

GEV FOCUS CAPITAL PRIVATE LIMITED

FAIR PRACTICES CODE

GEV FOCUS CAPITAL PRIVATE LIMITED

Version Control

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1.0.	First	Introduction of Policy	G. Murugan	Compliance	03.10.2025

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I. BACKGROUND

The Reserve Bank of India (“RBI”) has specified the broad guidelines on Fair Practices Code vide its notification Number RBI/2006-07/138 DNBS(PD) CC No.80/03.10.042/2005-06 dated September 27, 2006. The Guidelines have been amended vide notification RBI/2012-13/416/DNBS.CC.PD.No.320/ 03.10.01/2012-13 dated February 18, 2013, which has been further amended vide its notification no. RBI/DoR/2023-24/106 DoR.FIN.REC.No.45/ 03.10.119/ 2023-24 dated 19th October 2023, which was further updated on May 5, 2025. GEV Focus Capital Private Limited (hereinafter referred to as “GEV Focus Capital”) has adopted the Fair Practices code (“FPC”/ “Code”) based on the guidelines mentioned in the above notifications.

The code sets the standards for GEV Focus Capital(also called “the company”) to follow while doing business with its clients. GEV Focus Capital is registered with RBI as a Non- Deposit accepting Non banking Financial Company and categorized as an Investment and Credit Company.

It is the policy of GEV Focus Capital to make available all financial products to all eligible qualified applicants, without discrimination on the basis of race, caste, color, religion, sex, marital status, age or handicap.

GEV Focus Capital’s policy is to treat all the clients consistently and fairly. The employees of GEV Focus Capital shall offer assistance, encouragement and service in a fair, equitable and consistent manner. GEV Focus Capital shall also communicate its Fair Practice Code (FPC) to its customers by uploading the FPC on its website.

GEV Focus Capital shall ensure that the implementation of the FPC is the responsibility of the entire organization. Its commitment to FPC shall be demonstrated in terms of employee accountability, training, counseling, and monitoring, auditing programs and internal controls, and optimal use of technology.

GEV Focus Capital’s Management team is responsible for implementing the fair practices hereinafter detailed, and also to ensure that its operations reflect its strong commitment to all the stakeholders for offering in a fair and equitable manner, the various financial services and products including lending and that all employees are aware of this commitment.

II. APPLICATION OF THE CODE

GEV Focus Capital is engaged in the business of providing loans to individuals and non individuals, etc. This code shall be applicable to all the products and services offered by GEV Focus Capital.

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III. OBJECTIVES OF THE CODE

This Fair Practice Code has been designed to:

- Promote fair, transparent, and ethical practices in all dealings with customers
- Objectively state the standards for dealing with clients.
- Increase transparency of commercials and service levels enabling clients to take an informed decision.
- Issue guidelines for internal staff on treating customer in a fair manner
- Foster Client confidence in the company.

IV. KEY COMMITMENTS UNDER THE CODE

Our Key commitments to our customers are as follows:

1. To act fairly and reasonably in all our dealings with our clients:

- Meeting the commitments and standards in this code, for the products and services we offer, and in the procedures and practices we follow
- Ensuring that our dealings with the client rest on ethical principles of integrity and transparency.

2. To help Clients understand how our products work by ensuring that;

- Our advertising and promotional literature is clear and not misleading
- Clients are given clear information about our products, the terms and conditions and the interest/service charges, which apply to them.

3. Loan Proposals, Loan appraisal, Loan Processing, sanction and its terms and conditions:

- All the Communications with the customer shall be in vernacular language or the language understood by the customer.
- The loan application forms of the Company, shall include necessary information affecting the interest of the borrower and shall also specify the list of documents to be attached to the application. The application shall be duly acknowledged by GEV Focus Capital, either physically or electronically
- The client shall be informed of the processes involved till sanction and disbursement of the loan and shall be notified of the timeframe within which all the processes shall be completed ordinarily.
- The client shall also be informed of all the information which is relevant from the point of

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view of the transaction and all the parties involved.

