

## Silver Linings Program Terms and Conditions

Axis Bank customers who have a Senior Savings Account with Axis Bank will be eligible for various offers / benefits of the Silver Linings Program. The terms and conditions applicable for the benefits are mentioned below, the same is not exhaustive and customers would need to visit the relevant sections of other products to see all terms & conditions.

Customers with the following Axis Bank Savings Account variant will be automatically enrolled into the Silver Linings Program:

- Senior Privilege Savings Account SBSPA
- Prestige Senior Savings Account SSPRP
- Senior Privilege Priority Account PBSPA
- Burgundy Senior Privilege Account BGSPA

The benefits offered herein under the Silver Linings Program is complimentary to customers and is in addition to the existing product features and pricing benefits customers avail as part of their Savings Account. Customers will be governed by Savings Account Terms and conditions as defined by Axis Bank.

## I. Discounted healthcare services from Portea:

Portea aims at bringing quality medical care into patients' homes and aim to make primary healthcare not only more accessible but also more affordable and accountable to patient's needs.

<u>OFFER</u>: Silver Linings Program customers will be eligible for discounts on services and packages of Portea Medical services till 31<sup>st</sup> March, 2024 as defined below:

- Individual services: 10% Discount
- Package services: 30% Discount
- Silver Linings Program customers will receive the discount voucher code & offer details through SMS / Email within 30 days of account opening/ enrollment into the Program.
- There is no validity to the coupon code but the usage is limited to one time per Individual service and one time per package service.

#### Common Terms & Conditions

• Discount will be applicable on the following services:

Individual services-10% Discount				
Physiotherapy	Teleconsultation	Nursing Attendant	Doctor Consultation	



Nursing	Vaccination	Diabetes Management	Diagnostics		
Elder Care	Mother and Baby Care	Sleep Management Program			
Package services – 30% Discount					
Nursing - 20 days and above		Nursing Attendant - 20 days and above			
Physiotherapy - 15 days and above		Eldercare - Health Prime			

### Redemption Process:

- Axis Bank Program customers to call Portea Concierge Desk on 08068065204 which is operational 24\*7 to book the service of their choice.
- Customers will need to provide the Voucher code AXBKTN to avail 10% discount on individual service and AXBKTHY to avail 30% discount on packages. Voucher code to be shared with the customer care executive to avail the discount. This voucher code is also communicated by Axis Bank through Email/SMS/ Program Welcome Letter.
- A payment link will be sent to the customer on Mobile/ email provided to the agent for the services booked. Payment will need to be made using an Axis Card.
- Service requests made post 6 P.M. will be booked next day.
- This offer is applicable to all Silver Linings Program customers only.
- Payment made through non Axis Bank Cards will not be eligible for the discount on services as defined in the offer section above.
- Customer would need to be a Silver Linings Program customer till the voucher is received by the customer. In case the customer is downgraded to another account variant or the account is closed, the customer will not be eligible for the voucher.
- Voucher code and Redemption details of the offer would be sent on the registered mobile number/ Email of the first holder of the account and the Bank will not be responsible or liable, in any manner whatsoever, in case the above offer is not configured or could not be availed due to any restrictions including DNC/ NDNC or any delay, congestion on any telephone network or line or issues related to computer on-line system, servers or providers, website or mobile app or any other reason beyond the control of Axis Bank.
- For any issues / queries / complaints / grievances relating to the offer/voucher code please contact Portea customer service on 18001213090. In case adequate resolution is not provided by the Alliance Partner; Portea, customers can also contact Axis Bank customer service desk or write to us at www.axisbank.com/support
- Portea services are currently available in the following cities: Agra, Ahmedabad, Amritsar, Asansol, Bangalore, Baroda, Belgaum, Bhopal, Bhubaneswar, Calicut, Chandigarh, Chennai, Cochin, Coimbatore, Dehradun, Durgapur, Goa, Guwahati, Hubli, Hyderabad, Indore,



Jabalpur, Jaipur, Jamshedpur, Kolkata, Lucknow, Ludhiana, Madurai, Mangalore, Meerut, Mumbai, Mysore, Ncr, Nagpur, Nashik, Pondicherry, Pune, Raipur, Ranchi, Salem, Siliguri, Solapur, Surat, Vadodara, Vellore, Vijayawada, Visakhapatnam and Warangal.

