



## FAIR PRACTICE CODE POLICY

### OVERVIEW

In compliance of the Reserve Bank of India regulations on Guidelines on Fair Practices Code for NBFCs, Finkurve Financial Services Limited (hereinafter referred to as “the Company” or “FFSL”) has enacted this Fair Practice Code (the “Code”).

The Code shall be applicable to all the offices of the Company; and, shall be binding on all the employees, officers, directors and consultants of the Company.

### 1. OBJECTIVE OF FAIR PRACTICE CODE POLICY

- a) Adopt the best practices in dealings with customers.
- b) Set challenging benchmarks and strive to achieve high operating standards for ensuring customer satisfaction.
- c) Follow transparent, fair, ethical and legally tenable practices while conducting business.
- d) Provide all necessary information and inputs to customers / prospective customers and promote a mutually beneficial long-term relationship.
- e) Facilitate a continuously growing base of satisfied customers while scrupulously avoiding acquisition of customers having doubtful credentials or criminal background.

### 2. COMMITMENTS

- a) The Company undertakes to abide by all applicable laws, regulations and guidelines passed / issued by the government and regulatory bodies (Reserve Bank of India, SEBI etc.)
- b) The Company commits itself to full customer satisfaction through efficient, professional and courteous services.
- c) The Company shall consistently strive to meet with and improve upon the internally set benchmarks and practices and be ahead of the standards prevalent in the industry.
- d) The Company undertakes not discriminate customers on grounds of religion, caste, gender, language, sexual orientation, or physical disability.
- e) The Company will provide clear and full information about its products and services to its customers / prospective customers and will not resort to any misleading or potentially misleading advertisement or publicity.
- f) The Company will communicate in the local language or English at the request of the customer.
- g) The Company undertakes not to take advantage of any unintentional or clerical error made by the customer while transacting business.
- h) The Company is committed to put in place a system for promptly addressing complaints and suggestions of the customers supplemented with a structured Grievance Redressal Mechanism having an escalation matrix.
- i) The Company shall display the Code on its website; and also make available to the Customer, on request, a copy thereof.
- j) Personal information of the customer will not be shared with unauthorized persons or agencies or third parties by the Company. However, the Company will be bound to honour and comply with legal or regulatory requirements, if any, in this matter obligating it to part with such information even without notice to the customer.



### **3. LOANS, TERMS & CONDITIONS, INTEREST RATE & CHARGES**

- a) The Company shall disclose all relevant information relating to a loan / product such as eligible loan amount, interest rate, charges, penal/overdue interest, interest calculation methodology, rebate on interest etc. before sanction of the loan to enable the customer / prospective customer to take an informed decision. The customer / prospective customer will also be provided, on request, the detailed terms and conditions of the loan before sanction.
- b) The Company shall ensure that a Loan Sanction Letter Cum Key Fact Statement (KFS) is given to the customer containing all the terms and conditions governing the loan facility. The loan sanction letter will also mention the loan amount, loan account number, interest rate, charges, loan processing fees etc.
- c) The Company shall not in the normal course make any changes / modifications in the terms and conditions of the loan, including rate of interest, which could adversely affect the customer financially or otherwise. In abnormal circumstances when such changes / modifications are inevitable, keeping in view the new circumstances, adequate and proper notice shall be given to the customer about any such change/modification.

### **4. MARKETING & PROMOTION**

- a) The Company shall not deliberately promote a product with any ulterior / selfish motives or contrary to the customer requirements or expectations as disclosed by the customer. The Company will ensure that its personnel engaged in marketing and operations are suitably trained and instructed so as to preclude selling of its products by misrepresentation to the customer / prospective customer.
- b) The rates of interest will be based on variables such as cost of funds, risk premium, loan scheme, profit margin etc. and shall also, by and large, be in tune with industry practices and benchmarks.

### **5. RECOVERY OF DUES**

- a) The Company will not, as a matter of fair dealing, normally recall the loan before the initially agreed tenure.
- b) The Company does not accept nor will it encourage the use any coercive or hard measures to recover its dues from the customer.
- c) Even though the loan sanction letter contains all applicable terms and conditions of the loan, The Company shall, nevertheless, endeavour, on a best effort basis, to send advices, reminders etc. regarding due date for payment of interest, principal etc. by letter, courier service, telephone, SMS etc.
- d) The Company shall, on demand, provide the customer with a statement of the loan account at any time during the currency of the loan or immediately upon closure.
- e) The Company will not interfere in the affairs of the customers except for the purposes mentioned in the terms & conditions of the loan or when constrained to do so due to inadequate or false disclosures made by the borrower at the time of putting through the transactions.
- f) The Company shall resort only to remedies which are legally and legitimately available to it and will avoid using recovery measures during odd hours of the day, undue harassment, use of muscle power for recovery of loans. The Company shall ensure that the staff are adequately trained to deal with the customers in an appropriate manner.



## 6. CUSTOMER SERVICE & GRIEVANCE REDRESSAL

- a) The Company will implement all possible steps to prevent and minimize customer complaints / grievances.
- b) The Company will facilitate the customer to pay the whole or part of the dues through its payment links, Service Provider's App or direct deposit into The Company's Bank account.
- c) In the event that a customer has a grievance, the following Grievance Redressal Mechanism shall apply:
- d) Level 1: The customer must lodge a complaint by sending an email on: support.loans@arvog.com
- e) Level 2: In the event that the complaint remains pending at Level 1 for a period of more than 7 working days, or if the customer is not satisfied with the outcome of Level 1 resolution, the customer can contact the following Nodal official of The Company:

Name	Contact No.	Designation	Email Address
Mr. Darshit Jain	+91 9987434093	Nodal Officer	darshit.jain@arvog.com

If any Customer is not satisfied with the resolution provided by the Nodal Officer, then escalation can be made to the Grievance Redressal Officer (GRO) (Secondary Level). The Details of GRO are as follows:

Name	Contact No.	Designation	Email Address
Mr. Priyank Kothari	+91 7506339484	Grievance Redressal Officer	priyank.kothari@arvog.com

- f) Level 3: In the event that the complaint remains pending at Level 2 for a period of more than 7 working days, or if the customer is not satisfied with the outcome of Level 2 resolution, the customer can contact the Regional Office of the Reserve Bank of India (or via RBI's website [www.rbi.org.in](http://www.rbi.org.in)):

Office	Mumbai
Address	C/o Reserve Bank of India, RBI Byculla Office Building Opp. Mumbai Central Railway Station Byculla, Mumbai-400 008
Phone	+91 22 -2300 1280
Fax	+91 22 -2302 2302
E-mail	nbfc Mumbai@rbi.org.in

- g) The Company will put in place an effective training system to ensure that employees are customer friendly and do not resort to rude, inappropriate or unethical behaviour.
- h) The Company will endeavour to work out and display the time norms for putting through and completing the various transactions.
- i) The Company will have a sympathetic approach to the problems faced by the customer especially the poor and underprivileged sections.

Finkurve Financial Services Limited the Company Grievance Redressal Officer

Name: Mr. Darshit Jain

Email id: darshit.jain@arvog.com

Contact No.: +91 9987434093