

# Code of Conduct Assessment (CoCA)



Grameen Shakti Microfinance  
Services Private Limited (GSMS)

*NBFC - MFI*  
*May 2023*

**M-CRIL** - incorporating EDA Rural Systems  
*inclusive microeconomics*



## Grameen Shakti Microfinance Services Private Limited

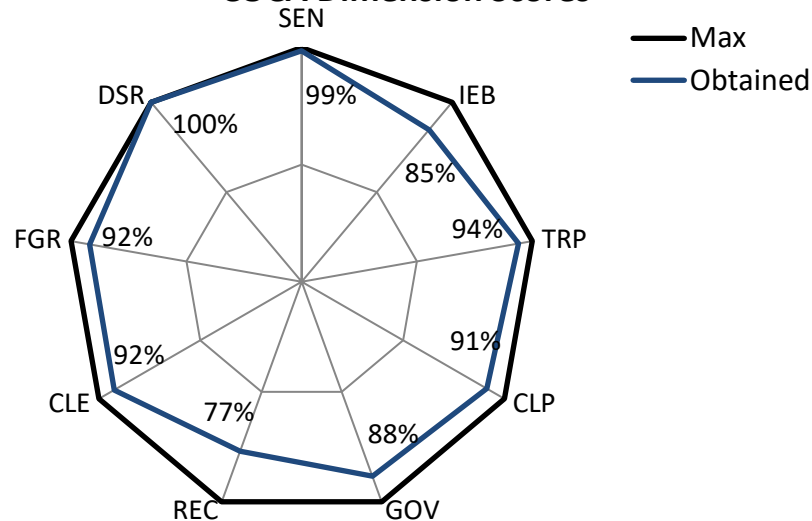
Kolkata, West Bengal, India

Legal form: NBFC-MFI

May 2023

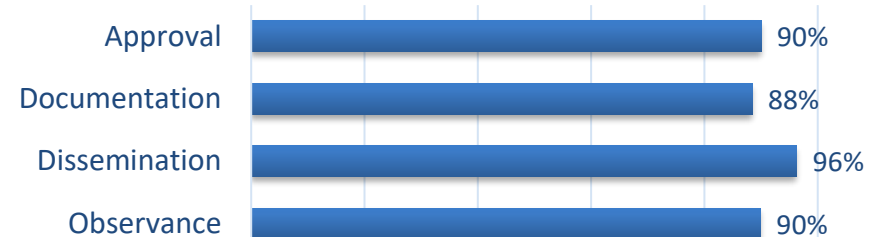
### Microfinance Institutional Rating (MIR)

#### COCA Dimension Scores



Score	91%
Grade	C1

#### ADDO Scores



Visit dates: 16-17 May 2023

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# Disclaimer

- ▶ Our services were performed, and this report was prepared in accordance with the Engagement Letter dated 11 May 2023 subject to the terms and conditions included therein.
- ▶ The information captured in this Report is based on the documentation and information received from time to time from Grameen Shakti Microfinance Services Pvt. Ltd. The findings contained herein are limited to the extent of the procedures conducted by M-CRIL till 18 May 2023 which are described in this document. Accordingly, changes in circumstances or information newly available after this date could affect the findings outlined in this Report.
- ▶ We have relied upon representations of employees of Grameen Shakti Microfinance Services Pvt Ltd., that all data and information provided by them are correct to the best of their knowledge. We accept no responsibility for any fact or information that has been intentionally withheld or otherwise omitted which could have had a material bearing on our findings.
- ▶ M-CRIL has relied upon the information supplied in connection with this engagement including management information. M-CRIL did not audit or otherwise verify the information supplied in connection with this engagement, from whatever source obtained, except as may be specified in this Report.
- ▶ In no circumstances shall we be liable, for any loss or damage, of whatsoever nature, arising from information material to our work being withheld or concealed from us or misrepresented to us by any person to whom we make information requests.
- ▶ The findings contained in this Report are limited to the extent of the procedures performed by M-CRIL, which are described in this Report. The findings, which are hearsay in nature, should not be construed as an opinion, legal or otherwise, on the rights and liabilities of the Company or any other third party that may be, directly or indirectly, concerned with findings in this Report.
- ▶ All the information presented in this Report from our market sources/third parties are the personal perceptions of the sources. Wherever possible, we have corroborated the information provided to us with the information that may be available in the public domain or that which has been provided to the client, however, we have not done so independently.
- ▶ The Report furnished by us is solely for the information of Grameen Shakti Microfinance Services Pvt Ltd, which had requested M-CRIL to undertake the engagement. Hence, the Report should not be used, circulated, quoted or otherwise referred either wholly or in part.
- ▶ Grameen Shakti Microfinance Services Pvt Ltd shall be fully and solely responsible for applying independent judgment, with respect to the findings included in this Report, to make appropriate decisions in relation to future course of action, if any. We shall not take responsibility for the consequences resulting from decisions based on information included in the Report.
- ▶ Based on the information provided by GSMS, M-CRIL has undertaken desk and e-interview based analysis for this grading report.





# Structure

- ▶ Code of Conduct Assessment - summary
- ▶ Strengths & issues
- ▶ **Higher Order Indicators**
  - ❖ Integrity and Ethical Behaviour
  - ❖ Sensitive Indicators
- ▶ **Building Blocks**
  - ❖ Transparency
  - ❖ Client Protection
  - ❖ Governance
  - ❖ Recruitment
  - ❖ Client Education
  - ❖ Data Sharing
  - ❖ Feedback and Grievance Redressal
- ▶ Annex
  - ❖ Assessment tool and methodology
  - ❖ Profile of the Board members
  - ❖ Details of Branches Visited
  - ❖ Methodology and Sampling Plan
  - ❖ Abbreviations

## Key for bullets:

- ✓ Positive
- ❑ Area to improve/Issue



## Code of Conduct Assessment – Summary

- GSMS scores highly in 'Transparency, Client Protection, Feedback and Grievance Redressal, Client Education and Data Privacy,' with well-documented policies and processes approved by the Board and policy dissemination. It is also backed up by the incorporation of core values based on the Unified CoC into its operational process.
- The overall score is further enhanced by GSMS's strong performance on the sensitive parameters.
- The parameters of integrity and ethical behaviour can be improved further. GSMS's approval parameters score is the lowest, indicating that it needs to incorporate processes for reporting code of conduct parameters to the Board.
- GSMS has a well-diversified Board, with three Independent Directors among six Board members, which bodes well from a strategic perspective. GSMS had certain sub-committees at the Board level.
- Credit policies are well established, documented, and communicated to field staff and clients.
- In accordance with the Reserve Bank of India's (RBI) fair practice code, GSMS discloses all terms and conditions to its borrowers.
- All branch staff received training on the new RBI guidelines (including household income assessment) and rescheduling process, and the branch staff were aware of the same as observed during field visits.
- In the internal audit checklist, GSMS must incorporate customer data storage, security, client satisfaction and staff satisfaction.
- There is need for improvement in the code of conduct compliance reporting system.
- GSMS has a board-approved free & fair recruitment policy and seeks reference checks for new staff.
- GSMS has a dedicated feedback and grievance redressal mechanism to handle client & employee complaints, which are presented to the Board, but client awareness of the mechanism needs to be improved further.



