



**R I C H B O N D**  
CAPITAL PRIVATE LIMITED

## **Code of Conduct**

(a) We shall refrain from interference in the affairs of the borrower except for the purposes provided in the terms and conditions of the loan documents (unless new information, not earlier disclosed by the borrower, has come to the notice of the lender).

(b) In the matter of recovery of loans, we shall not resort to undue harassment viz. persistently bothering the borrowers at odd hours, use of muscle power for recovery of loans etc. We shall ensure that the staffs are adequately trained to deal with the customers in an appropriate manner.

(c) The Board of Directors of 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 lending institutions' 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 grievances redressal mechanism at various levels of management.

(d) The Board of Company 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 rationale for charging different rate of interest to different categories of borrowers shall be disclosed to the borrower or customer and communicated explicitly in the sanction letter.

(e) The KYC Guidelines of RBI shall be strictly complied with. Due diligence shall be carried out to ensure the repayment capacity of the borrowers,

(f) As specified in the NBFC-MFIs (Reserve Bank of India) Directions, 2011, all sanctioning and disbursement of loans shall be done only at a central location and more than one individual shall be involved in this function. In addition, there shall be close supervision of the disbursement function,

(g) Adequate steps shall be taken to ensure that the procedure for application of loan is not cumbersome and loan disbursements are done as per pre-determined time structure.