

MKVENTURES CAPITAL LIMITED

(Formerly known as “IKAB SECURITIES AND INVESTMENT LIMITED”)

FAIR PRACTICE CODE

POLICY VERSION CONTROL:

VERSION NO.	APPROVED BY BOARD ON	REMARKS
1.0	08.08.2022	Policy adopted in supersession of previously adopted policy.
2.0	12.11.2022	Substitution of “Ikab Securities And Investment Limited” with the new name “MKVentures Capital Limited” from the Policy document
3.0	30.05.2023	Policy adopted in supersession of previously adopted policy.

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INTRODUCTION:

The Reserve Bank of India (RBI) has issued guidelines on Fair Practices Code for Non-Banking Finance Companies (“NBFCs”) thereby setting standards for fair business and corporate practices while dealing with their customers vide it’s Circular DNBS.CC.PD.No.266 /03.10.01/2011-12.

The Fair Practices Code (FPC) is aimed to provide to the customers an effective overview of practices, which will be followed by the Company in respect of the financial facilities and services offered by the Company to its customers. The Code will facilitate the customers to take informed decision in respect of the financial facilities and services to be availed by them and will apply to any loan that the Company may sanction and disburse or other financial product which it may distribute.

MKVentures Capital Limited (hereinafter referred to as “The Company” or “MCL”) is a public limited company incorporated under the provisions of the Companies Act, 1956 and Non-Deposit Taking Non-Systematically Non-Banking Financial Company [“NBFC-ND NSI”] registered with the Reserve Bank of India [“RBI”] under section 45-IA of the Reserve Bank of India Act, 1934 [“RBI Act”].

The Company has framed and adopted all the best practices prescribed by RBI from time to time and shall make appropriate modifications if any necessary to this Code to conform to the standards so prescribed. It is, and shall be, the policy of MKVentures Capital Limited (“MCL/Company”) to make available to all eligible qualified applicants, without discrimination on the basis of race, caste, colour, religion, sex, marital status, age, or handicap all financial products, either directly or through subsidiaries and/or associates.

The Company’s policy is to treat all its clients consistently and fairly. The employees of the Company will offer assistance, encouragement, and service in a fair, equitable, and consistent manner.

The Company will also communicate its Fair Practices Code (“FPC”) to its customers by uploading the FPC on its website. The Company will ensure that the implementation of the FPC is the responsibility of the entire organization. The Company’s fair lending practices shall apply across all aspects of its operations, including marketing, loan origination, processing, and servicing and collection activities. Its commitment to FPC will be demonstrated in terms of employee accountability, training, counselling, and monitoring, auditing programs and internal controls, and optimal use of technology.

The Company’s Board of Directors and the management team are 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.

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This Fair Practices Code applies to the following categories of products and services offered by us (currently offered or which will be introduced at a future date):

- Loans, guarantees and other products in the nature of financial assets.
- Products offered through a network consisting of the branches of the Company, its subsidiaries and associates.
- Products/services provided physically, over the phone, on the internet or by any other method whatsoever, existing or futuristic.

OBJECTIVE OF THE CODE:

This Fair Practices Code (FPC) is aimed to provide to the customers' effective overview of practices, which is to be followed by the Company in respect of the financial facilities and services offered by the Company to its customers. This Code would facilitate the existing as well as prospective customers to take informed decisions in respect of the financial facilities and services to be availed by them or financial products which they may obtain from the Company.

This Code has been developed to:

- Promote good, fair and trustworthy practices by setting minimum standards in dealings with the customers;
- Increase transparency to enable the customers to have a better understanding of what they can reasonably expect of the services.
- Promote a fair and cordial relationship between the customers and the Company.
- Building Customer confidence in the Company.

KEY COMMITMENTS:

The key commitments which the Company promises to follow in its dealings with its customers are:

To act fairly and reasonably in all dealings with its customers by ensuring that:

- Its products, services, procedures and practices meet the commitments and standards in this FPC.
- Its products and services meet relevant laws and regulations in letter and spirit as MCL.
- Its dealings with its customers will rest on ethical principles of honesty, integrity and transparency.

The Company will assist customers in understanding how its financial products and services work by:

- Providing information about them in a simple and understandable manner & language.
- Explaining their financial implications and
- Helping the customer choose the one that meets his/her needs.

The Company will make every attempt to ensure that its customers have a trouble-free experience in dealing with it; but in the case of errors or commissions and omissions, the Company 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, the Company will guide the customer on how to take the complaint forward.
- The Company will reverse any charges including interest applied to a customer's account due to an error or oversight on its part.

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The Company will guide its customers in choosing products and services which meet his/her requirements. Before the customer relationship is established, the Company will:

- Give the customer information explaining the key features of the services and products the customer has shown interest in.
- Give information on accounts, products and services which will suit the customer's needs.
- Clearly state the information that the Company requires to collect from the customer to fulfill its 'Know Your Customer' norms and to comply with legal and regulatory requirements in force from time to time.
- Request for additional information about the customer and his/her family to build a database; but this information will be furnished by the customer only if she/he wishes to do so.

