

FAIR PRACTICES CODE

(Approved by the Board of Directors of SU1 Capital Private Limited)

1. Introduction

SU1 Capital Private Limited ("SU1 Capital" or "the Company") is a Non-Deposit Taking Non-Banking Financial Company (NBFC-ND) registered with the Reserve Bank of India ("RBI") and classified as a Base Layer NBFC under RBI's Scale Based Regulation framework.

This Fair Practices Code ("FPC") is adopted in accordance with the applicable Master Directions and regulatory guidelines issued by the Reserve Bank of India from time to time.

The objective of this Code is to ensure fair, transparent, and ethical practices in dealing with customers.

The Company does not accept public deposits.

2. Application of the Code

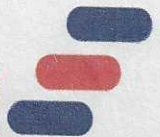
This Code applies to:

- All products and services offered by the Company
- All employees and authorized representatives
- All branches and service locations

The Code is available on the Company's website and at all business locations.

3. Loan Applications and Processing

- All communications shall be in a language understood by the borrower.



- Loan application forms shall include all material information affecting borrower interest.
- An acknowledgement shall be issued for all loan applications.
- The Company shall disclose:
 - Interest rate (annualised)
 - Processing fees
 - All other charges
 - Penal charges (if applicable)
- A **Key Fact Statement (KFS)** shall be provided to borrowers where applicable.

The Company shall collect only necessary information for processing applications and shall ensure confidentiality.

In case of invoice-backed or anchor-based financing, disbursement may be made directly to the supplier / anchor as per borrower authorization and agreed commercial structure.

4. Loan Appraisal and Sanction

Loan sanction letters shall clearly mention:

- Loan amount
- Tenure
- Annualised interest rate
- Method of interest calculation
- Processing fees and other charges
- Penal charges (if any)
- Repayment schedule

A copy of the executed loan agreement shall be provided to the borrower.



5. Disbursement and Changes in Terms

- Changes in interest rates and charges shall be prospective.
- Borrowers shall be informed of any changes.
- Decisions to recall loans shall be as per agreement terms.
- Securities shall be released within 30 days from date of full repayment or settlement of loan, subject to no subsisting claims. In case of delay beyond 30 days, the Company shall compensate the borrower at the rate prescribed by RBI from time to time.

6. Penal Charges Policy

The Company shall levy penal charges (not penal interest) for non-compliance with material terms of loan contracts.

- Penal charges shall be reasonable.
- Penal charges shall not be capitalized.
- No discrimination between similar borrower categories.

7. Recovery Practices

The Company shall not resort to undue harassment.

Recovery agents (if engaged) shall:

- Follow RBI's recovery guidelines.
- Recovery contact shall ordinarily be made between 8:00 AM and 7:00 PM unless otherwise agreed with the borrower.
- Not use abusive or coercive practices.

8. Grievance Redressal Mechanism

Customers may lodge complaints via:



Telephone: 0124-4939672; 8010154129,

Email: admin@su1capital.com

Postal Address:

Grievance Redressal Officer

SU1 Capital Private Limited

A-805, Emaar Digital Greens, Sector-61,

Golf Course Extension, Gurugram-122002

Complaints shall be acknowledged within 48 working hours and resolved within 30 days.

If not satisfied, customers may approach the RBI under the Integrated Ombudsman Scheme, 2021:

Website: <https://cms.rbi.org.in>

Toll-Free: 14448

Email: crpc@rbi.org.in

9. Confidentiality and Data Protection

Customer information shall be kept confidential and shall not be disclosed except:

- Where required by law
- To credit bureaus as per regulatory mandate
- With borrower consent

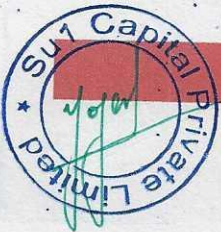
If third-party service providers are engaged, they shall adhere to strict confidentiality standards.

10. Credit Information Companies

The Company shall report borrower information to Credit Information Companies (CICs) in compliance with applicable regulations.

Borrowers shall be informed before reporting defaults.

The Company shall ensure accuracy of data submitted to Credit Information Companies and shall update records promptly upon receipt of corrections.



11. Advertising and Marketing

- All advertising material shall be clear and not misleading.
- Terms shall be transparent.
- Promotional communication shall be sent only with customer consent.

12. Guarantors

Guarantors shall be provided:

- Copy of guarantee document
- Information regarding borrower default

13. Interest Rate Policy

- Interest rates shall be determined based on cost of funds, risk profile, tenor, and business considerations.
- The rate of interest shall be annualised.
- The rationale for differential rates shall be documented.
- Interest rate policy shall be reviewed periodically by the Board.
- The rate of interest and approach for gradation of risk shall be made available on the Company's website.

14. Cooling- Off Clause

In case of digital lending products, borrowers shall be provided a cooling-off / look-up period as per applicable RBI guidelines.

15. Board Review

The Board of Directors shall periodically review:

- Customer complaints
- Policy effectiveness
- Regulatory compliance

