

RAJKOT INVESTMENT TRUST LIMITED

FAIR PRACTICES CODE

1. PREAMBLE

This Fair Practices Code (“Code”) has been adopted by the Board of Directors of the Company pursuant to the applicable provisions of the Reserve Bank of India Act, 1934, the RBI Master Direction – Non-Banking Financial Company – Scale Based Regulation Directions, 2023, and other applicable RBI guidelines issued from time to time.

The Company is committed to conducting its lending business in a fair, transparent, ethical and customer-centric manner and to fostering a fair relationship between the Company and its customers.

2. OBJECTIVES

The objectives of this Code are to:

- a) Promote good and fair practices by setting minimum standards in dealing with customers;
- b) Increase transparency in the Company’s operations;
- c) Foster a fair and cordial relationship between customers and the Company;
- d) Ensure compliance with applicable RBI guidelines;
- e) Strengthen customer confidence in the Company’s lending practices.

3. APPLICABILITY

This Code shall apply to all lending and financing activities undertaken by the Company and shall be binding upon all employees, officers, agents, service providers and recovery agents engaged by the Company.

4. LOAN APPLICATIONS AND PROCESSING

4.1 Loan Application Forms

The Company shall ensure that:

- Loan application forms contain all information necessary to enable the borrower to make an informed decision.
- The application form shall indicate the documents required to be submitted.
- The terms and conditions applicable to the loan shall be communicated clearly.

4.2 Acknowledgement of Loan Applications

The Company shall acknowledge receipt of all completed loan applications.

The acknowledgement shall indicate:

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- Application reference number;
- Date of receipt;
- Expected timeline for disposal of application.

4.3 Processing of Applications

All loan applications shall be processed within a reasonable timeframe based on:

- Nature of loan;
- Risk assessment;
- Completeness of documentation;
- Regulatory requirements.

5. LOAN APPRAISAL AND SANCTION

The Company shall assess the borrower's creditworthiness based on:

- Financial position;
- Repayment capacity;
- Credit history;
- Risk profile.

The Company shall communicate the decision regarding sanction or rejection of the loan application in writing or through electronic means.

Where a loan is sanctioned, the Company shall communicate:

- Loan amount;
- Rate of interest;
- Repayment schedule;
- Processing fees and charges;
- Security requirements;
- Other terms and conditions.

The acceptance of the terms by the borrower shall be obtained before disbursement.

6. LOAN AGREEMENT

The Company shall furnish a copy of the executed loan agreement and all relevant enclosures to the borrower.

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The agreement shall contain:

- Loan amount;
- Interest rate;
- Tenure;
- Repayment obligations;
- Security details;
- Rights and obligations of parties;
- Default provisions.

7. DISBURSEMENT OF LOANS

The Company shall ensure that:

- Disbursement is made in accordance with the terms agreed upon.
- Any change in terms and conditions is communicated to the borrower before implementation.
- Changes in interest rates or charges are applied prospectively.

8. INTEREST RATES

The Company shall adopt a Board-approved Interest Rate Policy.

The Company shall:

- Determine interest rates based on cost of funds, risk premium and business considerations.
- Disclose annualized interest rates to borrowers.
- Clearly disclose all fees and charges.

No hidden charges shall be levied.

9. TERMS OF RECOVERY

The Company shall recover dues in a lawful, fair and transparent manner.

Employees and recovery agents shall:

- Treat borrowers with dignity and respect.
- Avoid harassment, intimidation or coercion.
- Contact borrowers only during reasonable hours.

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- Comply with applicable RBI guidelines.

10. RELEASE OF SECURITIES

Upon repayment of all dues, the Company shall:

- Release all securities within the period prescribed by RBI;
- Return original documents subject to lawful rights of retention.

Any delay shall be communicated to the borrower along with reasons.

11. CONFIDENTIALITY OF CUSTOMER INFORMATION

The Company shall maintain confidentiality of customer information.

Customer information shall not be disclosed except:

- With customer consent;
- Pursuant to legal or regulatory requirements;
- To credit information companies and statutory authorities.

12. GRIEVANCE REDRESSAL MECHANISM

The Company shall maintain an effective grievance redressal system.

Customers may lodge complaints through:

- Branch Office;
- Email;
- Website;
- Customer Service Channels.

The grievance redressal mechanism shall display:

Nodal Officer

Name: Surabhi Mahnot

Designation: Company Secretary

Email: rajkotitld@gmail.com

Escalation to RBI

If the complaint is not resolved within the prescribed timeframe, the customer may approach the Reserve Bank of India under the Integrated Ombudsman Scheme.

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13. NON-DISCRIMINATION

The Company shall not discriminate on grounds such as:

- Religion;
- Caste;
- Gender;
- Marital Status;
- Disability;
- Ethnicity.

Credit decisions shall be based solely on business and risk considerations.

14. DIGITAL LENDING (WHERE APPLICABLE)

The Company shall comply with RBI guidelines relating to digital lending and shall ensure:

- Transparent disclosure of charges;
- Issue of Key Fact Statement;
- Protection of customer data;
- Secure digital processes.

15. CUSTOMER EDUCATION

The Company shall make this Fair Practices Code available:

- On its website;
- At all branches and offices;
- Upon request by any customer.

16. RESPONSIBILITIES OF EMPLOYEES

All employees shall:

- Act fairly and honestly;
- Follow the provisions of this Code;
- Assist customers in understanding products and services;
- Avoid misleading representations.

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17. REVIEW OF THE CODE

The Board of Directors shall review this Fair Practices Code periodically and at least annually or whenever required due to changes in applicable laws or RBI directions.

18. AMENDMENTS

The Company reserves the right to amend this Code from time to time in accordance with RBI guidelines and applicable laws.

19. EFFECTIVE DATE

This Fair Practices Code shall come into effect from the date of approval by the Board of Directors and shall remain in force until modified or replaced.