

Fair Practices Code (FPC) Policy

Aditsh Fintech Private Limited

(NBFC - Category II)

1. Objective

The objective of this Fair Practices Code (FPC) is to:

- Ensure fair, transparent, ethical, and legally compliant lending practices.
- Protect the interests and rights of customers, particularly retail borrowers.
- Establish a robust framework for customer interaction on, grievance redressal, and compliance oversight.
- Comply with the Reserve Bank of India's directions on Fair Practices Code for NBFCs.

2. Scope and Applicability

This policy applies to all employees of Aditsh Fintech Private Limited and its Lending Service Providers (LSPs), across all lending products and services offered. It covers the entire lifecycle of the loan – from application, processing, sanction on, disbursement, servicing, to closure.

3. Key Principles of Fair Practices

3.1 Loan Application and Processing

- Provide clear and easily understandable loan application forms with all necessary disclosures.
- Disclose information on related to interest rates, fees, charges, and documents required.
- Acknowledge receipt of all loan application and provide a reference number for tracking.

3.2 Loan Sanction on and Documenta on

- Communicate in writing (in the borrower's preferred language) the sanction on terms, including amount sanctioned, interest rate, tenure, repayment terms, and other conditions.
- The Company shall provide a Key Fact Statement (KFS) to every borrower in the format prescribed by the Reserve Bank of India, containing

the Annual Percentage Rate (APR), total cost of credit, tenure, interest rate, fees and charges, penal charges, and other material terms. The KFS shall be acknowledged by the borrower prior to disbursement

- Deliver a Key Fact Statement (KFS) to the borrower before loan disbursement. This includes:
 - All-inclusive APR- Annual Percentage Rate
 - EMI breakup
 - Charges (processing fees, prepayment, foreclosure, penal interest)
 - Recovery mechanism and contact points
- Ensure execution of a legally binding loan agreement and provide a signed copy to the borrower.

3.3 Disbursement of Loan

- Disburse loans strictly as per agreed terms and conditions without any unauthorized modifications.
- Provide borrowers with a loan account statement upon request without any charge.

3.4 Transparency and Disclosures

- Publish interest rates, processing charges, and service fees on the company website and display the same at branch offices.
- Inform borrowers of any change in terms and conditions in advance.
- Changes in interest rates to be effective only prospectively.

4. Communication and Language

- Ensure that all communications – oral and written – are made in a language understood by the borrower.
- Avoid the use of technical or legal jargon that may confuse or mislead customers.

5. Lending Service Providers (LSPs) Compliance

- All LSPs must strictly comply with this Fair Practices Code.
- Train LSPs on:
 - RBI's digital lending guidelines
 - Customer interaction e queue
 - Grievance redressal and escalation protocol
- Hold LSPs accountable for any mis-selling, misconduct, or violation of this code.

- Ensure LSPs do not have access to customers' personal or financial data beyond the scope authorized.

6. Recovery and Collection Practices

- Follow ethical and courteous practices for loan recovery.
- Recovery agents must:
 - Not use coercive or abusive language
 - Call only during reasonable hours (between 8 AM and 7 PM)
 - Not approach customers at inappropriate locations (e.g., workplace)
- Company shall approach customers through valid and allowable route and dedicated lines for loan recovery
- Company shall maintain a record of all recovery communications and interactions.

7. Grievance Redressal Mechanism

- Provide multiple channels for lodging complaints: phone, email, web form, or in person.
- Display the name and contact details of the Grievance Redressal Officer (GRO) at branches and on the website.
- Acknowledge all complaints within 48 hours.
- Resolve complaints within 7 working days from receipt.
- Escala on matrix must be clearly defined and available to customers.

8. Customer Rights and Protection

- Right to clear information and documents
- Right to privacy and confidentiality of data
- Right to fair treatment and respectful engagement
- Right to raise complaints and expect resolution on

9. Monitoring and Oversight

- The Compliance Officer shall be responsible for:
 - Ensuring implementation on and review of the FPC
 - Monitoring adherence by internal staff and LSPs
 - Reporting non-compliance to senior management

- Conduct periodic audits and mystery shopping to check implementation on fidelity.
10. Review and Revision of Policy
- This policy shall be reviewed at least annually or as required by changes in RBI guidelines or business operations.
 - Amendments must be approved by the Board of Directors and communicated to all stakeholders.
11. Display and Public Access
- A copy of this Fair Practices Code shall be:
 - o Displayed on the company's website.
 - o Made available at all branch locations.
 - o Provided to customers upon request at no charge.

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