- As part of the loan process, to inter-alia ensure utmost transparency, GEV Focus Capital provides all necessary information to the customer alongwith the sanction letters/ LOI (Letter of Intent)/KFS (Key Fact Statements) as the case may be.
- GEV Focus Capital shall provide the nature of security required, fees/Charges, if any, payable for processing, foreclosure, prepayment options, the amount of loan sanctioned alongwith the Key terms and conditions of the proposed exposure including annualized rate of interest and method of application there of, and the check list in respect of information/papers required for considering the loan.
- The terms of enforcement of any security shall be as per the Loan and the other allied documents executed between the parties.
- The procedure including timeline and place of return of original movable/ immovable property documents shall be mentioned in KFS.
- The client shall also be informed about the details of the penal charges (expressed in percentage per annum) and the charges payable by them in relation to their loan account and the method of application thereof.
- All the above information shall be part of the loan agreement expressed in writing and shall be duly approved by the client and countersigned by the authorized officials of GEV Focus Capital.
- GEV Focus Capital shall also furnish over e-mail an execution version of the loan agreement alongwith a copy of each of all enclosures quoted in the agreement to all the borrowers. Post disbursement of the Loan amount, the countersigned, stamped and notarized copy shall be shared with the borrowers.

4. Timely disbursement of loan including changes in terms and conditions:

- Upon the execution of the necessary documentation and completion of formalities, GEV Focus Capital shall ensure that the loan is disbursed at the earliest opportunity.
- GEV Focus Capital shall give notice to the borrower of any change in the terms and conditions including disbursement schedule, interest rates, service charges, pre payment charges etc as per the executed Loan agreement between the parties.
- GEV Focus Capital shall also ensure that changes in interest rates and charges are made effective only prospectively. A suitable condition in this regard shall be incorporated in the loan agreement.
- Any decision to recall/ accelerate payment or performance under the agreement shall be in consonance with the loan agreement.
- GEV Focus Capital shall release all securities on repayment of all dues or on realization of the outstanding amount of loan subject to any legitimate right or lien for any other claim GEV Focus Capital may have against the borrower/guarantor. If such right to 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 GEV Focus Capital is entitled to retain the securities till the relevant claim is settled/paid.

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5. Interest Rates and Penal charges in Loan accounts:

GEV Focus Capital adopts risk based pricing with respect to the charging of interest and its computation. The interest is arrived at by taking into account factors such as borrower profile, available security, client reputation/positioning in the market/ past track record, financial standing, cost of borrowing etc. The rate of interest is further dependent on the broad parameters like risk gradation of the client, tenor of the loan and type of the loan.

GEV Focus capital mentions the Annualised Rate of Interest and Penal Charges in bold in the sanction letters and Loan agreements.

The rate of interest shall be, based on the prevalent interest rates scenario, market conditions and track & credit record of the borrower/group/ industry, which shall be more specifically mentioned in the executed loan agreements.

Penalty, if charged by GEV Focus Capital, for non compliance of terms and conditions of loan contract by the borrower shall be treated as 'penal charges' and is not levied in the form of 'penal interest that is added to the rate of interest charged on the advances'

The company's policy is that penal charges are not capitalized.

The quantum and reason for penal charges is clearly disclosed by GEV Focus Capital in its Interest Rate Policy.

Whenever reminders for non-compliance of terms and conditions of loan are sent to borrowers, the penal charges on the same shall be communicated.

Regulation of excessive interest charged- GEV Focus Capital has adopted an interest rate policy which enunciates the guiding principles that GEV Focus Capital follows while charging interest.

V. RESPONSIBLE LENDING CONDUCT

GEV Focus Capital follows a detailed procedure for release of movable/ immovable property documents on repayment/ settlement of loans which is clearly covered under the KFS (Key Fact Statement). The securities will be released in not more than 30 days from the date of full and final settlement of the loan account.

VI. MISCELLANEOUS

- GEV Focus Capital 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,

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not earlier disclosed by the borrower, has come to the notice of GEV Focus Capital). In the matter of recovery of loans, GEV Focus Capital shall not resort to undue harassment viz. persistently bothering the borrowers at odd hours, use of muscle power for recovery of loans, etc. GEV Focus Capital shall ensure the staff are adequately trained to deal with the customers in an appropriate manner.

- The consent or objection of GEV Focus Capital to any requests for transfer of a borrower's accounts shall be as per the executed Loan and other allied documents between the parties but shall not be later than 21 days from the date of receipt of the request.

VII. RESPONSIBILITY OF BOARD OF DIRECTORS

GEV Focus Capital has a policy laying down appropriate grievance redressal mechanism which ensures that all disputes arising out of the decisions of company's functionaries are heard and disposed of at least at the next higher level and if required the code shall be reviewed preferably on annual basis at various levels of management, and accordingly consolidated report of such reviews shall be submitted to the Board.

VIII. RESET OF FLOATING INTEREST RATE OF EQUATED MONTHLY INSTALMENTS (EMI) BASED PERSONAL LOANS

Presently, GEV Focus Capital does not provide loans on Floating Interest Rate. However, as and when company intends to grant a Floating Interest Rate, it shall initially frame a Floating Interest Rate guideline before granting the same.

