regulatory, reputational and customer conduct risk.

Accordingly, this Code lays down the minimum standards of behaviour, communication, documentation, borrower interaction, confidentiality, recovery discipline, grievance handling and reporting expected from all DSAs, DMAs and Recovery Agents engaged by or acting on behalf of the Company.

2. REGULATORY BASIS AND BOARD APPROVAL

This Code is framed in accordance with the responsible business conduct principles, fair practice requirements, recovery conduct requirements, outsourcing and agency conduct expectations, and other applicable directions, circulars and guidelines issued by the Reserve Bank of India and other competent authorities from time to time.

The Company shall maintain Board-approved policies and review mechanisms for responsible business conduct, including policies relating to engagement of recovery agents and code of conduct for DSA / DMA / Recovery Agents. This Code has been approved by the Board of Directors and shall be binding on all covered persons.

In case of any inconsistency between this Code and applicable law / RBI directions, the stricter requirement or the requirement under applicable law / RBI directions shall prevail. The Company may amend this Code from time to time to align with business practices, regulatory changes, audit observations and borrower protection requirements.

3. OBJECTIVES

- To ensure that DSAs, DMAs and Recovery Agents act with integrity, fairness, professionalism and transparency.
- To ensure that borrowers and prospective customers are not misled, pressurized, harassed, humiliated or subjected to unlawful conduct.
- To establish clear standards for communication, field visits, tele-calling, documentation and recovery interactions.
- To protect borrower privacy and confidential information.
- To prevent misrepresentation regarding products, charges, overdue amounts, legal consequences or authority of agents.
- To ensure that recovery activity is conducted in accordance with law and the Company's Fair Practice Code and policies.
- To ensure that agents are trained, verified, monitored and held accountable for their actions.

- To provide a framework for reporting, escalation and corrective action in case of misconduct.

4. SCOPE AND APPLICABILITY

This Code shall apply to all individuals and entities engaged by or acting for the Company in the capacity of DSA, DMA, recovery agency, recovery agent, collection agency, collection executive, field executive, tele-caller, supervisor, team leader, consultant, outsourcing service provider or any other representative performing customer acquisition, marketing, lead generation, documentation, customer support, repayment follow-up, collection or recovery activities.

The Code shall apply whether the activity is performed physically, telephonically, digitally, through mobile applications, websites, messaging platforms, call centres, field visits, partner branches or any other channel.

Every agency shall ensure that its employees, officers, representatives, sub-agents, field staff and tele-calling staff comply with this Code. No person shall be allowed to interact with borrowers or prospective customers on behalf of the Company unless he / she has been authorized and trained in accordance with the Company's requirements.

5. DEFINITIONS

Term	Meaning
DSA	Direct Selling Agent engaged to source customers, assist with documentation, explain loan products or support customer acquisition activities on behalf of the Company.
DMA	Direct Marketing Agent engaged in lead generation, marketing, customer outreach, promotion or customer acquisition support for the Company.
Recovery Agent	Any person or entity engaged to assist the Company in repayment follow-up, overdue collection, field visit, settlement coordination, recovery communication or similar activities.
Agent	Collectively means DSA, DMA, Recovery Agent, their employees, representatives, field executives, tele-callers, supervisors and all persons acting on their behalf.
Borrower	A person who has availed a loan from the Company and includes co-borrower, guarantor or person legally liable for repayment, wherever applicable.
Customer	Includes existing borrowers, prospective borrowers, applicants, leads and any other person contacted in connection with the Company's products or services.
Confidential Information	All personal, financial, transactional, credit, contact, KYC, repayment, application, device, account and other information relating to customers or borrowers.

6. GENERAL STANDARDS OF CONDUCT

All Agents shall act in good faith and in the best interest of lawful, fair and responsible customer conduct. Agents shall not do anything that may compromise the dignity of customers, violate customer privacy, misrepresent the Company's products, or damage the reputation of the Company.

- Act honestly, fairly, responsibly and professionally at all times.
- Use only approved communication scripts, product information, recovery messages and customer-facing materials.
- Identify themselves correctly and disclose that they are acting for or on behalf of the Company.

