FAIR PRACTICE CODE OF TRUSTLENDERS CAPITAL PVT LTD.

Introduction

The Fair Practice Code (hereinafter referred to as 'the Code') has been drafted in line with the Master Circular- Fair Practice Code' issued by the Reserve Bank of India on July 01, 2015 - RBI/2015-16/16 DNBR (PD) CC.No.054/03.10.119/2015-16. The Code covers general principles and practices followed by Trustlenders Capita Pvt Ltd (hereinafter referred to as 'the Company') in serving our customers. It has been formulated to ensure –

- Fair and transparent practices in dealing with the customers
- Fair relationship with the customers
- Regulatory compliance with regard to customer interaction during the lifecycle
- Robust customer grievances redressal mechanism

The Code will be applicable to all the categories of products and services offered by the Company and also apply to our related operations such as customer sourcing, loan processing, loan servicing and collection activities.

The Code has been approved by the Board of Directors in the meeting dated Aug 1, 2019.

Principles and Practices

The principles and practices followed by the Company has been categorized as per the following key components in the credit lifecycle.

Loan applications and processing

- All communications to the borrowers shall be in the vernacular language or in a language as understood by them.
- Loan application forms shall include all necessary information which affects the interest of the borrower, so that a meaningful comparison with the terms and conditions offered by other NBFCs can be made and informed decision can be taken by the borrower.
- Loan application form shall enlist the list of mandatory documents required to be submitted by the borrower, along with the application form, while applying for any of the credit facilities offered by the company.
- Loan application form will include the rate of interest charged
- On receipt of loan application, the Company shall give an acknowledgment to the borrower.
- The Company shall verify the loan applications within a reasonable period of time and if additional details/ documents are required, it will accordingly intimate the borrowers.

Loan appraisal

• All the loan applications will be fairly assessed in line with the company's board approved credit policies and procedures.

• The Company shall convey in writing to the borrower in the vernacular language as understood by them, the amount of loan sanctioned along with the terms and conditions including annualized rate of interest and method of application thereof and keep the acceptance of these terms and conditions by the borrower on its record. The penal (additional) interest to be charged for late repayment shall be explicitly highlighted in bold in the loan agreements.

• In case of loan rejection the same shall also be communicated in writing to the borrowers in the language as understood by them.

• A copy of loan agreement along with a copy of all enclosures quoted in the loan agreement shall be provided to the borrower in the language as understood by them.

Disbursement of loans

• The company will ensure timely disbursement of loans as per the agreed terms and conditions.

• Any changes in interest rates and charges will take effect prospectively. A suitable clause to this effect shall be explicitly highlighted in the loan agreement.

• The Company shall furnish a copy of the loan agreement as understood by the borrower along with a copy each of all enclosures quoted in the loan agreement to all the borrowers at the time of sanction / disbursement of loans.

• The company shall give a notice in writing to the borrower, in a language as understood by them, of any change in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges, etc.

• The decision to recall/ accelerate payment or performance under the agreement shall be in consonance with the loan agreement.

• All securities pertaining to the loan shall be released on repayment of all dues or on realization of the outstanding amount of loan subject to any legitimate right or lien for any other claim the Company may have against the borrower. If such right of set off is to be exercised, the borrower shall be given notice about the same with full particulars about the remaining claims and the conditions under which the company is entitled to retain the securities till the relevant claim is settled/ paid.

General

Confidentiality

The Company shall respect the privacy of the customers and all the communication with the customers will be in a polite manner. Unless authorized by the customer, the Company shall not disclose the transaction details to any third party, except in following cases:

• Disclosure required under any statute or regulation.

• Public obligation to disclose such information

• If it is in the interest of the Company to make such disclosure to any bank/ financial institution/ group companies and associate companies. (E.g. fraudulent transactions, suspicious transactions, etc.)

Interest Rates

• To ensure that customers are not charged excessive interest rates, the Company has formulated a Pricing Policy which details out the interest rate model adopted by the company which factors in cost of funds, margin and risk premium, etc. to determine the rate of interest to be charged for loans and advances.

