

## FAIR PRACTICE CODE (Digital Lending Operations)

AGRIM FINCAP PRIVATE LIMITED  
(Regd. Office: 276, First Floor, Gagan Vihar, Delhi - 110051)

Document Control	Details
Policy Version	5.0 (Comprehensive Digital Framework)
Regulatory Basis	RBI Master Direction (NBFC – Responsible Business Conduct) Directions, 2025
Board Approval Date	January 29, 2026
Effective Date	February 1, 2026
Business Model	100% Unsecured Digital Personal Loans (No Collateral)

### 1. PREAMBLE & BRAND DISCLOSURE

**Agrim Fincap Private Limited** (hereinafter "the Company") is a Non-Deposit Taking NBFC registered with the Reserve Bank of India (RBI). The Company operates with a philosophy of "Digital Trust & Transparency," ensuring that every borrower is treated with dignity, fairness, and strict legal compliance.

#### 1.1. Our Digital Product Portfolio

The Company extends unsecured personal loans strictly through its proprietary digital platforms and authorized apps. This Code constitutes the governing policy for loans sanctioned under the following brands:

1. **Speedoloan**
2. **Shreeloan**
3. **Rupyalelo**
4. **5minuteloan**

*Disclaimer: Borrowers are advised that "Agrim Fincap Private Limited" is the regulated Lender on Record for all loans originated through the above platforms.*

### 2. LOAN ORIGINATION & TRANSPARENCY

#### 2.1. Digital Application & Immediate Acknowledgement

- **Application Mode:** Loans are sourced exclusively through the Company's verified website and mobile applications.
- **Automated SMS Trigger (TAT Notification):** Immediately upon the successful submission of a loan application, the Company's Loan Origination System (LOS) shall trigger an automated **SMS / WhatsApp notification** to the applicant.
- **Content of Notification:** To ensure the customer is not left in the dark, this message will explicitly state:
  - The unique **Application Reference Number**.
  - The defined **Turnaround Time (TAT)** for the credit decision (e.g., "Dear Customer, your application #998877 on Speedoloan is received. We will process your request and convey our decision within 24 hours.").



Toll-Free No.  
(18003092760)



+91-7428286298



info@agrimfincap.com



First Floor, 276, Gagan Vihar, Jagat Puri  
New Delhi, East Delhi - 110051

## 2.2. Transparency in Terms

- The Company shall disclose all essential product features (Loan Amount, Tenure, APR, Repayment Schedule) on the app interface before the customer clicks "Apply."
- **Unsecured Nature:** The Company explicitly states that **no collateral** or security interest is required for these loans.

## 3. INTEREST RATE POLICY & PUBLIC AWARENESS

### 3.1. Annual Percentage Rate (APR)

- The Company shall strictly disclose the **Annual Percentage Rate (APR)** in the Key Fact Statement (KFS).
- The APR represents the **all-inclusive cost** of the loan to the borrower, factoring in the Interest Rate, Processing Fees, and any other upfront charges.

### 3.2. Mandatory Public Disclosures

To ensure complete transparency regarding the cost of credit:

- **Online Disclosure:** The Company's detailed "Interest Rate Policy," including the gradation of risk and the range of applicable interest rates, is published on [www.agrimfincap.com](http://www.agrimfincap.com) and the websites of all four product brands.
- **Newspaper Publication:** The Company shall publish its **Interest Rate Range and Policy** in **two leading daily newspapers** (one in English and one in the local vernacular language) having wide circulation in the area of operation. This publication shall be refreshed annually or whenever there is a material change in lending rates.

## 4. LOAN APPRAISAL & VERNACULAR DOCUMENTATION

### 4.1. Credit Assessment

- The Company uses a proprietary credit algorithm to assess repayment capacity based on credit bureau history, income verification, and digital footprint.

### 4.2. Aadhaar-Based Vernacular Language Policy

- **Objective:** To ensure informed consent, the borrower must understand the loan terms in their native or state language.
- **Mechanism:** The Company's system will automatically detect the **State of Residence** from the borrower's **Aadhaar KYC** data.
- **Action:** The Loan Agreement, Sanction Letter, and Key Fact Statement (KFS) will be generated and emailed to the borrower in **two languages**:
  1. **English** (Standard Legal Text)
  2. **The Official State Language** corresponding to the Aadhaar address (e.g., A borrower in Gujarat will receive documents in English and Gujarati).