## Strengths

- ✓ GSMS has a strong Board comprised of diverse, experienced, and well-respected individuals. The Board has approved the Fair Practice Code, rescheduling/restructuring policy, and customer grievance resolution policy.
- ✓ Mandatory training on product terms is provided to the clients prior to disbursement, evaluation is done during GRT.
- ✓ GSMS analyses each client's cashflow and disburses the loan based on the borrower's ability to repay.
- ✓ It is mandatory to check CB, to capture total indebtedness of each client.
- ✓ GSMS entails policy, procedure, pricing, and transaction transparency. Field staff communicates with borrowers about terms and conditions in professional manner.
- ✓ Loan appraisal and monitoring systems are adequate.
- ✓ GSMS's recruitment policy is well-defined, performs reference checks and provides adequate induction training to new staff.
- ✓ The company has a robust customer grievance redressal mechanism to address complaints in an effective and timely manner.

## Areas for Improvements

- ❑ An updated Code of Conduct (CoC) framed in accordance with the GSMS's mission and vision was not displayed in branches.
- ❑ Circulars with most recent directions were not available in the branches visited.
- ❑ There is room for improvement in terms of customer awareness of effective interest rates, insurance charges, and grievance redressal mechanisms.
- ❑ The level of staff awareness about the latest RBI guidelines in relation to cashflow analysis, determining household income, and qualified assets was found to be moderate.
- ❑ Company needs to revise its internal audit checklist to assess staff satisfaction with incentives, client data storage & usage, income expenditure analysis of clients.





# Higher Order Indicators...1

## Integrity and Ethical Behavior

- ✓ GSMS treats its customers and employees with dignity and has policies in place to ensure this. It ensures that its employees are properly oriented and trained to provide effective client service.
- GSMS discusses briefly about CoC in their audit and risk management committee, but there's a need to prepare a comprehensive CoC compliance report format which can be presented to the board on a periodic basis.
- ✓ The Board has approved a policy for recovering delinquent loans, reschedule/restructure loans. Operational staffs are aware of process to be followed with delinquent clients.
- ✓ There are appropriate documentary evidences and policies (HR and operations) which indicate that both clients and employees are to be treated ethically and fairly.
- ✓ GSMS prepares monthly reports on the number, nature, and resolution of grievances received at the toll-free number, as well as feedback received for management review, which are presented to the Board.
- ✓ The contact number of the Grievance Redressal Officer were clearly displayed in all the branches visited.
- ✓ The contact details of the SRO nodal officers are displayed at the branches and documents.
- Employee satisfaction in terms of compensation and incentives is not covered by the scope of Internal Audit; however, it is mentioned in the HR manual.





## Higher Order Indicators...2

### Sensitive Indicators

- ✓ There has been no report of staff engaging in any abusive or nefarious activities while conducting transactions with clients.
- ✓ Borrowers' indebtedness level and household income analysis were found to be within RBI guidelines.
- ✓ GSMS does not charge any extra fees from client apart from processing fee and insurance premium. Further no penalty is charged for overdue and pre-closure of loans. The company also has a well-documented pre-payment policy.
- ✓ GSMS sends accurate data to all credit bureaus at the frequency specified by SROs.
- ✓ Clients of GSMS confirmed that none of them have been charged a processing fee of more than 1%.
- Around 60% of the clients visited, were aware about the number of instalments paid so far, amount deducted for insurance and processing fees, process to claim the insurance amount.







# Building Blocks...1

## Transparency

- ✓ All the terms and conditions (processing fees, insurance charges etc.) of its loan and savings products are disclosed in vernacular, prominently in the loan cards and certificates. The same are communicated clearly in vernacular to all the clients during the promotion meeting.
- ✓ GSMS's loan documents are provided in the vernacular language.
- ✓ Each client is given a loan card that includes all the terms and conditions as well as the complete repayment schedule, including the number of instalments, the instalment amount (broken down into principal and interest), and the due date.
- ✓ No hidden charges/ security deposits are paid by the client to avail loans from GSMS.
- Staff awareness of RBI guidelines was found to be moderate to high.
- In few of the branches visited by M-CRIL, the most recent RBI guidelines were not displayed on the notice board.
- A low number of clients were aware about the charges and prices for all services.
- ✓ GSMS's website (<https://www.grameenshakti.co.in/>) displays information about loan products, including interest rates and a customer grievance redressal mechanism.
- ✓ The audit committee verifies whether all clients have received the necessary loan documents by doing sample client visits on quarterly basis.





