



FREQUENTLY ASKED QUESTIONS (“FAQs”)

- **What is meaning of Code?**

Code means the “Recovery and Repossession of Secured Assets Policy and Code of Conduct for Collection Agents/ Direct Sales Agents (DSA)/ Direct Marketing Agents (DMA)” of Vivriti Capital Private Limited (hereinafter referred to as “VCPL”/ “Company”).

Copy of the Code has been circulated to all the Representatives.

- **When shall the recovery process commence?**

Any recovery/ collection process will be initiated when customers of the Company have overdue payments to be made with respect to credit facilities availed by them from VCPL.

- **Who shall be considered as Agents under this Code?**

Collection Agents/ Direct Sales Agents (DSA)/ Direct Marketing Agents (DMA)/ Digital Lending Apps (DLA)/ Lending Service Providers (“LSP”) shall be called as Agents.

- **Who all shall be covered under the purview of the Code?**

All employees of VCPL and / or other affiliates and employees, agents and representatives of persons or entities that may be engaged by VCPL to source/ acquire the customer, provide underwriting support, pricing support, servicing, monitoring, collection/ recovery of customer debts/ loans and enforce/repossess security on behalf of VCPL (hereinafter referred as “**Representative**”).

- **What should be the primary mode of communication with a borrower?**

A borrower may be approached through writing (including letters, messages by way of text/ whatsapp or by any other means) or by telephone calls.

- **Is it necessary to store the records of communication with a borrower?**

Yes. All records of written communication in any form with the borrower or related persons shall be saved and stored for future reference.

In addition to the above, phone calls shall be recorded with prior intimation to the borrower and shall be saved in records.



- **Who can contact the borrower?**

Representative of VCPL can contact the customers for collection of dues and/or for enforcement/repossession of security/ secured assets. He/ she shall identify himself/ herself and display the Identity card/ authority letter issued by VCPL upon request of customer.

- **Under what circumstances, family members/ friends/ other individual related to the borrower can be contacted?**

Representative of VCPL may contact any person other than the borrower, within the regulatory provisions, to locate the borrower, for background/KYC verification or such other purpose as may be permitted under the directions/guidelines.

- **Is it mandatory to serve due notice to the borrower in writing before commencing any legal or recovery measures?**

Yes, the Representative shall ensure to serve a written notice to the borrower prior to any legal or recovery measures including enforcement/repossession of the security/ secured assets. In those cases where the borrower or his/ her family members are not to available to receive the notice at the residence of the borrower and/ or the borrower is intentionally avoiding communication from the Representative, then the notice may be affixed on the residential premises of the borrower and the same shall be considered as duly acknowledged by the borrower for all purposes.

Further, serving of such notice over email or any other digital mode, shall be treated at par as serving physical communication to the borrower.

- **How to handle any customer grievances?**

Any questions/ clarifications/ issues raised by the customer should be answered in full by VCPL's Representatives. The customer shall be provided with required information and given assistance to resolve any such issue/ grievances.

Further, accounts with unresolved issues are to be escalated to Grievances Redressal Officer of VCPL through "Lodge Complaint" option available on its website at <https://www.vivriticapital.com/digitalLending.html>.

Any requests from the customer or third-party regarding details of supervisor or requests to speak with supervisor should always be honored by VCPL's Representative. A record of such requests received and resolved or pending shall be updated and sent to VCPL from time to time.



- **What are the contact details of Grievance Redressal Officer (GRO) of the Company?**

Address	Prestige Zackria Metropolitan, No.200/1-8, 2 nd Floor, Block 1, Anna Salai, Chennai, Tamil Nadu 600002
Contact Details (Telephone/Email):	044 40074800/01 grievanceredressal@vivriticapital.com

Further, any change in the office of GRO of the Company shall be updated in the Grievance Redressal Mechanism of the Company available at <https://www.vivriticapital.com/grievances.html>.

- **Does the “Fair Practice Code” of the Company apply to Representatives?**

Yes, the Representatives of the Company shall be abide by the Fair Practice Code of the Company and the same is in addition to this Code of Conduct. A copy of Fair Practice Code is available at website - <https://www.vivriticapital.com/pdf/FPC/FPC%20-%20English.pdf>

- **As a standard practice in all modes of communication, when should the borrowers be contacted by Representatives?**

Representatives shall contact the borrowers between 08:00 A.M and 07.00 P.M. on a given day.

- **In case a borrower specifies a particular time for contacting him/ her or asks not to be contacted during a specified time, is the same required to be considered?**

Yes. The communication shall be aligned to the convenience of the borrower to the extent possible.

- **When should a personal visit to be made to a borrower?**

A personal visit shall be made when other modes of communication fail to elicit a response or to recover the dues. The borrower does not respond to any communications made in writing or over the telephone and is not paying even after intimation regarding dues, in that situation Representative may make personal visits to the borrower's residence/ place of work during reasonable hours of the day.