- Provide accurate and complete information and not suppress material facts.
- Treat all customers with dignity, courtesy and respect, irrespective of gender, caste, religion, language, disability, financial condition or social status.
- Maintain customer confidentiality and not disclose customer information to unauthorized persons.
- Avoid any conflict of interest and promptly disclose any personal interest in any customer account.
- Comply with applicable laws, RBI directions, Company policies, this Code and instructions issued by the Company from time to time.
- Promptly report any customer complaint, dispute, fraud suspicion, data breach, misconduct or regulatory concern to the Company.

7. CODE OF CONDUCT FOR DSA / DMA

7.1 Customer Solicitation and Product Representation

DSAs and DMAs shall ensure that customer acquisition and marketing activities are conducted in a transparent and responsible manner. They shall not induce customers through false promises, exaggerated claims, concealed charges, misleading eligibility commitments or statements not approved by the Company.

- Explain the product only as per approved product information and communication material.
- Not guarantee sanction, approval, disbursement, credit limit, waiver, settlement or special treatment unless specifically authorized by the Company in writing.
- Not represent that the Company is bound to grant a loan merely because the customer has submitted an application.
- Not collect any unauthorized processing fee, facilitation fee, commission, cash, gift or personal benefit from the customer.
- Not use the name, logo, brand, letterhead, visiting card or digital identity of the Company except as authorized.
- Not create fake leads, duplicate leads, manipulated applications, forged documents or misleading customer records.
- Not make false statements regarding interest rate, processing charges, penal charges, repayment terms, tenure, foreclosure, prepayment or other charges.
- Not mislead customers regarding regulatory status, approval status, grievance redressal or legal consequences.

7.2 Documentation and KYC Conduct

- Assist customers in submitting documents only through approved processes and channels.
- Not alter, forge, fabricate, manipulate or backdate customer documents.
- Not retain original customer documents unless specifically authorized by the Company and acknowledged by the customer.
- Not upload incorrect, borrowed, fake, tampered or third-party documents.
- Not use customer OTP, password, login credentials, device access or digital signature without proper authorization and consent.
- Immediately report suspected fraud, impersonation, forged documents, identity mismatch or suspicious behaviour to the Company.

7.3 Customer Consent and Privacy

- Customer data shall be collected only for legitimate and authorized business purposes.
- Agents shall not access, copy, store, sell, share, forward, publish or misuse customer information.
- Agents shall not compel customers to share OTP, passwords, personal device access, contact list, gallery, social media credentials or unrelated personal information.
- Agents shall not use customer data for any other business, marketing, cross-selling or personal purpose.
- Any customer data received by Agents shall be returned, deleted or destroyed as directed by the Company.

7.4 Telemarketing Registration and TRAI / DoT Compliance

- The Company shall not engage any Direct Selling Agent, Direct Marketing Agent, tele-calling agency, telemarketer, call centre, lead generation partner, promotional calling partner or any other person / entity for promotional, marketing or telemarketing activities unless such person / entity holds valid registration as a telemarketer with the Department of Telecommunications, Government of India, wherever such registration is required under applicable law, TRAI guidelines or regulatory directions. The Company shall ensure that all DSAs / DMAs / telemarketers engaged for promotional or telemarketing activities are registered and compliant in terms of the guidelines issued by the Telecom Regulatory Authority of India from time to time.
- The Company shall maintain an updated list of all DSAs / DMAs / telemarketers engaged for promotional or telemarketing activities, together with the registered telephone numbers, headers, sender IDs, call numbers or such other identifiers used by them for making telemarketing calls or sending promotional communications on behalf of the Company. Such list and related details shall be furnished to TRAI / DoT or any other competent authority, wherever required under applicable law or regulatory directions.

8. CODE OF CONDUCT FOR RECOVERY AGENTS

Recovery Agents shall conduct repayment follow-up and recovery activity in a lawful, fair, transparent and dignified manner. Recovery Agents shall understand that recovery of dues cannot be pursued by unlawful pressure, intimidation, humiliation, privacy invasion or harassment.

