

# Code of Conduct

## Code of Conduct – Summary

1. Comply with laws, regulations: You are individually responsible for complying with the spirit, not just the letter, of laws, regulations.
2. Reject bribery and corruption: You must not give or accept bribes nor engage in any form of corruption.
3. Avoid being compromised by gifts and entertainment: You must not offer, give or accept inappropriate gifts or benefits to or from third parties.
4. Speak up: You must Speak Up if you suspect, or know of, any actual, planned or potential behaviour that breaks, or may break, any laws, regulations.
5. Combatting financial crime: You must comply with laws, regulations on money laundering, terrorist financing and fraud prevention.
6. Avoid conflicts of interest: You are responsible for identifying conflicts of interest. Once these have been identified you must take immediate steps to resolve the problem.
7. Treat customers fairly (TCF).
8. Respect customer confidentiality: Do not disclose customer data unless authorised to do so.
9. Treat people fairly and with respect: All employees are entitled to a safe working environment that is free from discrimination, bullying and harassment.
10. Responsibilities to our communities and regulators: You must be responsive to our communities and demonstrate exemplary governance at all times.

## 1. Comply with laws, regulations

### You must comply with the spirit, not just the letter of laws, regulations

#### Why is this important?

It is everyone's responsibility to ensure compliance with all laws, regulations wherever we operate. Failure to do so may lead to severe damage to our brand, loss of customer, regulatory and public confidence, suspension or withdrawal of the licences we hold, fines and other penalties.

#### What must you do?

1. You must act ethically and honestly at all times.
2. You must comply with the spirit as well as the letter of all relevant legal and regulatory requirements. This means that you must follow the underlying principles of laws and regulations as well as following their exact wording.

Revenue opportunities will not take priority over protecting our reputation and our brand: taking shortcuts to achieve revenue targets is not acceptable.

If you know or suspect that any law, regulation is being broken or ignored you must report the matter immediately to your manager. If this is not possible, you should use the confidential Speaking Up process.

## **2. Reject bribery and corruption**

**You must not give or accept bribes nor engage in any form of corruption**

**Why is this important?**

Bribery and corruption damage our business and conflict with our values. We oppose all forms of bribery and corruption because it is illegal and dishonest, and damages the countries and communities where it occurs. You are in breach of the Code of Conduct and also liable to criminal prosecution if you engage in such practice.

**What must you do?**

1. Do not offer or give any kind of personal payment, benefit or improper advantage to government officials or others with decision-making power.
2. Do not offer to pay a customer or potential customer for their business.
3. Do not request or accept any kind of personal payment, benefit or other improper advantage.

You must immediately report to your manager any suspicion or knowledge about anyone seeking or offering personal payments, benefits or other favours in contravention of the Code.

## **3. Avoid being compromised by gifts and entertainment**

**You must not offer, give or accept inappropriate gifts or benefits to or from third parties**

**Why is this important?**

Gifts and entertainment are not permissible unless they are reasonable in value, consistent with established market practice and appropriate to the occasion in the context of local custom and cost of living. Gifts and entertainment must not be, nor be perceived to be, an inducement for business.

**What must you do?**

1. Ensure that all gifts and entertainment given to or received from third parties, are approved by your Manager.
2. Do not offer gifts and entertainment to government officials, employees of regulatory bodies and employees of majority-government-owned entities without pre-approval of your Manager.
3. Do not receive or offer a cash gift unless it is of small value and is part of a traditional festive custom.
4. Do not offer gifts and entertainment without the approval of your Manager.

If you believe that refusal of a gift or entertainment is not possible, you should promptly inform your manager, ideally before it is accepted.

## **4. Speak up**

**You must Speak Up if you suspect any actual or planned behaviour that may break any laws, regulations**

**What is Speaking Up?**

Speaking Up describes our individual responsibility to report in confidence, actual or suspected misconduct, malpractice and illegal or unethical behaviour by informing senior management of our concerns.

### **Why is this important?**

We are committed to maintaining an ethical culture, one of integrity and compliance with laws, regulation; we also want to avoid control breaches that could lead to fraud. We encourage the practice of Speaking Up by providing staff with confidential and secure means to raise genuine concerns.

### **What must you do?**

There are following ways of Speaking Up

1. Talk to your manager.
2. If you wish to remain anonymous, you can send your concern to our email id "..... ". We will completely protect your anonymity. You do not have to be 100% sure before Speaking Up. If you have a genuine suspicion, you should Speak Up and explain your concerns. These will be recorded, reviewed, and where appropriate, promptly investigated. Feedback will be given provided your name is known.

## **5. Combatting financial crime**

**You must comply with laws, regulations on money laundering, terrorist financing and fraud prevention**

### **Why is this important?**

We recognize the critical importance of protecting the integrity of the global financial system by managing the risks arising from laundering the proceeds of crime, including child pornography, financing terrorism and aiding corruption. Financial crime can severely damage our brand and the communities in which we operate; it undermines our business and exposes us to severe penalties. It is also illegal.

