

The Reserve Bank of India has drafted the guidelines on Fair Practices Code for Non- Banking Finance Companies which sets the fair practices standards when dealing with individual customers and to serve as a part of best corporate practice.

It is, and shall be, our policy to make credit products available to all qualified applicants without discrimination on the basis of race, caste, colour, religion, sex, marital status, age or handicap.

Our policy is to treat all the clients consistently and fairly. Our employees will offer assistance, encouragement and service in a fair, equitable and consistent manner.

The Company's Board of Directors and the management Team is responsible for establishing practices designed to ensure that our operations reflect our strong commitment to fair lending and that all employees are aware of that commitment.

We will ensure that the implementation of the Fair Practices Code is the responsibility of the entire organisation. The Company's Fair lending practices shall apply across all aspects of our operations including marketing, loan origination, processing, servicing and collection activities. Our commitment to Fair Practice Code would be demonstrated in terms of employee accountability, training and technology.

We shall ensure that charges/fees which affect the interest of the prospective borrowers are appropriately informed to the borrower. Terms and conditions pertaining to the facility will be conveyed to the prospective borrowers. We commit that disputes arising out of the lending decisions will be appropriately resolved by a grievance redressal mechanism set up by us.

Infina Finance Pvt. Ltd is committed to providing service of the highest quality to its clients. The fair practice code applies to all products and services offered by us currently or in future.

All Types of Loan

The Fair Practices Code is applicable to all loans / Third Party products offered through our network (currently offered or which may be introduced at a future date) originated at the Head Office or at any Branch, over the phone, on the internet or by any method employed currently or may be introduced at a future date

KEY COMMITMENTS

The key commitments which we promise to follow in our dealing with our customers:

a. Act fairly and reasonably in all our dealings with our customers by ensuring:

- Our products, services, procedures and practices will meet the commitments and standards in this Code.
- Our products and services will meet relevant laws and regulations applicable from time to time.
- Our dealings with our customers will rest on ethical principles of integrity and transparency.

b. We will assist customers in understanding how our financial products and services work, by

- Providing information about them in simple Hindi and/or English and/or the local language, a language as understood by the borrower (wherever required).
- Explaining their financial implications.
- Helping the customer choose the one that meets his / her needs.

c. We will make every attempt to ensure that customers have a trouble-free experience in dealing with us; but if something does go wrong, we will deal with the same quickly and sympathetically.

- Mistakes will be corrected quickly.
- Complaints will be handled quickly.
- In case a customer is not satisfied with the way a complaint is handled, we will guide the customer on how to take the complaint forward.
- We will reverse any charges applied to a customer's account due to an any type of error on our part in timely manner. Such reversals will be informed to customers through registered email address or any other acceptable method to customer.

INFORMATION

We will guide our customers in choosing products and services which meets his / her requirements:

a. Before the customer relationship is established, we will:

- Inform the customer about key features of the services and products.
- Offer products and services which may suit the customer's needs and Inform key terms for the proposed transaction.
- Inform the customer about required information including KYC part to fulfill legal, regulatory and other internal requirements.

b. Will provide the product information through various modes like product presentations, web portal, emails, etc.

c. Once a customer has chosen a product, we will tell the customer how it works.

INTEREST RATES

a. At the time of loan disbursement, customer will be shared with repayment schedule with details of Interest and Principal Amount.

b. The Sanction Letter will contain information about interest rate – fixed rate or floating rate, interest reset details, penal charges (to be highlighted in bold), on when the interest will be debited to the account, etc.

c. The company will not impose foreclosure charges on any floating rate loan where the borrower(s) are individuals, and the loan is sanctioned for purposes other than business

CHARGES

a. Sanction letter will contain any applicable charges for the opted product such as Processing Fees, Pre-payment, Demat Charges, Documentation Charges, etc.

b. If in case of any change in charge structure or introduction of new charges, same will be notified to customer.

- c. We will communicate (to customers) charges for any service or product before providing the same.
- d. We will provide charges for any service or product whenever the customer requests for the same.

