

FAIR PRACTICE CODE

Last approved on 13TH February 2026

FAIR PRACTICE CODE

BACKGROUND OF THE CODE/POLICY:

The Chairperson informed the Board that The Reserve Bank of India (RBI) issued Guidelines on Fair Practice Code for all NBFCs to be adopted by them while doing lending business. Further RBI vide its several notifications has made amendments in the Fair Practice Code (FPC) considering the developments in the sector as a whole. The Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025 DOR.MCS.REC. No.281/01-01-039/2025-26 dated November 28,2025 ('RBI MD'). has issued Master Direction- Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2025 dated 28 November 2025 and amendments thereof wherein the NBFC having customer interface shall adopt the Fair Practice Code. This Fair Practice Code is aimed to provide to all the stake holders, especially customers effective overview of practices followed by the company in respect of the financial facilities and services offered by the company to its customers. This Fair Practice Code has been revised taking into account the new guidelines on "Fair Practice Code for NBFCs" issued by the RBI

In line with RBI MD, the following Fair Practices Code (hereinafter referred to as "the Code") will be followed by the Company in respect of the lending business of the Company. The Code covers general principles on adequate disclosures on the terms and conditions of a loan and also adopting a non-coercive recovery method

Introduction of Company

HI-KLASS TRADING AND INVESTMENT LIMITED, a Non-Banking Finance Deposit Taking Company registered with Reserve Bank of India ("RBI") is presently in the business of providing different types of loans which includes Consumer Durable Loans, Personal Loans, Two-Wheeler loans, Loan against Property, Loan against Shares etc., to its various customers. Such credit

facilities are extended to different types of customers, which include Individuals, Partnership Firms, Companies and other Legal entities.

HI-KLASS TRADING AND INVESTMENT LIMITED has put in place the Fair Practice Code (FPC) as per the RBI directives and it has been duly approved by the Board of Directors. The Fair Practice Code sets out the principles for fair practices/ standards while dealing with its customers.

The Company has adopted this Fair Practices Code (“the Code”) and have implemented it. The Code applies to all categories of products and services offered by the Company (currently offered and which may be introduced in future).

OBJECTIVE OF THE CODE

The Code has been developed with the following objectives:

- To promote good, fair and trust-worthy practices by setting standards in dealing with customers;
- To ensure transparency in the Company’s dealings with its customers;
- To ensure compliance with legal norms in matters relating to recovery of advances;
- To enable customers to have better understanding of what they can reasonably expect of the services offered by the Company;
- To reckon with market forces, through competition and strive to achieve higher operating standards;
- To strengthen mechanisms for redressal of customer grievances.

APPLICATION

The Code shall apply to all products offered by the Company.

The Company shall continue to evaluate multiple products to meet the financing requirements of its customers. The Code shall continue to apply to any product that is developed and provided by the Company to its customers.

FAIR PRACTICE CODE OF THE COMPANY

(i) APPLICATION FOR LOANS AND THEIR PROCESSING

- (a) The Loan Application forms will be in English or in vernacular language of the place where the office including branch of the company is situated.
- (b) All communications to the borrower shall be in English or the vernacular language or a language as understood by the borrower.
- (c) Loan application forms should include necessary information which affects the interest of the borrower such as interest, penal interest, mode of calculation of interest, date of payment of interest, change in the interest rates, premia for prepayment etc. so that a meaningful comparison with the terms and conditions offered by other NBFCs can be made and informed decision can be taken by the borrower.
- (d) All the terms and conditions for loans should be detailed in the application form itself. The loan application form will indicate the documents required to be submitted for processing of the Application. However, the company depending on the credit credential may require other documents from customers as it may deem fit.
- (e) The company will issue acknowledgement for receipt of all loan applications and such acknowledgement will also indicate the date within which the application will be disposed off which in normal case shall not exceed 30 working days from the date of receipt of the completed form.