## Building Blocks...2

### Client Protection

- ✓ GSMS follows the RBI's guidelines for its microfinance operations (including client indebtedness limit and number of lenders). The company has framed a Fair Practice Code and has adopted the RBI's fair practice code.
- ✓ Employees were found to be aware of the importance of maintaining professional conduct with clients.
- ✓ The company does not use loan recovery agents and does not engage in coercive collection practises.
- ✓ There was no instance of a client being charged for insurance in excess of the premium payable to an IRDA-approved insurer.
- ✓ GSMS has a client data security policy in place and performs periodic backups of its digital data.
- ✓ Staff members are aware of the importance of maintaining client data confidentiality. The company's manuals also state that the information collected would be utilised only for the purposes specified.
- ❑ The internal audit checklist should include loan sizes and their compliance with the RBI guidelines along with the loan tenure.
- ✓ As observed in the field by M-CRIL's team, all the clients were satisfied with the staff's behavior, the TAT for loan disbursement as reported by clients was 4-5 days.





## Building Blocks...3

### Governance

- ✓ GSMS has a well-diversified Board of Directors, with three independent directors among six board members, which bodes well from a strategic perspective. Among the six directors, three are women.
- ✓ There are four Board level committees, including, finance committee, nomination committee, risk committee and audit committee. These committees generally meet every quarter, and the discussions concentrate on strategic issues such as growth, sources of funds, performance review, strengthening of controls and regulatory compliance.
- ✓ The Board is actively involved in the formulation of all policies and other major decisions. The Board approves all policies, as well as any subsequent changes to them.
- ✓ GSMS have a debt restructuring policy or guideline in place after the breakdown of COVID 19 and has provided training to its staff on the policy.
- ✓ Internal audit committee comprises of four core members who also review risk aspects of the organisation. Reports are channelized through them before being presented to the Board.
- ❑ The internal audit findings report directly to the audit committee, but staff satisfaction related to compensation and incentive are not covered by Internal Audit.
- ✓ The CEO Compensation is clearly disclosed in the audited financial statements of the company.





## Building Blocks...4

### Recruitment

- ✓ The Board has reviewed its recruitment policies on a periodic basis.
- The MFI needs to have a defined and documented process for responding to reference check requests from fellow MFIs.
- ✓ GSMS has the practice of filling managerial vacancies from its existing set of employees through internal promotions.
- ✓ GSMS provides sufficient notice period to employees leaving the organisation.

### Data Sharing

- ✓ Centralized MIS does not allow any client related file to be stored in branches after disbursement.
- ✓ The process of sharing client data is documented in the operation manual. The client data is currently being shared with SRO and credit bureaus.
- ✓ The company conducts mandatory credit bureau checks on all its clients.
- ✓ All financial and operational information is available on GSMS's website, and it is updated periodically.





## Building Blocks...5

### Client Education

- ✓ GSMS has a defined process for training of clients before the loan disbursement and same is verified during GRT by the branch manager.
- ✓ As observed by the M-CRIL team, all the clients have received center training of 3 days by the FCO. CGT educates borrowers on their options, choices, and responsibilities. Clients are also informed about the organization's policies and procedures.
- ✓ The IA framework for branch audit also covers the evaluation of client awareness.
- ✓ GSMS does not charge clients for the trainings provided to clients
- There is scope for improvement in terms of client awareness of the annualised interest rate (73% of sample clients were aware), processing fee (67%), insurance charges and benefits (68%), and grievance redressal mechanism (66%). Borrowers, on the other hand, were aware of loan terms and products and services available. The majority of the borrowers were able to recoup the monthly interest charged by the company.
- ✓ Senior branch staff train employees on the various client processes to be followed.