TERMS AND CONDITIONS

- a. When a customer accepts a product or service for the first time, we will provide the customer with the Information that are relevant to the product / service.
- b. Key terms and conditions will be highlighted in sanction letter
- c. All Terms and Conditions will be fair and will set the customer's rights and responsibilities clearly and in plain language. We will use legal or technical language only where necessary.

ADVERTISING AND MARKETING

- a. We will ensure that all advertising and promotional material is transparent, fair, informative. It will not mislead prospective customer.
- b. We will provide detailed information about financial products offered by us.
- c. We may use services of agents for marketing our products and same will be communicated through appropriate clause in the product literature .

CONFIDENTIALITY

- a. Unless authorised by the customer, we will treat all personal information of the customer as private and confidential.
- b. We will not reveal transaction details to any other entities including group entities other than the following exceptional cases:
 - If we have to provide the information to Authorities as required by statutory or regulatory laws.
 - If there is a duty to the public to reveal this information.
 - If our interest requires us to provide this information (e.g. fraud prevention)

LOANS AND ADVANCES

- a. Will assess the ability of the customer to service interest payment and principal loan repayment before approving credit limit.
- b. We will inform the customer that loan is repayable on demand or otherwise

LOAN APPRAISAL AND TERMS/CONDITIONS

We shall convey to the customer by way of sanction letter or otherwise, the amount of loan sanctioned along with terms and conditions including annualized rate of interest and keep the acceptance of these terms and conditions by the customer on Company's Record

We 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).

RECOVERY

- a. We shall not resort to undue harassment, use of muscle power for recovery of loans
- b. Any type of margin call or recovery call will not be done before 8.00 a.m and after 7.00 p.m.
- c. The staff would be adequately trained to deal with customers in appropriate manner
- d. The loan agreement shall have a built-in repossession clause to ensure transparency of the terms and conditions relating to the same

INTEREST RATE MODEL

The Fair Practice Code of the Company shall be read with the Interest Rate Policy of the Company, which is available on the website of the Company.

LOAN SOURCED BY DIGITAL LENDING PLATFORMS

Wherever the Company engages Digital Lending Applications/Lending Service Platforms to source borrowers and/ or to recover dues, same shall be in accordance with RBI guidelines on Digital lending issued from time to time

FURTHER ASSISTANCE

Complaints / Grievances and Feedback / Suggestions – Internal Procedures

- Guidance will be provided to customer who wish to log a complaint if he/she is unhappy with product offering.

- Our employees will understand the concern of the customer and will highlight the same internally for discussion.
- After examining the matter, we will send a response to the customer sharing the facts and will try to provide solution for the same.

We will display at our branches the name and contact details of the Grievance Redressal Officer who can be approached by the public for resolution of complaints against our Company.

Further assistance will be provided if the customer is not satisfied with provided suggestions and views

MONITORING

We have a Nodal Officer to ensure compliance with the Code. The details of the Nodal Officer is as below:

Nodal Officer: Mr. Keyur Gandhi

Email: keyur.gandhi@infina.in

Phone: (022) - 6680 8380

Address : 7th Floor, Dani Corporate Park,
158, C.S.T. Road, Kalina,
Santacruz (East), Mumbai – 400 098

FURTHER ASSISTANCE

Kindly refer to the Grievance Redressal Mechanism.

https://cdn.prod.website-files.com/679a606e403156a82f920650/687799b0525c81680fc16612_Grievance%20Redressal%20Mechanism_Policy%20Infina%20Finance%202nd%20July%20%202025%20Clean.pdf

MORE INFORMATION ABOUT THE CODE

The code will be available on our website and copies will be made available on request.

REVIEW OF THE CODE

THE FAIR PRACTICE CODE WILL BE REVIEWED AT LEAST ONCE IN A YEAR BY THE BOARD.

INDEX OF THE REVIEW OF THE POLICY

Sr. No.	Date of the Review
1	April 18, 2019
2	May 28, 2020
3	February 8, 2023
4.	March 12 2024
5.	January 17 2025