



Employee Code of Conduct

Svamaan Financial Services Pvt. Ltd.

Code of Conduct Policy

Svamaan Financial Services Pvt. Ltd. (“Svamaan” or the “Company”) is registered as a Non-deposit taking NBFC-MFI with the Reserve Bank of India. Svamaan employees are expected to follow these guidelines at all times to ensure adherence to highest business and ethical standards while conducting the business and enabling a courteous working environment. Svamaan places high value on adherence to ethical business practices by its staff and will follow a zero tolerance policy in case of breach of the same.

Svamaan’s Code of Conduct is bifurcated into two parts covering:

1. Code of Conduct of Svamaan employees towards its customers
2. Code of Conduct guidelines for employees within the ambit of Svamaan

1. Code of Conduct of Svamaan employees towards its customers

Svamaan Financial Services is committed to follow Code of Conduct guidelines as laid down for the Microfinance Industry by MFIN and SADHAN in 2015. It covers the following activities of Svamaan:

- i. Providing financial services to clients, individually or in groups either on its own or as an agent
- ii. Recovery of credit provided to clients
- iii. Collection of thrift from clients, wherever permitted by law
- iv. Providing insurance, pension services and remittance services, or any other related products and services
- v. Formation of any type of community collectives including self-help groups, joint liability groups and their federations
- vi. Livelihood promotion services and Business

A. Integrity and Ethical Behaviors

1. Svamaan will design appropriate policies and operating guidelines to treat clients and employees with dignity
2. Company will incorporate 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
3. Svamaan will incentivize staffs for promoting good business & service practices towards customers
4. We will educate our customers on the Code of Conduct and its implementation

B. Appropriate interaction and collection practices

We will ensure that all Staff and persons acting on behalf of Svamaan adhere to the following norms/guidelines:

1. Use courteous language, maintain decorum, and are respectful of cultural sensitivities during all interaction with clients
2. Do not indulge in any behavior that, in any manner, would suggest any kind of threat or violence
3. Do not contact clients at odd hours, as per the RBI guidelines, for loan recovery
4. Do not visit clients at inappropriate occasions such as bereavement, sickness, etc., to collect dues
5. Svamaan will follow an approved company procedure to deal with client defaults sensitively
6. Debt restructuring mechanism adopted by the MFI will be followed for borrowers under liquidity stress

C. Recruitment

Svamaan is committed being an equal opportunity

1. As a matter of free and fair recruitment practice, there will be no restriction on hiring of staff from other MFIs by legitimate means in the public domain like general recruitment advertisements in local newspapers, web advertisements, walk-in interviews, etc.
2. Whenever Svamaan recruits from another MFI, it will be mandatory to seek a reference check from the previous 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. Svamaan will respond to reference check requests from another MFI within two weeks
4. Svamaan will honor notice period as contractually agreed with its employee subject to minimum of one-month notice period from an outgoing employee
5. Svamaan will not recruit an employee of another MFI, irrespective of the grade/level of the employee, without the relieving letter from the previous MFI employer. An exception can however be made in instances where the previous employer (MFI) fails to respond to the reference check request within 30 days
6. We will provide 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 MFI, except in proven cases of fraud or gross misconduct by the employee
7. A level up to the Branch Manager position, the said employee will not be assigned to the same area he/she was serving at the previous employer, for a period of 1 year

2. Code of Conduct of Employees towards Svamaan

Svamaan has specifically laid down codes of conduct that an employee of the company should adhere to and also keep an eye for adherence by others in the company. These codes aim to provide a just, disciplined, open and neutral work environment which is imperative to provide a conducive workplace to employees.