## Building Blocks...6

### Feedback and Grievance Redressal

- ✓ GSMS's operational manual has details of the grievance redressal mechanism as well as the time frame for resolution.
- ✓ The GRM is communicated to the clients during loan orientation by the FCOs. Clients can call on the number printed on their loan cards and directly contact the Senior Manager of Grievance Redressal at the HO to record their complaint. Thereafter, the complaint is escalated to the relevant department.
- ✓ Or the client can also visit the branch to get their complaint recorded by the BM in the complaint register.
- ✓ Complaints made through the helpline at H.O. and branches were documented at H.O.
- ✓ GSMS maintains records for complaint resolution which shows the exact number of days required for resolution of a complaint depending on its severity.
- ✓ Average TAT for any complaint to get resolved is 3 days.
- Client awareness about grievance redressal through SRO channel was found to be moderate. Only 40% of the interviewed clients were found to be aware of the SRO number and how it can be used for escalation.





# Annexes



# Assessment tool and methodology...1

## Assessment Tool

- ▶ The Code of Conduct Assessment (COCA) tool was developed as a response to the need expressed in a meeting of stakeholders in Indian microfinance by the Small Industries Development Bank of India (SIDBI) and the World Bank in December 2009. The code of conduct dimensions were identified by reviewing the various norms for ethical finance. These included RBI's fair practices guidelines for Non-Bank Finance Companies, industry code of conduct (Sa-Dhan/MFIN) and Smart Campaign's Client Protection Principles (CPP).
- ▶ In 2016, the need was felt to harmonize COCA to the most recent industry code of conduct and to standardize COCA tools of different rating/assessment agencies. This grading is based on the harmonized COCA tool. In the harmonized COCA tool, the dimensions were classified in three categories – highest order, higher order and building blocks. This grading is based on the harmonized COCA tool.

Highest Order	
Sensitive Indicators	
Higher Order	
Integrity and Ethical Behaviour	
Building Blocks	
Governance Transparency Client Education	Client Protection, Recruitment Feedback/ Grievance Redressal Data Sharing







## Assessment tool and methodology...2

The Number of indicators in each category is presented below:

Higher Order Indicators	Number of Indicators
Integrity and Ethical Behaviour	30
Sensitive indicators	27
Building Blocks	Number of Indicators
Transparency	40
Client Protection	123
Governance	29
Recruitment	13
Client Education	14
Feedback & Grievance Redressal	25
Data Sharing	6
<b>Total</b>	<b>250</b>

### Methodology

- ▶ The Code of Conduct exercise is spread over four to eight days. The first day is spent at the head office. The assessment team visits the branches over the next three to eight days. Depending upon the size and the operational area of the MFI, eight to fifteen branches and between 120 and 300 clients are sampled for primary survey (except in cases where number of branches in an MFI is less than eight).



## Assessment tool and methodology...3

### Sampling Guidelines

MFI Size	No. of branches to be visited	No. of borrowers to be visited
Small MFI (Less than 8 branches)	All branches	15 clients per branch covering minimum two centers.
Small / Mid size MFI (up to 2,50,000 borrowers)	8 – 10 branches (geographically distributed)	120-150 clients (15 clients per branch covering minimum two centers).
Large MFI (>2,50,000 borrowers)	12 – 15 branches (geographically distributed)	240-300 clients (20 clients per branch covering minimum two centers).
Large MFI (>2,50,000 borrowers & Gross loan portfolio >Rs 500 crores)	18-20 branches (geographically distributed)	360-400 clients (20 clients per branch covering minimum two centers)