(ii) LOAN APPRAISAL AND TERMS & CONDITIONS AND KEY FACT STATEMENT FOR LOANS AND ADVANCES

- (a) The Company will convey in writing to the borrower in the vernacular language by means of sanction letter or otherwise, the amount of loan sanctioned along with the terms and conditions including annualised rate of interest and method of application thereof and keep the acceptance of these terms and conditions by the borrower on its record.
- (b) The Company will mention the penal charge which will be charged for late repayment and / or any other default on the part of the customer, in bold in the loan agreement.
- (c) The Company will furnish a copy of the loan agreement as understood by the borrower along with a copy each of all enclosures quoted in the loan agreement to all the borrowers at the time of sanction / disbursement of loans.
- (d) The Company shall mandatorily provide a **Key Facts Statement (KFS)** to all borrowers before the execution of any loan agreement.

The KFS shall be Issued in the **prescribed format** as per Annex XXVII of the RBI circular and updated as per any amendments from time to time; Furnished in **English and in the vernacular language** or language understood by the borrower; Contain all critical information such as **interest rate (APR), fees and charges, EMI, repayment schedule, penal charges, foreclosure terms, and grievance redressal contacts**; Delivered to the borrower in **physical or electronic form**, with their **acknowledgment retained** by the Company; Issued **prior to loan disbursement**, and shall form a **mandatory part of the loan documentation process**.

(e) The Company shall ensure that **no loan is sanctioned or disbursed without providing the KFS**, and proper systems and audit checks shall be maintained to ensure full compliance with RBI guidelines.

(iii) DISBURSEMENT OF LOANS INCLUDING CHANGES IN TERMS OF AND CONDITIONS

- (a) The Company shall ensure timely disbursement of loans in conformity with the terms and conditions governing such loans as communicated to the borrower.
- (b) The company will give notice to the borrower of any change in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges etc., in a language understood by the borrower, or in the vernacular language.
- (c) The Company shall also ensure that changes in interest rates and charges are effected only prospectively.
- (d) Any decision to recall/accelerate payment or performance under the agreement will be in consonance with the loan agreement.

(iv) POST - DISBURSEMENT SUPERVISION

- (a) The Company shall carry out post-disbursement supervision in accordance with normal business practice, either directly or through its authorised agent(s) (subject to compliance of RBI's directions as amended from time to time), the signed facility documentation/term sheet, and the guidelines issued by RBI from time to time.
- (b) The Company, either directly or through its authorised agent(s), shall carry out any decision to recall/accelerate payment or performance under the agreement only after giving sufficient notice and in consonance with the facility documentation.

(v) RELEASE OF SECURITY

- (a) The company will release all securities on repayment of all dues or on realization of the outstanding amount of loan including interest accrued subject to any legitimate right or lien for any other claim; the company may have any borrower.
- (b) If the Company has any other claim against borrower and if such right of set off is to be exercised, the borrower shall be given notice about the same with full particulars about the remaining claims and the conditions under which the company is entitled to retain the securities till the relevant claim is settled/paid.

(vi) GENERAL

- (a) The company will not interfere in the affairs of the borrower except for the purposes provided in the terms and conditions of the loan agreement (unless new information, not earlier disclosed by the borrower, has been noticed).
- (b) The Company shall not discriminate on grounds of sex, caste and religion in the matter of dealing with its borrowers. However, this does not preclude the Company from participating in credit-linked schemes framed for weaker sections of the society.
- (c) The company shall not charge foreclosure charges/prepayment penalties on all floating rate term loans sanctioned to individual borrowers, with immediate effect.
- (d) In the matter of recovery of loans, the Company shall adopt legally valid processes and not resort to undue harassment or use of force viz. persistently bothering the borrowers at odd hours, use of muscle power for recovery of loans etc. The Company shall ensure its staffs are adequately trained to deal with the borrowers in an appropriate manner.
- (e) In case of receipt of request for transfer of borrower account, either from the borrower or from a bank/financial institution that proposes to take over the account, the consent or otherwise from the Company would be conveyed within 21 days from the date of receipt of request.

