

Fair Practices Code (FPC) Policy

Comero Leasing and Financials Private Limited

Approved by: Board of Directors

Effective Date: January 2, 2026

Aligned with: Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025

This Fair Practices Code ("FPC" or "Code") is formulated by the Board of Directors of Comero Leasing and Financials Private Limited ("Company", "we", "us", or "our") in compliance with the Reserve Bank of India (RBI) guidelines on Fair Practices Code for Non-Banking Financial Companies (NBFCs).

1. Introduction and Scope

- **Purpose:** Establishes fair, transparent practices for all customer interactions in lending operations.
- **Applicability:** Covers all loan products, channels (branches, digital, agents), and stages (application to recovery).
- **Governance:** Board approves; Senior Management implements; published on website in English and vernacular languages.
- **Review:** Annual or on RBI updates.

2. Objectives

- Ensure equitable, respectful treatment of borrowers.
- Provide clear disclosures on terms, fees, and risks.
- Promote ethical recovery without harassment.
- Facilitate prompt grievance redressal.
- Build customer trust through compliance.

3. Fair Lending Principles

3.1 Non-Discrimination

- Decisions based on creditworthiness, income, repayment capacity, and collateral only.
- No bias on caste, religion, gender, ethnicity, disability, or marital status.

3.2 Transparency and Disclosure

- Pre-loan disclosure: Annualized interest rate, APR, fees (processing, prepayment, penal), tenure, moratorium.
- All terms in simple language; borrower acknowledgment mandatory.

- Post-sanction: Copy of agreement, schedule, and documents handed over.

3.3 Responsible Lending

- Assess suitability via income proof, CIBIL score, debt burden.
- No coercive cross-selling; opt-out without penalty.

3.4 Privacy

- Data used only for lending; no sale for marketing without consent.
- Disclosure permitted: legal requirement, fraud, or customer interest.

4. Loan Application and Processing

- **Forms:** Comprehensive, with purpose, amount, EMI details, and consent for checks.
- **Documents:** Checklist provided upfront (KYC, income proof, etc.).
- **Acknowledgment:** Issued immediately with processing timeline (max 7-15 days).
- **Rejection:** Written reasons within 30 days.

5. Loan Appraisal and Sanction

- **Criteria:** Repayment capacity (DTI <50%), credit score (>700 preferred), collateral valuation.
- **Sanction Letter:** Specifies amount, rate (fixed/reducing), tenure, prepayment terms, security details.
- **Acceptance:** Dated signature/e-sign; no verbal changes.

6. Disbursement

- **Timeline:** Within 7 days of document submission.
- **Mode:** Direct to account or ECS; conditions precedent confirmed.
- **Changes:** 30-day notice for rate hikes; reasons documented.

7. Repossession and Enforcement (Secured Loans)

- **Agreement Clauses:**
 - Default triggers (e.g., 3 EMIs overdue).
 - 30-day demand notice before action.
 - Repossession procedure: peaceful, no force.
 - Auction/sale: Public notice, fair value, surplus to borrower.
- **Redemption:** Full payment anytime before sale.
- **Unsecured:** No physical recovery; legal suit only.

8. Recovery Practices

- **Protocols:**
 - Calls/SMS: 8 AM-7 PM, max 3/day, no weekends/holidays.
 - No threats, abuse, or public shaming.

- Settlement offers documented.
- **Escalation:** Legal notice after 90 days overdue; court as last resort.
- **Training:** Agents certified on ethics.

9. Grievance Redressal

9.1 Lodging

- Channels: Email grievance@xpressloan.in, phone (1800-8890-625), branch, portal.
- Acknowledgment: Within 3 working days with reference ID.

9.2 Resolution

- Simple: 15 days; Complex: 30 days.
- Interim reply if delayed; root cause analysis.
- Unresolved: Escalate to RBI Ombudsman (details provided).

9.3 Reporting

- Quarterly MIS to Board: Volume, resolution rate (>95% target).

10. Customer Rights

- Right to fair assessment and appeal.
- Prepayment without undue charges.
- Information access on own account.
- No interference in personal matters.

11. Monitoring and Compliance

- **Oversight:** Grievance Officer + Internal Audit quarterly checks.
- **Training:** Mandatory annual for all staff/agents (4 hours).
- **Audits:** 100% sample for high-value loans; mystery shopping.
- **Reporting:** Annual Board certification; RBI submissions as required.
- **Penalties:** Breach leads to disciplinary action.

12. Miscellaneous

- **Language:** Vernacular for rural borrowers.
- **Amendments:** Board-approved only.
- **Override:** Statutory rights prevail.
- **Contact:** GRO - Name: Ms. Babita Joshi, Email: grievance@comero.in, Phone: 1800-8890-625.

This policy ensures RBI compliance while prioritizing customer centricity. All staff must adhere strictly.

