CODE OF CONDUCT

for

Adi Chitragupta Finance Limited (ACFL)

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PREAMBLE

Adi Chitragupta Finance Limited (ACFL) is an **NBFC-ACFL (Non-Banking Finance Company – Micro Finance Institution) based in the state of Bihar**, with its **head quarter in Patna**, the state capital. **Certificate of Registration (COR) was issued by Reserve Bank of India, Patna on 24th April 2017.**

ACFL is formed with a focus on providing microfinance services to urban and rural poor, as well as micro and small businesspersons, in the under-served geographies of Northern & Eastern India, starting with Bihar. The geographic areas to be served by ACFL are amongst the poorest in India and also are grossly underserved by formal financial institutions.

ACFL is being conceived as a strong value-based and systems-driven company with a high level of customer focus, strong corporate governance and sound ethical practices. It is being proposed to bring organized financial services to a large number of poor clients who otherwise would not have access to credit and other financial services from any institutional agency.

Microfinance Institutions (ACFL), irrespective of legal forms, seek to create individual and social benefits and promote financial inclusion by providing financial services to clients of financially un-served and underserved households. Over time, the Microfinance Sector has become an integral part of the financial infrastructure for the vulnerable sections of the society in India.

CORE VALUES OF THE COMPANY

The Core Value which guides the ACFL are as follows:

A. INTEGRITY	B. QUALITY OF SERVICE	C. TRANSPARENCY	D. FAIR PRACTICES
To provide low-income clients - women and men and their families, with access to financial services that are client focused, designed to enhance their well-being, and delivered in a manner that is: • ethical, • dignified, • transparent, • equitable and • cost effective.	• To ensure quality services to clients, appropriate to their needs, and delivered efficiently in a convenient and timely manner. • To maintain high standards of professionalism based on honesty, non-discrimination and customer centricity.	• To provide complete and accurate information to clients regarding all products and services offered. • To create awareness and enable clients and all other stakeholders to understand the information provided with respect to financial services offered and availed.	• To ensure that clients are protected against fraud and misrepresentation, deception or unethical practices. • To ensure that all practices related to lending and recovery of loans are fair and maintain respect for client's dignity and with an understanding of client's vulnerable situation.
E. PRIVACY OF CLIENT INFORMATION • To safeguard personal information of clients, allowing disclosures and exchange of relevant information with authorized personnel only, and with the knowledge and informed consent of clients.	**F. INTEGRATING SOCIAL VALUES INTO OPERATIONS** • To ensure high standards of governance and management focused on not only financial performance but also social impact of business. • To monitor and report social as well as financial data. • To assess the social performance and social relevance of the institution from time to time	**G. FEEDBACK & GRM** • To provide clients formal and informal channels for feedback and suggestions. • To consistently assess the impact of services in order to enhance competencies and serve clients better. • To provide a formal and easy to access grievance redress mechanism for clients.	

VALUE STATEMENTS OF ACFL

Mission, Values and Vision

Mission Statement

The Mission defines an institution's reason for existence. It clearly and succinctly identifies what the organisation does, why it does it, and for whom. For ACFL, the mission was formulated as below direct mission statement

"We intent to improve the economic condition of underserved poor through cost effective financial products with exemplary client services along with bringing about financial literacy and skill improvement"

Vision

To promote Financial Inclusion, Skill building and to provide hassle free banking facilities like small loans, small insurance products to the economically backward people either directly or through correspondent banking channel, in a transparent manner.

Goals

i. To cover underserved states like Bihar, Jharkhand, UP and other areas in a phased manner in the endeavour of financial inclusion.
ii. To become an industry major in 5 years' time frame.
iii. To work ethically and transparently towards service to underprivileged.
iv. To become the BC (Business Correspondent) of Banks and start remittance and loan product accounts in times to come.

