

GEV FOCUS CAPITAL PRIVATE LIMITED

RECOVERY POLICY

GEV FOCUS CAPITAL PRIVATE LIMITED

Version Control

Document Version	Description of Changes	Memorandum of changes	Prepared by/ Changes proposed by	Owner Dept	Approval Date
1.0.	First	Introduction of Policy	Murugan Govindsamy	Credit Dept	

INDEX

GEV FOCUS CAPITAL PRIVATE LIMITED

Serial No.	PARTICULARS	PAGE NO.
(i)	Introduction	4
(ii)	Objectives and principles	4
(iii)	Key definitions	5
(iv)	Consumer Education on SME/NPA	6
(v)	Introduction to collections	6
(vi)	Recovery and Resolution	6
(vii)	Awareness Calling	7
(viii)	Non contactable customers	7
(ix)	Communication Norms	7
(x)	Engagement of Recovery Agents	7
(xi)	Responsibility of GEV Focus in engaging Recovery Agents	9
(xii)	Classification of Delinquent Pool	9
(xiii)	Special Mention Accounts (SMA)	9
(xiv)	Mature Loans/Small Balance cases	10
(xv)	Outsourcing	11
(xvi)	Early Warning System (EWS)	11
(xvii)	Asset Classification	11
(xviii)	Provisioning Norms	12
(xix)	Valuation of NPA secured Assets	12
(xx)	Write off Policy and Process	13
(xxi)	Restructuring of Loans	13
(xxii)	Settlement/Compromise and Loan Closures	13
(xxiii)	Wilful Defaulters	13
(xxiv)	Cash collection Limit	14
(xxv)	Filing of Mortgage records with Central Registry	14
(xxvi)	Submission of Credit Information	14
(xxvii)	Code of Conduct	14
(xxviii)	Policy Review & Approval Process	17

(i) Introduction:

Reg Office: SHRI DEVI PARK, Ground Floor, No.1, Hanumantha Road, T. Nagar, Chennai – 17
CIN: U64990TN2024PTC167931

GEV FOCUS CAPITAL PRIVATE LIMITED

GEV Focus Capital Private Limited (hereinafter referred as “the Company” or “GEV Focus”) a Non-Banking Financial Company (‘NBFC’) is holding a valid Certificate of Registration (“CoR”) from Reserve Bank of India (‘RBI’) vide registration no. N-07-00917 dated 20th Jun 2025 under current RBI classification norms as Type II, NBFC - Investment and Credit Company (NBFC-ICC) – Non Deposit taking Non-Systemically Important (‘ICC-ND-NSI’) under the provisions of Section 45 IA of Reserve Bank of India Act 1934.

The company aims to provide accessible, transparent, and responsible lending services. It is focused on offering financing to MSME & Loan against property segment.

The company shall aim at making the recovery process smoother and faster, so that Gross NPA level is maintained within the risk appetite of GEV Focus. It is essential for a sound NPA management system to have functionality allowing for quick identification of non-performing advances, their containment at minimum levels and ensuring minimal impingement on financials of the company.

(ii) Objectives and Principles:

The quality and performance of the advances portfolio has direct bearing on the profitability of any NBFC. Despite an efficient credit appraisal, disbursement and monitoring mechanism, problems can still arise due to various factors and results assets turning into Non performing Assets (NPA). These factors may be internal or external.

The objective of the recovery policy is to prepare a roadmap for starting collection activities at a very early stage of the account becoming overdue, understand the reasons behind the delays, counsel and persuade the customer to repay the installments/ interest in time and prevent the account from going into a state of default. The recovery activity is a major focus area for the portfolio to behave well.

- The policy is aimed at strengthening the management and recovery of NPAs and proactive initiatives to closely monitor other accounts by triggering detection of early warning signals and quicker corrective response.
- The Policy lays stress on picking up early warning signals, early identification and reporting of all existing and potential problem loans to facilitate quicker response and prevent the incidence of NPAs.
- The Policy emphasizes a broad approach, including critical parameters to be considered for collection, recovery and resolution of loans through reschedulement, compromise settlements etc.
- The Policy also proposes an approach for cleansing of NPA portfolio through judicious written off measures.
- The Policy aims at improving internal efficiency of the recovery machinery and thus enhancing the profitability of the Company.
- The Policy deals with initiation and management of the legal processes with due coordination with law enforcement agencies for recovery of bad loans.

