

1. PREAMBLE

Dhruva Capital Services Limited (“the Company”), a Reserve Bank of India (RBI) registered Non-Banking Financial Company (NBFC), adopts this Fair Practices Code (FPC) in accordance with:

- RBI Master Directions for NBFCs
- RBI Digital Lending Guidelines, 2022 (as amended from time to time)

This Code applies to all loan products offered directly by the Company through its digital platform “NeoMoney”.

All loans are provided by Dhruva Capital Services Limited. NeoMoney is only the digital platform facilitating such services.

2. APPLICABILITY & DISCLOSURE

- This FPC shall be displayed prominently on the Company’s website.
 - Details of all Lending Service Providers (LSPs) / Digital Lending Apps (DLAs), if any, along with their roles, shall be disclosed.
 - All communications shall be provided in English or any other language as understood by the borrower.
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3. LOAN APPLICATION & PROCESSING

- Loan application forms shall clearly indicate required information and documents.
 - A **Key Fact Statement (KFS)** shall be provided before loan acceptance, including:
 - Annual Percentage Rate (APR)
 - Interest rate
 - All applicable charges
 - Repayment schedule
 - Borrowers shall receive sanction letter, loan agreement, and all relevant documents digitally.
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4. LOAN APPRAISAL, SANCTION & TERMS

- Creditworthiness shall be assessed based on:
 - Income

- Credit history
 - Repayment capacity
 - No automatic increase in credit limit shall be done without explicit borrower consent.
 - All pricing elements shall be transparent, fair, and non-discriminatory.
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5. DISBURSEMENT & PRE-DISBURSEMENT TRANSPARENCY

- Loan disbursement shall be made **directly to the borrower's bank account**.
 - No pool or pass-through accounts shall be used.
 - All terms including KFS, charges, and repayment schedule shall be shared before disbursement.
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6. COOLING-OFF PERIOD

- A cooling-off / look-up period shall be provided to borrowers.
 - During this period, the borrower may exit the loan by paying:
 - Principal amount
 - Proportionate APR
 - No penalty shall be charged for such exit, except applicable one-time processing fee (if disclosed in KFS).
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7. DATA PROTECTION, PRIVACY & CONSENT

- Customer data shall be collected only with explicit consent.
 - Data collection shall be limited to what is necessary for loan processing.
 - The Company **does not access or collect**:
 - Contacts
 - SMS
 - Call logs
 - Installed applications
 - Media files or biometric data
 - All data shall be stored in India and handled as per applicable data protection laws.
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8. REPAYMENT, PREPAYMENT & PENAL CHARGES

- Repayment schedules shall be clearly communicated.
 - Prepayment/foreclosure shall be allowed as per loan terms.
 - Penal charges:
 - Shall be reasonable and disclosed upfront
 - Shall not be capitalized
 - Shall not be presented as interest
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9. RECOVERY PRACTICES

- Recovery shall be conducted in an ethical, non-coercive manner.
 - No harassment, intimidation, or undue pressure shall be used.
 - Borrowers shall be informed of recovery agents, if engaged.
 - All recovery agents shall follow RBI-prescribed conduct standards.
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10. GRIEVANCE REDRESSAL MECHANISM

Borrowers may contact:

Grievance Redressal Officer (GRO):

Name: Ramesh Kumar Pandey

Email: grievance@dhruvacapital.com

- Complaints shall be resolved within 30 days.

If not resolved, the borrower may escalate to the Reserve Bank of India through the Complaint Management System (CMS) under the Integrated Ombudsman Scheme.

11. TRANSPARENCY & WEBSITE DISCLOSURES

The Company shall disclose on its website:

- Loan products and features
 - Interest rates and APR range
 - All applicable fees and charges
 - Privacy Policy and Terms & Conditions
 - Details of LSPs / DLAs (if any)
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12. REVIEW & AMENDMENT

This Fair Practices Code shall be:

- Reviewed periodically or upon regulatory changes
 - Approved by the Board of Directors
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13. COMMITMENT TO RESPONSIBLE LENDING

The Company is committed to:

- Ethical and transparent lending practices
 - Full disclosure before loan acceptance
 - Protection of borrower data and privacy
 - Non-coercive recovery practices
 - Timely grievance resolution
 - Compliance with all applicable RBI regulations and laws
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