(vii) REGULATION OF EXCESSIVE INTEREST CHARGED

- a) The Board of Directors has adopted an interest rate model for determining the rate of interest to be charged on loans and advances, processing and other charges taking into account relevant factors such as, cost of funds, margin and risk premium, etc. 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 website of the company. The information published on the website shall be updated whenever there is a change in the rates of interest
- c) The rate of interest shall be annualized rate so that the borrower is aware of the exact rate that would be charged to the account. The said rate shall be disclosed to the borrower in application form and communicated explicitly in the sanction letter

(viii) KNOW YOUR CLIENT (KYC) GUIDELINES:

- a) In order to comply with the RBI guidelines issued on the know your customer (KYC) norms to be complied with NBFCs, the Company will be required to collect certain documents and information from the borrowers, including a proof of identity, before extending any financial assistance to the borrower.
- b) It will be the responsibility of the customer to provide the necessary documents, including an up-to-date proof of identity and address, and in the event of change in the recorded address or other particulars, such change, with the necessary proof documents shall be brought to the immediate notice of the Company; and
- c) The loan application forms and other material provided by the Company to the customer shall contain the details of necessary information and documents required to be furnished and/ or produced for verification by the customer for meeting the requirements of the KYC norms.

(ix) RESPONSIBILITY OF BOARD OF DIRECTORS

- a) The Board of Directors of the Company have laid down the appropriate grievance redressal mechanism within the organization. Such a mechanism shall ensure that all disputes arising out of the decisions of lending functionaries are heard and disposed of at least at the next higher level.
- b) The Board of Directors has laid down a mechanism for periodical review of the compliance of the Fair Practices Code and the functioning of the grievances redressal mechanism at various levels of management. A consolidated report of such reviews shall be submitted to the Board at regular intervals, as may be prescribed by it.

(x) GRIEVANCES REDRESSAL MECHANISM

- (a) The Company shall designate a Grievance Redressal Officer (GRO) to maintain a record of customer complaints. If a complaint is received in writing from a customer, GRO shall take the complaint on record and maintain the same in a database.
- (b) GRO shall endeavor to sort out the matter within 15 days of receipt of a complaint.
- (c) In case the complaint requires more time for resolution, the same shall be informed to the customer. The customer shall be updated at regular intervals regarding the status of the complaint by GRO.
- (d) The internal grievance redressal mechanism shall ensure the complaints arising out of the action/misconduct by any functionary within the Company, shall be referred by the GRO for developing solutions and disposal of the complaint.
- (e) The Board of Directors of the company shall have periodic review of the compliance of the Fair Practice Code and the functioning of the Grievance Redressal mechanism at various level of management. A consolidated review report, if any, should be placed before the board at regular intervals.
- (f) The company should display the name, address, designation, telephone no and email id of the GRO at its branch / place where business is transacted for benefit of its customers.
- (g) In case the complaint/dispute is not redressed within a period of one month from the date of the complaint, the customer may appeal to the Officer-in Charge of the Regional Office of Department of Supervision of Reserve Bank of India:

It shall be the endeavor of the company to improve the quality of service and redress complaints and grievances, if any, of the customers as part of Customer Relationship. Customers who have grievances in respect of decision of the company functionaries can also address their grievances at **company's mail-id**.

(xi) DISCLOSURES

A review of compliance of the Fair Practice Code and the functioning the grievance redressed mechanism would be done by the management at regular intervals and a report of such review shall be submitted to the Board of Directors on yearly basis. The same shall be put up on its website, for the information of various stakeholders. Hosting on website Fair Practice Code, in vernacular languages shall be put up on the website of the Company for the information of various stakeholders.

(Xii) REVIEW OF CODE

This Code may be amended or modified from time to time. To effective effectiveness and compliance with regulatory requirements, the Code shall be reviewed every year by the Board of Directors of Company or whenever there is a significant change in law governing the subject matter of the code. A consolidated report of such reviews shall be submitted to the Board at regular intervals, as may be prescribed by it

(Xiii). Loan facilities to the physically / visually challenged applicants

on grounds of disability and shall render all possible assistance to such persons for availing of the various business facilities. The Company shall not discriminate in extending products and facilities including loan facilities to physically / visually challenged applicants on grounds of disability and shall render all possible assistance to such persons for availing of the various business facilities. The Company shall include a suitable module containing the rights of persons with disabilities guaranteed to them by the law and international conventions, in all the training programmes conducted for their employees at all levels. Further, the Company shall ensure redressed of grievances of persons with disabilities under the Grievance Redressed Mechanism already set up by them.

Review of Policy: -

The Policy is reviewed and recommended by the Audit Committee at its meeting held on 13th February 2026, approved by Board of Directors at its meeting held on 13.02.2026