- In case of any dispute/issues arising in relation to the above with respect to non-receipt of voucher or on the eligibility, Axis Bank's decision shall be final and binding in all respects and the same shall not be disputed by the customer.
- The terms and conditions governing the offer shall be in addition to and not in substitution / derogation to the Primary Terms and Conditions governing Axis Savings Account & Debit Card issued by Axis Bank.
- The participation in the offer is entirely voluntary and it is understood, that the participation by the account holders shall be deemed to have been made on a voluntary basis.
- Customer is solely responsible for the safety and security of the promo code. Portea /Axis Bank shall not be responsible for any acts of omission or commission if coupon code is lost, stolen or used without permission of the customer.
- Once the coupon code has been sent to the customer, they are bound to protect the coupon code number and keep it confidential. In the event of any misuse of the e-voucher due to loss of any such confidential details due to the fault of the purchaser, Portea/ Axis Bank Ltd. shall not be responsible for the same and no refund will be issued to the customer.
- Axis Bank shall not be held liable for any delay or loss that may be caused in delivery of the goods and services against which the coupon code is utilized/redeemed.
- The benefits under the campaign are neither transferable nor redeemable in cash.
- Axis Bank holds out no warranty or makes no representation about the quality, delivery of the services offered by the Portea. Any dispute or claim regarding the services must be resolved by the customer with Portea directly without any reference to Axis Bank. The existence of a dispute, if any, regarding the services shall not constitute a claim against Axis Bank.
- Axis Bank reserves the right to add, alter, modify, change or vary all or any of these Terms and Conditions or to replace, wholly or in part, this offer by another offer, whether similar to this offer or not, or to withdraw it altogether at any point in time by providing appropriate notice to customers.
- Discounted benefits offered on Portea services provided by Axis Bank may not include all services offered by Portea directly or via other channels. Customers will only be eligible for discounted offering on services defined above.
- For details on Portea's refund Policy on services booked, please visit www.portea.com/terms-conditions/
- For details on Portea services, its features / benefits / terms & conditions/ privacy policies, please visit https://www.portea.com/privacy-policy/.



### II. Complimentary Half Year Sony Liv Membership:

### <u>OFFER</u>

For Silver Linings Program customers who have opened their Savings account on or after <u>22<sup>nd</sup>November</u>, 2022 will be eligible for a complimentary half year Sony Liv membership subject to meeting the eligibility criteria as mentioned below:

- Customers would need to spend a minimum of Rs. 75,000/- in a calendar quarter (Apr June, July Sep, Oct Dec, Jan-Mar) from their account through Axis Debit Card or UPI.
- Customers will need to meet the defined milestone within the next quarter post account opening to be eligible for the offer (account opening quarter will not be considered)
- Customers who qualify, will receive a communication (SMS/ Email) within 45 days post calendar quarter end to claim the voucher by a specific date (this will be mentioned in the communication). Customers will need to click on the link mentioned in communication and follow the steps mentioned to claim the voucher within the defined timeframe. The voucher code will be sent to the customer's registered mobile/ email within 15 Minutes on claiming for the same. If not received, customer can contact the Helpdesk number 1800-1033-314 or send an email on help@gyftr.com
- The customer would need to redeem the voucher code within the period defined to avail the membership, details will be shared with voucher communication.
- In case the customer does not redeem the same within the timeframe stipulated, the offer will expire and this will not be re-instated.

For Silver Linings Program customers who have opened their Savings account before 22<sup>nd</sup> November, 2022 will be eligible for a complimentary half year Sony Liv membership subject to meeting the eligibility criteria as mentioned below:

- Customers would need to spend a minimum of Rs. 75,000/- in a calendar quarter (Apr June, July – Sep, Oct – Dec, Jan-Mar) from their account through Axis Debit Card or UPI to qualify for the offer.
- Customer will need to meet the defined milestone in the period as defined by the Bank. The window will be announced once in a year for a calendar quarter, post which the offer will stop. For example, if the window is opened for Q3FY'24 customers will need to meet qualification criteria between 1<sup>st</sup> Oct'23- 31<sup>st</sup> Dec'23. Customers will be informed of the offer window in advance, through sufficient communication via Email, SMS and other banking channels.
- Customers who qualify for this milestone, will receive a communication (SMS/ Email) within 45 days post calendar quarter end to claim the voucher by a specific date (this will be mentioned in the communication). Customers will need to click on the link mentioned in communication and follow the steps mentioned to claim the voucher within the defined timeframe. The voucher code will be sent to the customer's registered mobile/ email within



15 Minutes on claiming for the same. If not received, customer can contact the Helpdesk number 1800-1033-314 or send an email on help@gyftr.com.

