Code of Conduct

Debt Expert India
A brand operated by Aero Outlook Ventures Private Limited

Effective Date: 14 August 2026

1. Purpose and Scope

This Code of Conduct ("Code") establishes the professional, ethical, and behavioural standards expected from all employees, consultants, agents, representatives, contractors, and other persons acting on behalf of **Debt Expert India**, a brand operated by **Aero Outlook Ventures Private Limited** ("Company", "Debt Expert India", "we", "us", or "our").

This Code applies to all Team Members while performing duties for or representing the Company, whether dealing with borrowers, lenders, banks, NBFCs, creditors, advocates, vendors, service providers, government authorities, or any other stakeholder.

It applies to all forms of communication, including:

- In-person communication
- Telephone calls
- WhatsApp and other messaging platforms
- Email
- Written communication
- Social media
- Digital advertising
- Website content
- Video and other public communications

Objectives

The objectives of this Code are to:

- Protect the interests and dignity of borrowers seeking assistance with financial distress
- Maintain professional and respectful communication with lenders and their representatives
- Ensure that debt-resolution services are provided honestly, lawfully, ethically, and transparently
- Prevent misleading sales practices and false promises
- Protect confidential client and lender information
- Promote responsible debt-resolution practices
- Maintain the reputation and professional standards of Debt Expert India

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2. Our Role and Guiding Principles

2.1 Debt Resolution and Advisory Support

Debt Expert India provides assistance relating to debt resolution, debt settlement, financial rehabilitation, borrower support, and related services, subject to the applicable engagement.

Team Members must clearly communicate the nature and limitations of our Services.

No Team Member may represent that the Company can compel a lender to accept a particular settlement or guarantee a specific financial outcome.

2.2 No Guaranteed Outcome

Team Members must not guarantee:

- A specific settlement percentage
- A particular discount or waiver
- Guaranteed debt reduction
- Guaranteed lender acceptance
- Guaranteed closure of an account
- Guaranteed credit score improvement
- Guaranteed cessation of all recovery communication
- Guaranteed legal outcome
- Any other result that is ultimately dependent upon a lender, creditor, credit bureau, court, regulator, or other third party

Any estimate or illustration provided to a client must be clearly identified as an estimate and must not be represented as a guaranteed result.

2.3 Lawful and Ethical Conduct

All Team Members must conduct themselves in accordance with applicable laws, regulations, contractual obligations, and Company policies.

No Team Member may engage in, encourage, facilitate, or knowingly assist unlawful, fraudulent, deceptive, or unethical conduct, even if requested by a client or another stakeholder.

2.4 Respect for Borrower and Lender Rights

Debt Expert India recognizes that borrowers have rights and responsibilities and that lenders and creditors may also have contractual and legal rights relating to amounts owed to them.

Our role is to support lawful and constructive resolution of debt-related matters and to facilitate communication and negotiation where applicable.

Team Members must not use intimidation, threats, abuse, deception, or unlawful pressure against borrowers, lenders, collection agents, advocates, or any other person.

2.5 Integrity and Honesty

All information communicated by Team Members must be truthful, accurate, and capable of reasonable verification.

Team Members must not:

- Make false statements
- Conceal material information deliberately
- Misrepresent the Company's capabilities
- Misrepresent a lender's position
- Create false urgency
- Promise outcomes that cannot reasonably be guaranteed
- Alter or fabricate documents or records

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3. Dealing with Clients and Borrowers

3.1 Responsible Financial Communication

Team Members must understand that clients approaching Debt Expert India may be experiencing financial stress.

Accordingly, communication must be professional, respectful, and non-exploitative.

Team Members must not take unfair advantage of a client's financial distress, emotional condition, lack of financial knowledge, or urgency.

3.2 No Encouragement of Fraudulent or Dishonest Conduct

Team Members must never advise, assist, encourage, or participate in:

- Fabricating financial documents
- Creating false income or employment records
- Concealing material financial information for fraudulent purposes
- Providing false information to lenders
- Forging signatures or documents
- Manipulating statements or records
- Creating false hardship circumstances
- Misrepresenting ownership of assets
- Any other fraudulent or unlawful activity

3.3 Responsible Communication Regarding Repayments

Team Members must not provide reckless or individualized instructions intended to encourage unlawful conduct or deliberate deception.

