

### Guidelines on Fair Practices Code of Spotlight Vanijya Ltd.

This fair practice code set out the minimum practices to be followed by the Company in respect of the financial facilities and services offered by the Company to its customers. The fair practice code has been revised in pursuance of the guidelines issued by the Reserve Bank of India vide its circular no. 2011-12/470/DNBS. CC.PD. NO. 266/03.10.01/2011-12 dated March 26, 2012.

#### **Objective of the Code**

The code has been developed with an objective of:

- (a) Ensuring fair practices while dealing with customers
- (b) Greater transparency enabling customers in having a better understanding of the product and taking informed decisions
- (c) Building customer confidence in the company
- (d) Strengthen mechanism for redressal of customer grievances.

#### **(i) Application for loans and their processing**

- (a) Loan application forms shall include necessary information, which affects the interest of the borrower, 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. The loan application form may indicate the documents required to be submitted with the application form.
- (b) The Company shall devise a system of giving acknowledgement for receipt of all loan applications. Preferably, the time frame within which loan applications will be disposed of should also be indicated in the acknowledgement.

#### **(ii) Loan appraisal and terms/conditions**

- (a) The Company shall convey in writing to the borrower by means of sanction letter or otherwise, the amount of loan sanctioned along with the terms and conditions including annualized 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 loan agreement shall contain the Penal interest charged for late repayment .

#### **(iii) Disbursement of loans including changes in terms and conditions**

- (a) The Company shall give notice to the borrower of any change in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges etc. and shall also ensure that changes in interest rates and charges are effected only prospectively. A suitable condition in this regard shall be incorporated in the loan agreement.
- (b) Decision to recall/accelerate payment or performance under the agreement shall be in consonance with the loan agreement.

#### **(iv) Rate of Interest**

- (a) The Company shall frame appropriate internal principles and procedures for determination of the interest rates and processing and other charges, if any, and also to ensure that are not excessive. The Company shall, at the time of disbursal, ensure that the interest rate and other charges, if any, on loan and advances are in strict adherence to the companies policy.

*N.D. Maheshwari*

(v) General


- (a) 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 new information, not earlier disclosed by the borrower, has come to the notice of the lender).
- (b) 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, should 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.
- (c) In the matter of recovery of loans, the Company shall not resort to undue harassment viz persistently bothering the borrowers at odd hours, use of muscle power for recovery of loans, etc.

(vi) **Customer Grievance**

Borrowers and others who have grievances in respect of decision of Spotlight Vanijya Limited functionaries may address their grievances to Mr. Alok Taparia, Principle Officer of the Company at 2, Red Cross Place, Kolkata-700 001.

The Board will annually review the compliance of this Fair Practice Code and the functioning of the grievance redressal mechanism at various levels of Management .

For Spotlight Vanijya Limited

  
Director

# SPOTLIGHT VANIJYA LIMITED

Regd. office: 2, Red Cross Place, Kolkata - 700 001


Ph: 2254-3100; Fax: 2254-3130

**CERTIFIED TRUE COPY OF THE EXTRACTS OF THE MINUTES OF THE MEETING  
OF THE BOARD OF DIRECTORS OF THE COMPANY HELD ON 6<sup>TH</sup> DAY OF APRIL,  
2013 AT 2, RED CROSS PLACE, KOLKATA 700 001.**

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"RESOLVED that the draft of Fair Practice Code as placed before the Board duly initallled by the Chairman be and is hereby approved and adopted as the company's Fair Practice Code to be followed by the company and all the Directors of the Company be and are hereby severally authorised to review the same periodically and also send the necessary reports and such other communications to the RBI and such other authorities from time to time with respect to the compliances in this regard."

*for* **Spotlight Vanijya Limited**

  
**Director**