- The customer would need to redeem the voucher / code within the period defined to avail the membership, details will be shared with voucher communication.
- In case the customer does not redeem the same within the timeframe stipulated, the offer will expire and this will not be re-instated.

### Common Terms & Conditions

- To become eligible for the offer, customers must make spends through their Debit Card or UPI transactions which is linked to their Axis Bank Senior Savings account. For the purpose of this offer, 'Debit Card' means and includes all Axis Bank Debit Cards.
- Debit Card spends can be done either online or offline (POS transactions). Only successful debit card transactions will be considered and reversals on any transactions will not be considered as successful debit card transactions.
- ATM transactions or withdrawals will not be considered under successful debit card transactions.
- Additionally, spends/transactions done using the card at following merchants shall not be considered while calculating the eligibility for Sony Liv membership:
  - Cash Withdrawals (6010,6011)
  - Insurance/Financial Institutions/Wallet Load +Top-up (4829, 6012, 6050, 60516211, 6300, 6381, 6399, 6531, 6532, 6533, 6534, 6535, 6611, 6760, 7276)
  - Education (8211, 8220, 8241, 8244, 8249, 8299, 8493, 8494) o Fuel (5172, 5541, 5542, 5983)
  - Government services (8111, 9211, 9222, 9223, 9311, 9312, 9313, 9314, 9399, 9402, 9405, 9411)
  - o Jewelry (5094, 5944)
  - Charities (8398) Telecom (4812, 4814)
  - Visa (9700, 9701, 9702)
- Only Merchant transactions (P2M) will be considered for UPI. UPI transactions made to merchants as listed in the above point will not be eligible.
- In case of Joint account, all debit card transactions done by either Primary member will be considered for calculating the eligibility. Eligibility will be considered at an account level.
- Customer would need to be a Silver Linings Program customer till the voucher is received by the customer. In case the customer is downgraded to other account variant or the account is closed, the customer will not be eligible for the voucher.
- Axis Bank reserves the sole right to decide on whether a purchase transaction meets the eligibility criteria as mentioned in the Terms & Conditions. All decisions with respect to the offers shall be at the sole and exclusive discretion of Axis Bank and the same shall be final, binding and non-contestable.



- Axis Bank reserves the right to add, alter, modify, change or vary all or any of these Terms and Conditions or to replace, wholly or in part, this offer by another offer, whether similar to this offer or not, or to withdraw it altogether at any point in time by providing appropriate notice to customers
- Redemption details of the Voucher would be sent on SMS/ Email and Axis Bank will not be responsible or liable, in any manner whatsoever, in case the above offer is not configured or could not be availed due to any restrictions including DNC/ NDNC or any delay, congestion on any telephone network or line or issues related to computer on-line system, servers or providers, website or mobile app or any other reason beyond the control of Axis Bank.
- In case of any issues relating to the above Offer including any dispute or discrepancy or non-receipt of Voucher or on the eligibility, Axis Bank's decision shall be final and binding in all respects and the same shall not be disputed by the customer.
- In case of any dispute in relation to non-receipt of Sony Liv membership post following redemption process due to any reasons which are not under Axis Bank's control, customer should share proof of consent shared with Axis Bank for availing the membership.
- All issues pertaining to this offer to be raised within 90 days from the last day of fulfillment /qualification.
- The participation in the offer is entirely voluntary and it is understood, that the participation by the customers shall be deemed to have been made on a voluntary basis
- The terms and conditions governing the offer shall be in addition to and not in substitution / derogation to the Primary Terms and Conditions governing Axis Savings Account and Debit Card.