Following are the guidelines laid down in this part and all employees must abide by these codes, these codes are illustrative and not exhaustive:

1. Every employee shall at all times maintain absolute integrity
2. Conduct oneself in a manner which will enhance the reputation of the company

3. Confirm to and abide by the rules, regulations and policies made by the Company from time to time
4. Comply with and obey all lawful and reasonable orders, verbal or written, of superiors
5. Every employee, holding a supervisory position, shall take all possible steps to ensure the integrity and devotion to duty of employees under his control and authority
6. No employee shall engage himself or participate in any demonstration, which involves incitement to an offence
7. No employee shall communicate, directly or indirectly, to any official confidential document or any part thereof or information to any person to whom he is not authorized to communicate such document or information
8. No employee of the company shall engage directly or indirectly in any trade or business or undertake any other employment
9. Every employee of the company shall report to the Company/CEO if any member of his family is engaged in any trade or business or owns or manages any agency having business dealing with the company
10. No employee shall attempt to bring any outside influence to further his interests in respect of matters pertaining to his service in the company
11. Absence from duty or overstaying leave for more than 7 days will be deemed to have voluntarily abandoned service and will be liable for termination of employment without any further reference to him. However, the company reserves the right to recover the amount in lieu of notice period, in case of voluntary abandonment of service
12. Employees shall support the management in adjusting the manpower and reshuffling the workload and work allotment for increased efficiency and productivity
13. There shall be no discrimination or harassment against any person on the grounds of race, color, religion, disability, age, sex or marital status. Any discriminatory action against full time employees, contractual employees, clients or vendors shall be met with disciplinary action

Misconduct

Svamaan also categorically defines any act which is against company's philosophy of providing a safe, just and disciplined work environment. Such acts are notified as misconduct and there is zero tolerance of such misconducts.

Misconduct is specifically defined as following:

1. Theft, fraud and dishonesty in connection with the business or property of the company or of property of another person within the premises of the company
2. Taking bribes or any illegal gratification
3. Acting in a manner prejudicial to the interests of the company
4. Furnishing false information regarding name, age, father's name, dependents, qualifications, previous service, health, competence or any other matter relevant at the time of employment
5. Absence from duty without leave or overstaying the sanctioned leave without information to the reporting manager / supervisor
6. Habitual late coming or habitual early going or irregular attendance

7. Registering of attendance on phone or registering the attendance of another employee or assisting in doing so
8. Negligence in work or performance including slowing down of work or willful interference in the work of another employee or employees
9. Receiving, viewing, downloading or distributing pornographic material
10. Changing any system settings without prior authorization
11. Providing wrong information to colleagues/team members
12. Threatening, abusing or assaulting any employee or any disorderly behavior within the premises and any such action at any other place if it has any connection with the company affairs
13. Indulging in any act of sexual harassment at workplace
14. Gambling within the premises of the company
15. Smoking and chewing tobacco within the premises where it is prohibited
16. Sleeping while on duty
17. Misuse of any cash advance or non – compliance with the provisions of the rules for grant of any cash advance
18. Unauthorized possession of any lethal weapon within the premises of the company
19. Refusal to work on another job as assigned in the due course of business
20. Refusal to accept and acknowledge charge sheets, orders or any other communication addressed to an employee by the supervisor
21. Abet or attempt to abet any act, which amounts to misconduct
22. Commission of any act, which amounts to a criminal offence involving moral turpitude
23. Commission of any act subversive of discipline or of good behavior in the course of duty
24. Conviction or criminal charge/s by a competent court of law
25. Willful damage or sabotage to property of the company or sabotage of the interests of the company. Commission of any irresponsible act resulting in damage to any work or property or interests of the company
26. Interference or tampering with any safety devices installed or violating the safety or environment regulations in or about the premises of the company
27. Falsification of company's records, manuals or electronic, impersonation or forgery
28. Purchasing properties, machinery, stores etc. from the company or selling properties, machinery, stores etc. to the company by the employee or his family member's relative without permission in writing from CEO
29. Making representation to person or bodies outside the company whether official or otherwise on matters connected with the affairs of the company or personal grievances against the management
30. Unauthorized sharing or disclosure of confidential information of the company
31. Allowing unauthorized persons to operate or provide access to company equipment/software
32. Violation of any provision of these rules or any other habitual act or omission, which the company considers as misconduct

Penalty

Penalty may be imposed on an employee if any of the above guidelines are violated or any misconduct is committed. The Company/CEO based on the seriousness of the misconduct shall decide the penalty and could even lead to the termination from the services of the company.