## 5. DISBURSEMENT & CONTRACT TERMS

### 5.1. Sanction & Cooling-Off Period

- **Pre-Execution KFS:** The Key Fact Statement is issued *before* the loan contract is signed.
- **Look-Up Period:** A mandatory "Cooling-Off Period" of **3 Days** (for loans with tenure  $\geq 7$  days) is provided. During this window, the borrower can exit the loan by repaying the Principal + Proportionate APR, with **zero prepayment penalty**.

## 5.2. Direct Disbursement

- Disbursement is made **directly** from the Company's bank account to the borrower's verified bank account. No funds are routed through third-party pools or Lending Service Providers (LSPs).

## 5.3. Penal Charges (Strict Compliance)

- **Nature:** The Company levies '**Penal Charges**' (a fixed overdue fee), **NOT** 'Penal Interest'.
- **No Capitalization:** No interest is ever charged on unpaid penal charges.
- **Purpose:** These charges are solely to inculcate credit discipline and are not a revenue-generation tool.

## 6. CUSTOMER SERVICE & STAFF TRAINING

### 6.1. "No Customer Left Unattended" Policy

The Company enforces a strict protocol to ensure every customer interaction is acknowledged and resolved.

- **Training:** All staff members associated with Speedoloan, Shreeloan, Rupyalelo, and 5minuteloan undergo mandatory monthly training on "Customer Centricity & Fair Practice."
- **Response Protocol:**
  - **Missed Calls:** The CRM system logs every missed call. It is mandatory for an agent to **call back within 2 business hours**.
  - **Chat/Email:** Automated acknowledgement is sent instantly. A human resolution must be provided within the TAT defined in the Grievance Policy.
- **Quality Assurance:** The QA Team audits 10% of all calls to ensure staff are polite, empathetic, and compliant.

## 7. RECOVERY & COLLECTION CODE

### 7.1. Code of Conduct

- **Authorized Hours:** Recovery calls are strictly limited to **08:00 AM to 07:00 PM**.
- **Prohibited Acts:** Staff are strictly prohibited from using abusive language, threatening legal action that is not permitted, or contacting friends/family for recovery (except strictly as references for tracing).

### 7.2. Monitoring

- **100% Call Recording:** All recovery calls (inbound and outbound) are recorded and stored for 90 days to ensure evidence in case of disputes.

## 8. GRIEVANCE REDRESSAL MECHANISM (GRM)

*The Company has established a robust 4-Tier Mechanism to ensure disputes are resolved efficiently.*

### Level 1: Customer Care (First Point of Contact)

For queries related to Speedoloan, Shreeloan, Rupyalelo, or 5minuteloan:

- **Email:** care@agrimfincap.com
- **Phone:** +91 98733 32713
- **TAT:** Acknowledgement within 24 hours; Resolution within 3 working days.

## Level 2: Grievance Redressal Officer (GRO)

If the customer is not satisfied with the Level 1 response:

- **Name:** Kiran Singh
- **Designation:** Grievance Redressal Officer
- **Email:** gro@agrimfincap.com
- **Address:** 276, First Floor, Gagan Vihar, Delhi - 110051
- **TAT:** Resolution within 7 working days.

## Level 3: Nodal Officer (Principal Nodal Officer)

For unresolved complex issues or policy-level escalations:

- **Email:** nodal.officer@agrimfincap.com
- **Role:** The Nodal Officer acts as the final internal appellate authority.
- **TAT:** Final Company decision within 15 working days.

## Level 4: Reserve Bank of India - Complaint Management System (CMS)

If the complaint / dispute is not redressed within a period of **one month (30 days)**, the customer may appeal to the Reserve Bank of India through their official **Complaint Management System (CMS)** portal.

- **Portal URL:** <https://cms.rbi.org.in>
- **Procedure:** Customers can lodge their complaint online on the CMS portal under the "NBFC" category if the Company fails to provide a satisfactory resolution within the stipulated time.

## 9. BOARD REVIEW & OVERSIGHT

- **Periodic Review:** This Code shall be reviewed annually by the Board of Directors.
- **Reporting:** A quarterly report on Grievance Redressal (complaints received vs. resolved) is presented to the Board to ensure the "No Customer Left Unattended" policy is effective.

Signed & Approved By

For AGRIM FINCAP PRIVATE LIMITED  
  
Director

Board of Directors  
Agrim Fincap Private Limited

Date: 29/01/2026