

# Sriffin Credit Private Limited

## Fair Practices Code

### 1. Introduction

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The document ensures that the principles of responsible lending, transparency and core values are followed in letter and spirit. Sriffin follows various guidelines issued by Reserve Bank of India (“RBI”) on Fair Practices Code for NBFC-MFIs, Master Direction – Reserve Bank of India (Regulatory Framework for Microfinance Loans) Directions, 2022 read with RBI notification DOR.STR.REC.13/13.03.00/2024-25 dated April 15, 2024 and Industry Code of conduct developed by the Self-Regulatory Organizations.

#### 1.1 Definitions and Abbreviations

##### 1.1.1 Abbreviations

Abbreviation	Description
Board	Board of Directors of Sriffin Credit Private Limited
CEO	Chief Executive Officer
COO	Chief Operating Officer
CCO	Chief Compliance Officer
FPC	Fair Practices Code
RBI	Reserve Bank of India
SRO	Self-Regulatory Organisation
CIC	Credit Information Company
CSS	Customer Support Service
MFIN	Micro Finance Institution Network
TAT	Turn Around Time
Sriffin Credit Private Limited	Company
DC	Disciplinary Committee
GRM	Grievance Redressal Mechanism

### 2. Fair Practices Code

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#### 2.1 Purpose

The Fair Practices Code is adopted by the Board pursuant to guidelines on “Fair Practices Code” issued by the Reserve Bank of India vide Master Circular DNBS. (PD). CC.No.286 /03.10.042/ 2012-13 dated July 2, 2012, to ensure transparency and fairness while interacting with its borrowers. Clear norms are laid down which the Company must follow while dealing with the borrowers during different stages of the loan journey of a borrower.

#### 2.2 Scope

The Code is applicable to loans and products offered by the Company.

## **2.3 Objective**

- To formulate FPC and lay down the process and guidelines for effective implementation of FPC which is in compliance with the guidelines prescribed by the regulator and Self-Regulatory Organizations (SROs);
- To protect Borrowers from fraud, misrepresentation, deception and unethical practices;
- To ensure that all practices related to lending and recovery of loans are fair and maintain respect for Borrower's dignity;
- To train all the employees and borrowers on the FPC in an effective manner and to ensure that they follow the FPC at all times;
- To monitor the effective implementation of the FPC and maintain zero tolerance to deviations;
- To constantly review and revise the FPC based on the RBI and SRO guidelines in addition to the experiences gained by the Company

## **2.4 Overview**

Guidelines on FPC adopted by the Company

### **1) Loan Application and Processing**

1. All communication to the borrowers is made in the vernacular language / in a language understood by the borrower.
2. Loan application form includes all the necessary information on the loan terms and conditions to help the borrower in making an informed decision.
3. The loan application form indicates the documents required to be submitted along with the application form.
4. An acknowledgment of having received the loan application form is given to the borrowers.
5. The aforesaid acknowledgment is dated and indicates the time frame within which the loan application shall be disposed of.

### **2) Loan appraisal / Disbursement of Loans and terms/conditions**

1. KYC Guidelines issued RBI are complied with, and due diligence is carried out to ensure the borrowers' repayment capacity.
2. The Company shall train and equip all its Field Officers to conduct proper due diligence to understand the repayment capacity of the borrower and the details of existing debt if any so that the loan sanctioned is adequate for the purpose and repayable without strain on the part of the borrower.
3. The Company provides microfinance collateral-free loans to households as per the RBI-prescribed norms. Here 'household' shall mean an individual family unit, i.e., husband, wife, and their unmarried children.
4. The information regarding the household income of the borrowers' is to be duly submitted to the Credit information companies (CICs).
5. The Company will limit Microfinance loans on the outflows on account of repayment of monthly loan obligations of a household as a percentage of the monthly household income shall be maximum 50 percent.
6. The Company shall obtain credit bureau report from CICs for all loan applications to get details of the existing loan repayment obligations of the borrower / household. The Company shall make informed decision on sanction of loans to borrowers based on credit bureau report.
7. Training is offered to borrowers on procedures related to loan products and terms and this training is free of cost.

