



SHANKAR FININVEST PRIVATE LIMITED

CIN - U74899DL1995PTC067650
RBI CoR - B-14.02178

Registered Address:
160, First Floor, Gaffar Market,
Karol Bagh, New Delhi, 110005

SHANKAR FININVEST PRIVATE LIMITED

FAIR PRACTICES CODE (FPC)

A Non-Banking Financial Company – Investment and Credit Company (NBFC-ICC), Non-Deposit Taking, Non-Systemically Important (ND-NSI)

Registered Office Address: 160, First Floor, Gaffar Market, Karol Bagh, New Delhi, 110005

This Fair Practices Code (“FPC”) of Shankar Fininvest Private Limited, a Non-Banking Financial Company – Investment and Credit Company (NBFC-ICC), Non-Deposit Taking, Non-Systemically Important (ND-NSI).

1. PREAMBLE

Shankar Fininvest Private Limited (“the Company”), being an NBFC-ICC, ND-NSI regulated under the Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025, Circular RBI/DOR/2025-26/362 DOR.MCS.REC.No.281/01-01-039/2025-26 dated November 28, 2025 (“Directions”), or any successions thereof recognises that responsible, compliant and well-governed outsourcing of financial and non-financial activities is critical for maintaining operational integrity, ensuring customer protection, and upholding regulatory expectations.

The Company acknowledges that fair conduct is not merely a regulatory requirement but a foundational element of responsible financial intermediation. This Code sets out a comprehensive system of principles, behavioural standards, and operational expectations to guide all employees, officers, authorised agents, outsourced partners, Digital Lending Apps (DLAs), Loan Service Providers (LSPs), and any person or entity engaged on behalf of the Company.

2. PURPOSE AND GUIDING PHILOSOPHY

The FPC aims to embed a culture of fairness across all facets of the credit lifecycle. The Company is committed to ensuring that customers are dealt with ethically, courteously, and transparently from the moment of first interaction until final closure of the loan. Every procedure, decision and communication shall be consistent with the principles of equity, non-discrimination, integrity, and regulatory compliance.

The Company’s lending philosophy is driven by responsible credit practices, customer-centricity, and protection of borrowers from unfair treatment or misrepresentation. This Code is intended to enhance customer trust, strengthen internal governance, and ensure



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that the Company remains aligned with the highest standards of prudential and conduct regulation applicable to NBFC-ICC ND-NSI entities.

3. APPLICABILITY AND COVERAGE

This Code applies to all business units, branches, digital platforms, outsourced service partners, and personnel representing Shankar Fininvest Private Limited. It also governs every stage of the Company's lending activities including sourcing, marketing, application evaluation, KYC verification, credit appraisal, documentation, sanction, disbursement, servicing, collections, grievance redressal, and closure.

The FPC is applicable for both physical and digital lending channels, including loans extended through LSPs and DLAs, and encompasses applicants, borrowers, co-borrowers, guarantors, rejected applicants, and existing customers seeking renewals or re-loans.

4. GOVERNANCE, OVERSIGHT, AND RESPONSIBILITY

The Board of Directors of Shankar Fininvest Private Limited bears ultimate responsibility for approving, reviewing, and supervising the implementation of this Code. The Board shall ensure that the principles laid down herein are embedded in the Company's internal policies, operating procedures, and compliance frameworks.

5. APPLICATIONS FOR LOANS AND THEIR PROCESSING

The Company shall ensure that all communications to the borrower shall be in the vernacular language or a language as understood by the borrower.

The Company shall ensure that loan application forms contains all necessary information which affects the interest of the borrower, so that a meaningful comparison with the terms and conditions offered by another lender can be made, and informed decision can be taken by the borrower. The loan application form shall clearly indicate the documents required to be submitted with the application form.

The Company shall devise a system of giving acknowledgement for receipt of all loan applications. The acknowledgement shall preferably indicate the time frame within which the loan application is expected to be processed and disposed of.

6. LOAN APPRAISAL AND TERMS / CONDITIONS

The Company shall convey in writing to the borrower in the vernacular language as understood by the borrower 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. The Company shall also mention the penalties charged for late repayment in bold in the loan agreement.



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The Company shall 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.

7. DISBURSEMENT OF LOANS INCLUDING CHANGES IN TERMS AND CONDITIONS

The Company shall give notice to the borrower in the vernacular language or a language as understood by the borrower of any change in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges etc. The Company shall also ensure that changes in interest rates and charges are effected only prospectively. A suitable condition in this regard must be incorporated in the loan agreement.

The Company shall ensure that decision to recall / accelerate payment or performance under the agreement shall be in consonance with the loan agreement.

8. GENERAL

The Company shall refrain from interference in the affairs of the borrower except for the purposes provided in the terms and conditions of the loan agreement (unless information, not earlier disclosed by the borrower, has been noticed).

In case of receipt of request from the borrower for transfer of borrowal account, the consent or otherwise i.e., objection of the Company, if any, shall be conveyed within 21 days from the date of receipt of request. Such transfer shall be as per transparent contractual terms in consonance with law.

In the matter of recovery of loans, the Company shall not resort to undue harassment viz., persistently bothering the borrowers at odd hours, use muscle power for recovery of loans etc. As complaints from customers also include rude behaviour from the staff of the companies, the Company shall ensure that the staff is adequately trained to deal with the customers in an appropriate manner.

9. LANGUAGE AND MODE OF COMMUNICATING FAIR PRACTICE CODE

The Company shall have the freedom of drafting the Fair Practices Code, enhancing the scope of the guidelines but in no way sacrificing the spirit underlying the above guidelines. The same shall be put up on its website, for the information of various stakeholders.

10. REGULATION OF EXCESSIVE INTEREST CHARGED BY NBFCs

The Board of the Company 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.



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

The rate of interest must be annualised rate so that the borrower is aware of the exact rates that would be charged to the account.

11. COMPLAINTS ABOUT EXCESSIVE INTEREST CHARGED BY NBFCs

The Company acknowledges that the Reserve Bank has been receiving several complaints regarding levying of excessive interest and charges on certain loans and advances by NBFCs. Though interest rates are not regulated by the Reserve Bank, 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. Accordingly, the Company shall ensure that all interest rates and associated charges on loans and advances are fair, transparent and in accordance with the interest rate policy of the Company.

12. LOAN FACILITIES TO THE PHYSICALLY / VISUALLY CHALLENGED

The Company shall not discriminate in extending products and facilities including loan facilities to physically / visually challenged applicants on grounds of disability. All branches of the NBFC 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 redressal of grievances of persons with disabilities under the Grievance Redressal Mechanism already set up by them.

13. INTERNAL CONTROL, MONITORING, RECORD-KEEPING AND REVIEW

Compliance with this Code shall be reviewed periodically through internal audit, compliance checks, MIS reporting, and Board-level oversight. The Company shall maintain complete documentation and audit trails, including sanction letters, KFS, digital consents, call recordings, agent logs, and grievance records, for durations mandated by RBI.

The FPC shall be reviewed annually or sooner if required due to regulatory developments, operational changes, or supervisory observations. Amendments shall become effective only upon approval by the Board of Directors, and the latest version shall always be made available at the Company's Corporate Office at Noida and on its website.



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