



(CIN:U74899DL1994PLC062407)

## **POLICY ON PROCESSING MODEL OF INTEREST RATE, PROCESSING FEES AND OTHER CHARGES**

The policy has been framed to impart transparency as well as to follow best practices in keeping with the guidelines issued by the Reserve Bank of India in accordance with the guidelines applicable to Systemically Important Non Deposit taking NBFCs.

### **Objective**

As a good corporate citizen and in deference to the advice of RBI, the Board after thorough deliberation has resolved that a balance has to be struck between the health of the company and the interest rate /other fees to be charged. Under the present circumstances keeping the risk factor, cost of funds, loan administration charges, provisions for loan impairment and reasonable profit for the shareholders the following policy has been devised.

### **Interest Rate**

#### **Regulation of excessive interest charged by the Company**

(a) Board of NBFC shall adopt an interest rate model taking into account relevant factors such as cost of funds, margin and risk premium and 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 rate 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.

(b) The rates of interest and the approach for gradation of risks shall also be made available on the web-site of the companies or published in the relevant newspapers. The information published in the website or otherwise published should be updated whenever there is a change in the rates of interest.

(c) The rate of interest should be annualised rate so that the borrower is aware of the exact rates that would be charged to the account.

Though interest rates are not regulated by RBI, rates of interest beyond a certain level may be seen to be excessive and can neither be sustainable nor be conforming to normal financial practice. Boards of NBFCs, therefore, shall lay out appropriate internal principles and procedures in determining interest rates and processing and other charges. In this regard the directions in the Fair Practices Code about transparency in respect of terms and conditions of the loans are to be kept in view.

The existing Rate of Interest [RoI] shall be periodically reviewed for different loan products taking into account the cost of funds, market rates and RBI's stance on rates in credit policy directions etc., and if required suggestions will be made for the changes in rates of loans extended by the company.

Interest rates and other charges for each product are dependent on the nature of the product, security and collateral provided repayment mode, geographical locations, expected delinquency and costs for servicing the loans and most importantly prevailing interest rates in the market.

Cost of fund is an important determinant of our interest rate policy. In addition to the Equity Capital, the Company's funding requirements are met from combination of sale of its loans to other lenders such as banks, issuance of commercial paper, term borrowings, cash credit facilities etc. The Company being a non-deposit taking Finance Company does not have access to deposits and in a way exposed to higher interest rate risk than banks or deposit taking NBFCs.

The interest rate policy also takes into account the prevailing regulations and guidelines issued by the regulators from time to time.

Based on the prevailing market conditions and competitive benchmarks new and existing acquisitions will be for following loan types:-

- I. **Short Term unsecured commercial loans in the form of Term Loan, CC/OD, Demand & Call loans:**
- II. **Secured Commercial loans (including loans to builders for residential/commercial real estate) secured against any collateral tangible security and bill & export/import financing:**
- III. **Secured Commercial & individual LAP loans against mortgage of real-estate property:**
  
- IV. **Secured Housing Loans against mortgage of own property:**

### **Processing Fee & Pricing Model**

Processing charges are the charge which cover the expenses incurred to process any loan & has to be taken upfront from the customer at the time of disbursement to recover the cost. There are always others factors/costs which are involved related to risk which financier has to run during the tenor of the loan.

The rate ceilings prescribed for different category of loans are negotiable subject to the upper ceiling as decided by the Board and/or the ALCO Committee.

Further, during the tenure of the loan, performance of the loan account /periodical updating of KYC documents, continuation legal appraisal and status mortgage other securities needed monitoring for which the company is required to incur charges for processing of those documents. These expenses are also to be factored in the levy of upfront PF from the borrower.

Upfront processing fees should not only cover the direct cost which financier has to incur upfront but also cover the indirect costs & risk involved in a particular deal. At the same time we need to be transparent to customer & ensure similar charges & ROI is charged with customers having similar risk.

To achieve this objective & have a fair pricing model, Company has framed a Risk based rating model policy considering the following factors for deciding the PF & ROI. Deal IRR is the combination of both.

#### **Direct cost:**

- 1) Cost of assessment of project:
- 2) Cost of ROC search:

- 3) Cost of Valuation:
- 4) Cost of Title/legal search:
- 5) Cost of visiting the project:
- 6) Credit assessment & underwriter cost
- 7) Sourcing cost
- 8) Cost of Business intelligence reports like Save Risk, Probe 42

**Indirect cost:**

- 1) Management Risk
- 2) Leverage Risk & Liquidity Risk
- 3) Risk of non-creation of security
- 4) Refinancing Risk
- 5) Cost of Asset Class
- 6) Risk of Marketability of underlying security
- 7) LTV

**Penal interest and Legal expenses etc.**

- (a) In the event of default in repayment of EMI, prescribed penal interest shall be levied on EMI during the period of default in addition to the agreed/negotiated interest within the interest rate ceilings prescribed for different loan products.
- (b) The above rate ceilings are not inclusive of legal expenses/ out of pocket expenses, if any incurred by the company for recovery of bad/called-back loans for any reason. All out of pocket expenses shall be recovered from the borrower over and above the prescribed rate ceilings.

**Authorisation**

The Board of Directors has authorised ALCO Committee, Whenever ALCO decides any change in the existing Benchmark the new rate is displayed on the website of the Company besides sending information to all borrowers intimating the effective date of change of rate, changes in EMIs and revised interest rates Further actual rate, fee(s) and loan amount may vary based on concession offered and grid approved by risk and product in consultation with Business Head.

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