8. Sanction letter along with key fact statement to be provided to the borrower in vernacular language conveying the amount of loan sanctioned, processing fee, insurance premium, and all the terms and conditions including the annualized interest rate.
9. The key fact statement shall be written in a language understood by the borrower. Contents of the key fact statement shall be explained to the borrower and an acknowledgement shall be obtained that the borrower has understood the contents of the key fact statement.
10. Pricing related information shall be provided to prospective borrower in a standardized simplified key fact statement as listed in Annexure 1.
11. All the loans will be sanctioned and disbursed at a central location and more than one individual participates in this function.
12. Flexibility of repayment periodicity on microfinance loans as per the borrower's requirement is provided.
13. Loan disbursements are done as per predetermined time structure.
14. Borrowers are made aware of no penalty or no charges on prepayment of a loan. In case of genuine difficulty, additional time for repayment to be given to borrower without any additional charges.
15. The Company shall implement control points to make sure that loan amount is received by the borrower entirely and no intermediary is involved in the disbursement process and no commission is taken by anyone.
16. The minimum, maximum and average interest rates charged on microfinance loans is displayed in all its offices, in the literature (information booklets/ pamphlets) issued, and details are mentioned on the website.
17. All documents are kept in safe custody in the respective premises by authorized persons and the privacy of the borrower is maintained.

### **3) Disclosures in Loan Document / Loan Card**

1. A standard format of loan document will be approved by the board.
2. The loan document is in vernacular language as understood by the borrower, and the same is provided, along with a copy of all enclosures if any, to all the borrowers.
3. The following shall be disclosed in the loan document:
  - a. All the terms and conditions of loan,
  - b. that the pricing of the loan involves only three components viz; the interest charge, the processing charge, and the credit shield insurance premium (which includes the administrative charges in respect thereof)
  - c. That no security deposit/margin is being collected from the borrower,
  - d. That the moratorium between the grant of the loan and the due date of the repayment of the first instalment is equal to or more than the frequency of repayment.
  - e. An assurance that the privacy of the borrower's data will be respected.
  - f. No penalty or charges on prepayment of a loan
4. Adequate disclosures in the loan document on sharing the client data with the CICs and appropriate consent is taken for internal records.
5. The loan card shall contain the following details:
  - a. The effective rate of interest charged
  - b. Simplified fact sheet on pricing
  - c. All other terms and conditions attached to the loan
  - d. Information that adequately identifies the borrower
  - e. Acknowledgements of all repayments including instalments received and the final discharge

- f. The loan card will prominently mention the grievance redressal system and the name and contact number of the nodal officer
- g. Non-credit products issued shall be with the full consent of the borrowers and fee structure shall be communicated in the loan card itself
- h. All entries on the loan card will be in vernacular language
- 6. The grievance redressal system and the toll-free customer care helpline number are printed on the loan card and displayed in all branches.

#### **4) Avoiding Over-Indebtedness**

- a. Branch Managers shall make proper enquiries with regard to current indebtedness of the Borrowers before sanctioning of the loan.
- b. The Company will ensure that the loan is provided basis on the assessment of annual household income of the Borrower considering the broad parameters viz., Household profile, Household income and Household expenses.
- c. The Company provide accurate data to CICs on level of indebtedness and ascertain by way of obtaining declaration from the Borrowers, verification of bank account statements wherever available and local enquiries, Credit Bureau checks, etc.
- d. The Company assess the repayment of monthly obligations of household with monthly household income to ascertain the outflow.
- e. The Company shall not exceed the indebtedness cap as decided by the Industry Associations and the overall prescribed limit set by RBI.
- f. The Company shall educate Borrowers on ill effects of over-borrowing.