• The rate of interest and the approach for gradations of risk and rationale for charging different rates of interest to different categories of borrowers shall be disclosed to the borrower or customer in the application form and communicated explicitly in the sanction letter. The information is also hosted on the Company's website.

• The rates of interest shall be annualized rates.

• The Company shall not charge foreclosure charges/ pre-payment penalties on all floating rate term loans sanctioned to individual borrowers.

Other general aspects

• The Company shall not interfere in the affairs of the borrower except for the purposes provided in the terms and conditions of the loan agreement, unless new information, not earlier disclosed by the borrower, has come to the notice of the lender.

• The request for transfer of borrower account should be received in writing from the borrower. In case of transfer of borrower account the consent or otherwise i.e. objection of the Company, if any, shall be conveyed within 15 days from the date of receipt of such request. Such transfer shall be as per transparent contractual terms in consonance with the law.

• For recovery of loans, the Company will not resort to undue harassment viz. persistently bothering the borrowers at odd hours, use of muscle power for recovery of loans etc. For this, the Company shall provide adequate training to the staff members to deal with the customers in an appropriate manner.

Grievance Redressal

• The Company believes in maintaining strong relationships with its customers and understands the importance of addressing complaints or grievances in an efficient manner. The Company has a robust grievance redressal mechanism to resolve customer disputes.

• The Company shall endeavor to resolve all the customer disputes within 7 days from the date of receipt of customer disputes.

• The Company has multiple channels of communication and following are modes through which customers can raise a complaint with us

i. Email – Customer can write to us at info@trustlenders.in
ii. Telephone – Customer can call us on +91 8826849777
iii. iii. Post – Customer can write to us at Trustlenders Capital Private Limited, 5th Floor, Pinnacle Business Park, B-9, Sec -3, Noida, UP-201301

• The customers can also contact our Grievance Redressal Officer, the details of whom are mentioned below:

Grievance Redressal Officer Mr. Abhishek Mahajan,

Trustlenders Capital Private Limited, 5th Floor, Pinnacle Business Park, B-9, Sec -3, Noida, UP-201301

Ph No: +91 8826849777 E Mail ID: info@trustlenders.in

• If the grievances/ complaints are not redressed within a period of one month, the customer may appeal to the Officer in Charge of the Regional Office of DNBS of RBI.

Address Reserve Bank of India, DNBS, RBI, Parliament Street, New Delhi.

Email ID nbfcodelhi@rbi.org.in

Pursuant to RBI guideline (RBI/2017-18/133 DNBR.PD.CC.No 091/03.10.001/2017-18 and RBI/2015-16/16 DNBR (PD) CC.No.054/03.10.119/2015-16), the Company has appointed the Grievance Redressal Officer as the Nodal Officer, and will have the following responsibilities, - Representing the company and furnishing information to the Ombudsman and the Appellate Authority in respect of complaints filed against the company.

- Coordinating and liaising with the Customer Education and Protection Department (CEPD), RBI, Central Office.
- The name and contact details of the Grievance Redressal Officer / Nodal Officer, along with the name and contact details of the Ombudsman has been displayed at our branches and is hosted on the company's website.
- The compliance officer of the Company shall be responsible monitoring the email address of the grievance redressal division as designated by the Company for the purpose of registering complaints by customers.

Responsibilities of Customer Care Team

• The customer care team is responsible for the resolution of a grievance to the utmost satisfaction of the customers. They are also responsible to send an acknowledgement for the grievance with tentative timelines for resolution.

• If in case the grievance has not been resolved, the team is required to make the customers aware of the alternative avenues available to escalate the grievance.

• In any case, where the customers care team manager is not in unable to address a grievance, he may refer the case to the Grievance Redressal Officer.

• Once the grievance has been resolved, it is required to inform the customers within the defined timelines.

Review of the Code

• The Fair Practices Code shall be subject to periodic review in accordance with any regulatory or statutory requirement and shall be approved by the Board of the Company. A consolidated report of such reviews may be submitted to the Board at regular intervals.

• The Company shall abide by this Fair Practices Code following the spirit of the Code and in the manner it may be applicable to its business.