Organizational Values

Core Values

- Integrity
- Ethics
- Transparency
- Authenticity
- Discipline
- Credibility in approach, action and quality service delivery
- Mutual Respect

OPERATIVE VALUES

ACFL recognises a set of values which are pertinent to achieve the mission of the organisation. Values are deeply held beliefs and are meant to be expressed through day-to-day behaviours of all. The acronym used for values is **RESPECT**, which is:

Responsive & Honest	Prompt responses and immediate attention to every detail regarding matters involving clients as well as organisation by all staff. Be truthful to all.
Enable Integrity	Strengthen and imbibe the culture of morality and ethical work culture.
Superior Teamwork	Ownership of success and responsibility of failure shared by all. Operation with shared vision and togetherness in every aspect related to ACFL.
Professionalism	Punctuality, efficiency and effectiveness shown in all operations by everyone.
Exemplary Governance	A strong participatory senior management and board, working on the principle of staff feedback, quick decision making and visionary leadership.
Cost Effectiveness	Operating at minimum cost by reducing wastage and misuse and by standardisation of processes and systems.
Transparency	Clear and concise communication about terms, conditions and processes to clients as well as across the hierarchy of the organisation.

CODE OF CONDUCT FOR ACFL

ACFL, follows all regulatory norms as well as consumer protection practices (specifically, RBI's Guidelines on Fair Practices issued for NBFCs) laid down by the government and the regulators in both letter and spirit. This Code of Conduct lays down additional requirements to enhance and improve Company's practices. The code of conduct is to be followed by ACFL are as follows.

Application of the Code

This Code applies to the following activities undertaken by ACFL:

1. Providing financial services to clients, individually or in groups either on its own or as an agent.
2. Recovery of credit provided to clients.
3. Collection of thrift from clients, wherever permitted by law.
4. Providing insurance, pension services and remittance services, or any other related products and services.
5. Formation of any type of community collectives including self-help groups, joint liability groups and their federations.
6. Livelihood promotion services and Business
7. development services including marketing of products or services made or extended by the eligible clients or for any other purpose for the welfare and benefit of clients.
8. Finance Plus services provided by ACFL such as health, financial literacy, vocational training etc.

ACFL Agrees to

1. Promote and strengthen the Microfinance movement in the country by bringing low-income clients to the mainstream financial sector.
2. Build progressive, sustainable, and client-centric systems and practices to provide a range of financial services (consistent with regulation) to clients.
3. Promote cooperation and coordination among themselves and other agencies in order to achieve higher operating standards and avoid unethical practices – including competitive business practices - in order to serve clients better.

ACFL, adheres to the core values of Microfinance and abide by the Code of Conduct, as mentioned in the following paragraphs.

A. Integrity and Ethical Behaviour

ACFL designs appropriate Board approved policies and operating guidelines to treat clients and employees with fairness and dignity.	ACFL incorporates transparent and professional governance system to ensure that staff and persons acting on their behalf are oriented and trained to put this Code into practice.	The incentive structure for the staff aims at promoting good business and service practices towards customers.	ACFL educates clients on the Code of Conduct and its implementation

B. Transparency

1. ACFL discloses all terms and conditions to the client, in a form and manner that is understandable, for all services offered. Disclosure is made prior to disbursement in accordance with the Reserve Bank of India's (RBI) Fair Practices Code through the following documents.
    a) Individual sanction letter
    b) Loan card
    c) Loan schedule
    d) Passbook

    Further, disclosure is made through Group/Centre meetings for securing clients' informed consent. (Details can be printed on a paper and all borrowers can sign on the same as acknowledgement of their acceptance).
2. ACFL communicates all the terms and conditions for all products/services offered to clients in the official regional language or a language understood by them.
3. At the minimum, the ACFL discloses the following terms:
    a) Rate of interest on a reducing balance method
    b) Processing fee
    c) Any other charges or fees howsoever described
    d) Total charges recovered for insurance coverage and risks covered
4. ACFL communicates in writing, charges levied for all financial services rendered. Fee on non-credit products/services will be collected only after prior declaration to the client.
5. ACFL declares all interest and fees payable as an all-inclusive Annual Percentage Rate (APR) and equivalent monthly rate.

6. ACFL follows RBI's guidelines with respect to interest charges and security deposit.
7. Formal records of all transactions are maintained in accordance with all regulatory and statutory norms, and borrowers' acknowledgment/acceptance of terms/ conditions forms a part of these records.
8. Where a loan is not sanctioned against an accepted application, ACFL discloses the reasons for rejection.
9. Place in public domain the assessment reports on code of conduct compliance.
10. ACFL puts its annual reports and annual financial statements in public domain (preferably on their websites) immediately after approval of their Board/AGM.

Client Protection

A. Fair Practices

1. ACFL ensures that the provision of micro finance services to eligible clients is as per RBI guidelines.
2. ACFL offers only financial products and services that have been approved by the concerned regulatory authority to their customers (even when acting as agents of other financial institutions).
3. ACFL obtains copies of relevant documents from clients, as per standard KYC norms. Additional documents sought are reasonable and necessary for completing the transaction.
4. The decision on loans is taken within a reasonable time. ACFL indicates the time limit within which customers can expect a decision on their application and if sanctioned, the time taken for disbursement of loan.
5. Products is not bundled. (Bundling in this context means making purchase of a product or service conditional for provision of another product or service). The only exceptions to bundling are made with respect to credit life, life insurance & livestock insurance products, which are typically offered bundled with loans. The term of insurance is transparently conveyed to the client in compliance with RBI & Insurance Regulatory and Development Authority (IRDA) norms. Consent of the client is taken in all cases.

B. Avoiding Over-Indebtedness

1. ACFL conducts proper due diligence as per its internal credit policy to assess the need and repayment capacity of client before making a loan and only makes loans commensurate with the client's ability to repay.
2. If a client has loans from 2 separate MFIs then irrespective of the source of the loans, ACFL shall not be the third lender to that client. This is validated by the Credit Bureau Report prior to extension of the loan.
3. ACFL does not, under any circumstance, breach the total debt limit for any client, as prescribed by RBI. This is validated by the Credit Bureau Report prior to disbursement of the loan.
4. ACFL after due verification of credit bureau reports ensures that loans given on the basis of joint liability of group of borrowers (JLG loan) is restricted to Rs 60,0001 per borrower. Where the loan to a specific borrower exceeds Rs 60,000, or the loan takes the total debt of the borrower above Rs 60,000, such a loan should be given as an individual loan without involving the JLG. ACFL takes necessary steps to have appropriate systems and staff with required competencies to deal with individual loans.

5. ACFL does carry out test checks of efficacy of its processes relating to avoidance of over-indebtedness through additional credit bureau reports on select sample of clients after loan disbursement. The result of this verification is reviewed by the Board periodically.
6. To reduce the errors in identification of borrowers in credit bureau reports, ACFL will move towards adoption of UIDAI number (Aadhaar number) based KYC within a two-year period (from the day this COC comes into effect). As an initial measure, ACFL will ensure that while providing second and subsequent cycle loans the borrowers are identified with their Aadhaar number as part of KYC. The Aadhaar numbers will then be used by the Credit Bureaus for producing CIR. (If use of Aadhaar will be legally allowed in this regard).

C. Appropriate Interaction and Collection Practices

1. ACFL having clearly defined guidelines for employee interactions with clients.
2. ACFL ensures that all staff and persons acting on behalf of the ACFL
   a) Use courteous language, maintain decorum, and are respectful of cultural sensitivities during all interaction with clients.
   b) DO NOT indulge in any behaviour that in any manner would suggest any kind of threat or violence.
   c) DO NOT contact clients at odd hours, as per the RBI guidelines for loan recovery agents.
   d) DO NOT visit clients at inappropriate occasions such as bereavement, etc., to collect dues even if two or more successive repayments are not received
3. ACFL provides a valid receipt (in whatever form decided by the Company) for each and every payment received from the borrower and record the payment in the loan passbook/loan card with the client.
4. ACFL having a detailed Board approved process for dealing with clients, at each stage of default.
5. ACFL does not collect shortfalls in collections from employees, and their HR policies must categorically denounce this practice. However, in proven cases of frauds by employees the Company can recover the money from employees.