Guiding principles of this policy

- GEV Focus's recovery procedure will be based on legal and acceptable practices
- Reg Office: SHRI DEVI PARK, Ground Floor, No.1, Hanumantha Road, T. Nagar, Chennai – 17**
CIN: U64990TN2024PTC167931

GEV FOCUS CAPITAL PRIVATE LIMITED

- GEV Focus will treat its defaulters with respect and dignity without losing focus on recovery
- GEV Focus will follow only ethical practices and will not resort to unduly coercive tactics in the process of recovery of NPAs.
- GEV Focus will not initiate any legal or recovery measures including repossession of the security without giving due notice to the borrower in writing. GEV Focus will follow all such procedures as required under law for recovery/repossession of the security.
- Repossession of security will be aimed only for the purpose of recovery of dues and not to deprive the borrower of possession of the security. Repossession, valuation and realization of security will always be done in a fair and transparent manner.

(iii) Key Definitions

Default : 'Default' means non-payment of debt (as defined under the IBC) when whole or any part or instalment of the debt or interest has become due and payable and is not paid by the debtor or the corporate debtor, as the case may be.

Overdue: An amount will be treated as overdue if it is not paid on the due date fixed by the company.

Non Performing Assets: "Non-Performing Asset (referred to as "NPA") shall mean:

- (i) an asset, in respect of which, interest has remained overdue for a period of more than 90 days.
- (ii) a term loan inclusive of unpaid interest, when the instalment is overdue for a period of more than 90 days or on which interest amount remained overdue for a period of more than 90 days.
- (iii) a demand or call loan, which remained overdue for a period of more than 90 days from the date of demand or call or on which interest amount remained overdue for a period of more than 90 days.
- (iv) a bill which remains overdue for a period of more than 90 days.
- (v) the interest in respect of a debt or the income on receivables under the head 'other current assets' in the nature of short-term loans/advances, which facility remained overdue for a period of more than 90 days.
- (vi) any dues on account of sale of assets or services rendered or reimbursement of expenses incurred, which remained overdue for a period of more than 90 days.
- (vii) the lease rental and hire purchase instalment, which has become overdue for a period of more than 90 days.
- (viii) In respect of loans, advances and other credit facilities (including bills purchased and discounted), the balance outstanding under the credit facilities (including accrued interest) made available to the same borrower/ beneficiary when any of the above credit facilities becomes non-performing asset. Provided that in the case of lease and hire purchase transactions, an applicable NBFC shall classify each such account on the basis of its record of recovery.

(iv) Consumer Education on SMA/NPA

GEV FOCUS CAPITAL PRIVATE LIMITED

With a view to increasing awareness among the borrowers, GEV Focus shall place consumer education literature on its websites, explaining with examples, the concepts of date of overdue, SMA and NPA classification and upgradation, with specific reference to day-end process. GEV Focus shall also consider displaying such consumer education literature in its branches by means of posters and/or other appropriate media. Further, it shall also be ensured that its front-line officers educate borrowers about all these concepts, with respect to loans availed by them, at the time of sanction/disbursal/renewal of loans.

(v) Introduction to Collections

- The Recovery policy of GEV Focus is built around dignity and respect to customers.
- GEV Focus will not follow practices that are unduly coercive in collection of dues.
- The policy is built on courtesy, fair treatment and persuasion.
- GEV Focus believes in following fair practices regarding collection of dues and thereby fostering customer confidence and long-term relationship.
- GEV Focus will keep the customer informed of the method of calculation of interest and how the Equated Monthly Instalments (EMI) or payments through any other mode of repayment will be appropriated towards interest and principal due.
- GEV Focus would expect the customers to adhere to the repayment schedule agreed to and approach GEV Focus for assistance and guidance in case of genuine difficulty in meeting repayment obligations.
- All the members of the staff authorized to represent the company in collection would be educated and persuaded to follow the guidelines.