# III. Customized Travel Services:

## <u>OFFER</u>

# A. Complimentary TRAVEL EDGE Discount Voucher of Rs. 1500

Silver Linings Program customers who have opened their account on or after 22<sup>nd</sup> November, 2022 will be eligible for a complimentary TRAVEL EDGE Discount Voucher of Rs. 1500, which can be redeemed against domestic air travel bookings subject to meeting the eligibility criteria as mentioned below:

- Activate their Axis Bank Debit Cards through any spend amount within 45 days of account opening.
- $\circ$  This offer is valid till 31<sup>st</sup> July, 2023
- TRAVEL EDGE discount voucher will have a validity of 12 months from receipt and can be redeemed against any Domestic Travel Booking made through Axis Bank TRAVEL EDGE platform for travels within a month (Eg. If ticket booking on 30<sup>th</sup> October, 2023, then the



travel date should be by 1<sup>st</sup> December, 2023. Tickets post 1st December, 2023 will not be eligible for discounted voucher offer).

- In case of Joint account, activation of the Debit Card of the Primary Account holder will be considered. Eligibility will be considered at an account level.
- Debit Card will be considered as active if customer uses Axis Debit Card to make a transaction, which can be done either online or offline (POS transactions). ATM transactions or withdrawals will not be considered under successful debit card transactions.
- Redemption Process of the Voucher:
  - Customer will need to call TRAVEL EDGE Concierge Number on 022-6855 4000 and share the TRAVEL EDGE Discount voucher code and other details required for Booking the Travel with the agent (Travel destination, travel dates and Name as per Aadhaar/ Pan card are to be provided). Post flight selection, a payment link which includes the discounted price post application of Voucher code will be sent on the registered or requested Mobile number and registered email ID of the customer. On payment through an Axis Bank Card only (Debit or Credit card), customer will receive ticket details on their registered email/mobile number.
- Customers will not be able to use Axis Edge Reward Points or Edge Miles for payment of tickets booked using these discounted vouchers.
- Customers will be eligible to earn Edge Points and Edge Miles basis their Card variant for bookings done using this voucher code.
- Only Debit Card activation of card linked to the Senior Savings Account, will be considered. Senior Savings account means accounts under scheme codes SBSPA, SSPRP, PBSPA, BGSPA.
- The rewards will be calculated at an account level & the customer has to be a Senior Savings Account Holder as defined in the above point
- TRAVEL EDGE Discount Voucher shall be sent to the registered email/ mobile number of the Primary account holder within 75 days of Account Opening, subject to the customer meeting qualification criteria.
- Axis Bank reserves the sole right to decide on whether a purchase transaction meets the eligibility criteria as mentioned in the above Terms & Conditions. All decisions with respect to the offers shall be at the sole and exclusive discretion of Axis Bank and the same shall be final, binding and non-contestable.

# B. TRAVEL EDGE Concierge Services:

• TRAVEL EDGE Concierge services will be available for all Axis Bank Silver Linings Program customers as defined in this document to book flight tickets, hotels and other experiences available on the Axis TRAVEL EDGE Platform.



- The Concierge services are available on 022-6855 4000 from 10 am to 10 pm (Monday to Sunday)
- Customers to select "Silver Linings Program" from the IVR option to connect directly with an executive who will help them with their bookings.
- Payment for all bookings made through the TRAVEL EDGE Concierge Service will need to be made through an Axis Debit or Credit Card.
- C. Waiver of Convenience fee and discounts for Senior Citizens on Travel Bookings made through TRAVEL EDGE:
  - All Axis Silver Linings Program customers will be eligible for waiver of convenience fee for flight tickets booked through TRAVEL EDGE Platform/Concierge.
  - Additionally, Silver Lining customers will also be able to avail special pricing on TRAVEL EDGE platform for domestic flight tickets. Special Pricing is dependent on flight sectors and airlines selected and is subject to change on a daily basis.