- **At what time a personal visit may be made at a residence of the borrower?**

Personal visits shall be made at residence during reasonable hours of the day. It is suggested to avoid visits early in the morning and later in the evening.



- **Can communication/personal visit at a residence be made at the time of festivals?**

No. It is advised to avoid any communication and/ or personal visits on days of festivals.

- **What are other occasions when communications/personal visit at a residence may be avoided?**

Bereavement in the family, other times of crisis/adversity, or any other occasions which seem inappropriate shall be avoided to the extent possible. If the Representative comes to know about it at the residence of the borrower, they should recuse themselves politely.

- **If at the residence, borrower is not present and only minors or elderly people are available, what should be done?**

The Representative may request for a call back from borrower and shall recuse themselves. No unwarranted communication shall be made with such members of the family regarding outstanding dues or repayment.

- **Is it allowed to enter the residence of the borrower? In his/ her absence, can the Representative wait at the residence till he/ she comes back?**

While the Representative may enter the premises of the residence of the borrower, it is suggested to limit circumstances where Representative enters the residence (house building). They should not wait at the premises unless a grown-up family member/ housekeeper asks to wait till the borrower comes back. In case the borrower does not come back within a reasonable time, the Representative should recuse themselves.

- **Can the Representative speak to other grown-up people at the residence (Spouse, Parents, Brothers etc.) and communicate to them regarding payment dues?**

If the borrower is available at the residence, Representative shall abstain from any communication with other family members. If not, then they may speak to them. It should be ensured that the communication is limited to conveying the facts and asking to inform the borrower about the same. There should not be any undue coercion, intrusion of privacy of the borrower, intimidation, or harassment in any manner.

- **Can a personal visit be made to the workplace of the borrower?**

Personal visits can be made to workplace of the borrower. However, it is suggested to resort to the same when other modes of communication fail to get a response. At a workplace, the Representatives shall adopt a very good demeanour. No communication regarding the pending dues shall be made to any person other than the borrower at their workplace. Extra care should be taken to ensure that the decorum of a workplace is maintained and conduct of the Representative is in a well dignified manner.



- **At what time a personal visit may be made to the workplace of the borrower?**

Personal visits shall be made to the workplace during reasonable hours of the day. It is suggested to avoid visits early in the morning and later in the evening, keeping in mind the work schedule/ office timings.

- **What type of language is to be used while communicating with the borrower?**

The language shall be the one well understood by the borrower. It should be plain business language. Use of abusive/ foul language is to be strictly avoided in any circumstance. Words carrying different connotations/ double meaning shall not be used.

- **Can social media (Facebook, WhatsApp, Instagram, or any other similar application) be used for communicating with the borrower?**

Yes. Subject to other conditions as mentioned above and ensuring privacy, borrowers can be contacted through their social media accounts. However, all other conditions including timing, foul language and intimidation are to be adhered to. Also, records of the communication shall be stored safely for future reference.

- **Can the information regarding outstanding due amount or other details regarding the facility or the personal details of the borrower be shared *publicly* on social media?**

No. Under no circumstance, any such information shall be publicly shared over social media or any other mode, except in case of any regulatory requirements. No act which tantamount to defamation/ humiliation of the borrower shall be resorted to by Representatives in the process of recovery of loans.



SOME DOs AND DON'Ts FOR REPRESENTATIVES

DOs	DON'Ts
Dress in formal clothes and carry the Company identity card/ authority letter during work hours	Do not get personal, tough, aggressive, or abusive
Be punctual and available at meetings organized by VCPL	Do not use coercion of any sort to make recover of payments
Visit and analyze the customer situation.	Do not humiliate borrowers in public places by discussing their loan over dues with third parties/neighbors.
Do talk in a pleasant, polite, and non-aggressive manner always. Answers should be factual and to the point.	Do not go for collections in a group of more than three staff members at a time.
Collection interactions should be based on fair conduct and persuasion.	Do not visit the customers on weekly or public holidays.
Present all the information required by the customer in an appropriate manner.	Do not pressurize the family members of the customer.
Do answer borrower's query to the satisfaction of the borrower.	Do not humiliate the customer, lose temper, get angry or irritated irrespective of the situation.
Do provide a valid receipt for each loan instalment payment received (partial or full) and record the payment in the borrower's loan passbook/loan card immediately after the transaction and educate customers to keep all the receipts for all future references.	Do not give false promises to customers like promising higher loans in case of part payments or such other incentives.
Visit the customer on dates on which he/she has promised to make payments.	Do not seize customer assets or any personal documents e.g., Voter ID, ration card etc.
Maintain a reasonable distance from the Customer.	Do not share customer's information with other customers.
Should adopt ethical practices in its conduct with borrowers	Do not discriminate based on caste, gender and/ or religion.