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### 1. Preamble

Model Code of Conduct is a set of guidelines designed to ensure that Service Provider working as agents of American Express Banking Corp., act and conduct in conformity with the laid down policies and procedures as set in the Code.

### 2. Definitions

2.1 The term “Service Provider” in this document refers to all Direct Sales Agencies, Direct Sales Team, Vendors, and their employees working as agents for American Express Banking Corp.



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- 2.2 The term “Bank” refers to American Express Banking Corp.
- 2.3 The term “Customer” refers to existing customers of the Bank.
- 2.4 The term “Prospect” refers to target segment of customers that the Bank wishes to solicit in accordance with prevailing policy.

### **3. Applicability**

- 3.1 Upon adoption and inclusion as part of agreement between the Bank and the Service Provider this code will apply to all persons involved in marketing and distribution of any Card products of the Bank.
- 3.2 The Service Provider must agree to abide by this code prior to undertaking any direct marketing operation on behalf of the bank.
- 3.3 Any Tele Marketing Executives & Field sales personnel found to be violating this code will be permanently removed from working on the Bank processes handled by the Service Provider and such action taken should be reported to the Bank from time to time by the Service Provider.
- 3.4 Failure to comply with this requirement may result in permanent termination of business of the Service Provider with the Bank and may even lead to permanent blacklisting by the industry of the service provider, its personnel or both, as the case may be.
- 3.5 A declaration to be obtained from Tele Marketing Executives & Field sales personnel, by the Direct Sales Agents & direct sales team before assigning them their duties is annexed to this Code.
- 3.6 The service provider shall ensure that the database approved by it for use by its personnel has been reviewed against ‘Do not call registry’ maintained by the Bank and names of customers and prospective customers who expressed their unwillingness to receive a solicitation call have been removed from the database.
- 3.7 The service provider will ensure to comply with directions issued by TRAI from time to time on “Unsolicited Commercial Communications – National Customer Preference Register (NCPR)”.



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### 4. Soliciting a Prospect / Customer

#### a) Tele calling a Prospect / Customer

A prospect is to be contacted for sourcing a bank product or bank related product only under the following circumstances:

- (i) When prospect has expressed a desire to be solicited for a product through the bank's internet site/call centre/Branch or through the Relationship Manager at the Bank or has been referred to by another prospect/customer or is an existing customer of the bank.
- (ii) When the prospect's name/telephone no/address is available & has been taken from one of the lists/directories/databases approved by the Direct Sales Agent Manager/Team leader
- (iii) Service Provider resource provided by service provider will have his scope of work limited to sales attempt to customers who are part of any authorized data list approved by AMEXCO under all compliance policies. Service Provider does not have any decision-making powers related to card issuance and neither can convey any decision-making assurances with customer or prospect related to card issuance.

**The Service Provider will not call a person whose name/number is included in the "do not call" list of the Bank.**

#### b) Tele-calling / Visiting hours

- (i) Telephonic contact with the Customer / Prospect will be made between 10:00 Hrs. and 19:00 Hrs.
- (ii) Calls earlier or later than the prescribed time period may be made only when the Prospect / Customer has expressly authorized Tele Marketing and Field Sales Executives to do so either in writing or orally.
- (iii) Residence / Business Address visit must normally be limited between 10:00 Hrs. and 19:00 Hrs. Visits earlier or later than the prescribed time period may be made only when the

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prospect has expressly authorized Tele Marketing Executives / Field sales personnel to do so either in writing or orally.

- (iv) If a customer or a prospective customer has declined to accept the call or the visit, the service provider and its personnel ensure that customer is not called or visited for a period of three months from the day of declining to accept the call or the visit.

### c) **Telemarketing Etiquettes**

The Service provider must ensure that a Prospect / Customer is not called prior to 10:00 Hrs or post 19.00 Hrs unless specifically requested. The Service provider will ensure that only the lists approved by the DSA Leader / the Bank is called upon. **The following must be adhered to while making a call**• All conversations with Customer / Prospect should be made in a polite, courteous, and transparent manner

- The Tele Marketing Executive will identify himself, his company and principal
- The Tele Marketing Executive will request for Prospect / Customer permission to proceed. In the event of permission being denied, he should apologize and politely disconnect
- The Tele Marketing Executive must state reason for his call
- The Tele Marketing Executive will never interrupt or argue with the Prospect / Customer
- The Tele Marketing Executive will to the extent possible, talk in the language which is most comfortable to the prospect
- The Tele Marketing Executive must keep the conversation limited to business matters
- The Tele Marketing Executive will check for understanding of “Most Important Terms and Conditions” by the customer if he plans to buy the product
- The Tele Marketing Executive should reconfirm next call or next visit details
- The Tele Marketing Executive will provide his telephone number, supervisor’s name or bank officer contact details if asked for by the customer
- The Tele Marketing Executive will not make any false commitment to the customer on behalf of the Bank



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- The Tele Marketing Executive will thank the customer for his / her time

### **The Service provider must adhere to the following post a call with Prospect or Customer**

1. The Service provider will provide feedback to the bank on customers who have expressed their desire to be flagged “Do Not disturb”
2. The Service provider will never call or entertain calls from customers regarding products already sold and will advise them to contact the Customer Service Staff of the Bank.
3. Customers who have expressed their lack of interest for the offering should not be called for the next 3 months with the same offer.

### **d) Precautions to be taken on visits / contacts**

1. Field Sales Executive will respect personal space, maintain adequate distance from the prospect
2. Field Sales Executive will not enter the prospect's residence / office against his / her wishes
3. The Service provider must ensure that a customer / Prospect residence / business is visited by not more than one field executive and one supervisor, if required.
4. Field Sales Executive will respect the prospect's privacy.
5. If the prospect is not present and only family members / office persons are present at the time of the visit, he/ she should end the visit with a request for the prospect to call back.
6. Field Sales Executive will provide his / her telephone number, supervisor's name or the concerned bank officer's contact details, if asked for by the customer.
7. Field Sales Executive must limit discussions with the prospect to the business and maintain a professional distance.