## Common Terms & Conditions for TRAVEL EDGE offer & services:

- Axis Bank reserves the right to add, alter, modify, change or vary all or any of these Terms and Conditions or to replace, wholly or in part, this offer by another offer, whether similar to this offer or not, or to withdraw it altogether at any point in time by providing appropriate notice to customers.
- Axis Bank will not be responsible or liable, in any manner whatsoever, in case the above
  offers are not configured or could not be availed due to any restrictions including DNC/
  NDNC or any delay, congestion on any telephone network or line or issues related to
  computer on-line system, servers or providers, website or mobile app or any other reason
  beyond the control of Axis Bank
- In case of any issues relating to the above offers including any dispute or discrepancy or non-receipt of TRAVEL EDGE Discount Voucher / discounted fares or on the eligibility, Axis Bank's decision shall be final and binding in all respects and the same shall not be disputed by the customer.
- All issues pertaining to this offer to be raised to Axis Bank within 90 days from the last day of fulfillment/ qualification.
- The terms and conditions governing the offer shall be in addition to and not in substitution / derogation to the existing Primary Terms and Conditions governing the Axis Savings Account and Debit Card.
- The above T&Cs are in addition to the Edge Travel Program T&Cs mentioned herein: <u>https://traveledge.axisbank.co.in/Terms\_condition</u>
- The participation in the offer is entirely voluntary and it is understood, that the participation by the customer shall be deemed to have been made on a voluntary basis.
- For more details on Axis TRAVEL EDGE its services/benefits/term & conditions visit https: <u>https://traveledge.axisbank.co.in</u>



### IV. Special Offer on SmartEdge - AI Subscription through Axis Direct

# <u>OFFER</u>

- This offer is applicable only to Axis Bank Silver Linings Program customers Senior Privilege Savings Account (SBSPA), Prestige Senior Savings Account (SSPRP), Senior Privilege Priority Account (PBSPA), Burgundy Senior Privilege Account (BGSPA)
- Customers can get a 50% refund of charges for subscribing to SmartEdge AI, a broking offering with Research backed stock investment ideas of Axis Direct. Axis Direct is brand of Axis Securities Limited, a subsidiary of Axis Bank.
- Please refer to the detailed Terms & Conditions of SmartEdge AI before subscribing. To know more about SmartEdge AI visit: https://simplehai.axisdirect.in/dynamicWeb/axisintellect/index.html
- The maximum refund is restricted to Rs. 2,499 per customer.
- The offer is applicable for SmartEdge AI subscription received during the offer period of 22<sup>nd</sup> November, 2022, to 31<sup>st</sup> March, 2024.
- The fee charged will be refunded up to the eligible amount by T+1 month (T being the month of SmartEdge AI amount debit).
- The offer cannot be clubbed with any other offer and if a customer has received multiple offers from Axis Direct, the subscription fee reversal from all the offers will be limited to 50% of the actual fee received during this offer period.
- The above offer is not applicable for NRIs.
- The offer is non-transferable and is exclusively for whom it is intended.

## V. Dedicated Relationship Manager

- All Axis Silver Linings Program customers meeting below mentioned criteria are to be provided an Axis Bank official to help with all banking & service requirements.
- Axis Silver Linings Program customers who have a Senior Privilege Priority (PBSPA) account or Burgundy Senior Privilege Savings (BGSPA) account will be assigned a Dedicated Relationship Manager. Additionally, Prestige Senior Savings (SSPRP) and Senior Privilege Savings account (SBSPA) will be assigned an Axis Bank official on meeting the below criteria:
  - Prestige Senior Savings Account (SSPRP): Average monthly balance of Rs. 50,000
  - Senior Privilege Savings account (SBSPA): Average monthly balance of Rs. 25,000
- Prestige Senior Savings (SSPRP) and Senior Privilege Savings (SBSPA) customers opening their account post 22<sup>nd</sup> November'22, will be assigned an Axis Bank official within 90 Days from meeting the above mentioned criteria.
- In case of Joint account, an Axis Bank officer will be assigned to the first holder of the account. Eligibility will be considered at an account level.



- Axis Bank reserves the sole right to decide on whether the account meets the eligibility criteria as mentioned in the terms & conditions and can re-assign the Axis Bank official in case the customer does not meet defined criteria. All decisions with respect to this benefit shall be at the sole and exclusive discretion of Axis Bank and the same shall be final, binding and non-contestable.
- Axis Bank reserves the right to add, alter, modify, change or vary all or any of these Terms and Conditions or to replace, wholly or in part, this offer by another offer, whether similar to this offer or not, or to withdraw it altogether at any point in time by providing appropriate notice to customers.

### VI. Healthcare Discounts through complimentary Senior Citizen ID Card

- Silver Linings Program customers will be provided special additional healthcare benefits and discounts at Apollo Pharmacies and several Diagnostic Centers. To know more about the benefits and its terms & conditions, please visit https://www.axisbank.com/retail/accounts/savings-account/senior-privilege-savingsaccount
- To apply for a complimentary Axis Bank Senior Citizen ID Card, please visit the nearest branch.

