



Model Code of Conduct for Direct Sales Agents

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SPINNY CAPITAL PRIVATE LIMITED CIN

No. U65999HR2021PTC099583

Tel: +91-727-727-7275 **Website:** www.spinnycapital.com **Email:** contactus@spinnycapital.com

Regd. Office: 7th floor, Tower-A, Capital Business Park, Sector-48, Sohna Road, Gurgaon, Haryana -122018



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1. Purpose

This Code of Conduct defines the ethical and professional standards to be followed by Direct Sales Agents (DSAs) engaged by **Spinny Capital Private Limited** (the company) for customer acquisition services. It ensures fair, transparent, and responsible customer sourcing in compliance with the RBI regulations.

2. Scope

This Code applies to all DSAs involved in marketing, customer identification, loan application facilitation, and related acquisition activities on behalf of the company.

3. Professional Integrity and Ethical Conduct

- DSAs represent the company honestly and ethically.
- They shall not misrepresent the Company's products, terms, or eligibility criteria.
- DSAs should not engage in false, misleading, or deceptive practices to acquire customers.

4. Customer Interaction and Communication

- DSAs must provide clear, accurate, and complete information about loan products, eligibility criteria, documentation requirements, interest rates, fees, and repayment terms.
- They should communicate in a language that is understandable to the customer.
- DSAs shall not exert undue pressure, coercion, or harassment on potential customers to avail of loans.
- DSAs shall identify themselves clearly with name and affiliation with the company.
- DSAs shall be mindful of the hours of calling and shall contact the customer only between 8 AM and 7 PM or any time as confirmed by the customer with the DSA.

5. Documentation and Application Process

- DSAs shall assist customers in filling loan applications correctly and ensure that all submitted documents are genuine and complete.
- They shall not tamper with, alter, or falsify any documents.
- DSAs must maintain the confidentiality and security of customer documents and information.

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6. Confidentiality and Data Privacy

- DSAs shall ensure that all customer data collected during acquisition is handled with strict confidentiality.
- They shall comply with applicable data protection laws and company's privacy policies.
- Disclosure of customer information to unauthorized third parties is strictly prohibited.

7. Prohibited Practices

- DSAs shall not engage in inducements, incentives, or promises that are not authorized by the company.
- They shall not discriminate against customers on any grounds.
- DSAs shall not make commitments or promises on behalf of the company that are beyond their authority.

8. Training and Competence

- DSAs shall participate in training programs arranged by the company to understand product details, customer handling, regulatory requirements, and this Code of Conduct.
- They must maintain adequate knowledge to guide customers appropriately.

9. Grievance Redressal

- DSAs must inform customers about the company's grievance redressal mechanism and assist in the resolution process when required.
- All customer complaints received by DSAs should be promptly reported to the company.

10. Compliance and Monitoring

- DSAs shall cooperate with audits, inspections, and compliance checks conducted by the company and the RBI.
- Any breach of this Code may lead to immediate termination of engagement and potential legal action.

11. Acknowledgment

I, _____, hereby acknowledge that I have read, understood, and agreed to abide by the Model Code of Conduct for Direct Sales Agents providing Customer Acquisition Services for **Spinny Capital Private Limited**.

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Name _____ of _____ DSA: _____
Signature: _____
Date: _____

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