### **e) Appearance & Dress Code**

- (i) The Field Executive must be in proper attire while meeting up with Prospect / Customer. The Field Sales Executive should wear a clean and well-ironed Shirt and long pants. Women Field Sales Executive must also wear a formal attire (Sari, Suit etc.).



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- (ii) T-shirts, jeans, shorts or sneakers are not considered appropriate while meeting up with Prospect / Customer.
- (iii) The Field Sales Executive should carry the Identity card provided to him by the Service Provider. The identity card issued by the Service Provider should state the full name, designation of the Field Sales Executive along with his photograph. He must display prominently the said identity card on person.

### **5. Use and disclosure of Confidential Information**

- 5.1 Confidential Information includes but is not limited to all proprietary and confidential information of the Bank or its subsidiaries, affiliates, or licensees, including without limitation all information, in any form, tangible or softcopy, including without limitation applications, charts, data, documents, forms, instruments, papers or statements, regarding the Bank or any of its subsidiaries, affiliates, or licensees; the customers or debtors of the Bank or the customers of any of its subsidiaries, affiliates, or licensees, the accounts, account numbers, names, addresses or any other personal identifier of such customers; or any information derived therefrom.
- 5.2 The Service Provider must not use or disclose Confidential Information for any purpose other than the purpose for which the Confidential Information was provided to the Service Provider as set forth in the Agreement, and agrees to cause all the Service Provider's employees, agents, representatives, or any other party to whom the Service Provider may provide access to or disclose Confidential Information to limit the use and disclosure of Confidential Information to that purpose.
- 5.3 The Service Provider agrees to implement appropriate measures designed to ensure the security and confidentiality of Confidential Information, to protect such information against any anticipated threats or hazards to the security or integrity of such information, and to protect against unauthorized access to, or use of, Confidential Information that could result in substantial harm or inconvenience to any customer of the Bank or any of its subsidiaries, affiliates, or licensees; the Service Provider further agrees to cause all the Service Provider's agents, representatives, subcontractors, or any other party to whom the Service Provider may provide access to or disclose Confidential Information to implement appropriate measures designed

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to meet the objectives set forth in this paragraph; and the Service Provider shall provide the Bank with copies of audits and test result information sufficient to assure the Bank that the Service Provider has implemented information security measures consistent with this paragraph.

- 5.4 On the expiry or termination of relationship with the Service Provider, the Service provider shall hand over or cause to be handed over all such Confidential Information and all other related materials in the Service Provider's possession to the authorized officer of the Bank.
- 5.5 In the event of a breach or threatened breach by the Service Provider of this clause, monetary damages may not be an adequate remedy; therefore, the Bank shall be entitled to injunctive relief to restrain the Service Provider from any such breach, threatened or actual.
- 5.6 The Service Provider should respect a prospect's privacy. The prospect / Customer interest may normally be discussed only with the prospect and any other individual/family such as prospect's accountant/secretary/spouse, authorized by the prospect / Customer.

### **6. Leaving messages and contacting persons other than the prospect**

- 6.1 The Service Provider must ensure that calls are first made to the prospect.
- 6.2 In the event the prospect is not available, a message may be left for him/her, the aim of the message should be to get the prospect to return the call or to check for a convenient time to call again. Ordinarily, such message may be restricted to prospect's accountant/secretary/spouse, authorized by the prospect.
- 6.3 As a general rule, the message must indicate that the purpose of the call is regarding selling or distributing a product of the Bank.

### **7. No misleading statements/misrepresentations permitted**

The Service provider will not mislead the prospect on any service / product offered. The Service provider should not mislead the prospect about their business or organization's name or falsely represent themselves as Bank's employees and should not make any false / unauthorized commitment on behalf of the Bank for any facility / service.





**8. Gifts or bribes**

1. The Service Provider or its personnel will not accept gifts or bribes of any kind from Customer / Prospect.
2. The Service Provider or its personnel will report any offer / bribe made by the customer / Prospect to the Bank
3. The Service Provider or its personnel will not offer any gifts / gratitude in cash or kind to the customer to solicit business

**9. Handling of letters, documents & other communication**

- 9.1 No Service provider or its personnel will write directly to the customer on behalf of the Bank and/or about the products and services of the Bank.
- 9.2 The service provider or its employees shall not offer to prepare or prepare, obtain or agree to obtain any document for the customer or a prospective customer while soliciting business for the Bank.

**10. Inspection and Call monitoring**

The Service Provider must agree to allow the right of inspection and call monitoring to the Bank to ensure that standards as agreed upon in the Code of Conduct are being adhered to.

**ANNEXURE Declaration–Cum-Undertaking** to be obtained by the DSA from TMEs / BDEs employed by them

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**Re: Code of Conduct**

Dear Sir,





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I am working in your company as a \_\_\_\_\_. My job profile, inter alia, includes offering, explaining, sourcing, and assisting documentation of products and linked services to prospects of American Express Banking Corp.

In the discharge of my duties, I am obligated to follow the Code of Conduct attached to this document.

I confirm that I have read and understood and agree to abide by the Code of Conduct. I further confirm that the trainer mentioned below has explained the contents in full to me.

In case of any violation, non-adherence to the said Code, you shall be entitled to take such action against me as you may deem appropriate.

Signed on this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_

Signature\_\_\_\_\_ Name\_\_\_\_\_ Agency\_\_\_\_\_

Signature of Trainer                      Name                                      Company

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