The Company will provide information on the various channels that can be used to access its products and services. The customer will also be informed on where further information on this is available.

The Company will guide its customer on rights and responsibilities specific to the mode of operation under which the product is taken. Before offering any kind of fund based or non-fund based non-banking facility the Company will assess the ability of the customer (prospective borrower) to repay.

The loan application form shall indicate the documents required to be submitted along with the application form.

The Company shall provide to the prospective borrower an acknowledgment for receipt of all loan applications.

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

MCL shall convey in writing to the borrower by means of sanction letter or otherwise, the amount of loan sanctioned along with the terms and conditions including annualized rate of interest and method of application thereof and keep the acceptance of these terms and conditions by the borrower on its record.

As complaints received against NBFCs generally pertain to the charging of high interest/penal interest, MCL shall specifically mention the penal interest charged for late repayment in the loan agreement. Appropriate internal principles and procedures for determining interest and other charges shall be laid down and be subjected to review keeping in view the business exigencies, regulatory and customer sentiments, market practices, etc. The acceptance of the terms and conditions communicated by the borrower shall be preserved by the Company in its records.

MCL shall furnish a copy of the loan agreement along with a copy of each of all enclosures quoted in the loan agreement to all the borrowers at the time of sanction/disbursement of loans. The Company shall give notice to the borrower in the vernacular language as understood by the borrower of any change in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges, etc. The Company shall ensure that changes

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in interest rates and other charges are effected only prospectively. The loan agreement shall contain a specific clause to this effect. The decision of the Company to recall/accelerate payment or performance shall be in consonance with the terms of the loan agreement.

The Company shall release all securities upon repayment of all dues or on the realization of the outstanding amount of loan subject to any legitimate right or Lien for any other claim it will have against the borrower. In case such right of set-off is to be exercised, the borrower shall be given due notice with full particulars about the outstanding claims and the conditions under which the Company is entitled to retain the securities till the relevant claim is settled/paid.

GENERAL CLAUSES:

1. MCL shall refrain from interfering in the affairs of the borrower except for the purposes provided in the terms and conditions of the loan agreement, unless new information, not earlier disclosed deliberately or otherwise by the borrower, has come to its notice.
2. In case of receipt of the request from the borrower for transfer of a borrower account to other NBFC, bank of the financial institution, the consent or otherwise shall be conveyed within 30 days from the date of receipt of such request. Such transfer shall be in accordance with the loan agreement and the Company's Product Policy guidelines
3. In the matter of recovery of loans, the Company shall resort only to remedies which are legally and legitimately available to it and will avoid using recovery measures during odd hours of the day, undue harassment, use of muscle power for recovery of loans. MCL shall ensure that the staff are adequately trained to deal with the customers in an appropriate manner.
4. There shall be no discrimination in extending products and facilities including loan facilities to the physically/visually challenged applicants on grounds of disability (Ref: RBI Circular No. DNBS.CC.PD.No. 191/03.10.01/2010-11 dated July 27, 2010).
5. All Terms and Conditions will be fair and will set the customers rights and responsibilities clearly and in plain language, the Company will use legal or technical language only where necessary.
6. The Company will make available any charges applicable to products and services applicable. If the Company increases any charges or introduces a new charge. The Company will notify the same to the customers. The Company will provide the terms and conditions in respect of any product or service whenever a customer requests for the same.

MARKETING MATERIAL:

- The Company will ensure that all advertising and promotional material is clear, fair reasonable, and not misleading.
- The Company will provide the customers with a full range of financial products the customer is eligible for. Some of these products/services will be its own; some others may be the products of companies with which the MCL will have arrangements with.

CONFIDENTIALITY:

- Unless authorized by the customer the Company will treat all personal information as private and confidential.
- The Company will not reveal transaction details to any other entity including within the group other than the following exceptional cases:
 - If the Company have to provide the information by statutory or regulatory laws
 - If there is a duty to the public to reveal this information.

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- If its interest requires MCL to provide this information (e.g. fraud prevention). The Company will not use this reason for giving information about customers to anyone else (including group companies) for marketing purposes.
- If the customer has given consent/concurrence to provide/share such information
- Where the customer asks us to reveal such information to its group/associate/entities or companies for providing other services or products

GRIEVANCE REDRESSAL MECHANISM:

- The Company shall also lay down the appropriate grievance redressal mechanism within the organization to resolve disputes arising in this regard. Such a mechanism shall ensure that all disputes arising out of the decisions of the Company's functionaries are heard and disposed of at least at the next higher level.
- The Board of Directors shall also provide for periodical review of the compliance of the Fair Practices Code and the functioning of the grievance's redressal mechanism at various levels of management and a consolidated report of such reviews shall be submitted to the Board at regular intervals, as may be prescribed by it. To start with Company may provide the same on a quarterly basis.
- The Company will guide customers who wish to lodge a complaint and also provide guidance on what to do in case the customer is unhappy with the outcome.
- After examining the matter, the Company will send a response as soon as possible; the Company will also guide a customer on how to take the complaint further if the customer is not satisfied.
- A nodal officer shall be appointed for the redressal of grievances of the customers including the borrowers, in connection with any matter pertaining to business practices, lending decisions, credit management and recovery. The name and contact details of the nodal officer shall be displayed in the website of the Company.
- Internally constituted Customer Grievance Redressal Council comprising senior management officials, to review with the Nodal Officer and oversee the Grievance Redressal Mechanism.