#### **5) Non-Coercive Method of Recovery**

- 1. Recovery shall normally be made at a centrally designated place.
- 2. However, Field staff will be allowed to make recovery at the place of residence or work of the borrower only if the borrower fails to appear at a central designated place on two or more successive occasions.
- 3. Board-approved policy to define a uniform system and procedure as a policy in the matter of staff recruitment, training and monitoring. The Company's policy shall focus on training field staff through training programs to inculcate appropriate behavior towards borrowers without adopting any abusive or coercive recovery practices.
- 4. Only employees and not outsourced recovery agents shall be used for recovery in sensitive areas.
- 5. Any employee shall not adopt any harsh method towards recovery, which is outlined as under
  - a. Use of threatening or abusive language
  - b. Persistently calling the borrower and/ or calling the borrower before 9:00 a.m. and after 6:00 p.m.
  - c. Harassing relatives, friends, or co-workers of the borrower
  - d. Use or threat of use of violence or other similar means to harm the borrower or borrower's family/ assets/ reputation
  - e. Misleading the borrower about the consequences of non-repayment
- 6. The Company shall have zero-tolerance policy on any incident of violation of above norm related to behaviour with customers.
- 7. The Company's compensation policy will consider customer satisfaction & respectful treatment as one of the parameters while deciding on appraisal and any financial rewards.

8. The Company shall not incentivize its staff for overdue collections or disbursements based on ticket size.
9. The Company shall not incentivize its staff for overdue portfolio.

In the event of any grievance of the borrower regarding recovery and staff behavioral issues, he / she may approach the Branch Manager or Zonal Manager for redressal. The contact number of the authorities will be provided to the borrower at the time of sanction of loan.

## **6) General**

- a. The Company will not discriminate against its customers based on caste, region and religion.
- b. The Company shall refrain from interference in the affairs of the borrower/ member except for the purposes provided in the terms and conditions of the loan document (unless the borrower/member declared/ disclosed earlier false information which comes to our notice on a later date).
- c. The Company shall lay down effective Grievance Redressal Mechanism by way of installing complaint boxes at all our offices, arrange for the Toll-Free Number and designate a senior level officer as Grievance Redressal Officer. We shall provide the address / contact details of the Ombudsman working at the office.
- d. The Company shall display our FPC in local languages in all our office premises. Also, the following informative displays shall be organized at branches and our web site;
  - i. Loan products with salient features
  - ii. Dos and don'ts for field staffs. Grievance Redressal Mechanism detailing Branch Manager's name and contact number, Toll-Free number and nodal officer designation, Ombudsman's address and contact number and availability of complaints box.
  - iii. SRO Code of conduct
  - iv. We shall bring out a statement in local language articulating our commitment to transparency and Fair Lending Practices and the same shall be displayed in the office premises and loan cards.
- e. We shall provide training and refresher courses to all our members/ borrowers at annual interval at free of cost so as to bring about the awareness of all the changes that might have occurred during the period. We shall train our field staff to enable them to render such training to borrowers.

## **7) Privacy of Borrower Information**

- a. The Company shall respect Borrower's privacy and shall treat Borrower information as private and confidential.
- b. The Company shall incorporate an adequate disclosure in the loan document on sharing Borrower data with credit bureaus, statutory organizations, group companies and third parties and the acceptance of the Borrower shall be obtained for internal records.
- c. The Company will train employees on fidelity and secrecy of Borrower data.

## **8) Internal Control System**

Periodical review of compliance to fair practices code and grievance redressal system to be done by the Company. Srfin shall make necessary organizational arrangements to assign responsibility for compliance to designated individuals within the Company and establish systems of internal control including audit and periodic inspection to ensure the same.

## 9) Policy on Grievance Redressal Mechanism

Sriffin endeavours to be a borrower centric organization keeping borrowers at the centre of its policy making and all the policies and procedures are designed to provide efficient and faster services to borrowers. While Sriffin will take all the steps to ensure that borrower service is given utmost importance, in case there is any 'Grievance' which includes queries, complaints & feedbacks.

