

Fair Practices Code

Background

The Reserve Bank of India, by its notification no RBI / 2006-07 /138 DNBS (PD) CC No. 80 / 03.10.042 / 2005-06 dated September 28, 2006 has prescribed the broad guidelines on fair practices that are to be framed and approved by the Board of Directors of all Non - Banking Financial Companies (NBFCs). The fair practices code so framed and approved by the Board of Directors should be published and disseminated on the web-site of the company, if any, for the information of the public.

SPA Capital Services Limited (the "Company"), is carrying out the business as distributor of various financial products and is also engaged in the business of lending and borrowing and investments. The Company has been registered with the Reserve Bank of India as NBFC.

(I) Objective of the Code

The code has been developed with an object to:

- Promote fair practices by setting minimum standards in dealing with customer.
- Increase transparency so that customer can have a better understanding of what type of service level can be expected from the company.
- Foster customer confidence in the company.

(II) Application of the Code

The code applies to all products, as may be offered by the company.

(III) Key Commitment

- (a) To help borrower / customer understand Company's financial products and services by:
 - (i) Ensuring that the customer is given clear information about Company's product and services, the terms and conditions and interest rates/service charges, which apply to them in the loan application form
 - (ii) Keeping customer informed about changes in the interest rates, charges, terms and conditions
- (b) To act fairly and reasonably in all dealings with the customer by:
 - (i) Meeting the commitments and standards in this code for products and services offered by the Company
 - (ii) Making sure that products and services meet relevant principles of integrity and transparency
 - (iii) Informing customer about the time limit by which loan application will be processed and informing them of the status at regular intervals
 - (iv) Handling customer complaints promptly
 - (v) Informing customers about the process to take their complaints forward to the higher authorities
- (c) To treat personal information of customers as private and confidential

(IV) Information

- (a) The customer shall be given information regarding interest rates, terms and conditions for loan and other charges in a clear and precise manner. The Loan Application Form may indicate the documents required to be submitted with the application form
- (b) Acknowledgement shall be given on receipt of loan application documents. Normal time frame for processing of the Loan Application would also be informed to the customers
- (c) After the loan is sanctioned, customer shall be informed about the annualized rate of interest at which loan is sanctioned, and the method of application thereof, mode & time at which the interest will be debited (whether monthly or quarterly) and other terms and conditions applicable to loan. The Company shall keep the record of acceptance of these terms and conditions by the Borrower.
- (d) The Company shall inform customer about any changes made in the terms and conditions like disbursement schedule, interest rates, service charges, prepayment charges etc applicable to the loan. Such changes shall be effected prospectively. A suitable condition in this regard would be incorporated accordingly in the Loan Agreement.

(V) Post disbursement Supervision

- (a) Post disbursement supervision would be constructive.
- (b) Decision to recall / accelerate payment or performance under the agreement will be in consonance with the loan agreement. For example, in case there is a shortfall in margin/security given due to market fluctuation requiring borrower to give additional margin/security or due to some other reason loan needs to be recalled or payment needs to be accelerated earlier than schedule, same shall be communicated to customer and sufficient notice, as specified in the agreement, will be given to him.
- (c) The Company shall release securities on repayment of all dues or on realization of outstanding amount of loan subject to any pending unsettled claims of the Company. The securities would be withheld after informing client full particulars about the pending claims and the conditions under which the Company is entitled to retain the securities till the relevant claim is settled.

(VI) Non-Interference in the Affairs of the Borrower :

The Company shall not interfere in the affairs of the borrower except for the purposes provided for in the terms and conditions of sanction of the loan.

(VII) Confidentiality

- (a) The Company shall treat customer information as private and confidential and shall be guided by following principles and policies: The information shall be parted by the Company only in the following circumstances:
 - (i) Information required to be given under law or as demanded or required by Statutory authorities
 - (ii) Information is given with customer's specific written permission
- (b) In case of receipt of request for transfer of borrower account, either from the borrower or from a lender which proposes to take over the account, the consent or otherwise would be conveyed within 21 days from the date of receipt of request. Such transfer would be as per transparent contractual terms in consonance with law.

(VIII) Collection of Dues

- (a) Company's collection policy shall be built on courtesy, fair treatment and persuasion. Efforts will be made in building customer confidence and long term relationship
- (b) The staff deputed to make recovery calls shall identify themselves and shall provide details with regard to outstanding claims to the customer
- (c) Under no circumstances, Company shall resort to harassment of the customer for recovery of the dues.

(IX) Complaints, Grievances and Feedback

- (a) If complaint is received in writing or over phone, complaint number would be given which would be referred to in future. Complaint register would be maintained. A person will be designated to receive complaints from customers.
- (b) Company will endeavor to sort out the matter within fifteen days of receipt of a complaint
- (c) In case the complaint requires more time then the same would be informed to the customer. Customer would be updated at regular intervals regarding the status of the same.
- (d) The grievance redressal mechanism within the organization will be explained to the customer to resolve any dispute, such a mechanism would ensure that all disputes arising out of decisions of our functionaries are heard and disposed off at least at the next higher level.

(X) Review

The Board of Directors will periodically review the compliance of Fair Practices Code and the functioning of the grievances redressal mechanism at various levels of Management.