Outsourcing Policy
Aditsh Fintech Private Limited
(NBFC - Category II)

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1. Policy Objective

To ensure that all outsourced ac vi es are conducted in a secure, transparent, and compliant manner, minimizing operational and reputational risks while maintaining service quality and regulatory adherence, particularly in accordance with RBI's Outsourcing of Financial Services by NBFCs Directions.

2. Scope and Applicability

This policy applies to all outsourcing arrangements entered into by Aditsh Fintech Private Limited, including but not limited to services outsourced to Lending Service Providers (LSPs), technology vendors, collection agents, call centres, and KYC/verification agencies.

3. Policy Principles

Aditsh Fintech remains ul mately responsible for all outsourced services and must ensure:

- No outsourcing shall result in a breach of confidentiality, regulatory obligations, or customer rights.
- Outsourcing does not lead to evasion of responsibility.
- Compliance with all applicable laws, especially RBI and PMLA regulations.

4. Standard Opera ng Procedure (SOP)

4.1 Vendor Due Diligence

Before entering into any outsourcing arrangement, the following due diligence must be conducted:

- Evaluate the vendor's financial strength, technical capability, compliance track record, past client references, and business community framework.
- Conduct background checks, including li ga on history, RBI blacklist verification, and market reputation.
- Ensure the vendor has adequate data security and cybersecurity controls in place.

4.2 Service Level Agreements (SLAs)

Every outsourcing arrangement must be governed by a legally binding contract, which includes:

- Clearly defined scope of services.
- Specific performance metrics and melines.
- Detailed data protection and customer confidentiality clauses.
- Rights of Aditsh Fintech to audit and monitor vendor ac vi es.
- Obligations of the vendor to comply with all relevant RBI directions, AML/CFT, and fair practices.
- Defined exit strategy and procedures for termina on of the contract.

4.3 Monitoring & Audi ng

- Periodic audits (quarterly/bi-annually) will be conducted by internal audit or third-party auditors to ensure compliance with contractual and regulatory standards. Regular review of:
    - o LSP call scripts o Data privacy controls o Customer complaint handling o KYC processes and customer verification steps
- Reports will be shared with the Outsourcing Committee/Compliance Officer and escalated to the Board if any material deviation is observed.

4.4 Non-Compliance and Termina on

- Any vendor found non-compliant with:
    - o SLA commitments
    - o Regulatory guidelines
    - o Data confidentiality or customer abuse o Misrepresenta on or fraudulent practices o Will be served with a corrective ac on no ce.

 Persistent or serious breaches shall lead to termina on of the contract with immediate effect and blacklisting of the vendor.

5. Governance and Oversight

 Outsourcing Committee or equivalent internal governance body will:

- o Approve major outsourcing contracts.

- Review audit reports. o Recommend vendor cornual on or replacement.

- The Compliance Officer will ensure all outsourcing arrangements adhere to RBI and regulatory guidelines.

6. Regulatory Reporting & Record Keeping

- Maintain a centralized register of all outsourced ac vi es, including nature of service, dura on, vendor details, and audit status.
- Submit periodic information to RBI, if and when required, regarding critical outsourced ac vi es or vendor relationships.

7. Business Community & Risk Management

- Each vendor must have a documented Business Community Plan (BCP) and Disaster Recovery Plan (DRP).
- Aditsh Fintech must ensure that the outsourcing does not hinder regular operations in the event of a service failure.

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
Responsible Department: Operations, Compliance, Risk