This grievance redressal mechanism provides for timely redressal of the grievances/hearing of the feedback. Besides, all the grievances and feedback received are reviewed at the highest level of the organization and policies are reviewed and decisions taken to strengthen the delivery mechanism and provide better services.

The Company shall establish dedicated Customer Support Service ("CSS") for receiving, handling and disposal of Borrower grievances, documentation and reporting under this policy.

The objective of this policy is immediately addressing the Borrower grievances by providing efficient services in a fair and transparent manner and to ensure prompt redressal of Borrower grievances and provide a mechanism for review of the implementation of the grievance redressal mechanism at the highest level:

- a) To provide Borrowers formal and informal channels for feedback and suggestions;
- b) To provide a formal grievance redressal mechanism for Borrowers;
- c) To educate customers on grievance redressal mechanism;
- d) To ensure that Borrowers are protected against fraud, deception or unethical practices;
- e) To handle/resolve complaints speedily and efficiently;
- f) To consistently assess the impact of services in order to provide better services to the Borrowers in timely and efficient manner.

Sriffin shall set up multi-tier Customer Grievance Redressal Mechanism and the following are the key elements of the Grievance Redressal Mechanism:

Scope	Purpose
<b>Channels to Register Grievance</b>	<ul style="list-style-type: none"><li>• Walk-ins in Branch Office Recorded in Complaints Register</li><li>• Toll Free Number</li><li>• Call, letter or email to the Principal Nodal Officer</li><li>• MFIN/Sa-Dhan toll-free number</li><li>• RBI's Ombudsman</li></ul>
<b>Display</b>	<ul style="list-style-type: none"><li>• All office premises</li><li>• Website</li><li>• Loan card / fact sheet</li></ul>
<b>Informing Borrowers about their rights</b>	<ul style="list-style-type: none"><li>• Compulsory Group Training &amp; Group Recognition Test</li><li>• Loan card / fact sheet</li><li>• Periodic reminder by staff at Center Meetings</li></ul>
<b>Resolution in Timely Manner</b>	<ul style="list-style-type: none"><li>• Escalation Matrix</li><li>• Categorizing the complaints based on severity and criticality and defining TAT</li></ul>
<b>Reporting and Review Mechanism</b>	<ul style="list-style-type: none"><li>• Data Analysis: (Trend, Comparison and Key metrics)</li></ul>
<b>Staff Roles and Training</b>	<ul style="list-style-type: none"><li>• Mandatory Training for Complaints handling and Monitoring</li></ul>
<b>Monitoring Borrowers Grievance Redressal</b>	<ul style="list-style-type: none"><li>• Proper record maintained and a monthly report shared with CSS</li><li>• Internal Audit Check: Client Verification to measure client satisfaction.</li><li>• Regulatory Compliance</li></ul>

## **Centralised mechanism for Grievance Redressal**

The Company shall have a centralized mechanism of grievance redressal which allows the Company to follow-up and process Borrower's grievances. Irrespective of where the complaint has been received, it will be tracked by the Grievance Redressal team at Head Office.

### **Registration of Grievance**

Each Branch has Complaints (Grievance) Register. Borrowers are free to walk into the Branch and register a complaint / query / feedback in the register. If any queries or complaints of the Borrowers, which are recorded / registered in the complaints register, remain unresolved for more than 7 (seven) working days by the Branch Manager should be report it to Grievance Redressal team at Head Office.

If the Borrower is not satisfied with the response received from the Branch Manager or if the issue is not resolved within 7 (seven) working days, the Borrower can reach to CSS through dedicated toll-free number or through CSS e-mail: [complaints@srifincredit.com](mailto:complaints@srifincredit.com).

Branch Mangers are responsible to share details grievance registered in the Branches on a monthly basis to CSS within 10 days from the end of each month.