IX. REPOSSESSION OF FINANCED VEHICLES

As the company does not offer vehicle loans, the clause of repossession of vehicles is not applicable to the company. However, as and when company intends to grant vehicle loan it shall follow the guidelines given in the para 45.13 of the Master Direction as amended from time to time before granting the same.

X. CUSTOMER PROTECTION

GEV Focus Capital, shall treat all their customer's personal information as private and confidential and shall not reveal details of customers dealings with them to a third party, except as provided herein and in the following exceptional cases:

- When we have to give the information by law or to credit rating agencies/CIBIL/CERSAI etc.
- If there is duty towards the public to reveal the information.
- In case of continued default – as the company may think fit to regularize the account
- In case of any information required by the applicable Law enforcement agencies.

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XI. REGULATION OF EXCESSIVE INTEREST CHARGED

- The company has laid down appropriate internal principles and procedures in determining interest rates and processing and other charges.
- The company has adopted an interest rate model and policy taking into account cost of funds, margin and risk premium for determining rate of interest to be charged for loans and advances.

XII. REDRESSAL MECHANISM

- The company has laid down the appropriate grievance redressal mechanism within the organization to resolve disputes arising in this regard. Such a mechanism ensures that all disputes arising out of the decisions of the functionaries are heard and disposed of atleast at the next higher level.
- Response to a complaint would be given within a maximum period of one month from the date of the complaint, unless the nature of complaint requires verification of voluminous facts and figures.

XIII. Complaints/Grievance Redress Mechanism

(A) In case of any complaint/grievance with respect to the conduct of GEV Focus Capital, the customer can make his complaint through any of the following modes:

Email: complaints@gevfocuscapatil.com

Customer Walk-In at Corporate Office: No.1, Hanumantha Street, T. Nagar, Chennai 600017

In case a customer chooses to lodge his complaint regarding any conduct of GEV Focus Capital, through email/SMS, a reply to the same shall be sent to the customer via email/SMS acknowledging his complaint and also informing him about his complaint number and expected time of resolution.

In case a customer chooses to lodge his complaint at the office of GEV Focus Capital, he shall be requested to give his complaint in writing. The Grievance Redressal Officer shall provide him with an unique complaint number, with the expected time of resolution.

The complaints with respect to GEV Focus Capital shall be regularly monitored by Grievance Redressal Officer to ensure effective resolution and escalation. The company shall not only ensure that all the complaints received are recorded and resolved, but also ensure an effective monitoring/ escalation mechanism to the senior levels responsible so as to ensure that none of the complaints remain unresolved.

All disputes arising out of the decisions of officers in relation to the services shall be heard and disposed off at least at the next higher level.

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Post resolution of the complaint, the customer shall get an e-mail/SMS confirming the resolution of the complaint. At this point the customer has to confirm whether the complaint has been resolved to his satisfaction or not. The complaint shall be deemed closed if the customer does not respond to email/SMS.

B) The company shall display the following information prominently, for the benefit of its customer/s/ places where business is transacted:

1. The name and contact details (Telephone/Mobile Nos. as also email address) i.e. (Name and details to be furnished) responsible for lodging and resolving.
2. Contact details of the officer-in-charge of the Regional Office of Dept of Supervision, NBFC (DoS-NBFC) under whose jurisdiction the Registered Office of the company fall in the event of a complaint/dispute remaining unresolved for a period of one month.

In case customers are not satisfied with the resolution provided by the company, they may further approach

Regional Director – Chennai
Department of Supervision (NBFC) (“DOS-NBFC”)
Reserve Bank of India,
Fort Glacis, 16, Rajaji Road,
Fort St George, Chennai
Tamil Nadu 600001

XIV: `Review:

A periodical review of the Fair Practice Code and the functioning of the grievance’s redressal mechanism at various level of management would be undertaken by the Company.

The Company shall abide by this Fair Practice Code following the spirit of the code and in the manner, it may be applicable to its business.

The Company shall put the above Fair Practice Code (which shall preferably be in the vernacular language or a language as understood by the borrower) outlined hereinabove on its website, for the information of various stakeholders. The Company would also review and refine the FPC, as may be required periodically once in a year and in accordance with the regulations. Further any updation relating to change in the name of officials shall be approved by the CEO. Onus of review of this FPC guidelines lies with the Compliance department.

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“This policy was approved by the Board of the company in its meeting held on 03.10.2025”

Company Secretary
GEV Focus Capital P Ltd
Chennai
03.10.2025