(vi) Recovery and Resolution

The repayment record of borrowers shall be monitored both with regard to payment of interest and repayment of principal. Whenever a borrower defaults or is likely to default, rigorous follow-up shall be made for the collection of dues / arrears. When default occurs, oral and written communications are to be sent to the borrower to regularise their accounts within a specified period. In case the assistance is secured by a guarantee (personal or corporate), steps shall be taken to recover dues from the guarantor. GEV Focus shall use any of the following broad methods for management of problem accounts:

- Restructuring and rehabilitation in deserving cases
- Settlements / compromise /One Time Settlement where chances of entire recovery are remote/time consuming
- Exit options
- Legal Action & recovery
- Write-off
- Sale of NPA /W-off assets to ARCs

(vii) Awareness Calling

GEV FOCUS CAPITAL PRIVATE LIMITED

Relationship Managers/ Collectors and customer service team (Internal or external-Outsourced) will allocate the calling data among themselves who will call each and every customer from the calling list at least 3 days before the due date of repayment and remind them about the instalment/ interest falling due and a record of the same shall be maintained for scrutiny by higher authorities. Automated payment notification reminders/messages will also be sent across to borrowers through SMS or mail in a customized manner.

(viii) Non-Contactable Customers

In case a customer is not reachable, contact details provided doesn't exist, customer intention during call reveals fraudulent intention or Willful default, such accounts will be assigned to Field Collection Managers for field visit and to initiate appropriate steps for recovery.

(ix) Communication Norms

- GEV Focus /authorized representative is committed to ensure that all written and verbal communication with its borrowers is in simple business language.
- GEV Focus / authorized representative will adopt decent and ethical manners during interaction with borrowers and would respect their privacy.
- The customer would be contacted ordinarily at the place of his / her residence / business / occupation or at the address/es / places furnished by the customer to the company.
- GEV Focus Tele calling/ Sales team or authorized agent will contact customers normally between 0800 Hrs and 1900 Hrs.

(x) Engagement of Recovery Agents

GEV Focus may utilize the services of recovery agents for collection of dues and repossession of securities. Recovery agents will be appointed as per regulatory guidelines issued in this regard. The company understands that the outsourcing of recovery activity does not diminish its obligations, and those of the Board and senior management, who have the ultimate responsibility for the outsourced activity and that the Company would therefore be responsible for the actions of the recovery agents and the confidentiality of information pertaining to the customers that is available with the recovery agent.

In this respect:

- The name and address of all Recovery Agents on GEV Focus approved panel will be placed on the company's website for information.
- Only recovery agents from the approved panel will be engaged by GEV Focus.
- Whenever GEV Focus engages services of a recovery / enforcement / seizure agent, the identity of the agent will be disclosed to the borrower.
- The recovery agents engaged by GEV Focus will be required to follow a code of conduct while dealing with customers and company will ensure the same

GEV Focus shall perform appropriate due diligence to assess the capability of recovery agents to comply with the obligations outlined in the outsourcing guidelines. This due diligence will include evaluation of:

GEV FOCUS CAPITAL PRIVATE LIMITED

- Past experience and competence to support the recovery process over the contracted period.
- Financial soundness and ability to meet commitments even under adverse conditions.
- Business reputation, culture, compliance record, history of complaints, and any outstanding or potential litigation.
- Security measures, internal control frameworks, and the adequacy of their business continuity management systems.
- Their due diligence practices with regard to their employees to ensure reliability and professionalism.

All engagements with recovery agents will be governed by carefully defined outsourcing agreements, vetted for legal effect and enforceability. These agreements will include the following provisions:

- A clear definition of outsourced activities, along with appropriate service and performance standards.
- GEV Focus's right to access all books, records and information with the recovery agent relevant to the outsourced activity.
- Continuous monitoring and assessment of recovery agents' performance coupled with enabling corrective measures promptly wherever needed.
- A termination clause, including provision for a minimum notice period in the unfortunate likelihood event of termination of the contract..
- Stringent controls to ensure customer data confidentiality, along with liability provisions for breaches of security or confidentiality.
- Contingency plans to ensure business continuity in case of disruption.
- GEV Focus's prior approval/consent before the recovery agent subcontracts any part of their activities.
- GEV Focus's right to conduct audits on the recovery agent, either directly or through internal/external auditors, and obtain audit or review reports related to the services performed.
- A clause allowing the Reserve Bank of India or its authorized personnel to freely access GEV Focus's documents, records of transactions, and other necessary information stored or processed by the recovery agent within a reasonable time frame.
- A clause recognizing the Reserve Bank's right to inspect the recovery agent's books and accounts through its officers or authorized representatives.
- A confidentiality clause mandating the continued safeguarding of customer information during the life period of the contract and even after the termination of the agreement.