Where discussions involve repayment difficulties, Team Members should communicate the importance of considering the client's actual financial circumstances, contractual obligations, applicable consequences, and available lawful resolution options.

Clients should not be told that stopping payments automatically guarantees a settlement or discount.

3.4 Transparent Explanation of Settlement

Before engaging a client for settlement-related Services, Team Members should clearly explain, as applicable:

- Settlement depends upon the lender or creditor
- Settlement terms are subject to negotiation
- The lender may reject a proposal
- Settlement may affect credit history or future borrowing
- Default may have financial, contractual, or legal consequences
- The timing of settlement can vary
- Settlement does not necessarily eliminate every possible consequence associated with default
- Fees payable to Debt Expert India are separate from amounts payable to lenders unless expressly stated otherwise

3.5 No Unauthorized Legal Practice

Only appropriately qualified and authorized legal professionals may provide legal opinions, represent clients before courts or tribunals, or perform activities legally reserved for advocates or other licensed professionals.

Non-lawyer Team Members must not:

- Hold themselves out as advocates
- Represent themselves as lawyers
- Give legal opinions as if they are qualified advocates
- Misrepresent their legal qualifications
- Promise a particular legal outcome

Where legal assistance is required, the matter should be appropriately referred or coordinated with qualified legal professionals.

3.6 Informed Consent

Where client authorization is required to communicate with a lender, creditor, advocate, or other third party, appropriate consent or authorization must be obtained before such communication.

Team Members must ensure that clients understand the purpose and scope of documents they are asked to sign or approve.

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4. Dealing with Lenders, Banks, NBFCs and Creditors

4.1 Professional Communication

All Team Members must communicate with lenders, banks, NBFCs, creditors, collection agencies, advocates, and their representatives professionally and respectfully.

Threatening, abusive, insulting, discriminatory, or deliberately provocative communication is prohibited.

4.2 Accurate Representation

Team Members must not knowingly provide false or misleading information regarding:

- Client's financial circumstances
- Client's income
- Client's assets
- Client's repayment position
- Client's intentions
- Legal status
- Regulatory requirements
- Settlement authority
- Any alleged approval or direction from a government or regulatory authority

4.3 Regulatory References

Team Members must not misuse references to the RBI, courts, regulators, government authorities, laws, regulations, or official guidelines to create false pressure on a lender.

Any regulatory or legal reference used in client or lender communication should be accurate and relevant to the matter.

4.4 Settlement Negotiations

Team Members must understand that settlement is generally subject to the lender or creditor's applicable authority and commercial decision-making process.

A proposed settlement must not be represented as accepted until appropriate confirmation has been received.

Team Members must not falsely claim that a settlement has been approved when it has not been formally confirmed.

4.5 No Undisclosed Personal Benefits

Team Members must not accept undisclosed personal payments, commissions, gifts, benefits, or other financial advantages from:

- Clients
- Lenders
- Collection agents
- Vendors
- Service providers
- Other parties connected with a client's matter

Any potential conflict of interest must be disclosed to the appropriate Company authority.

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5. Sales, Marketing and Public Communications

5.1 Truthful Advertising

All advertisements, website content, social media posts, promotional material, brochures, presentations, videos, and sales communications must accurately describe the Company's Services.

Team Members must not make claims that are false, misleading, exaggerated, or incapable of reasonable substantiation.

5.2 Prohibited Guaranteed Claims

Team Members must not use claims such as:

- “100% Guaranteed Settlement”
- “Guaranteed Loan Waiver”
- “Guaranteed 90% Discount”
- “Settlement Guaranteed”
- “RBI Approved Settlement Company”
- “Government Approved Debt Settlement”
- “Bank Authorized Settlement Company”

unless such statement is factually accurate, legally permissible, and appropriately substantiated.