## Assessment tool and methodology...4

### **Code of Conduct Assessment exercise requires:**

- ▶ Discussions with key staff members and the senior management at the head office, particularly the senior operational management team as well as the human resources team. These discussions focus on key issues of the code of conduct identified above.
- ▶ Review of policy documents and manuals at the head office. These are reviewed in order to assess the policy as well as documentation regarding important aspects of the code of conduct. The last audited financial statements will also be required.
- ▶ Sampling of branches at the head office. The assessment team samples branches for review. The branches are chosen in across different states in case the MFI operates in more than one state. Care is exercised to include older branches as well as branches that are distant from the head office or the regional office. The sampling of the branches is performed at the head office of the MFI.
- ▶ Discussions with the branch staff at the branch office. Discussions with branch managers and the field staff is carried out to assess their understanding of the key code of conduct principles.
- ▶ Sampling of respondents in the selected branches. A judgmental sampling is performed on the MFI's clients by the assessment team to draw respondents from the interest group, in order to maximize the likelihood that instances of non-adherence can be detected.
- ▶ Interview with the clients. Information from the clients is collected ideally during the group meetings.
- ▶ If this is not possible, visits are made to the clients' locations for collecting information.
- ▶ Review of loan files at the branch office. This review focuses on loan appraisal performed before disbursing loans as well as the documents collected from the clients.





## Assessment tool and methodology...5

The CoC tool is required to cover 7 building blocks and 2 higher order indicators as depicted below:

Building Blocks	Max. Score
Transparency	40
Client Protection	123
Governance	30
Recruitment	13
Client Education	14
Feedback & Grievance Redressal	25
Data Sharing	6

### Score on Building Blocks

Higher Order Indicators	Max. Score
Integrity and Ethical Behavior	30
Sensitive Indicators	27
First Filter	91
Final Score	91

Grading Guidelines		
Grade	Lower Limit	Upper Limit
C1	91%	100%
C2	81%	90%
C3	73%	80%
C4	51%	72%
C5	0%	50%





## Profile of the Board on 31 March 2023

Board Member	Position on Board	Qualification	Relevant experience (in years)
Ganesh Chandra Modak	Managing Director	Master in Commerce	30 years
Sukriti Mukhopadhyay	Director	Master in Arts & Social Work	20 years
Sundari Modak	Director	Bachelor in Arts	15 years
Pranab Kumar Saha	Independent Director	B. Pharm	39 years
Maitrayee Banerjee	Independent Director	Master in Arts	35 years
Gautam Sen	Independent Director	Master in Arts	36 years





# Methodology

- **Preliminary analysis of GSMS information, review of available reports and financial statements**
- Conducted desk and interviews based analysis with the branches.
  - Total 6 branches (5-West Bengal and 1-Bihar)
- Discussion with Branch Manager on different aspects of CoC, MFI's policies and procedures to be conducted, physically and virtually.
- Documentation review – policies and data shared by GSMS.
- Virtual interaction with clients – FGD with 2-3 centers per branch, across 6 branches
- Assess relationship between staff and clients
- Check for implementation of client protection principles.
- Feedback on products – suitability to client needs, application of terms & conditions
- Virtual discussions with the Chief Functionary and senior management (Operations, Accounting & Finance, MIS, Human Resources and Internal Audit) to understand MFI's objectives, governance, market strategies, operations, products and services, integration of CoC in policies and procedures and MIS.
- Collection and review of documents, manuals, Board minutes and associated documents to Code of Conduct.
- **Data Analysis and Report writing**
- **Internal Review at M-CRIL**
- **Report draft sent to GSMS**





## Sampling Plan

As part of this assessment, we conducted client discussion with 12 branches of the MFI. The details of the branches are provided below:

#	Branch	State	# of centers
1	Purnanagar	West Bengal	3
2	Shantipur	West Bengal	4
3	Srirampur	West Bengal	3
4	Bindol	West Bengal	3
5	Patirajpur	West Bengal	2
6	Sonaili	Bihar	2