GEV FOCUS CAPITAL PRIVATE LIMITED

- Provisions requiring the recovery agent to preserve documents as mandated by law, with safeguards ensuring protection of GEV Focus's interests even after post-termination of the services.
- In case the recovery agent is acting for more than a client, to keep the information and records pertaining to clients separately and confidential, not mixing among the clients.

(xi) Responsibility of GEV Focus in engaging Recovery agents

- GEV Focus shall ensure that recovery agents are trained to handle their responsibilities with care and sensitivity, focusing on proper customer solicitation, respecting calling hours (8:00 a.m. to 7:00 p.m.), ensuring privacy of customer information, accurately conveying terms and conditions of products.
- Recovery agents must adhere to GEV Focus's board-approved **Code of Conduct** besides providing an undertaking to comply with.
- They must follow the **Fair Practices Code for NBFCs** and other applicable code for collection of dues and repossession of security.
- Recovery agents must not engage in - intimidation or harassment (verbal or physical), public humiliation or intrusion into the privacy of borrowers, their families, referees, or friends, sending inappropriate or threatening messages via mobile or social media, making persistent, threatening, or anonymous calls, calling borrowers outside permissible hours, misleading representations about the loan or recovery process etc. Recovery agents must maintain strict confidentiality of customer information throughout and beyond their engagement with GEV Focus.

(xii) Classification of Delinquent Pool-The following methodology shall be applied;

Classification & Segregation of Delinquent Pool – No. of days				
Type	Ageing Stage	Type of Default	Due Date	
LIVE	0 - 30	1 EMI Overdue	1st /12th	Bucket one
	31 - 60	2 EMI Overdue	1st / 12th	Bucket Two
	61 - 90	3 EMI Overdue	1st / 12th	Bucket Three

(xiii) Special Mention Account (SMA)

- **SMA-0** is a category in which stress with respect to principal and interest has remained overdue for a period of 1-30 days. These customers need to be handled by sales team.
- **SMA-1** is a category in which stress with respect to the principal and interest has remain overdue for a period of more than 30 days to 60 days. These customers need to be handled by Sales and tele-calling team
- **SMA-2** is the third category devised in order to mitigate the bad loan problem with the amount being overdue for tenure more than 60 days to 90 days. SMA-2 and NPA cases will be handled by Collection teams

GEV FOCUS CAPITAL PRIVATE LIMITED

The dunning matrix	Secured Loans	Unsecured Loans
RISK - X (Current)	Awareness Calling/Bulk SMS	
BKT-1(1-30)	Tele Calling and selective non-contactable cases to be referred on field to Sales/Collection team	
BKT-2 (31-60)	1. 100% to be referred on field to sales/Collection team. Field referral continues. 2. L-1 Notice will be issued for EMI Bounces subject to request from Collection Head	
BKT-3 (61-90)	1. L1 and L2 Notices will be issued to all EMI bounce cases. 2. Notice Under Sec 138 will be initiated for all the EMI bounce for all Unsecured loans. 3. Based on mandate from collections, will initiate section 138 for EMI bounce cases for secured Loans.	
BKT->=4 (90+) * LRN and SARFAESI to be used on case-to-case basis with recommendation of Collection Head	U/s 138 EMI Based legal proceedings will be initiated for secured Loans and initiated with specific recommendation of collection head.	All Unsecured Loans will face LRN/U/s 138 / DRT/ SUIT/Arbitration Etc
** 180+ cases Legal action will be kept on hold only based on collection recommendation		
Any deviation is to be decided on a case-to-case basis by collection head and CEO		
Foreclosure charges will not be applicable for LRN issued cases; however all other charges as per the agreement will be applicable.		

(xiv) Mature loans/small balance cases

Mature loans are those loans where maturity date is reached, but still some outstanding are there. It will be based on vintage of maturity and size of outstanding. Mature loans with/without Principal dues may be written off based on collections feedback, signifying utility or disproportionately high cost of further recovery efforts. These may be flagged as non-Workable based on approval from the Collections Manager for the region. Closure of such accounts will be as per the waiver delegation matrix in force.