D. Privacy of Client Information

ACFL keeps personal client information strictly confidential. Client information may be disclosed to a third party subject to the following conditions:

a) Client has been informed about such disclosure and prior permission has been obtained in writing.
b) The party in question has been authorized by the client with intimation to the ACFL to obtain client information from the ACFL.
c) It is legally required to do so.

d) This practice is customary amongst financial institutions and available for a close group on reciprocal basis (such as a credit bureau) provided that the i) clients' prior consent has been obtained and ii) the receiver of such information is also bound by these conditions to keep the client information confidential.

E. Governance

ACFL incorporates a formal governance system that is transparent and professional, and adopts the following best practices of corporate governance:

1. ACFL observes high standards of governance by inducting persons with good and sound reputation as members of Board of Directors/Governing body and seek to comply with the best standards stipulated in Companies Act, RBI regulations and the Stock Exchange regulations for listed companies (even though It may not be companies or listed in a stock exchange).
2. ACFL will endeavour to have independent directors to the extent of 1/3rd of the Governing Board.
3. ACFL having a Board approved debt restructuring product/program for providing relief to borrowers facing repayment stress.
4. ACFL will appoint an audit committee of the Board with an independent director as chairperson
5. ACFL ensures transparency in the maintenance of books of accounts and reporting/ presentation and disclosure of financial statements by qualified auditor/s.
6. ACFL puts in best efforts to follow the Audit and Assurance Standards issued by the Institute of Chartered Accountants of India (ICAI).
7. ACFL places before the Board of Directors, a compliance report indicating the extent of compliance with this Code of Conduct and the functioning of the grievance redressal mechanism at various level of management, specifically indicating any deviations and reasons therefore, at regular intervals, as may be prescribed by Board.

F. Recruitment

The code covers all ACFL staffs.

1. As a matter of free and fair recruitment practice, there will be no restriction on hiring of staff from MFIs by legitimate means in the public domain like general recruitment advertisements in local newspapers, web advertisements, walk-in interviews, etc.
2. Whenever ACFL seeks to recruit an employee in another MFI, it will be mandatory to seek a reference check from the current employer. The reference check will be sought from current employer only after an offer is made and an offer letter is issued to the prospective employee.
3. ACFL will respond to the reference check request from another MFI within two weeks.

4. ACFL honours notice period as contractually agreed between employer and employee subject to a minimum of one month for an outgoing employee.
5. ACFL shall not recruit an employee of another MFI, irrespective of the grade/level of the employee, without the relieving letter from the previous employer. An exception can however be made in instances where the previous employer fails to respond to the reference check request within 20 days. ACFL shall provide such relieving letter to the outgoing employee in case he/she has given proper notice, handed over the charge and settled all the dues towards the ACFL, except in proven cases of fraud or gross misconduct by the employee.
6. Whenever ACFL recruits from another MFI, at a level up to the Branch Manager position, the said employee shall not be assigned to the same block where he/she was serving at the previous employer, for a period of 1 year.

G. Client Education

1. ACFL having a dedicated process to raise clients' awareness of the options, choices and responsibilities vis-à-vis financial products and services available.
2. New clients must be informed about the organization's policies and procedures to help them understand their rights as borrowers.
3. ACFL ensures regular checks on client awareness and understanding of the key terms and conditions of the products/ services offered / availed. Customer feedback are gathered, as part of internal audit systems or through some other regular monitoring such as a system of calls to random sample of customers. The feedback from such monitoring are reported to the board periodically.

H. Data Sharing

1. ACFL shares complete client data with all RBI approved Credit Bureaus, as per the frequency of data submission prescribed by the SRO.
2. ACFL provides the data and information called for by all supervisory and regulatory bodies including the SRO.

