IIFL WEALTH PRIME LIMITED

POLICY ON INTEREST RATE MODEL AND POLICIES & PROCEDURES ON DETERMINING INTEREST RATES

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Preface

Reserve Bank of India (RBI) had vide its Circular DNBS / PD / CC No. 95/ 03.05.002/ 2006-07 dated May 24, 2007 advised that Boards of Non-Banking Finance Companies (NBFC's) lay out appropriate internal principles and procedures in determining interest rates, processing and other charges. This was reiterated vide RBI's circular DNBS (PD) C.C. No. 133 / 03.10.001/ 2008-09 January 2, 2009.

Keeping in view the RBI's guidelines as cited above, and the good governance practices, the Company had adopted the following internal guidelines, policies, procedures and interest rate model have been adopted by IIFL Wealth Prime Limited (formerly known as IIFL Wealth Finance Limited) for its lending business.

These need to be taken cognizance of while determining interest rates and other charges, and changes thereto.

(II) Methodology

The average yields and the rate of interest under each product is decided from time to time, giving due consideration to the following factors;

a) The cost of funds on the borrowings, as well as costs incidental to those borrowings, taking into consideration the average tenure, market liquidity and refinancing avenues, etc.;

b) Operating cost in our business and maintaining the stakeholders expectations for a reasonable, market-competitive rate of return;

c) Inherent credit and default risk in our business, particularly trends with sub-groups / customer segments of the loan portfolio;

d) Nature of lending, for example unsecured/ secured, and the associated tenure;

e) Nature and value of securities and collateral(s) offered by customers/ borrowers/ pledger(s);

f) Subventions and subsidies available, if any;

g) Risk profile of customer - professional qualification, stability in earnings and employment, financial positions, past repayment track record with us or any other lenders, external ratings of customers/ borrowers/ pledger(s), credit reports, customer relationship, future business potential, etc.;

h) Industry trends - offerings by competition.

III) <u>Interest Rate Policy for lending business</u>

a) The Company shall adopt a discrete interest rate policy which means that the rate of interest for same product and tenure availed during the same period by separate customers would not be standardized but could vary within a range, depending, amongst other things, the factors mentioned above.

b) The Company shall disclose the rate of interest and the approach for gradations of risk and rationale for charging different rate of interest to different categories of borrowers in the application form and communicate explicitly in the sanction letter.

c) The rates of interest and the approach for gradation of risks shall also be made available on the web-site of the company or published in the relevant newspapers. The information published in the website or otherwise published would be updated whenever there is a change in the rates of interest.

d) The interest rates offered could be on fixed basis or floating / variable basis. Changes in interest rates would be decided at any periodicity, depending upon market volatility and competitor review.

e) Our offered rates of interest to customers are linked to the IIFLW Prime Lending Rate, which is a reflection of our cost of raising funds from the capital markets. Review period of the PLR is dynamic by nature and is not conducted strictly only on a defined interval. Review is linked to market conditions, particularly cost and availability of borrowed funds. Any modification in the PLR is linked to a significant movement in our funding cost, which is indicatively an increase/decrease of 50 bps on average basis for the period under consideration. The spread above or below the IIFLW PLR is determined by a range of factors which are linked to (a) the specific loan account, particularly the credit risk characteristics thereof and (b) the overall relationship with the borrower when considered a part of a group or family which is associated with our core business or Wealth Management services.
There will not be any floor or ceiling associated with the spread and it will be charged as per the relevant evaluation mentioned above

f) Annualized rate of interest would be intimated to the customer.

g) Besides normal interest, the Company may levy additional interest for adhoc facilities, penal interest for any delay and, or default in making payments of any dues. The levy or waiver of these additional or penal interests for different products or facilities would be decided within the limits prescribed under the policy.

h) The Company shall mention the penal interest in bold in the loan/ master financing agreement.

i) The interest re-set period for floating/ variable rate lending would be decided by the Company from time to time, applying the same decision criteria as considered for fixing of interest rates.

j) Frequency of charging and recovering interest would be dependent on the specific credit and commercial characteristics of a loan account, and when considered a part of a group or family which is associated with our core business or Wealth Management services. Therefore such frequency could be monthly, quarterly or on annual basis.

k) On IPO financing, the rate of interest will be applied considering (i) the ROI to be levied to the borrower(s) and (ii) charges from the bank towards undertaking marketing and distribution activities for IPO.

l) Interest rates would be intimated to the customers at the time of sanction / availing of the loan and the EMI apportionments towards interest and principal dues would be made available to the customer.

m) Interest shall be deemed payable immediately on due date as communicated and no grace period for payment of interest is allowed.

n) Interest changes would be prospective in effect and intimation of change of interest or other charges would be communicated to customers in a manner deemed fit, as per terms of the loan documents.

o) Besides interest, other financial charges like processing fees, cheque bouncing charges, pre-payment/ foreclosure charges, part disbursement charges, cheque swaps, cash handling charges, RTGS/ other remittance charges, commitment fees, charges on various other services like issuing NO DUE certificates, NOC, letters ceding charge on assets/ security, security swap & exchange charges, etc. would be levied by the Company wherever considered necessary. Besides the base charges, the service tax and other cess would be collected at applicable rates from time to time. Any revision in these charges would be with prospective effect. A suitable condition in this regard would be incorporated in the loan/ master financing agreement. These charges would be decided upon collectively by the management of the Company.

p) The practices followed by competitors would also be taken into consideration while deciding on interest rates/ charges.

q) Interest rate models, base lending rate and other charges, and their periodic revisions are made available to our prospective and existing customers through our offices and branches. Prior to entering into an agreement with our customers, we provide them with our statement of charges and interest and address their queries and questions on the same, to their satisfaction. Our loan officers ensure charges and rates of interest are explained clearly and transparently to the clients who may be interested in our products.

r) In case of staggered disbursements, the rates of interest would be subjected to review and the same may vary according to the prevailing rate at the time of successive disbursements or as may be decided by the company.

s) Claims for refund or waiver of such charges/ penal interest / additional interest would normally not be entertained by the Company and it is the sole and absolute discretion of the Company to deal with such requests.