(xv) Outsourcing

GEV FOCUS CAPITAL PRIVATE LIMITED

GEV Focus may outsource the task of recovery to collection agency in terms of outsourcing policy norms duly approved by the Board. Collection agencies will be regulated by GEV Focus's Fair debt collection practices.

(xvi) Early Warning System (EWS)

GEV Focus will follow the EWS for early identification of problem loans to take corrective measures before the position becomes irretrievable to minimize the risk of loss.

- Quick Mortality
- Bounce Ratio
- Fraud Cases**

** Fraud cases should be brought to the notice of Risk Management Committee immediately in the next RMC meeting.

(xvii) Asset Classification

GEV Focus will categorize its loans into SMA - 0, SMA – 1 and / SMA - 2 as described below

S.No	Classification	DPD	Remarks
1	SMA - 0	0-30	These represent exposures where there has not been a significant increase in credit risk since initial recognition or that has low credit risk at the reporting date. All standard exposures (i.e., exposures with no overdue) and exposure up to 30 DPD (days past due) fall under this category.. SMA – 0 loans also include facilities where the credit risk has improved and the loans have been reclassified from SMA – 1 or SMA - 2.
2	SMA - 1	31-60	Loans that have had a significant increase in credit risk since initial recognition are classified under this stage. Based on empirical evidence, significant increase in credit risk is witnessed after the overdues on an exposure exceed a period more than 30 days. Accordingly, the Company will classify all exposures with overdues exceeding 30 days and up to 60 days (31DPD to 60 DPD) at each reporting date under this Stage. The Company will measure lifetime ECL on these loans. SMA – 1 loans also include facilities, where the credit risk has improved and the loan has been reclassified from SMA - 2.

GEV FOCUS CAPITAL PRIVATE LIMITED

3	SMA - 2	60-90	All exposures having overdue balances for a period exceeding 60 to 90 days are classified under this stage.
---	---------	-------	---

Loan exposures that have overdue for more than 90 days will be classified as Non Performing Assets (NPA). GEV Focus will classify the non-performing assets further into the following three categories based on the period for which the asset has remained nonperforming and the realisability of the dues, as per RBI norms and approved Loan Policy of the company:

- Sub-standard Assets
- Doubtful Assets
- Loss Assets

Sub-standard Assets:

A sub-standard asset would be one, which has remained NPA for a period less than or equal to 12 months.

Doubtful Assets:

An asset would be classified as doubtful if it has remained in the sub-standard category for a period of 12 months.

Loss Assets:

A loss asset is one where loss has been identified by GEV Focus or internal or external auditors or the RBI inspection, but the amount has not been written off wholly. In other words, such an asset is considered uncollectible and of such little value that its continuance as a bankable asset is not warranted although there may be some salvage or recovery value. There would be a provision of 100% for loss assets.

(xviii) Provisioning norms

GEV Focus will follow the provisioning norms for all delinquent cases laid down by RBI from time to time.

(xix) Valuation of NPA secured assets

Valuation of securities of all NPA secured loans > Rs 10Lacs of real outstanding of GEV Focus will be carried out in a fair and transparent manner.

- Valuation of mortgage immovable property will be carried out immediately for Fraud Identified cases
- Quick mortality cases 90+ DPD (within One Month)
- Others – 90+ (within 90 days)
- The valuation will be done by Branch Manager for NPAs with real outstanding of upto Rs 10 lakh and by the approved valuer of the company for NPAs above real

GEV FOCUS CAPITAL PRIVATE LIMITED

outstanding of Rs 10 lakh, and based on site inspection and recent sale transactions in the vicinity of the property..

(xx) **Write off Policy and Process:** -

- GEV Focus will Write off from the books in case of delinquent accounts of >541 DPD for secured Loan and >181 DPD for Unsecured loans. The cutoff period maybe reduced or increased based on the profitability of the company duly approved by Board.

OR

- Where Customer has expired and payment capacity of legal heir is limited.
- Where customer is not traceable
- Permanent Closure of the borrower's activity
- Intention of the borrower is not to pay and there is a limited legal hold on customer.
- Where follow-up cost is likely to be higher than recoverable dues.

(xxi) **Restructuring of Loans:**

Upon Restructuring of Loans, Asset classification and provisioning norms will be followed as per RBI norms from time to time.

(xxii) **Settlement/Compromise and Loan closures:**

Collections will offer settlements/payment-plans to customers on a case-to-case basis.

Compromise settlement refers to a negotiated settlement where a borrower offers to pay and GEV Focus agrees to accept in full and final settlement of its dues an amount less than the loan outstanding amount due under the relative loan contract. Settlement invariably involves a certain sacrifice by way of write off and/or waiver of a portion of its dues on a one-time basis. All settlement / compromise decisions would be approved by the designated approval authorities as per the Approved Delegation of Authority matrix of GEV Focus.

(xxiii) **Willful Defaulters**

Company will report to RBI, the list of suit filed accounts of willful defaulters of Rs.25 lac and above as at end of every quarter, as per norms.

Willful defaults broadly cover the following:

- Deliberate non-payment of the dues despite adequate cash flow and good net worth
- Siphoning off funds to the detriment of the defaulting unit
- Assets financed either has not been purchased or been sold and proceeds mis-utilised;
- Misrepresentation/falsification of records; disposal/removal of securities without GEV Focus 's knowledge;
- Fraudulent transactions by the borrower.

GEV FOCUS CAPITAL PRIVATE LIMITED

(xxiv) Cash Collection Limit:

Income tax act section 259ST imposed restriction on a cash transaction and limited it to Rs.2L per day. No person shall receive an amount of Rs.2L or more in aggregate from a person in a day or single transaction or transactions relating to one event or occasion from a person. Company will follow the norm.

(xxv) Filing of Mortgage Records with Central Registry:

As per the Central Government's directives issued in relation to sanctioning of loans by banks and financial institutions, the lenders of the loan shall register all information with regards to security interests that they have been created on any asset or property with CERSAI. Such registration is required to be completed within a period not exceeding 30 days from the date of the creation of security interests.

GEV Focus shall file and register records of equitable mortgages created in its favor with the Central Registry of Securitization Asset Reconstruction and Security Interest of India (CERSAI). All types of mortgages, including those involving immovable, movable, and intangible assets, shall be registered with CERSAI as per the RBI's guidelines.

GEV Focus shall comply with the provisions of the circular "Filing of Security Interest relating to Immovable (other than equitable mortgage), Movable and Intangible Assets in CERSAI" dated December 27, 2018, as amended from time to time.

(xxvi) Submission of Credit Information

GEV Focus shall maintain membership with all registered Credit Information Companies (CICs) and submit required credit information, including historical data. Data will be submitted fortnightly (as of the 15th and last day of each month) within seven days of the reporting date. GEV Focus will ensure that submitted data is accurate, updated, and complete, adhering to regulatory standards. Customers will be informed that their credit information is being reported to CICs, bearing impact on their credit standing.

(xxvii) Code Of Conduct

The policy on collection outlines minimum requirements that need to be adhered to by the authorized representatives of GEV Focus while contacting a customer for recovery. Besides GEV Focus, other Third-Party Vendors may also contact Customers on behalf of GEV Focus. The code is a mandatory requirement for all individuals/persons/vendors/entities who contact the Customer(s) on behalf of GEV Focus.

It is imperative that all persons involved in collection related activities must strictly agree and abide by the policy described below on collection activities. This policy applies to all employees of GEV Focus including affiliates and employees/Collection agents of companies that may be engaged to collect debts on behalf of GEV Focus.

The following are the core underpinnings of the collection process:

1. The customer would be contacted ordinarily at the place of his / her choice and in the absence of any specified place, at the place of his / her residence and if unavailable at his / her residence, at the place of business / occupation.

