

FAIR PRACTICE CODE

Policy Objective

This Policy document on Fair Practice Code is in accordance with the RBI guidelines. The objective of this document is to ensure fair treatment for all stakeholders and to maintain transparency and ethics in all its operations.

Client

For the purpose of Collection Policy client is defined as a person who has availed at least one of the loan products of the company.

Policy

Fair Practices Code is displayed in vernacular language at all branches and offices of Aviral Finance Private Limited ("Aviral"). All communication to the clients is in a language understood by them.

A statement in vernacular language articulating our commitment to transparency and fair lending practice is displayed at all branches and in loan agreement.

Training is provided to our clients at no cost to make borrowers fully aware of the procedure and system related to Aviral loan products.

All Sales Officers are trained to make necessary enquiries related to existing debt of the clients, train clients and to follow transparent and ethical practices.

Aviral display effective interest rate and grievance redressal mechanism at all of its offices and branches in vernacular language.

Aviral ensures professional behavior of its employees toward its clients and timely grievance redressal and is accountable for preventing inappropriate staff behavior and delay in grievance redressal. A declaration regarding this is also made in the loan agreement document.

Aviral maintains KYC policy in compliance with RBI guidelines. Due diligence is carried out each time client applies for the loan to ensure the repayment capacity of the client.

Aviral refrain from interference in the affairs of the borrower except for the purposes provided in the terms and conditions of the loan agreement.

Applications for loans and their processing

All communications to the clients are in vernacular language or in a language understood by them.

Loan application form includes necessary information which affects the interest of the clients, so that the informed decision can be taken by the clients. It also indicates the documents to be submitted with the application form.

An acknowledgement receipt is provided to clients on acceptance of loan application form. Time frame for loan application disposal is indicated in the acknowledgement.

A well-structured and smooth loan application process is followed and disbursement date is communicated to the client in advance.

The interest rate charged to the customer by us is in accordance with the interest rate policy as approved by the Board, which in turn is in accordance with the extant RBI guidelines.

Loan appraisal and terms/conditions

Sanctioning of loan is communicated to the client in vernacular language by means of letter or otherwise, including amount of loan sanctioned, annualized interest rate along with terms and condition.

Loan agreement, including all terms and conditions and loan repayment schedule is provided to client at the time of loan sanctioning and a copy of same with acceptance from client is kept on record.

Disbursement of loan including changes in terms and condition

All loans are disbursed directly to client's bank account and all disbursements are in accordance with the RBI guidelines.

Aviral gives notice to the borrower in the vernacular language or a language as understood by the borrower of any change in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges etc. A suitable condition in this regard is incorporated in the loan agreement.

Aviral releases all securities 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 it has against clients. In case such right of set off is exercised Aviral gives notice to the client about the same with full particulars about the remaining claims and the conditions under which securities are retained till the relevant claim is settled/paid. We do not charge any penal interest or charges for any delayed payment or pre-closure of loans and the same is mentioned in bold in relevant communications, including loan agreement.

Disclosures in loan agreement / loan card (passbook) for loans:

Aviral has a standard format of loan agreement in vernacular language as approved by the board.

Following points are disclosed in loan agreement:

- a. All the terms and conditions of the loan.
- b. Pricing components of the loan, they being the interest charge, the processing charge and the insurance premium (not inclusive of administrative charges, as per IRDA guidelines)
- c. That no penalty is charged on delayed payment.
- d. That no Security Deposit / Margin is collected from the borrower.
- e. That the client cannot be a member of more than one SHG/JLG.
- f. That the moratorium between the grant of the loan and the due date of the repayment of the first installment.
- g. Assurance that the privacy of client data is respected.

Aviral also discloses the following details in the loan card (passbook):

- a. The effective rate of interest charged.
- b. All other terms and conditions attached to the loan.
- c. Information which will identify the borrower.
- d. Acknowledgements for all repayments including installments received and the final discharge.
- e. The grievance redressal system, including the name and contact number of the nodal officer
- f. Non-credit products issued is with full consent of the borrowers

- g. All entries in the Loan passbook are in vernacular language or in a language understood by the borrower.

Non Coercive method of recovery

All collections are made at centrally designated place. In case of non-repayment of loan installment board approved loan repayment policy is followed.

A board approved policy is in place with regard to code of conduct by Sales Officer and systems for their recruitment, training and supervision.

Aviral ensures not to follow any unethical practices for recovery of loans and does not contact clients at odd hours.

Only employees and no outsourced agents are used for recovery of loan.

Internal Control System

Company has designated senior officer of the company for ensuring compliance of the above Fair Practise Code. A system of internal control including audit and periodic inspection will be put in place to ensure the same.

Grievance Redressal Mechanism

Company will set up grievance redressal system approved by the board and as per the RBI guidelines. For the purpose of grievance redressal following information has been displayed at all of our branches and offices

Name of the Grievance Redressal Officer:

Contact No.:

Email ID:

If the complaint / dispute is not redressed within a period of one month, the customer may appeal to the Office-in-charge of the

Regional Office of DNBS, RBI Bhopal

Phone: