Lending Operations Policy

Aditsh Fintech Private Limited
(NBFC – Category II)

1. Policy Objective To ensure ethical, transparent and compliant lending through a structured manual and assisted lending process. This policy is intended to protect borrowers and ensure responsible conduct throughout application, assessment, sanction, documentation, disbursal, servicing and closure.

2. Scope and Applicability This policy applies to all lending products and all employees and authorised representatives involved in customer interaction, documentation, credit assessment, sanction, disbursal, servicing, collections and grievance handling.

3. Governing Principles • Transparency: All loan terms, rates, fees and charges shall be clearly disclosed before execution. • Data Privacy: Borrower information shall be handled only for lawful business and compliance purposes. • Consent: Required customer consent shall be obtained before collection or use of personal information. • Responsible Assessment: Lending decisions shall be based on eligibility, documentation, income, repayment capacity, credit profile and applicable risk parameters. • Fair Treatment: Customers shall be treated fairly and respectfully throughout the lending lifecycle.

4. Standard Lending Procedure 4.1 Customer Enquiry and Documentation Customer enquiries may be received through the website, telephone, branch or other authorised channels. Required KYC, income, banking, business and collateral documents, as applicable, shall be collected and verified by the lending team.

4.2 Credit Assessment and Sanction The Company shall assess the applicant's identity, financial position, repayment capacity, credit history and other relevant risk factors. Sanction terms shall be communicated clearly in writing before disbursal.

4.3 Key Fact Statement and Loan Agreement The borrower shall receive the applicable Key Fact Statement and loan agreement containing the sanctioned amount, tenure, interest rate, APR where applicable, processing fees, other charges, repayment obligations and material terms before disbursal.

4.4 Disbursal and Repayment Loan disbursal and repayment shall be carried out in accordance with the sanctioned terms, applicable law and RBI directions. Appropriate records shall be maintained for each transaction.

4.5 Customer Records The Company shall maintain appropriate records of applications, documents, sanction decisions, agreements, disbursals, repayments, communications and closure in accordance with applicable record-retention requirements.

5. Grievance Redressal Borrowers shall be informed of the available grievance channels and the contact details of the designated grievance officials. Complaints shall be acknowledged, investigated and resolved within applicable timelines.

6. Data Protection and Information Security Customer information shall be protected through appropriate access controls, confidentiality measures and security practices. Information shall be shared only where required for lawful business, regulatory, statutory or contractual purposes.

7. Monitoring and Compliance The Compliance function shall periodically review adherence to this policy, customer complaints, disclosures, lending practices, documentation and applicable RBI requirements.

8. Policy Review and Approval This policy shall be reviewed annually or earlier where required due to regulatory or business changes. Amendments shall be approved through the Company's applicable governance process.

Approved By: Board of Directors
Effective Date: 16 February 2026
Next Review Date: 2 April 2027
Policy Owner: Chief Compliance Officer