



FAIR PRACTICES CODE

The Reserve Bank of India has drafted the guidelines on Fair Practices Code for Non-Banking Finance Companies which sets the fair practices standards when dealing with individual customers and to serve as a part of best corporate practice.

It is, and shall be, our policy to make credit products available to all qualified applicants without discrimination on the basis of race, caste, colour, religion, sex, marital status, age or handicap.

Our policy is to treat all the clients consistently and fairly. Our employees will offer assistance, encouragement and service in a fair, equitable and consistent manner.

We shall ensure that charges/fees which affect the interest of the prospective borrowers are appropriately informed to the borrower. Terms and conditions pertaining to the facility will be conveyed to the prospective borrowers. We commit that disputes arising out of the lending decisions will be appropriately resolved by a grievance redressal mechanism set up by us.

We will ensure that the implementation of the Fair Practices Code is the responsibility of the entire organisation. The Company's Fair lending practices shall apply across all aspects of our operations including marketing, loan origination, processing, servicing and collection activities. Our commitment to Fair Practice Code would be demonstrated in terms of employee accountability, monitoring and auditing programs, training and technology.

The Company's Board of Directors and the management Team is responsible for establishing practices designed to ensure that our operations reflect our strong commitment to fair lending and that all employees are aware of that commitment.

Infina Finance Pvt. Ltd., is committed to providing service of the highest quality to its clients. This Fair Practices Code applies to the following categories of products and services offered by us (currently offered or which may be introduced at a future date).

1. LOANS

The Fair Practices Code is applicable to the above irrespective of whether the same is provided at the Branch, over the phone, on the internet or by any other method we may be currently using or may introduce at a future date. (Commitments made in the Code are applicable under normal operating environment).

2. KEY COMMITMENTS

The key commitments which we promise to follow in our dealing with our customers:

- a. Act fairly and reasonably in all our dealings with our customers by ensuring:
 - *Our products, services, procedures and practices will meet the commitments and standards in this Code.*
 - *Our products and services will meet relevant laws and regulations.*
 - *Our dealings with our customers will rest on ethical principles of integrity and transparency.*
- b. We will assist customers in understanding how our financial products and services work by:
 - *Providing information about them in simple Hindi and/or English and/or the local language.*
 - *Explaining their financial implications*
 - *Helping the customer choose the one that meets his / her needs.*
- c. We will make every attempt to ensure that customers have a trouble free experience in dealing with us; but if something does go wrong, we will deal with the same quickly and sympathetically:
 - *Mistakes will be corrected quickly.*
 - *Complaints will be handled quickly.*

INFINA Finance Private Ltd.

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- *In case a customer is not satisfied with the way a complaint is handled, we will guide the customer on how to take the complaint forward.*
- *We will reverse any charges applied to a customer's account due to an error on our part.*

3. INFORMATION

We will guide our customers in choosing products and services which meets his / her requirements:

- a. Before the customer relationship is established, we will:
 - *Give the customer information explaining the key features of the services and products the customer has shown interest in.*
 - *Give information on accounts, products and services which may suit the customer's needs.*
 - *Clearly state the information that we require to collect from the customer to fulfill our KYC norms and to comply with legal and regulatory requirements.*
 - *Request for additional information about the customer and his / her family to build a database; but this information is furnished by the customer only if she / he wishes to do so.*
- b. We will provide information on the various channels that can be used to access its products and services. The customer will also be informed on where further information on this is available.
- c. Once a customer has chosen a product, we will tell the customer how it works.
- d. We will guide our customer on rights and responsibilities specific to the mode of operation under which the product is taken.

4. INTEREST RATES

- a. At the time of availing of a loan, we will provide the customer with information on when the interest will be debited to the account.
- b. The loan application form / Sanction Letter shall contain sufficient information about interest, charges, penal rate etc.
- c. We will also provide customers with information such as Customer Contact Centre numbers.

5. CHARGES

- a. We will make available any charges applicable to products and services applicable at the time a customer signs up for the same. The same shall be prominently displayed to make the customer aware.
- b. If we increase any charges or introduce a new charge, we will notify the same to the customers.
- c. We will communicate (to customers) charges for any service or product before providing the same.
- d. We will provide charges for any service or product whenever the customer requests for the same.

6. TERMS AND CONDITIONS

- a. When a customer accepts a product or service for the first time, we will provide the customer with the Rules and Regulations that are relevant to the product / service.
- b. All Terms and Conditions will be fair and will set the customer's rights and responsibilities clearly and in plain language. We will use legal or technical language only where necessary.



7. ADVERTISING AND MARKETING

- a. We will ensure that all advertising and promotional material is clear, fair reasonable and not misleading.
- a. We will provide the customers with a full range of financial products the customer is eligible for. Some of these products / services will be our own; some others may be the products of the group or companies with which we have tie-up arrangements.
- b. We will inform the customer of these group companies / companies with which we have entered into a business arrangement and if the customer so desires
- c. We will direct the staff / agents of the company for marketing their products / services.

8. CONFIDENTIALITY

- a. Unless authorized by the customer we will treat all personal information as private and confidential
- b. We will not reveal transaction details to any other entity including within the group other than the following exceptional cases:
 - *If we have to provide the information by statutory or regulatory laws.*
 - *If there is a duty to the public to reveal this information.*
 - *If our interest requires us to provide this information (e.g. fraud prevention), we will not use this reason or giving information about customers to anyone else (including group companies) for marketing purposes.*
 - *If we have taken the customers permission (for instance at the time of loan sanctioning) to provide such information to our group / associate / entities or companies for providing other products or services.*
 - *Where the customer asks us to reveal such information to our group / associate / entities or companies for providing other services or products.*

9. LOANS AND ADVANCES

- a. Before lending money, or any other borrowing, we will assess the ability of the customer (borrower) to repay.
- b. Before granting the loan, we will inform the customer if the same is repayable on demand or otherwise.
- c. We shall give acknowledgement for receipt of all loan applications.

10. FURTHER ASSISTANCE

- a. Complaints / Grievances and Feedback / Suggestions – Internal Procedures:
 - *We will guide customers who wish to lodge a complaint and also provide guidance on what to do in case the customer is unhappy with the outcome. Our staff will assist with any questions.*
 - *After examining the matter, we will send a response as soon as possible; we will also guide a customer on how to take the complaint further if the customer is not satisfied.*
- b. Feedback and Suggestions:
 - *We request our customers to provide feedback on our service to help improve services.*

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11. MONITORING

We have a Nodal Officer to ensure compliance of the Code. Our internal auditing procedures make sure we meet the Code

MORE INFORMATION ABOUT THE CODE

The code will be made available on request

REVIEW OF THE CODE

The fair practice code will be reviewed at least once in a year by the board.

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