# INTEREST RATE & CHARGES POLICY

# OF

# ASOMI FINANCE PVT LTD

ASOMI

FINANCE PRIVATE LIMITED

**"ASOMI CAMPUS"**

**32A, B R DEKA PATH, NH-37(BYPASS)**

**JALUKBARI, GUWAHATI -781014, ASSAM**

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GUWAHATI

# SUMMARY OF THE POLICY

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| **Document Name** | Interest Rate and Charges Policy |
| **Reviewed and Adopted** | 01.04.2026 |
| **Next Review** | 01.04.2027 |
| **Periodicity of Review** | Annual or earlier if there are material changes in RBI regulations. |
| **Owner** | Asomi Finance Pvt Ltd |
| **Approver** | Board of Directors |

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## 1. PREFACE OF THIS POLICY

As per the Reserve Bank of India guidelines, Board of each NBFC shall approve an Interest rate model that is applicable for the Company, taking in to 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. Further, the directive states that the rate of interest and the approach for gradation of risk and the rationale for charging different rates of interest for different category of borrowers should be communicated to the borrowers / customers in the sanction letters issued to them.

This Policy has been framed in accordance with the applicable provisions of the Reserve Bank of India Act, 1934, the RBI Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 (as amended from time to time), the Fair Practices Code prescribed by RBI, the RBI Digital Lending Guidelines wherever applicable, and other circulars/instructions issued by the Reserve Bank of India from time to time.The board of directors of Asomi Finance Private Limited (henceforth referred to as "**Company**" or "AFPL") has designed a detailed interest rate policy (**"the Policy"**) in accordance with the master direction issued by the Reserve bank of
India (including amendments thereof) to disclose their internal guiding principles, interest rate model, rate of interest, gradations of risk and rationale for charging different rate of interest to their borrowers.

The Company shall take this Policy into consideration while making all of its decisions regarding the determination of interest rates and other charges applicable to its loan offerings.

## 2. OBJECTIVE OF THIS POLICY

The primary objective behind drafting and adopting this policy is to decide on the principles, methodology and approach of charging spreads to arrive at final rates charged from customers and define the standard interest rates to be followed for different customer segments and loan offerings.

The Policy will also help the Company to lay down the different principles and rationale behind determining the different interest rates charged to its different customers.

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The company through this policy charge interest rates determined in a manner as to ensure long-term sustainability of the business by taking into account the interests of all stakeholders and developing and adopt a suitable model for the calculation of a reference rate.

## 3. SCOPE

This Policy shall apply to all lending products offered by the Company including secured loans, unsecured loans, vehicle loans, LAP, MSME loans and any future lending products offered by the Company. The Policy shall be applicable across all physical, digital and assisted channels.

## 4. INTERNAL RESPONSIBILITIES

a) **Board of Director**: The Board of Directors of the Company shall oversee this Interest Rate Policy and ensure its effective implementation. Further, the Board may delegate the responsibility of implementation of this Policy and other functioning aspects to the any director and/or ALCO as it deems fit.

b) The Board of Directors shall:

- Approve the Interest Rate Policy.
- Review the policy annually.
- Approve any material revisions.
- Ensure transparency in pricing.
- Ensure that interest rates are fair, reasonable and non-discriminatory.
- Monitor customer complaints relating to pricing.
- Ensure compliance with RBI Directions

## 5. INTEREST RATE MODEL

The company's borrowings and all its loans to clients can be on ***Fixed Rates/Floating Rates.***

**Asomi Finance Pvt Ltd** being a diversified NBFC is engaged in the business of lending money through various products to cater the needs of different customer segments. The primary target audience for the Company's offerings include:

- Unsecured business loans
- Personal Loan
- Insta Loan (small ticket size loan for instant requirements)

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- Commercial vehicles Loan
- Corporate Loans

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Currently Asomi Finance has different base rate for different segments of customers. The base interest rate shall be calculated by the Company after taking into account, factors such as Weighted Average cost of borrowing, Cost of Equity, Fund raising cost, Opex Cost, Risk Premium and Base ROA etc.

Further, the Company shall determine the interest rate applicable to each loan account based on different yardsticks such as tenure of the loan, borrower's profile, borrower's repayment capacity, past repayment track record of the borrower, etc.

