FAIR PRACTICES CODE

Fairness. Transparency. Responsible Lending.

APPLICABLE TO: CUSTOMERS & EMPLOYEES

Department: Human Resources

FOR INTERNAL USE ONLY

SABRIMALA FINTECH PRIVATE LIMITED

1. PURPOSE

Sabrimala Fintech Private Limited ("the Company") is committed to fair, transparent and responsible dealings with its customers at every stage of the lending relationship — from loan application to final settlement. This Fair Practices Code ("the Code") sets out the standards employees and representatives must follow while engaging with customers, in line with the Company's values and applicable RBI regulations for Non-Banking Financial Companies.

2. SCOPE

This Code applies to all employees, branches, customer-facing teams and authorised representatives (including recovery agents and business correspondents, where engaged) involved in lending, credit, collections or customer service activities on behalf of the Company.

3. FAIR PRACTICES

The Company is committed to:

Fair & Respectful Treatment — Dealing with every customer courteously, without discrimination.
Transparency — Clearly disclosing terms, conditions, charges and processes at every stage.
Clear Communication — Communicating in a manner customers can reasonably understand.
Responsible Lending — Assessing customer needs and repayment capacity before extending credit.
Confidentiality — Protecting customer information and using it only for authorised purposes.
Ethical Conduct — Conducting all business dealings with honesty and integrity.

4. LOAN APPLICATION & PROCESSING

- Loan application requirements and documents needed will be clearly communicated to the customer at the outset.
- Applications will be processed through the Company's approved credit assessment procedures.
- Customers will be informed of the status of their application, including reasons for rejection, where applicable, in line with Company process.

- Acknowledgement of loan applications will be provided as per the Company's standard practice.

5. LOAN TERMS, INTEREST & CHARGES

- Sanctioned loan terms, including interest rate, fees, charges and repayment schedule, will be communicated to the customer in writing before disbursement.
- The interest rate applicable to a loan will be determined as per the Company's Board-approved interest rate policy, considering cost of funds, risk premium and other relevant factors.
- All applicable fees and charges will be disclosed upfront; no charges will be levied without prior notice to the customer.
- Penal charges, where applicable, will be levied in accordance with applicable RBI norms and will not be applied as a means of revenue enhancement.
- Any change in interest rate, fees or other terms will be communicated to the customer in advance, through approved communication channels.

> **NOTE**
> *This Code does not itself prescribe specific rates, charges or timelines. These are governed by the Company's Board-approved policies and the applicable Key Facts Statement/loan agreement issued to each customer.*

6. DISBURSEMENT & DOCUMENTATION

- Loans will be disbursed only after the loan agreement is executed and applicable sanction conditions are fulfilled.
- A copy of the loan agreement and key sanction terms will be provided to the customer.
- Disbursement will be made in a timely manner, in line with the Company's standard turnaround process.
- Any material change in loan terms during the tenure of the loan will be communicated to the customer in advance.

7. CUSTOMER PRIVACY & CONFIDENTIALITY

Customer information — including personal, financial and credit information — is confidential and must be protected at all times. Employees must not disclose, share or use customer information for any purpose other than the authorised business purpose for which it was collected, except where disclosure is required by law or with the customer's consent.

8. RECOVERY & COLLECTION PRACTICES

Recovery and collection activity must at all times be:

- Lawful and in accordance with the Company's approved recovery process.
- Conducted respectfully and professionally, without harassment, threats or abusive behaviour.
- Carried out at a reasonable time and in a reasonable manner.
- Free from any conduct that intimidates or misrepresents the Company's authority.

Employees and recovery agents engaged by the Company are expected to conduct themselves in accordance with this Code and the Company's applicable recovery guidelines at all times.

9. GRIEVANCE REDRESSAL

Customers with a complaint or grievance may raise it through the following escalation path:

Customer → Concerned Branch / Department Official → Grievance Redressal Officer → Further escalation as applicable under the RBI Integrated Ombudsman Scheme / regulatory framework in force.

Grievance Redressal Officer	Rupak Dassarma
Designation	Grievance Redressal Officer
Email	rupak.dassarma@sabrimalafintech.com
Grievance Redressal Officer (GJ)	Vijay Baraiya
Second Escalation (GJ)	Chirag Thakkar
Designation (GJ)	Grievance Redressal Officer
Email (GJ)	vijay.baraiya@sabrimalafintech.com
Email (GJ)	Chirag.thakkar@sabrimalafintech.com

Complaints will be acknowledged and addressed through the Company's Grievance Redressal Policy. Customers not satisfied with the resolution provided may escalate the matter further as applicable under the current RBI framework.

10. EMPLOYEE RESPONSIBILITIES

Every employee involved in customer-facing or lending-related activity must:

- Follow this Fair Practices Code at all times.
- Provide accurate and complete information to customers.
- Treat customers respectfully and professionally.
- Protect customer confidentiality.
- Follow Company-approved processes for lending, disbursement and recovery.
- Avoid making misleading statements or unauthorised commitments to customers.
- Escalate customer complaints appropriately and promptly.

11. MONITORING & REVIEW

The Company will periodically review compliance with this Code and update it as required by RBI regulations, applicable law or evolving business requirements. This Code is subject to review and approval by the Company's Board.