We cooperate with governments, regulators and other financial services providers to safeguard customer accounts from fraud and to help combat organized financial crime. We must also comply with local anti-money laundering laws and regulations.

### **What must you do?**

You must always be alert and recognise that we are all part of the fight against financial crime. To do this you must:

1. Ensure that you participate in all required training and awareness programmes.
2. Establish the identity of our customers from reliable evidence. Know enough about our customers to identify transactions which are inconsistent with their business or personal status, or which do not match the normal pattern of activity.
3. Report suspicious activities immediately to your manager.

## **6. Avoid conflicts of interest**

**You must take steps to avoid conflicts of interest. If you identify potential conflicts of interest, you must take immediate action to resolve them in an open manner**

### **What are conflicts of interest?**

Conflicts of interest can take many forms and arise wherever there are actual or potential competing interests.

Conflicts of interest fall into two broad categories: business and personal.

Business conflicts of interest are those where our company has:

1. A conflict of interest with a customer.
2. Two or more customers who have a conflict of interest.
3. Confidential information about an existing customer that could be used in another customer relationship.

Personal conflicts of interest are those where you may put your own personal interests ahead of those of a customer or the Company.

### **Why is this important?**

Managing conflicts of interest ensures that we always act in the best interests of our customers, avoid legal and regulatory risk and protect the company's brand and our own personal standing.

### **What must you do?**

1. Anticipate and properly identify all potential conflicts of interest.
2. Where a conflict is identified, report it immediately to your manager.
3. Ensure it is resolved in a transparent and open manner.

## **7. Treat customers fairly (TCF)**

### **You must treat customers fairly and meet their needs and expectations**

#### **Why is this important?**

Treating our customers fairly is fundamental to build our long term relationships with customers and help grow the business by enhancing our reputation. It is also an issue of increasing importance to law-makers and regulators.

Mis-selling and misrepresentation fall under the category of treating our customers fairly.

Mis-selling is the sale of a product or service to a customer without regard to the customer's interests. Mis-selling is prohibited; it exposes you and the company to regulatory penalties, reputational damage and legal action by customers.

Misrepresentation is providing inaccurate or misleading information about the company, the products or services which we deal in, such that it influences our customers or stakeholders when they make an informed decision.

#### **What must you do?**

1. Do not mis-sell or misrepresent the products or services we deal in.
2. Respond to customer complaints quickly and fairly.
3. Be responsive to customer feedback on products and services.

The TCF standards which you must follow:

1. Understand both the products and your customers risk appetite, objectives, finances and personal circumstances in order to ensure that we meet customer needs.
2. Provide relevant, complete and clear information to customers to ensure they have the best choice of suitable products.
3. Only sell products or services to customers that meet their needs.

4. Make sure that the customer understands the product and its risks, particularly with complex products and that the product performs as we have led the customer to expect.
5. Keep customers appropriately informed before, during and after the point of sale.
6. Deal with customer complaints in a courteous, efficient and timely manner. Remember to record all complaints appropriately. A responsive approach will impress customers and enhance their perception of us. Always involve your Manager if a complaint alleges illegality or unethical behaviour, or may lead to litigation, compensation or a complaint to the regulator.

## **9. Respect customer confidentiality**

**You must respect laws, regulations governing confidentiality of customer and company information**

### **Why is this important?**

Confidentiality of customer data is fundamental to our relationship with our customers. Leaks or wrongful use of confidential data will undermine customer trust in our company and may lead to regulatory penalties, as well as legal action and damage to our brand.

### **What must you do?**

1. You must exercise care in relation to confidential or sensitive information and data belonging to customers or the company. It should not be lost or viewed in public places.
2. You must not disclose such information unless expressly authorised to do so by the company or by law.
3. If you know or suspect information has been lost or seen by unauthorised individuals (internal or external to the company), contact your Manager immediately.
4. All information in our public and internal communications should be accurate, timely and clear.
5. All customer personal data must be:
  - a. Accurate and up to date, neither biased nor misleading.
  - b. Used only for the purposes for which it was given.
  - c. Kept only as long as is necessary.
  - d. Held securely.
  - e. Adequate and relevant, not excessive and unnecessary.
  - f. Not distributed unnecessarily within the other members of the company.
  - g. Only distributed outside the company, if proper authority has been given and it is legal to do so.

## **10. Treat people fairly and with respect**

**All employees are entitled to a safe working environment that is free from discrimination, bullying and harassment**

### **Why is this important?**

We believe that, if we treat our colleagues and teams as partners, our people will deliver, resulting in sustained, high growth in our business results. These behavioural standards are also a core component of our company's approach to people management and development, as we believe that, adopting a strength-based, inclusive approach will achieve a high performance culture.

### **What must you do?**

You are expected to treat your colleagues with fairness and respect. Adopting these behavioural standards has a number of benefits. For example, providing people with equal opportunities to develop their potential will encourage higher quality and more productive work, lower staff attrition, higher morale and engagement.