## 6. BENCHMARK ESTABLISHING THE INTEREST RATE

The interest rate applicable to different loan products of the Company shall be determined by taking the following aspects into consideration:

| Sr. No | Factor | Description |
|---|---|---|
| 1 | Weighted Average cost of borrowing | The Company borrows funds through term loans, ICD, Non-Convertible Debentures, OCD and subordinate debt etc. from the investors. Weighted average cost of borrowing of such funds is taken for bench mark calculation. |
| 2 | Cost of Equity | Company needs to put some equity portion to run the business and the cost of such equity is taken into consideration. |
| 3 | Fund raising cost | It includes processing fees on term loans, brokerage to source funds through NCDs /ICD, OCD, Rating Fee, trusteeship fee, commission etc. |
| 3 | Opex Cost | It includes employee expenses, branch related fixed and variable costs, operations costs, partners commission, sales and marketing expenses etc |
| 5 | Risk Premium | Base risk premium to cover business-related risks and would vary by business, customer segment, geography, sourcing channel etc. |
| 6 | Base ROA | Base Return on assets is the minimum return expected by the company on its assets. |

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## 7. PRINCIPLES BEHIND CHARGING DIFFERENT INTEREST RATES

The Company shall take the following factors into account for charging different interest rates to its different customers:

- Risk associated with credit and probability of default in the applicant's business segment.
- Track record of clients with similar backgrounds.
- Historical performance of similar homogeneous clients
- Profile of each loan applicant.
- The industry which an applicant belongs to.
- The repayment history of the borrower.
- Ticket size of the loan.
- Credit Bureau score of the borrower.
- Duration of the loan (short term / Long Term)
- Collection performance in the geographies to which the applicant belongs.
- Existing debts of the borrower.

The rate of interest for the same product and tenor availed during same period by different customers need not be the same. It could vary for different customers depending upon consideration of all or combination of above factors.

## 8. ADDITIONAL CHARGES

Besides interest, the Company will levy additional financial charges such as loan processing fees, cheque bounce charges, ESC failure charges, penal charges, pre-payment/foreclosure charges, late payment fees, charges for issue of statement account etc., wherever considered necessary.

Any change in the charges will inform borrowers in advance and apply prospectively. No claims for refund or waiver of such charges/ penal charges / additional interest would normally be entertained by the company, and it is the sole discretion of the company to deal with such requests, if any, which would be decided by authorised officials/committees on a case to case basis.

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## 9. DEFAULT IN PAYMENT OF INSTALMENTS

Customers shall be liable to pay all applicable charges including but not limited to Cheque Bouncing Charges (CBC), Late Payment Penalty (LPP), Recovery / Legal Charges etc., in case of default in payment of Instalments / other dues. Company shall disclose these charges to its Applicants / Borrowers via various types of documents like Application Form, Sanction Letter, and Loan Agreement, which would also be displayed on the company's website in the Schedule of charges.

If any change is introduced in the above charges based on economic or financial scenario etc., company shall notify the Customer in the language as understood by the Customer about such changes as also the effective date from when the revised rates are being made applicable

## 10. OTHER PROCEDURAL ASPECTS

The Company shall adhere to the following procedural aspects with regards to the rate of interest charged on its different loan offerings:

a) In compliance with its Fair Practices Code, the Company shall disclose the rate of interest and approach for gradations of risk and rationale for charging different rate of interest to different categories of borrowers in its application form as well as in its Loan Sanction Letter explicitly.
b) The Company shall inform the borrower about their loan amount; annualised rate of interest and other details of the loan at the time of sanctioning the loan.
c) Other charges such as processing fees, additional interest charged on delayed payments and cheque bouncing charges shall also be mentioned in the sanction letter and Loan Agreement.
d) The annualised rate of interest shall be intimated to the borrower so that they are aware of the exact rates charged to the account.
e) The Company shall display its interest rate policy and interest rate structure for each loan product on its website.
f) The Company shall inform its customers about any increase in fees or charges via different communication channels such as SMS, email, website updates, etc.,

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## 11. REVIEW OF THIS POLICY



- This Policy shall be reviewed at least annually by the Board of Directors, or earlier whenever necessitated due to changes in applicable laws, regulations, circulars, notifications, or directions issued by the Reserve Bank of India (RBI), or due to changes in the Company's business model, risk profile, operational processes, or regulatory requirements.
- The Chief Compliance Officer, in consultation with the concerned business and functional heads, shall periodically assess the adequacy and effectiveness of this Policy and recommend amendments, wherever required. Any modification, revision, or amendment to this Policy shall be placed before the Board of Directors for its review, approval, and adoption.
- The Board may also direct a review of this Policy at any time based on regulatory observations, internal audit findings, inspection reports, changes in industry practices, or any other material developments affecting the Company's operations.

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