5.3 No False Regulatory Endorsement

Debt Expert India must not be represented as:

- RBI approved
- RBI authorized
- Government approved
- Bank approved
- NBFC authorized
- Court approved

unless there is a specific and verifiable legal basis for making such representation.

Team Members must not use the name, logo, emblem, seal, or branding of a regulator, government authority, bank, or NBFC in a manner that falsely suggests endorsement or affiliation.

5.4 Responsible Sales Practices

Sales personnel must provide clients with sufficient information to understand:

- Nature of the Services
- Applicable professional/service fees
- Payment schedule
- General scope of Services
- Important limitations
- Cancellation terms
- Refund terms
- Possibility that a lender may reject a settlement proposal

Team Members must not deliberately hide material terms in order to obtain a sale.

5.5 No Pressure Selling

Team Members must not use unreasonable, deceptive, or coercive sales techniques.

This includes:

- False deadlines
- Fake regulatory notices
- False claims about immediate legal action
- Fake lender approvals
- Artificial settlement offers
- Threats of guaranteed consequences
- Misrepresentation of the client's legal position

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6. Confidentiality and Data Protection

6.1 Client Confidentiality

Client information must be treated as confidential.

This includes, where applicable:

- Personal information
- Contact information
- Loan information
- Credit card information
- Financial information

- Credit reports
- Documents
- Settlement negotiations
- Lender communications
- Legal documents
- Payment information
- Other sensitive case information

Such information must only be accessed, used, or shared for legitimate business purposes and in accordance with Company policies and applicable law.

6.2 No Unauthorized Disclosure

Team Members must not disclose client information to friends, family members, unauthorized employees, competitors, social media accounts, or other third parties without appropriate authorization.

Client information must not be used for personal benefit.

6.3 Lender Information

Information received from lenders or their representatives must also be handled responsibly.

Confidential settlement offers, internal communications, documents, or information received under restricted circumstances must not be publicly disclosed or misused.

6.4 Data Security

Team Members must follow Company procedures relating to:

- Password security
- Access controls
- Document storage
- Electronic communication
- Device security
- Data sharing
- Record retention
- Secure disposal of documents

Any suspected data breach, unauthorized disclosure, lost device containing client information, or other security incident must be reported promptly to the designated Company authority.

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7. Conflicts of Interest

Team Members must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company or its clients.

Potential conflicts may include:

- Personal financial dealings with a client
- Undisclosed commissions
- Referrals for personal financial benefit
- Accepting significant gifts or benefits
- Representing competing interests in the same matter
- Using client information for personal gain

Any potential conflict must be disclosed to the appropriate management or compliance authority.

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8. Gifts, Payments and Improper Benefits

Team Members must not offer, solicit, or accept improper payments or benefits intended to influence a business decision.

Reasonable business courtesies, where permitted, must not compromise professional judgment or create an actual or perceived conflict of interest.

No Team Member may accept personal payment from a client for Company Services outside the Company's approved payment process.

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9. Record Keeping and Documentation

Team Members must maintain accurate records relating to client interactions, service activities, communications, authorizations, payments, and relevant case documentation.

Records must not be:

- Falsified
- Deliberately altered
- Backdated without legitimate reason
- Concealed
- Destroyed contrary to Company policy
- Misrepresented to clients or third parties

Where an error is identified, it should be corrected through the appropriate process.

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10. Social Media and Public Statements

Team Members must exercise caution when using social media.

They must not:

- Publish confidential client information

- Publish confidential lender communications
- Disclose settlement terms without authorization
- Make defamatory allegations against lenders or individuals
- Represent personal opinions as official Company statements
- Use Company branding without authorization
- Publish misleading claims about Company performance
- Make false claims regarding regulatory approvals

Only authorized persons may issue official public statements on behalf of Debt Expert India or Aero Outlook Ventures Private Limited.

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11. Workplace Conduct

All Team Members are expected to maintain a professional workplace environment.