- Recovery Agents shall identify themselves and disclose their authority at the first instance of communication.
- Recovery Agents shall carry a valid identity card, authorisation letter from the Company / recovery agency, and a copy of the notice issued to the borrower whenever they contact the borrower for recovery, field visit or borrower-facing recovery activity. Such notice / authorisation shall include the contact details of the Company and / or recovery agency, as applicable.
- Before or at the time of initiating recovery through a recovery agency / recovery agent, the borrower shall be informed of the name and details of the recovery agency / recovery agent authorised to act on behalf of the Company. If the recovery agency is changed during the recovery process, the borrower shall be informed of such change, and the new agency / agent shall carry the required notice, authorisation letter and identity card.
- Recovery Agents shall provide correct details of overdue amount, payment mode and authorized Company contact details.
- Recovery Agents shall not use threatening, abusive, obscene, defamatory, humiliating or intimidating language.
- Recovery Agents shall not use or threaten use of violence or physical force.

- Recovery Agents shall not harass relatives, friends, neighbours, co-workers, employers or references of the borrower.
- Recovery Agents shall not publish or disclose the name of borrowers as defaulters in any unauthorized manner.
- Recovery Agents shall not send inappropriate, threatening, defamatory, humiliating or misleading messages through SMS, WhatsApp, email, social media or any other channel.
- Recovery Agents shall not make anonymous calls or impersonate any authority.
- Recovery Agents shall not persistently call borrowers in a manner amounting to harassment.
- Recovery Agents shall respect borrower privacy and maintain decency and decorum during every interaction.

9. BORROWER COMMUNICATION PROTOCOL

All communications with borrowers shall be polite, factual, documented and limited to legitimate recovery or customer service purposes. The tone of communication shall not be threatening, sarcastic, humiliating or coercive. Communications shall be made only through approved channels and approved numbers / systems.

- The Agent shall state his / her name, agency name and that he / she is contacting on behalf of the Company.
- The Agent shall verify that he / she is speaking with the borrower or authorized person before disclosing loan details.
- The Agent shall not disclose loan details to third parties without lawful basis or authorization.
- The Agent shall communicate overdue details, repayment modes and timelines accurately.
- The Agent shall record customer disputes, repayment commitments, refusal reasons and complaints accurately.
- The Agent shall escalate unresolved disputes or complaints to the Company promptly.
- The Agent shall not misstate the legal status of the account or create false urgency by unauthorized threats.

All borrower-facing communications by Agents shall be made in the vernacular language or any other language understood by the borrower / customer. English may also be used where the borrower / customer has opted for or is comfortable with English or where English is used as an additional mode of communication, provided that the communication is understandable to the borrower / customer.

Recovery calls or recovery-related communications shall not be made before 8:00 a.m. or after 7:00 p.m. for recovery of overdue loans. No internal approval, business reason, occupation-related reason, portfolio requirement or recovery urgency shall permit recovery contact outside the timing restrictions prescribed under applicable RBI directions or law. Where a stricter timing requirement is prescribed under applicable RBI directions, law, Company policy or product-level process for any borrower category or product, including microfinance borrowers if such product is introduced in future, such stricter timing requirement shall be followed.

10. FIELD VISIT PROTOCOL

Field visits, wherever permitted, shall be conducted only by authorized, trained and verified personnel. Field visits shall be used only for legitimate recovery follow-up, verification, document collection or communication and shall not be used as a method of pressure, intimidation or public embarrassment.

- The field executive shall carry identity card and authorization documents.
- The field executive shall identify himself / herself at the first instance.
- The visit shall be conducted at the borrower's chosen place of contact, and in absence of such place, at residence or place of business / occupation in a lawful manner.
- The field executive shall not enter the premises forcibly or remain at the premises after being lawfully asked to leave.
- The field executive shall not raise voice, gather crowd, threaten, abuse, intimidate or create a scene.
- The field executive shall not disclose debt details to neighbours, security guards, employers, colleagues, relatives or other third parties.
- The field executive shall not seize, remove, damage or threaten to seize any property except through lawful process specifically authorized by the Company.
- The field executive shall record the visit outcome accurately and escalate any dispute, medical emergency, vulnerable borrower situation or complaint to the Company. Where the borrower is physically challenged, visually impaired, a senior citizen, medically distressed, otherwise vulnerable, or requests assistance due to disability or vulnerability, the Agent shall deal with the borrower with additional sensitivity, shall not exert pressure, and shall immediately escalate the matter to the Company for appropriate handling in accordance with the Company's Grievance Redressal Policy and applicable RBI directions.

