

IDF FINANCIAL SERVICES PRIVATE LIMITED
Fair Practice Code – Digital Lending

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| Approving Authority | Board of Directors |
| Reviewing Authority | Board of Directors |
| Policy Making Body | Board of Directors |
| Effective Date | 26-09-2025 |

Background

The Company offers short-tenure, digital personal finance products. This Fair Practices Code (“FPC”) sets out the practices, systems and controls the Company will follow to ensure fair, transparent, responsible and customer-centric lending, in compliance with RBI – NBFC Responsible Business Conduct Directions, 2025 .

The Company affirms that all provisions of Chapter III – Fair Practices Code of the RBI Directions, 2025 shall be fully complied with.

Fair Practice Principles

The Principles and process set out for compliance of above a detailed herein:

- Language & Accessibility
 - The Company will ensure that all loan-related communications, including the FPC, KFS, loan agreement and disclosures, are provided in the vernacular language or a language understood by the borrower.
 - As all products are digital, the customer will be shown and will accept all communications in the selected language on the digital interface.
- Loan Applications & Processing
 - The Company will ensure that loan application forms contain all information affecting borrower interests, enabling comparison and informed decision-making.
 - Required documents will be clearly indicated in the application journey.
 - An instant digital acknowledgement of loan application or expression of interest will be provided.
 - As the product is digital and decisioning is instantaneous, there is no waiting period, and the status is communicated in real time on the app/website.
- Loan Appraisal & Terms
 - The Company will ensure that a clear and comprehensive disclosure of terms and conditions is made before final acceptance by the customer.
 - Key Facts Statement (“KFS”)

- will be provided in the RBI-prescribed standard format.
- All loans will be offered only on fixed interest rates; no prepayment penalty will be levied.
- The Company will disclose interest rates, processing fees, penal charges and all other amounts payable by the borrower in an upfront and transparent manner.
- Interest rate determination shall follow the Company's Interest Rate Policy, while all borrower-facing disclosures are governed by this FPC.
- Changes in Terms & Conditions
 - The Company will provide prior notice to the borrower, in a language understood by them, for any change in terms and conditions including interest rate, charges or repayment schedule.
 - Any change in charges or interest will be applicable only prospectively.
 - Necessary contractual provisions will be incorporated into the loan agreement.
- Recall / Acceleration of Loans
 - Any decision to recall or accelerate repayment will be strictly in accordance with the loan agreement.
 - The Company will not interfere in the borrower's affairs except for purposes permitted under the loan terms or in case of material information not previously disclosed.
- Transfer / Takeover of Loan Accounts
 - The Company will convey its consent or objection within 21 days of receiving a request from a borrower for transfer of their loan account.
 - Transfers will be undertaken strictly in line with transparent contractual terms and applicable law.
- Recovery Practices
 - The Company will ensure fair, dignified and non-coercive recovery practices at all times.
 - No harassment, including:
 - calling at odd/unreasonable hours,
 - intimidation,
 - use of muscle power,
 - persistent or aggressive communication.
 - All recovery agents and staff will be trained in appropriate customer conduct and sensitised on prohibited practices.
 - Any recovery agent appointed, including functions performed by LSP shall be in adherence to Code of Conduct Prescribed in this respect
- Non-Discrimination in Credit
 - The Company will ensure that no borrower is discriminated against on the basis of caste, creed, religion, colour, gender, sexual orientation, disability or any other prohibited parameter.
 - Credit decisions will be made only based on transparent, objective and digital underwriting parameters, including verifiable data, credit bureau records and other risk indicators.

- Confidentiality & Data Protection
 - The Company will ensure complete confidentiality of borrower data, and share information only:
 - with explicit customer consent,
 - as required under law, or
 - with authorised entities for loan processing and servicing.
 - The Company will follow all data security standards applicable to digital lenders.
- Transparency in Fees & Charges
 - All applicable fees, charges, penal interest, due dates and repayment obligations will be disclosed upfront in the KFS and loan agreement.
 - No hidden charges, undisclosed fees or arbitrary revisions will be levied.
 - Penal charges, if applicable, will be reasonable and communicated clearly.
- Advertising & Marketing
 - All marketing, digital communication and promotional material will be:
 - fair, transparent and non-misleading,
 - compliant with RBI and regulatory guidance,
 - reviewed and approved by the Company before release.
- Digital Lending Conduct
 - The Company will ensure compliance with RBI Digital Lending norms including:
 - direct disbursement to borrower's bank account,
 - direct repayment to Company's bank account,
 - no pass-through of funds via LSPs,
 - mandatory provision of digitally executed loan documents and KFS to the borrower.
- Display & Review
 - The FPC will be displayed on the Company's website, mobile application and branch premises (if any).
 - The FPC will be reviewed periodically and updated as per regulatory changes.

Grievance Redressal Mechanism

The Company will maintain a dedicated, grievance redressal system ensuring that disputes or complaints are reviewed at the next higher level. Customers can raise grievances 24x7 via:

- In-app support,
- Email,
- Customer care number,

Complaint acknowledgement will be provided within 48 hours, and final resolution within 30 days.

The details of the Nodal Grievance Officer and escalation matrix are displayed on the website and application and is as follows:

- Level 1: Customer Care: support@paisapop.com || +91 9599225482
- Level 2: Brand Nodal Officer: Soumyakant Panda |
soumyakant.p@paisapop.com | [7749970899](tel:7749970899)
- Level 3: Brand Grievance Officer: grievance@paisapop.com
- Level 4: NBFC Grievance Officer: grievance.idf@gmail.com

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