I. Feedback/ Grievance Redressal Mechanism

1. ACFL established a dedicated feedback and grievance redressal mechanisms to correct any error and handle/receive complaints speedily and efficiently. The minimum standards required of the GRM are i) an easy procedure for recording a complaint over phone - with details of phone numbers printed on loan cards, ii) a staff assisted procedure at the branch for recording complaints/ grievances, iii) acknowledgement for receipt of the complaint iv) a time limit for resolution of the complaint, v) a clear appeal procedure in case where customer is not satisfied with the solutions offered by the ACFL, vi) nodal staff in the branch

to guide customers to lodge grievance with RBI or SRO, vii) assurance to customers that they will be treated fairly despite the complaint/grievance being lodged.

2. ACFL informs clients about the existence and purpose of these mechanisms and how to access them.
3. ACFL designates at least one grievance redressal official to handle complaints and/ or note any suggestions from the clients and make his/ her contact numbers easily accessible to clients.
4. ACFL displays contact number and address of SRO (as applicable) nodal official and details of the grievance redressal system of the SRO.
5. ACFL having an appropriate mechanism for ensuring compliance with the Code of Conduct.
6. Where complainants are not satisfied with the outcome of the investigation conducted by the concerned officer into their complaint, they shall be notified of their right to refer the matter to the grievance redressal mechanism established by the SRO, as applicable.
7. ACFL prepares a monthly report on grievances received, resolved and pending for a senior management review and periodic reports to the board.

CLIENT PROTECTION GUIDELINES

The CPG states that ACFL shall display the Client Protection Code in all branches and offices in English and the local language, in plain view.

1. Shall endeavour to provide micro finance services to all eligible clients, as per RBI guidelines.
2. Shall educate clients, staff, and any persons acting on their behalf on the Code of Conduct and its implementation.
3. Shall disclose all terms and conditions to the client for all products/services offered, prior to disbursement, in accordance with the Reserve Bank of India's (RBI) fair practices code through the following documents.
   a) Individual sanction letter
   b) Loan card
   c) Loan schedule
   d) Passbook

   In addition, disclosure is be made through Group/Centre meetings for securing clients' informed consent. (Details can be printed on a paper and all borrowers can sign on the same as acknowledgement of their acceptance).
4. Shall communicate all the terms and conditions for all products/services in the official regional language or a language understood by clients.
5. Shall disclose the following terms:
   a) Rate of interest on a reducing balance method.
   b) Processing fee
   c) Any other charges or fees howsoever described
   d) Total charges recovered for insurance coverage and risks covered
6. Communicates in writing, charges levied for all financial services rendered.
7. Does not collect fee on non-credit products/ services without prior declaration to the client.
8. Declares all interest and fees payable as an all-inclusive APR and equivalent monthly rate.
9. Follow RBI's guidelines with respect to interest charges and security deposit.
10. Obtains copies of relevant documents from clients, as per standard KYC norms. Additional documents sought must be reasonable and necessary for completing the transaction.
11. Discloses reasons for rejection of loans to applicants.
12. Indicates the time limit within which applicants/customers can expect a decision on their application and if sanctioned, the time taken for disbursement of loan.

13. Does not bundle products, except for credit life, life insurance & live-stock insurance products. The terms of insurance is transparently conveyed to the customer in compliance with RBI & IRDA norms. Consent of the client is taken in all cases.
14. Conducts proper due diligence to assess the need and repayment capacity of client before making a loan and only make loans commensurate with the client's ability to repay.
15. Does not be the 3rd lender to a client if the client has loans from 2 other lenders (irrespective of the source of loan).
16. Does not breach the total debt limit for any client, as prescribed by the RBI or Central/ State Government or SRO.
17. Ensures that all employees follow company guidelines for interaction with clients.
18. Ensures that all staff and persons acting for the ACFL or on behalf of the ACFL:
    a) Use courteous language, maintain decorum, and are respectful of cultural sensitivities during all interaction with clients.
    b) DO NOT indulge in any behaviour that in any manner that would suggest any kind of threat or violence to clients.
    c) DO NOT contact clients at odd hours, as per the RBI guidelines for loan recovery agents.
    d) DO NOT visit clients at inappropriate occasions such as bereavement, sickness, etc., to collect dues.
19. Provides a valid receipt (in whatever form decided by the ACFL) for each and every payment received from the borrower and record the payment in the loan passbook/loan card with the client.
20. Follows approved company procedure to deal with client default sensitively.
21. Follows the debt restructuring mechanism adopted by the ACFL for borrowers under liquidity stress.
22. Keeps personal client information strictly confidential.
23. Discloses client information to a third party only under the following conditions:
    a) Client has been informed about such disclosure and permission has been obtained in writing.
    b) The party in question has been authorized by the client to obtain client information from the ACFL.
    c) It is legally required to do so.
    d) This practice is customary amongst financial institutions and available for a close group on reciprocal basis (such as a credit bureau) provided that the i) clients' prior consent has been obtained and ii) the receiver of such information is also bound by these conditions to keep the client information confidential.