## **11. Responsibilities to our communities and regulators**

**You must be responsive to our communities and demonstrate exemplary governance at all times**

### **Why is this important?**

A key part of exemplary governance is maintaining strong and effective relationships with local regulators and governments. Failure to meet our commitments can result in a loss of confidence in us by our regulators, imposition of penalties including fines, loss of licences and damage to the company.

### **What must you do?**

1. You must be open and honest when dealing with our regulators.
2. You must co-operate fully with regulators at all times. Ensure information you provide to the regulator is comprehensive and accurate.
3. You must contact your Manager if you have any questions about how to respond to a regulatory enquiry or relationship.
4. Prepare properly for meetings with the regulator and for regulatory inspections.
5. Do not contact the regulator unless you are authorized to do so
6. If your responsibilities include communicating with the regulator, ensure you are familiar with the current Regulatory Plan in force in the country.

## **12. Ensure Compliance with BCSBI code**

## **13. Tele-calling a Prospect (a prospective customer)**

A prospect is to be contacted for sourcing any product only under the following circumstances:

- When prospect has been referred to by another prospect/customer or is an existing customer who has given consent for accepting calls.
- When the prospect's name/telephone no/address is available and has been taken from one of the lists/directories/databases approved by your Manager/Team leader, after taking his/her consent.
- Follow the DND (SCB & NDNC) scrubbing process.

## 14. Telemarketing etiquettes

### Pre- call:

- No call prior to 0930 hours or post 1900 hours unless specifically requested.
- No serial dialing
- No calling on lists unless list is cleared by team leader.
- Follow the DND (SCB & NDNC) scrubbing process.

### During a call:

- Identify yourself, your company and client organisation. Request permission to proceed; if denied permission, apologize and politely disconnect. State reason for your call.
- Leaving a message:
  - Calls must be first placed to the prospect. In the event 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 XXXX (name of officer) representing XXXX Client Organization called and requested to call back at XXXXX (phone number)”. As a general rule, the message must indicate that the purpose of the call is regarding selling or distributing Client Organization product.
- Always offer to callback on landline, if call is made to cell number.
- Never interrupt or argue, to the extent possible; talk in the language, which is most comfortable to the prospect. Keep the conversation limited to business matters.
- Check for understanding of “Most important Terms and Conditions” by the customer if he plans to buy the product. Reconfirm next call or next visit details. Provide your telephone no, your supervisor's name, contact details if asked for by the customer.
- Thank the customer for his/her time

### Post- call:

**Customers who have expressed their lack of interest for the offering, on a best effort basis, would not be called for the next 3 months with the same offer.**

- Provide feedback to the customers who have expressed their desire to be flagged “Do Not Disturb” informing them about the options on registering on SCB DND registry.
- Do not call or entertain calls from customers regarding products already sold; Advise them to contact the Customer Service Staff of the client organization.

## 15. Precautions to be taken on visits/contacts

### Respect personal space – maintain adequate distance from the prospect:

- Not enter the prospect's residence/office against his/her wishes

- Not visit in large numbers i.e. Not more than one Executive and one supervisor, if required
- Respect the prospect's privacy
- If the prospect is not present and only family members/office persons are present at the time of the visit, end the visit with a request for the prospect to call back.
- Provide your telephone number, supervisor's name, contact details, if asked for by the customer.
- Limit discussions with the prospect to the business – Maintain a professional distance

## **16. Grooming Guidelines**

The underlying code is to appear “Conservative & Formal” which portrays a professional look. The “Do's & Don'ts” for the dress code are as follows:

### **Do's**

- Be appropriately dressed in formal wear.
  - Gents – Formal shirt and trouser along with tie
  - Ladies – Salwar Kameez/Saree/Western formal.
- Avoid light shades of dressing, as they tend to look dirtier.
- Clothes should be well ironed.
- Wear proper plain socks either matching to trouser or shoes.
- Wear proper polished Black/Brown leather shoes.
- Have proper haircuts they should be well combed at all times.
- Shave regularly.
- Trim your nails regularly.
- Maintain proper personal hygiene.
- Use and carry 'Mouth Fresheners' and 'Deodorants' as felt necessary.
- Always carry a handkerchief and comb with you.
- Wear a vest in hot and humid climates.
- Wear a jacket while using 2 wheeler in dusty/polluted environments.
- Eating Paan, smoking or consuming alcohol in the presence of the Customer is strictly prohibited.

### **Don'ts**

- The attire should not be gaudy or fluorescent.
- Sleeves should not be rolled up.
- Jeans/T Shirt/Sleeveless outfits should not be worn.

### **17. Discussing the prospect's interest with third party**

- Respect a prospect's privacy. The prospect's interest may normally be discussed only with the prospect and any other individual/family member such as prospect's accountant/secretary/spouse, authorized by the prospect.

### **18. Handling of letters & other communication**

- Any communication sent to the prospect should be only in the mode and format approved by the client organization.