Borrowers can register their grievances by making telephone calls to a dedicated toll-free number. The phone calls will be received in the Head Office. Recognizing that Borrowers speak various languages, the Company has ensured that the team receiving calls can handle calls in multiple languages.

All calls received by CSS are recorded in a software/spreadsheet for effective tracking. The employee receiving the grievance in CSS shall classify in one of the following categories.

### **Grievance Categorization:**

**Level 1:** Bribe /Agent involvement; Behaviour; Collection Troubles; NEFT Issues;

**Level 2:** Concession Request; Staff negligence; Advance Collection; Client Dropouts; Loan Claim and Settlement

**Level 3:** General Queries; Staff Contact Details; New/ Next Cycle Loan; Product and Process related information; Insurance Related issues;

Under no circumstances grievance registration should be refused on the grounds that the Borrower is not able to provide certain details. A grievance / complaint number should be generated for each grievance.

The employee registering the grievance should note the grievance in detail. He or she should also provide the complainant a tentative timeframe in which the complaint is likely to be resolved.

In case a call is in the nature of a general query, the employee attending the call should try to answer it during the call itself. In case the employee attending the call is not able to answer the query, he or she should refer such query to the concerned persons in business team.

### **Processing of Grievance:**

The employee registering the grievance should forward the grievance to the concerned State Head.

The State Head should then ensure that the complaint is resolved by following up with concerned official. Within 5 (five) working days of receipt of complaint, the State Head should submit a follow-up report to CSS. The State Head can contact the complainant, if required. CSS, on the basis of the report, will decide whether any further action is required on such grievance.

CSS will update the complainant within 7 (seven) working days of receipt of grievance about its status.

**Closure of Grievance:**

CSS should close the complaint on the basis of follow-up discussion with the complainant.

**Escalation of Serious Grievance:**

All grievances which are concerned to financial irregularity (bribery, frauds etc.,) should be escalated to the Risk Team and Chief Operating Officer by CSS.

**Communication of the Grievance Redressal System:**

Effectiveness of the Grievance redressal system requires its communication to the Borrowers.

Following should be ensured for the effective communication:

1. Details of the Grievance Redressal Mechanism, particularly the toll-free number should be displayed prominently in the Branch Offices.
2. This should be explained to the Borrowers during CGT, GRT and during loan disbursement.
3. Supervisors should inform the Borrowers about the Grievance Redressal Mechanism every time they visit Borrowers during their monitoring visits.
4. Details of grievance redressal system should also be printed on loan card provided to the Borrowers.
5. Field Staff should be trained to ensure that all Borrowers are aware of the Grievance Redressal Mechanism.

**Appointment of Grievance Redressal Officer / Principal Nodal Officer:**

The Company has appointed a Grievance Redressal Officer / Principal Nodal Officer who supervises overall process of grievance redressal. He / She will be the senior most appellate authority for grievances in the Company. He / She will also be responsible for reporting to the senior management and ensuring that all grievances received are properly addressed.

The name and contact details of Grievance Redressal Officer / Principal Nodal Officer is displayed in the Company website and all the branches for easy access to Borrower in case of any grievance.

The Company shall put in place Grievance Redressal Mechanism given below, which provides guidelines for receiving, handling and disposal of Borrower grievances, documentation, turn-around-time and escalation matrix for unresolved complaints and periodical review mechanism:

**Level 1** – Borrowers can submit their written or verbal grievances to staff in the center meetings or at Branch premises

**Level 2** – If the Borrower is not satisfied with the resolution provided by the Branch Staff or in case the issue is not resolved within 7 (seven) working days, they can call the Toll-free number: 1800 203 3858 provided at the time of loan application / mentioned in the Loan card from 9.30 a.m. to



5.30 p.m. on working days.

**Level 3** – If the issue is not resolved within 15 (fifteen) days, borrowers can escalate the complaint / grievance to Ombudsman or Principal Nodal Officer. Details of the same to be mentioned in Loan card / Company website from 9.30 a.m. to 5.30 p.m. on working days.

