

# **Digital Lending Policy**

## **Aditsh Fintech Private Limited**

### **(NBFC – Category II)**

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#### 1. Policy Objective

To ensure ethical, transparent, and compliant digital lending practices through regulated digital platforms, in accordance with the Reserve Bank of India's Guidelines on Digital Lending (RBI Circular DOR.CRE.REC.66/21.07.001/202223 dated September 02, 2022). This policy aims to protect borrowers' interests and ensure responsible conduct by Lending Service Providers (LSPs).

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#### 2. Scope and Applicability This policy applies to:

- All digital loans originated or serviced through digital platforms (web or app).
- Lending done through own digital channels or via registered LSPs/DSAs.
- Any interface where customer interaction or data collection occurs digitally.

#### 3. Governing Principles

- **Transparency:** All loan-related terms must be clearly disclosed upfront.
- **Data Privacy:** Borrowers' data must be handled strictly as per applicable laws.
- **Consent:** Explicit and recorded borrower consent is required before data access.
- **Compliance:** Fulfilment of RBI's directions on disbursements, disclosures, grievance redressal, and outsourcing.
- **Cooling-off period** (minimum 3 days or as approved)
- **Borrower can exit without penalty** (except proportionate interest)

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#### 4. Standard Operating Procedures (SOP)

##### 4.1 Display LSP Details to Borrowers

- Name and contact information of the Lending Service Provider (LSP) involved must be disclosed:
  - o On the website/app before onboarding.

- o On the sanction letter and loan agreement.

#### 4.2 Share Key Fact Statement (KFS) Before Disbursal

- KFS must include:

- o Sanctioned loan amount
- o Tenure

- o Annual Percentage Rate (APR)

- o Processing fees and other charges

- o Total amount to be repaid

- KFS must be shared in a language understood by the borrower before loan execution.

#### 4.3 Disburse to Borrower's Bank Account Only □

- Loan disbursal must be made:

- o Directly to the borrower's bank account
- o No

- third-party or LSP pool accounts to be used.

- Repayments must also come from the borrower's verified bank account only.

#### 4.4 Include All Charges in Annual Percentage Rate (APR)

- All fees, including processing fees, origination charges, insurance, etc., must be factored into the APR.

- APR must be disclosed to the borrower upfront in the KFS and agreement.

#### 4.5 Take Borrower Consent Before Accessing Data □

- Explicit consent must be obtained before:

- o Accessing device data (location, contacts, etc.)
- o

- Sending promotional or marketing communications

- Only essential data relevant to loan servicing is to be collected.

- No automatic or forced access to data permitted.

### 5. Digital Loan Agreements & Disclosures

- Loan agreement must be signed digitally and a copy shared with the borrower immediately.

- SMS/email confirmation to be sent upon each key stage: application, approval, disbursal, EMI due, and closure.
- Maintain a Digital Loan Register with mestamped logs of all customer communications and actions.

#### 6. Grievance Redressal Mechanism

- Borrowers to be informed of their rights and grievance redressal process.
- Details of the Grievance Redressal Officer to be displayed on the platform.   
Unresolved complaints to be escalated to the Nodal Officer.
- Complaints must be resolved within 7 working days, and a grievance register must be maintained.

#### 7. Cybersecurity & Data Protection

- End-to-end encryption must be implemented for all financial transactions.
- Follow CERT-In and RBI cybersecurity guidelines for secure infrastructure.
- Implement role-based access control (RBAC) and two-factor authentication.
- Periodic third-party audits of apps/websites to be conducted.

#### 8. Monitoring & Reporting

- Compliance Officer to ensure adherence to RBI's digital lending norms.
- Quarterly review of:
  - o LSP performance
  - o Customer complaints
  - o APR calculations and disclosures
- Submit periodic reports, if required, to RBI or other authorities.

#### 9. Policy Review and Approval

- This policy shall be reviewed annually or upon major regulatory updates.
- Changes to the policy must be approved by the Board of Directors.

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This policy has been approved by the Board of Directors and shall be monitored through periodic reporting to the Board / relevant Committee.

Approved By: Board of Directors  
Effective Date: 16, February 2026  
Next Review Date: 2, April 2027  
Policy Owner: Chief Compliance Officer