11. TELE-CALLING AND DIGITAL COMMUNICATION PROTOCOL

Agents conducting tele-calling or digital communication shall comply with calling discipline, data privacy, approved scripts and customer dignity requirements. Digital channels shall not be used to shame, threaten or harass borrowers.

- Use only approved dialers, numbers, email IDs, SMS gateways, WhatsApp accounts, apps or systems.
- Use only approved scripts, templates and customer-facing content.
- Maintain call recordings and logs wherever required by the Company and permissible under law.
- Do not use personal social media accounts for recovery or customer contact.
- Do not create WhatsApp groups, social media posts, broadcast lists or public messages naming borrowers or disclosing loan details.
- Do not send obscene, defamatory, threatening, humiliating, misleading or unlawful messages.
- Do not repeatedly call a borrower in a manner that causes harassment or mental distress.
- Do not contact a borrower through hidden, anonymous, spoofed or misleading numbers.

12. CONFIDENTIALITY AND DATA PROTECTION

All customer and borrower information received or accessed by Agents shall be treated as confidential. The Agent shall use such information only for the specific work assigned by the Company and for no other purpose.

- Do not copy borrower data to personal devices, personal email IDs, unauthorized spreadsheets or private cloud storage.
- Do not share borrower data with other clients, vendors, agents, friends, relatives or unauthorized employees.
- Do not use borrower data for personal gain, marketing, cross-selling or any non-Company purpose.
- Do not retain borrower data after completion or termination of assignment unless specifically authorized by the Company.

- Report any data breach, loss of device, unauthorized access, accidental disclosure or suspected misuse immediately to the Company.
- Return, delete or destroy borrower data as directed by the Company and provide confirmation wherever required.

13. PAYMENT COLLECTION AND SETTLEMENT CONDUCT

Agents shall not collect any amount from borrowers except through authorized payment modes and only in accordance with Company instructions. No Agent shall demand or accept any unauthorized charge, commission, settlement fee, facilitation fee, personal benefit, gift or cash from any customer.

- All repayments shall be made only through authorized payment links, bank accounts, apps or modes approved by the Company.
- Cash collection is prohibited unless specifically permitted under a documented Company process.
- Agents shall not issue unauthorized receipts or acknowledgements.
- Agents shall not promise waiver, discount, settlement, restructuring or credit bureau correction without specific written authorization from the Company.
- Agents shall not divert payments to personal accounts, third-party accounts or unauthorized wallets.
- Any payment dispute or customer claim of repayment shall be escalated immediately for verification.

14. PROHIBITED PRACTICES

The following practices are strictly prohibited and may result in immediate suspension, termination, blacklisting, withholding of payment, indemnity claim, legal action and reporting to appropriate authorities:

- Threatening, abusing, intimidating, humiliating or harassing any customer or borrower.
- Using or threatening to use violence, force or physical harm.
- Making false threats of arrest, FIR, police action, criminal case, passport cancellation, job loss, social media exposure or public shaming.
- Impersonating police, court officer, government officer, RBI official, lawyer, credit bureau official or employee of the Company unless lawfully authorized.
- Contacting relatives, friends, neighbours, colleagues, employers or references for harassment or disclosure of loan details.
- Calling outside permitted hours or persistently calling in a manner amounting to harassment.
- Publishing or circulating borrower names, photographs, documents, contact details or loan details.
- Sending abusive, obscene, defamatory, threatening or misleading messages.
- Creating fake documents, false visit reports, manipulated call logs or incorrect customer records.
- Collecting unauthorized money, personal benefit, cash, gifts or private settlement amounts.
- Misusing customer data or sharing customer information with unauthorized persons.
- Subcontracting work or appointing sub-agents without approval of the Company.
- Continuing to contact a borrower after the Company has instructed hold, recall, dispute review, complaint review or legal review.
- Any conduct that violates applicable law, RBI directions, Company policy or customer dignity.

15. TRAINING, UNDERTAKINGS AND CERTIFICATION

The Company shall ensure that Agents are made aware of this Code and related policies before they are permitted to act on behalf of the Company. Each agency shall be responsible for ensuring that all its employees and representatives are trained and compliant.