**Level 4** – If the issue is not resolved within 3 (three) working days of call to Ombudsman or Nodal Officer, borrowers can escalate the complaint / grievance to

Microfinance Institutions Network (MFIN):

Grievance Redressal Officer 403–404, 4th floor, Emaar Palms Spring Plaza, Golf Course Road, Sector-54 Gurgaon-122003.

Toll Free No. 1800-102-1080 between 9:30 am to 5:30 pm on weekdays (Monday to Friday)  
customercomplaint@mfinindia.org

Sa-dhan:

Grievance Redressal Officer A-1 248, 3rd Floor, Safdarjung Enclave, New Delhi-110029, Delhi  
Contact No. 011 4717 4418 between 9:30 am to 5:30 pm on weekdays (Monday to Friday)  
nandi@sa-dhan.org

**Level 5** – Borrowers can also write to the Officer of Reserve Bank of India, if the issue is not resolved within 30 (thirty) days or if they are not satisfied with the resolution

If the issue is not resolved, Borrower can complain to RBI online on <https://cms.rbi.org.in>. or  
Complaints can also be filed through the dedicated e-mail: [crpc@rbi.org.in](mailto:crpc@rbi.org.in)  
or

Sent physical complain to the 'Centralised Receipt and Processing Centre' set up at Reserve Bank of India, 4th Floor, Sector 17, Chandigarh - 160017 in the format provided at [https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIOS2021\\_121121\\_A.pdf](https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIOS2021_121121_A.pdf)

or

Toll-free No. 14448 (9:30 am to 5:15 pm)

## 10) WHISTLE BLOWER

1. Srifin recognizes that employees are a significant source of whistle blowers as they would be in a position to identify the deviations against the FPC or any other policy of the organization. Any employee can lodge a complaint against his superiors/ subordinates/ colleagues who are allegedly involved in prohibited activities and breaches code of conduct such as fraud, misappropriation of funds, unethical behavior, mistreatment towards Borrowers etc., by sending a mail to [complaints@srifincredit.com](mailto:complaints@srifincredit.com). The Company shall have dedicated Team at Head office to deliberate on the complaints received and to seek review and feedback on case-to-case basis interact or communicate with the employees concerned and maintain tracker of the complaints received. The Team will present the complaints with their observations/feedback and review reports to the Disciplinary Committee (DC) for its review and decision as per the Disciplinary Policy of the Company. Complaints received anonymously without any source will not be accepted and acted upon.
2. A whistle blower would also be a Borrower who gives complaint against an employee for any of the prohibited activities such as fraud, misappropriation of funds, unethical behaviour, mistreatment

towards the Borrowers' etc. In this regard, staff or borrowers of Srifin can call the dedicated toll-free number and lodge their complaint. The complaint will be investigated and appropriate action will be taken by the DC. (Caller name will be kept anonymous, if requested).

3. The identity of the Whistle Blower will be protected and ensured that no retaliatory or adverse measures are initiated against the Whistle Blower w.r.t the actual complaint.
4. However, the caller should have enough evidence on correctness of the Borrower grievance and should avoid raising unrealistic complaints. A whistle blower reporting unrealistic complaints shall not be punished if the complaint was raised with good intention and if there are sufficient grounds to suspect a colleague. A staff reporting unrealistic complaints with a bad intention/motivation is liable to receive a disciplinary action i.e., oral warning on first instance and a written warning in case of repetition or any other action as per the applicable policy.
5. Any complaints received from employee or customer against whom, if any action has already been initiated by the Company like show cause notice or overdue collection demand etc., such complaints will not be treated as Whistle Blower.