24. Follows board approved process to raise clients' awareness of the options, choices, and responsibilities vis-à-vis financial products and services available.
25. Informs all new clients about the organization's policies and procedures.
26. Informs clients about the existence and purpose of feedback mechanisms and how to access them.
27. Gets an assessment of compliance with the code of conduct carried out by an agency approved by the SRO, once in every 12 to 18 months and place the assessment report in public domain.

INSTITUTIONAL CONDUCT GUIDELINES

The ICG states that all MFIs, regardless of their form:

1. Shall have an appropriate mechanism for ensuring compliance with the Code of Conduct.
2. Shall have appropriate policies and operating guidelines to treat clients and employees with fairness and dignity.
3. Shall maintain formal records of all transactions in accordance with all regulatory and statutory norms, and borrowers' acknowledgement/acceptance of terms/ conditions must form a part of these records.
4. Shall have detailed board approved process for dealing with clients, at each stage of default.
5. Shall not collect shortfalls in collections from employees except in proven cases of frauds by employees.
6. ACFL will ensure that their competitive practices are fair and customer friendly.
7. ACFL will avoid geographies where there is a large presence of other MFIs with significant business volumes.
8. Shall have a Board approved debt restructuring product/program for providing relief to borrowers facing repayment stress.
9. Shall seek a reference check from previous employer for any new hire.
10. Shall provide within 20 days the reply to the reference check correspondence for another MFIs.
11. Shall honour notice period as contractually agreed between employer and employee subject to a minimum of one month for an outgoing employee.
12. Shall not recruit an employee of another MFIs without the relieving letter from the previous employer except where the previous employer fails to respond to the reference check request within 20 days.
13. Shall not assign a new employee recruited from another MFI to the same area he/she was serving at the previous employer, for a period of 1 year. This restriction applies to positions up to the Branch Manager level.
14. Shall have a dedicated process to raise the client's awareness of options, choices, rights and responsibilities as a borrower and shall conduct regular checks on client awareness and understanding of the key terms and conditions of the products/ services offered / availed.
15. Shall agree to share complete client data with all RBI approved Credit Bureaus, as per the frequency of data submission prescribed by the SRO.
16. Shall establish dedicated feedback and grievance redressal mechanisms to correct any error and handle/receive complaints speedily and efficiently.

17. Shall designate an official to handle complaints and/ or note any suggestions from the clients and make his/ her contact numbers easily accessible to clients.
18. Shall undertake remedial measures in respect of deficiencies found in COC observance during assessments carried out.

COMPANY'S COMMITMENT TO CUSTOMERS

We, as part of the Microfinance Industry promise the customers that we will:

1. Provide micro finance services to all eligible clients in complete compliance with RBI guidelines.
2. Educate clients on the Code of Conduct and its implementation.
3. Disclose all terms and conditions to the client for all products/services offered, prior to disbursement, in accordance with the Reserve Bank of India's (RBI) fair practices code through the following documents.
    a) Individual sanction letter
    b) Loan card
    c) Loan schedule
    d) Passbook
4. In addition, disclose the terms and conditions in local language through Group/Centre meetings and secure their consent. (Details can be printed on a paper and all borrowers can sign on the same as acknowledgement of their acceptance).
5. Communicate all the terms and conditions for all products/services in the official regional language or a language understood by clients.
6. Disclose the following terms of loans:
    a) Rate of interest on a reducing balance method
    b) Processing fee
    c) Any other charges or fees howsoever described
    d) Total charges recovered for insurance coverage and risks covered
7. Declare all interest and fees payable as an all-inclusive APR and equivalent monthly rate communicate in writing, charges levied for all financial services rendered.
8. Not collect fee on non-credit products/ services without prior declaration to the client.
9. Follow RBI's guidelines with respect to interest charges and security deposit.
10. Obtain copies of relevant documents from clients, as per standard KYC norms. Any additional documents we ask for, will be reasonable and necessary for completing the transaction.
11. Disclose reasons for rejection of loans to applicants.
12. Indicate the time limit within which applicants/ customers can expect a decision on loan application and if sanctioned, the time taken for disbursement of loan.
13. Not bundle products, except for credit life insurance, life insurance & live-stock insurance products. The terms of insurance will be transparently conveyed to the customer and will comply with RBI & IRDA norms. Consent of the client will be taken in all cases.

14. Conduct proper due diligence to assess the need and repayment capacity of customer before making a loan and must only make loans commensurate with the client's ability to repay.
15. Not be the 3rd lender if the customer already has loans from 2 other lenders (Irrespective of the source of loan).
16. Not breach the total debt limit for any client, as prescribed by the RBI or Central/State Governments.
17. Ensure that all our employees follow company guidelines for interaction with customers.
18. Ensure that all staff and persons acting on our behalf:
    a) Use courteous language, maintain decorum, and are respectful
    b) DO NOT indulge in any Behaviour that in any manner that would suggest any kind of threat or violence to clients.
    c) DO NOT contact clients at odd hours, as per the RBI guidelines for loan recovery agents.
    d) DO NOT visit clients at inappropriate occasions such as bereavement, sickness, etc., to collect dues.
19. Provide a valid receipt (in whatever form decided by the ACFL) for each and every payment received from the borrower.
20. Follow approved company procedure to deal with any default sensitively.
21. Follow the debt restructuring mechanism approved by our board for borrowers under liquidity stress.
22. Keep the collected client information strictly confidential.
23. Disclose client information to a third party only under the following conditions:
    a) Client has been informed about such disclosure and permission has been obtained in writing.
    b) The party in question has been authorized by the client to obtain client information from the ACFL.
    c) It is legally required to do so.
    d) This practice is customary amongst financial institutions and available for a close group on reciprocal basis (such as a credit bureau) provided that the:
        i. Customer's prior consent has been obtained and ii) the receiver of such information is also bound by these conditions to keep the client information confidential.
24. Follow board approved process to raise customers' awareness of the options, choices, and responsibilities vis-à-vis financial products and services available.
25. Inform all new clients about the organization's policies and procedures.
26. Inform clients about the existence and purpose of feedback mechanisms and how to access them.

CUSTOMERS' RIGHTS

As a customer you have the following rights to:

1. Ascertain the terms and conditions of the loan from the field officer or the branch staff – either orally or in writing
2. Ascertain the balance outstanding, amount of loan and interest repaid and other information relating to an existing loan or a loan that has been closed not earlier than 12 months back either orally or in writing.
3. Receive a loan sanction letter or loan card indicating all the terms of the loan
4. Get a passbook in any suitable form indicating the periodic loan instalments repaid and the balance outstanding
5. Get a receipt for any payments including loan instalments made to the staff of ACFL
6. Access the officials indicated in the loan-card or other material of the ACFL for making complaints, registering grievances – this can be done in writing or over phone
7. Receive assistance from a designated staff of the ACFL in the branch for lodging a complaint or grievance
8. Receive an acknowledgement of a complaint or grievance lodged by you with a time limit indicated for resolution
9. Receive a reply to your complaint/grievance within the prescribed time limit – which will be informed to you by the ACFL when you lodge the complaint
10. Appeal to a higher level in case you are not satisfied with the response or the solution provided on your complaint
11. Appeal to the nodal officer of RBI in any case, regardless of our grievance procedure