- Agents shall undergo training on fair practices, customer conduct, recovery discipline, data protection and grievance escalation.
- Training records shall be maintained by the Company and / or agency, as applicable.
- Agents shall sign an undertaking confirming compliance with this Code.
- Agencies shall certify that their personnel deployed for Company work have been trained, verified and made aware of prohibited practices.
- Refresher training may be conducted periodically or upon regulatory change, audit observation, complaint trend or misconduct incident.
- No untrained or unauthorized person shall be deployed for Company work.

16. MONITORING, AUDIT AND REVIEW

The Company shall monitor Agents on an ongoing basis to ensure compliance with this Code. Monitoring shall consider both performance and conduct. Collection efficiency or lead generation volume shall not override compliance, customer dignity, privacy and fair conduct.

- Sample call audits and communication reviews may be conducted.
- Field visit reports, customer complaints and account notes may be reviewed.
- Training records, undertakings and manpower lists may be verified.
- Agencies may be required to submit periodic compliance certificates.
- The Company may conduct audits, inspections and surprise checks of agency processes and records.
- Repeated complaints, adverse audit findings or data security concerns may result in enhanced monitoring or suspension.

17. BORROWER COMPLAINTS AND ESCALATION

All complaints relating to the conduct of DSAs, DMAs or Recovery Agents shall be treated seriously and shall be handled through the Company's grievance redressal mechanism. The Company shall investigate complaints relating to harassment, threats, abuse, excessive calls, privacy breach, misrepresentation, unauthorized collection, data misuse or any other misconduct.

- Complaints shall be recorded with date, customer details, account details, agent details and nature of grievance.
- Call recordings, communication logs, visit reports and account notes shall be retrieved wherever available.
- The concerned agency / Agent shall be required to provide explanation and records.
- The Company may temporarily suspend the Agent from contacting the customer until review is completed.
- Corrective action shall be taken if misconduct is established.
- Serious matters may be escalated to Senior Management, Compliance, Legal or law enforcement authorities, as applicable.

Where any complaint discloses a prima facie case of serious misconduct, harassment, intimidation, threat, abusive conduct, contact outside permitted hours, public humiliation, privacy breach,

unauthorised collection, coercive recovery practice, misrepresentation, data misuse, impersonation, unlawful pressure or similar serious misconduct, the Company shall immediately restrict or suspend the concerned Agent / agency from further customer contact in the relevant account or generally, as may be appropriate, pending completion of investigation. Such serious complaints shall mandatorily be escalated to the Grievance Redressal Officer / Nodal Officer / Compliance Department / Senior Management, as applicable.

18. CONSEQUENCES OF BREACH

Any breach of this Code shall be treated as a serious matter. Depending on the nature and severity of breach, the Company may take one or more of the following actions:

- warning or advisory to the Agent / agency;
- mandatory retraining;
- temporary suspension from Company work;
- recall of allocated cases;
- removal of individual Agent from approved manpower list;
- withholding or clawback of agency payments;
- termination of agreement;
- blacklisting from future engagement;
- indemnity claim for loss, penalty, damage or regulatory action suffered by the Company;
- legal action or reporting to law enforcement / regulatory authority in serious cases.

The Company shall take appropriate corrective, contractual, disciplinary, legal, reporting or termination action against any Agent / agency / representative found to have breached this Code, applicable RBI directions, Company policy, borrower confidentiality requirements, data protection obligations or lawful recovery standards. Confirmed cases involving violence, threat, intimidation, extortion, impersonation, public humiliation, unauthorised collection, privacy breach, data theft, abusive language, contact outside permitted hours, coercive recovery practice, misrepresentation, fake documentation, unauthorised fee collection or misuse of customer data shall mandatorily result in removal of the concerned person from borrower-facing activity, in addition to suspension, termination, blacklisting, withholding of payment, indemnity claim, legal action, regulatory reporting or other action, as may be applicable.

19. POLICY REVIEW AND REPORTING TO BOARD

This Code shall be reviewed at least annually by the Board of Directors or any committee / authority authorized by the Board. The Code may be reviewed earlier in case of change in RBI directions, change in applicable law, regulatory inspection observation, audit finding, material borrower complaint, data breach, misconduct incident, change in business model or direction from the Board / Senior Management.

A consolidated status report on agency conduct, recovery agent complaints, serious violations, training, undertakings, audit observations, due diligence status and corrective actions may be placed before the Board / Board-approved Committee / Senior Management at regular intervals.