GEV FOCUS CAPITAL PRIVATE LIMITED

2. Collection Representatives should always identify themselves and the company/entity they represent at the very beginning of every interaction and the Customers must be informed that the call is being recorded wherever telecall is made
3. Customers deserve to be treated with dignity. Collection Representatives should always remain professional during telephone conversations and visits. No written or verbal threats, abuse or rudeness is permitted. Collection Representative should use only acceptable business language, even if the other party is aggressive.
4. All calls being made to the Customer(s) must be recorded as per requirements of the Code of Conduct stipulated by the Reserve Bank of India.
5. Customers are entitled to privacy. Privacy policies apply to all conversations with third parties. A customer is to be contacted for debt collection only when the payment is nearing or already due, including grace period, and if it otherwise may lead to the imposition of an additional cost on the customer or may impact the customer's credit history/rating, or may cause a financial loss to the company.
6. All collection activities should be consistent with the guidelines provided in this document and in compliance with the Code for collections of dues stipulated (from time to time) by the Reserve Bank of India. All letters and other communication must be in the format approved by the company.
7. Customers should be called only between 0800 Hrs and 1900 Hrs unless exceptional circumstances warrant deviation from this timeframe. Under no circumstances, customer can be called beyond 2100hrs.
8. Customer requests for stoppage of calls/visits to place of work are to be honoured if he/she provides a suitable alternative address / phone number where he/she may be reached
9. Calls must first be placed to the customer. In the event the customer is not available, a message may be left for the customer to an adult family member. The aim of the message should be to get the customer to return the call.
10. Collections are authorised to disclose the loan obligations only to the customer, co-borrower or the co-guarantor. Even if the customer does not respond to a prior message, it is not permitted to indicate that the call pertains to any loan obligation of the customer or to state that the customer is overdue on his loan account or to state or indicate the amount due or passing on a message to the customer for making a payment.
11. Customer's questions should be answered in full. They should be provided with information requested, given assistance and issues resolved. Accounts with unresolved issues are to be escalated.
12. Collections Representative may communicate with third parties to obtain customer's location information - home address, business address, home phone number and workplace phone number. This may be done when the customer's present location is either unknown or uncertain or the customer is not contactable or a skip. While obtaining such information the Collections Representative must clearly identify himself/herself, if required, along with the name of the organisation.

GEV FOCUS CAPITAL PRIVATE LIMITED

13. If the customer has provided a financial guarantee of a third party, the third party may be called and the customer's obligations may be discussed. In such a situation, the guarantor may be treated as the borrower. Further, if the customer is deeply delinquent (more than or equal to 2 months behind on his/her repayment) or non-contactable or a skip, then customer's debt/obligation may be discussed with references provided.
14. Customer or third-party requests for the name of the superior or requests for speaking with the superior should always be honoured.
15. Collections Representative should respect personal space, maintain adequate distance, not to unnecessarily call the Customer prior to or subsequent to the visit to the Customers' residence from a personal mobile phone unless the said call is for checking on the availability of the Customer or for directions to the location of the Customers' residence.
16. Collections Representative should not enter the customer's residence against his/her wishes or when told that the customer is not at home.
17. Collections Representative should not restrict the customer's movement or restrain him/her from entering or leaving the house/room.
18. Collections Representative should not remain in the customer's house if he/she were to leave for any reason including to collect money from a bank/elsewhere.
19. Collections Representative should respect the customer's privacy and not embarrass the customer in the presence of his/her neighbours / others.
20. Collections Representative should not make visits at the customer's residence if the customer expressly forbids such visits in writing and provides suitable alternative address where he/she is connectable during collections working hours.
21. Collections Representative should not make visits at the customer's residence if customer's family member is gravely ill and a social engagement is in progress. If the customer is not present and when only minors/elderly / infirm are present at the time of the visit, the Collections Representative should end the visit with a request for the customer call back. He should also not enter the house unless invited. He should not wait for the customer in the customer's residence unless specifically asked to do so by the customer or family.
22. Collections Representative should not offer assistance to the customer for driving him/her to the bank/any other spot from where money to repay the loan is to be collected. CR should not have any discussions of a personal nature with the customer, must maintain a professional distance and restrict conversation about the debt owed and the customer's proposed repayment plan.
23. Collections Representative should not collect sums in excess of total debt of the customer, threaten to take extra judicial action (e.g., physical threat or any unlawful action) to expropriate and dispose of customer's assets when no such right exists and apply the payments to other accounts than the ones indicated by the customer.
24. If the customer declines to pay, the consequences of such a decision may be explained to him/her. CR should explain Impact on credit history, Possible inclusion in negative list,

GEV FOCUS CAPITAL PRIVATE LIMITED

Possible legal action and its impact and Cost of defending legal action, if such action is contemplated.

25. GEV Focus will document the efforts made for the recovery of dues and the copies of communication sent to customers, if any, will be kept on record.

(xxviii) Policy Review & Approval process

The Policy would be reviewed and updated on annual basis or as and when required and the revised version will be placed before the Board for approval.