

# Code of Conduct SOP

**For: Apricity Finserv Pvt LTD**

**Effective Date: 01 Mar'26**

**Approved By: Board of Director**

**Review Frequency: Annual**

## **1. Purpose**

The Company adopts this Code of Conduct to establish clear standards of ethical behavior, professional discipline, integrity, and accountability applicable to all employees. This Code is intended to protect and promote the interests of the Company, its employees, customers, and other stakeholders, while fostering a culture of responsibility and compliance.

It ensures:

- Ethical business practices
- Regulatory compliance
- Transparency and accountability
- Protection of stakeholder interests
- Adherence to RBI guidelines and applicable laws

## **2. Scope**

This Code shall apply to:

- Senior Management
- All permanent and contractual employees
- Business correspondents, agents, and all outsourced partners acting on behalf of the Company

All covered persons are expected to adhere to the standards set out in this Code while performing their roles and responsibilities.

## **3. Regulatory Framework**

This Code is framed in accordance with:

- Guidelines issued by Reserve Bank of India
- Fair Practices Code for NBFCs
- Internal policies of the Company

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#### **4. Core Ethical Principles**

All personnel shall adhere to the following principles:

##### **4.1 Integrity**

- Act honestly and ethically in all dealings
- Avoid misrepresentation of products/services

##### **4.2 Professional Conduct**

- Maintain high standards of professionalism
- Avoid harassment, discrimination, or abusive behavior

##### **4.3 Transparency**

- Provide clear and accurate information to customers
- Disclose all fees, charges, and terms

##### **4.4 Confidentiality**

- Protect customer and company data
- Do not disclose confidential information without authorization

#### **5. Conflict of Interest**

Employees must:

- Avoid situations where personal interest conflicts with company interest
- Disclose any potential conflict to HR/Compliance
- Not engage in competing business activities

#### **6. Anti-Bribery and Anti-Corruption**

- No employee shall offer, give, solicit, or accept bribes
- Facilitation payments are strictly prohibited

#### **7. Fair Lending & Customer Protection**

- Follow RBI's Fair Practices Code
- No coercive recovery practices
- Transparent loan documentation

- Provide grievance redressal mechanism
- Respect borrower dignity

#### **8. Misrepresentation / Improper Conduct**

- a. Yelling or screaming at a customer, using rude or abusive language, sarcastic remarks, or repeatedly interrupting the customer in a disrespectful manner.
- b. Call avoidance, including intentionally disconnecting customer calls or deliberately providing incorrect information to end a call without assisting the customer
- c. Making disparaging or negative remarks about the Company, its affiliates, or its products with the intent to harm the Company's reputation or create a negative impression
- d. Unauthorized disclosure or release of confidential information will result in dismissal.
- e. Inappropriate fraternization or unprofessional relationships with customers or any external entities.
- f. Intentionally placing a customer on hold and disconnecting the call or forcing the customer to hang up.
- g. Making untrue or deceptive statements to mislead or entice a potential customer to make a purchase

#### **9. Data Protection & Information Security**

- Comply with IT and cybersecurity policies
- No unauthorized sharing of customer data
- Secure storage of physical and digital records

#### **10. Workplace Conduct**

- Equal opportunity employer
- Zero tolerance for harassment
- Follow POSH policy
- Maintain respectful workplace culture

#### **11. Use of Company Assets**

- Use company resources only for official purposes
- Protect IT systems from misuse
- No unauthorized software installation

## 12. Whistleblower Mechanism

- Employees may report unethical practices confidentially
- Protection against retaliation
- Complaints may be submitted to Compliance Officer or Audit Committee

## 13. Permissible Calling Hours

Regulated entities (including NBFCs) should contact borrowers only between:

**8:00 AM and 7:00 PM**

This is mentioned under:

- **Fair Practices Code for NBFCs**
- RBI's guidelines on **Recovery Agents**
- Customer harassment prevention norms

Calling outside these hours may be treated as:

- Harassment
- Unfair practice
- Violation of regulatory guidelines

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## I Important Points

- Calls outside 8 AM – 7 PM are generally not permitted unless specifically requested by the borrower.
- Repeated or unnecessary calls within the permitted window can still be considered harassment.
- All calls should be logged and auditable.
- Recovery agents must follow a proper code of conduct.

## 14. Disciplinary Action

Any breach of this Code of Conduct will be treated seriously and may result in disciplinary action, depending on the nature and severity of the violation. Such actions may include:

- **Warning** – Verbal or written caution placed on record for minor or first-time violations.
- **Suspension** – Temporary removal from duties, with or without pay, pending investigation or as a disciplinary measure.

- **Termination** – Dismissal from employment or engagement in cases of serious misconduct or repeated violations.
- **Legal Action** – Initiation of civil and/or criminal proceedings where the violation involves fraud, misconduct, regulatory breach, or any unlawful activity.

The Company reserves the right to determine appropriate action based on internal policies and applicable laws.

## **15. Roles & Responsibilities**

### **Board of Directors**

- Approve Code and monitor compliance

### **Compliance Officer (Manager)**

- Ensure implementation
- Conduct periodic review

### **HR Department**

- Conduct training
- Maintain declarations

### **Employees**

- Sign annual declaration of compliance

Note: All final actions will be closed post approval of Director.

## **16. Training & Awareness**

- Mandatory induction training
- Annual refresher programs
- Regulatory update sessions

## **17. Monitoring & Review**

- Annual review by Compliance Department
- Internal audit verification
- Update as per RBI circulars

## **18. Declaration**

All employees must sign:

"I have read and understood the Code of Conduct and agree to abide by its provisions."

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