## **11) EXTERNAL COMPLAINTS**

Complaints received from (on behalf of Borrower or on the basis of public interest) general public & other stake holders such as government agencies, RBI, police, lawyers, SRO (Sa-adhan & MFIN etc.,) & social activists will also be handled at Head office and appropriate redressal will be provided in terms of the applicable policy. Hence, any staff who receive complaints from such agencies should escalate them to CSS.

## **DISSEMINATION OF FPC AND GRM**

- a. The Company shall adopt a policy on criteria for recruitment of all staff, their training and the reporting structure. The criteria cover minimum qualification, skill sets and their social and behavioural aspects. Each employee is trained on FPC, GRM, Code of Conduct, Whistle Blower Mechanism and the appropriate way of dealing with the Borrowers.
- b. Every employee is trained on the FPC including grievance redressal mechanism. Besides, they are also trained on soft skills so as to behave properly and respectfully with borrowers without adopting any abusive or coercive debt collection / recovery practices. Each employee is trained in a way that the Borrower is given due respect and is treated with dignity and self-esteem. The employees are trained to make necessary enquiries regarding the income and existing debt of the household of the prospective Borrowers.
- c. Utmost importance shall be given to the adherence of the FPC, GRM, Code of Conduct and Whistle Blower Mechanism while awarding the promotions to staff.
- d. Disciplinary action shall be taken on staff who do not adhere to the FPC, GRM, Code of Conduct and Whistle Blower Mechanism.
- e. All branches & offices shall prominently display FPC, GRM, Code of Conduct and Whistle Blower Mechanism in vernacular language for Borrower's information.
- f. A copy of this FPC & GRM shall also be uploaded on the website for the information of various stake holders.
- g. Borrowers shall be educated on the FPC, GRM and escalation matrix for their unresolved complaints, options, choices and responsibilities vis-à-vis financial services. Borrower education shall be made through group training, interaction in the Branch and Centre Meetings.
- h. New Borrowers must be informed about the organization's policies and procedures to help them understand their rights as Borrowers.

### 3. Annexure 1

#### Key Facts Statement Part 1 (Interest rate and fees/charges)

1	Loan proposal/ account No.		Type of Loan	
2	Sanctioned Loan amount (in Rupees)			
3	Disbursal schedule			
4	Loan term (year/months/days)			
5	Instalment details			
	Type of instalments	Number of EPIs	EPI (₹)	Commencement of repayment, post sanction
6	Interest rate (%) and type (fixed or floating or hybrid)			
7	Additional Information in case of Floating rate of interest			
	Additional Information in case of Floating rate of interest			
8	Fee/ Charges	Payable to the Srifin Credit Private Limited (A)	Payable to a third party through Srifin Credit Private Limited (B)	
(i)	Processing fees	One-time	Not Applicable	
(ii)	Insurance charges	Not Applicable	One-time	
(iv)	Any other (please specify)	Not Applicable	Not Applicable	
9	Annual Percentage Rate (APR) (%)			
10	Details of Contingent Charges (in ₹ or %, as applicable)			
(i)	Penal charges, if any, in case of delayed payment			
(ii)	Other penal charges, if any			
(iii)	Foreclosure charges, if applicable			
(iv)	Charges for switching of loans from floating to fixed rate and vice versa			
(v)	Any other charges (please specify)			

#### Part 2 (Other qualitative information)

1	Clause of Loan Agreement engagement of recovery agents relating to	
2	Clause of Loan Agreement which details grievance redressal mechanism	
3	Phone number and email id of the nodal grievance redressal officer	
4	Whether the loan is, or in future maybe, subject to transfer to other Banks or Financial Institutions or securitization (Yes/ No)	
5	Whether the loan is Lending under collaborative lending arrangements	
6	Whether the loan is a Digital Loan	

#### Detailed Repayment Schedule

Instalment No.	Outstanding Principal (in Rupees)	Principal (in Rupees)	Interest (in Rupees)	Instalment (in Rupees)

### 4. Amendments to Policy

The Board of Directors based on the recommendations of CEO, COO & CCO can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.