INFORMATION:

As per RBI Circular No. RBI/2012-13/416 DNBS.CC.PD.No.320/03.10.01/2012-13, the Company shall display the following information prominently, for the benefit of the customers, at their branches/places where the business is transacted:

- The name and contact details (Telephone/Mobile nos. as also email address) of the Grievance Redressal Officer who can be approached by the public for resolution of complaints against the Company.
- If the complaint/dispute is not redressed within a period of one month, the customer may appeal to the Officer-in-Charge of the Regional Office of DNBS of RBI (complete contact details), under whose jurisdiction the registered office of the Company falls i.e. Mumbai Regional Office.

REPOSSESSION OF VEHICLES/ASSETS:

The Company shall have a built-in re-possession clause in the contract/loan agreement with the borrower which shall be legally enforceable. To ensure transparency, the terms and conditions of the contract/loan agreement shall also contain provisions regarding:

- Notice period before taking possession;
- Circumstances under which the notice period can be waived;
- The procedure for taking possession of the security;

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- Provision regarding final chance to be given to the borrower for repayment of the loan before the sale/auction of the property;
- Procedure for giving repossession to the borrower
- Procedure for sale/auction of the property.

REGULATION OF EXCESSIVE INTEREST RATE:

- MCL shall adopt an interest rate model taking into account relevant factors such as cost of funds, margin and risk premium, etc and determine the rate of interest to be charged for loans and advances. The rate of interest and the approach for gradations of risk and the rationale for charging different rates of interest to different categories of borrowers shall be disclosed to the borrower or customer in the application form and communicated explicitly in the sanction letter.
- The rates of interest and the approach for gradation of risks shall also be made available on the website of the companies or published in the relevant newspapers. The information published on the website or otherwise published should be updated whenever there is a change in the rates of interest.
- The rate of interest should be annualized rates so that the borrower is aware of the exact rates that would be charged to the account. As per the circular issued by the RBI on July 14, 2014, the Company shall not charge pre-payment penalties on any floating rate term loans sanctioned to Individual Borrowers.

LENDING AGAINST THE COLLATERAL OF GOLD JEWELLERY:

While lending to individuals against gold jewellery, MCL shall adopt the following in addition to the general guidelines as above. MCL shall put in place Board approved policy for lending against gold that should inter alia, cover the following:

- Adequate steps to ensure that the KYC guidelines stipulated by RBI are complied with and to ensure that adequate due diligence is carried out on the customer before extending any loan
- Proper assaying procedure for the jewellery received
- Internal systems to satisfy ownership of the gold jewellery
- The policy shall also cover putting in place adequate systems for storing the jewellery in safe custody, reviewing the systems on an on-going basis, training the concerned staff and periodic inspection by internal auditors to ensure that the procedures are strictly adhered to. As a policy, loans against the collateral of gold should not be extended by branches that do not have appropriate facility for storage of the jewellery
- The jewellery accepted as collateral should be appropriately insured
- The Board approved policy with regard to auction of jewellery in case of non-repayment shall be transparent and adequate prior notice to the borrower shall be given before the auction date. It shall also lay down the auction procedure that would be followed. There shall be no conflict of interest and the auction process must ensure that there is arm's length relationship in all transactions during the auction including with group companies and related entities.
- The auction shall be announced to the public by issue of advertisements in at least 2 newspapers, one in vernacular language and another in national daily newspaper.
- As a policy the Company itself shall not participate in the auctions held
- Gold pledged will be auctioned only through auctioneers approved by the Board
- The policy shall also cover systems and procedures to be put in place for dealing with fraud including separation of duties of mobilization, execution and approval.

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- The Company would put in the necessary framework and processes for ensuring compliance with the recommendations of the Working Group on NBFC lending against collateral of gold jewellery as enumerated under Circular No. DNBS.CC.PD.No.356 /03.10.01/2013-14 dated September 16, 2013.

The Company will follow the guideline as per the circular DNBR.CC.PD.036/03.10.01/2014-15 dated May 21, 2015, for the valuation of gold jewellery under which valuation of gold jewellery for arriving at loan to value shall be done at the average cost of the closing price of 22 carats for proceeding 30 days as quoted by Bombay Bullion Association (BBA) or the historical spot gold price data publicly disseminated by a commodity exchange regulated by Forward Market Commission (FMC).

The Company will abide by all guidelines, directives, instructions and advice of the Reserve Bank of India as will be in force from time to time. The contents of this document shall be read in conjunction with these guidelines, directives, instructions, and advice.

The Company will apply better practice so long as such practice does not conflict with or violate Reserve Bank of India regulations.

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