Discussion with Branch staff was also conducted



# Abbreviations

ALM	Asset Liability Management	IT	Information Technology
BC	Banking Correspondent	JLG	Joint Liability Group
BM	Branch Manager	LAF	Loan application Form
CAGR	Compound Annual Growth Rate	LLP	Loan Loss provisioning
CB	Credit Bureau	LPF	Loan Processing Fee
CFE	Chief Finance Executive	LUC	Loan Utilisation Checks
CGM	Chief General Manager	MFI	Micro Finance Institution
CGT	Compulsory Group Training	MIS	Management Information System
CO	Credit Officer	NBFC	Non-Banking Finance Company
COO	Chief Operations Officer	OER	Operating Expense Ratio
DFI	Development Finance Institutions	OSS	Operational Self Sufficiency
GLP	Gross loan portfolio	PAR	Portfolio at Risk
HO	Head Office	PSB	Public Sector Bank
HR	Human Resources	RBI	Reserve Bank of India
IA	Internal Audit		







# Glossary

- ▶ **Active borrowers per field staff:** Amount of borrower / Number of field staff
- ▶ **Active borrower per staff:** Number of borrower / Total staff
- ▶ **Average loan size:** Total loan amount disbursed in the period / Number of disbursed loans
- ▶ **Average outstanding:** Gross portfolio / Number of active borrowers
- ▶ **Assets under management:** Sum of assets managed by the institution including own portfolio, off-balance sheet portfolio and securitised portfolio.
- ▶ **Capital Adequacy Ratio:** Total net worth / Total risk weighted assets
- ▶ **Cost per Borrower (active client) :** Operating expenses/Average number of active borrowers
- ▶ **Client drop-out ratio:** Number of clients dropped out during the period/(average number of clients during the period)
- ▶ **Financial expense ratio:** Total interest expense during the period /Average portfolio
- ▶ **Debt-equity ratio:** Total liabilities/Total equity
- ▶ **Loan loss provisioning ratio:** Total loan loss provisioning expense during period /Average portfolio
- ▶ **Operational Self-Sufficiency (OSS):** Ratio of total income to total costs for the period
- ▶ **Operating expense ratio:** Total operating expenses (incl. depreciation) during the period/average loan portfolio
- ▶ **Portfolio at risk (PAR (>30days):**The principal balance outstanding on all loans with overdues greater than or equal to 30 days /Total loans outstanding on a given date.
- ▶ **Return on assets (RoA):** Operational income (or loss) after tax during the period /Average assets
- ▶ **Return on equity (RoE):** Ratio of operational income (after tax)/(loss) to average net worth
- ▶ **Staff attrition rate:** Number of staff who left the institution during the year/(average number of staff during the year)
- ▶ **Yield on portfolio:** Interest, fee income and commission for off-balance sheet portfolio during the year/Average gross loan portfolio for the year





# Microfinance Capacity Assessment Grading symbols

Grading Scale	Definitions
M1	MFIs with this grade are considered to have highest capacity to manage their microfinance operations in a sustainable manner.
M2	MFIs with this grade are considered to have high capacity to manage their microfinance operations in a sustainable manner.
M3	MFIs with this grade are considered to have above average capacity to manage their microfinance operations in a sustainable manner.
M4	MFIs with this grade are considered to have average capacity to manage their microfinance operations in a sustainable manner
M5	MFIs with this grade are considered to have inadequate capacity to manage their microfinance operations in a sustainable manner.
M6	MFIs with this grade are considered to have low capacity to manage their microfinance operations in a sustainable manner.
M7	MFIs with this grade are considered to have very low capacity to manage their microfinance operations in a sustainable manner.
M8	MFIs with this grade are considered to have lowest capacity to manage their microfinance operations in a sustainable manner.





## Code of Conduct Assessment (CoCA) symbols

Assessment Scale	Definitions
C1	Excellent performance of the MFI on Code of Conduct dimensions.
C2	Good performance of the MFI on Code of Conduct dimensions
C3	Average performance of the MFI on Code of Conduct dimensions
C4	Weak performance of the MFI on Code of Conduct dimensions
C5	Weakest performance of the MFI on Code of Conduct dimensions