## VII. GENERAL TERMS & CONDITIONS APPLICABLE

The below Terms and conditions are in addition to T&Cs of respective offers, if any.

- In case of any dispute pertaining to the offers, Axis Bank's decision shall be final and binding on customers.
- Any dispute relating to the Offer or the Terms and Conditions shall be subject to the jurisdiction of the courts in Mumbai only.
- The offers above are not transferable and non-negotiable.
- Axis Bank holds out no warranty or makes no representation about the quality, delivery of the services offered by the Alliance Partner. Any dispute or claim regarding the services must be resolved by the customer with the Alliance Partner directly without any reference to Axis Bank. The existence of a dispute, if any, regarding the services shall not constitute a claim against Axis Bank.
- Axis Bank reserves the right to disqualify any customer from the benefits of the offer if any fraudulent activity is identified as being carried out for the purpose of availing the benefits under the offer or otherwise by use of Axis Bank Savings account, Debit Card or Credit card.
- All taxes, duties, levies or other statutory dues and charges payable in connection with the benefits accruing under the offer shall be borne solely by the customer and Axis Bank will



not be liable in any manner whatsoever for any such taxes, duties, levies or other statutory dues

- Campaigns/ Offer is subject to applicable law and regulations and would be modified / discontinued by Axis Bank based on the prevailing law / regulation at any point of time and neither party shall be under any liability or obligation or continue implementation of the said Campaign/Offer till such time the terms are modified by the Parties as per the prevailing/ amended law at that point of time. Any changes to these Terms and Conditions of Use or any terms posted on www.axisbank.com site apply as soon as they are posted. In the event, that the Campaign/Offer cannot be continued without total compliance of the prevailing law at any point of time, this Campaign/Offer shall be deemed to be terminated forthwith from the date when the amended law restricting / prohibiting the Campaign/Offer comes into force. By continuing to use the card after any changes are posted, customers are indicating their acceptance of those changes.
- Any person taking the advantage of the above-mentioned offers shall be deemed to have read, understood and accepted these terms and conditions
- Termination of Offer: Axis Bank reserves the right to, without liability or prejudice to any of its other rights, at any time, without previous notice and from time to time, withdraw/suspend/amend/cancel these offers, without assigning any reasons thereof. In case of any dispute or discretion, Axis Bank's decision shall be binding and final.
- Axis Bank will not be liable in any manner whatsoever for any loss/ damage /claim/injury that may arise due to withdrawal or change in the terms and conditions of the Offer or discontinuation of it.
- Axis Bank will not be responsible or liable in case the offer is not configured or could not be availed due to malfunction, delay, traffic congestion on any telephone network or line, computer on-line system, servers or providers, computer equipment, software, or website.
- The concerned brands and partner and Axis Bank reserve the right at any time, without notice, to add/alter/change/ or vary any or all of these terms and conditions or to replace, entire or in part, this offer by another offer, whether similar to this offer or not, or to withdraw it altogether.
- Axis Bank shall not be liable in any manner whatsoever for any loss/ damage/ claim that may arise out of use of any services availed of by the Account Holder/s under the Program.
- Images provided in promotions are only for pictorial representation and Axis Bank does not undertake any liability or responsibility for the same.
- Nothing contained herein shall constitute or be deemed to constitute an advice, invitation or solicitation to purchase any products/ services of partners or any third party and is not intended to create any rights and obligations.
- Axis Bank or the brand partners retain the right to change or discontinue the offers at any time during the promotion period



- Brand partners & Axis Bank reserve the right to disqualify any customer from the benefits of the offer if any fraudulent activity is identified as being carried out for the purpose of availing the benefits under the offer or otherwise.
- Axis Bank shall not be obliged to make any public announcements to intimate the successful customers about the discount / benefits under the offers.
- The offers are not available wherever prohibited and products/ services for which such programs cannot be offered for any reason whatsoever.
- Logos/trademarks used are owned by respective entities. Axis Bank has been authorized to use these logos/trademarks for offer promotion purposes.
- Terms & conditions of the respective partners apply.
- For any complaints and escalations pertaining to the offer write to us on axisbank.com/support
- Participation in the offers is entirely voluntary and it is understood, that the participation by the customer shall be deemed to have been made on a voluntary basis.