The Company does not tolerate:

- Harassment
- Threats
- Bullying
- Discrimination
- Intimidation
- Abusive behaviour
- Retaliation against persons raising genuine concerns
- Deliberate misconduct

Team Members must treat colleagues, clients, lenders, vendors, and other stakeholders with professionalism and dignity.

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12. Compliance and Training

12.1 Mandatory Compliance

Compliance with this Code is a condition of employment or engagement with the Company.

Team Members may be required to acknowledge their understanding of this Code and applicable Company policies periodically.

Violation of this Code may result in disciplinary action, including suspension or termination of employment or engagement, depending upon the seriousness of the conduct.

Where appropriate, the Company may also take legal action or report suspected unlawful conduct to the relevant authority.

12.2 Training

The Company may provide periodic training covering:

- Ethical debt-resolution practices
- Client communication
- Data protection
- Information security
- Responsible sales and marketing
- Applicable laws and regulations
- Lender communication
- Legal and compliance awareness
- Prevention of fraud and misrepresentation

Team Members are expected to participate in relevant training and remain informed about applicable Company policies.

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13. Reporting Concerns and Violations

Any Team Member who becomes aware of actual or suspected:

- Fraud
- Misrepresentation
- Client exploitation
- Unauthorized disclosure of information
- Data breach
- Regulatory violation
- Bribery or improper payment
- Falsification of documents
- Unethical sales practices
- Violation of this Code

should promptly report the matter through the Company's designated internal reporting channels.

The Company will make reasonable efforts to protect persons who report genuine concerns in good faith from retaliation, subject to applicable law and the circumstances of the matter.

Knowingly making false allegations for malicious purposes may itself constitute misconduct.

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14. Management Responsibility

Managers and supervisors are responsible for promoting compliance with this Code within their teams.

They must:

- Lead by example
- Address misconduct appropriately

• Escalate serious concerns
• Avoid encouraging unethical sales practices
• Ensure that employees understand applicable procedures
• Support responsible and transparent client handling

No sales target or business objective overrides the requirements of this Code.

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15. Investigation and Disciplinary Action

The Company may investigate suspected violations of this Code.

Depending on the circumstances, the Company may:

• Seek clarification
• Review relevant records
• Interview persons involved
• Restrict system access
• Suspend an individual's responsibilities
• Take disciplinary action
• Terminate employment or engagement
• Recover losses where legally permissible
• Report suspected unlawful conduct to relevant authorities

All actions will be taken subject to applicable law and Company procedures.

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16. No Retaliation

The Company does not encourage retaliation against a Team Member who raises a genuine concern in good faith.

Any person who believes that they have experienced retaliation for reporting a legitimate concern should promptly report the matter through the appropriate internal channel.

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17. Interpretation and Updates

The Company may amend or update this Code from time to time to reflect:

• Changes in applicable law
• Regulatory developments
• Changes in business practices
• New compliance requirements
• Changes in Company policies
• Operational requirements

Where there is uncertainty regarding the interpretation of this Code or the legality or appropriateness of a proposed action, Team Members should seek guidance from their reporting manager or designated compliance/legal authority before proceeding.

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18. Employee and Team Member Acknowledgement

All Team Members are expected to read, understand, and comply with this Code.

By continuing their employment, consultancy, agency, contractual engagement, or other association with Debt Expert India, each Team Member acknowledges that:

1. They have received or been provided access to this Code.
2. They have read and understood its requirements.
3. They agree to comply with the Code and applicable Company policies.
4. They understand that violations may result in disciplinary action.
5. They understand that certain conduct may also result in civil, criminal, regulatory, or other legal consequences where applicable.
6. They agree to seek guidance where they are uncertain about the legality or appropriateness of an action.

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19. Company Information

Debt Expert India
A brand operated by Aero Outlook Ventures Private Limited

Website: www.debtexpertindia.com
Location: Etah, Uttar Pradesh, India
Compliance / Grievance Email: legal@advocateindia.org

This Code of Conduct is intended to establish professional and ethical standards for persons representing Debt Expert India and does not replace any applicable law, employment agreement, consultancy agreement, service agreement, or other legally binding document.