



CAPITAL TRADE

LINKS LTD.

CIN : L519090DL1984PLC019622

FAIR PRACTICE CODE OF
“CAPITAL TRADE LINKS
LIMITED”

Registered Office – 102-103, First Floor Surya Kiran Building, 19 K.G. Marg Connaught Place New Delhi-110001
Corporate Office - Office No. 1, 3rd Floor, Mahalaxmi Metro Tower, C-1, C-2, Sector-4 Vaishali, Ghaziabad-201010
Ph - 0120-4882133 M.: 70423533322, Email – info@capitaltrade.in, Website – www.capitaltrade.in

Pursuant to Reserve Bank of India (RBI) 's Circular DNBS (PD) CC NO.80/03.10.042 /2005-06 of September 28, 2006, issued to Non-Banking Financial Companies (NBFCs), the Board of Directors have adopted a Fair Practices Code..

Further, RBI vide Circular DNBS.CC.PD.No.266/03.10.01/2010-11 dated March 26, 2012 and vide circular DNBS.CC.PD. No. 320/03.10.01/2012-13 dated February 18, 2013, had amended guidelines on Fair Practices Code for NBFCs and accordingly suitable modifications are made hereunder in the Code to comply with the aforesaid guidelines.

Fair Practices Code

The Company's business would be conducted in accordance with prevailing statutory and regulatory requirements, with due focus on efficiency, customer-orientation and corporate governance principles. In addition, the Company would adhere to the Fair Practices Code in its functioning, the key elements of which are as follows:

1. Applications for Loans and their Processing

- All communication to the borrower shall be in the vernacular language or a language as understood by the borrower.
- Loan application forms shall include necessary information, which affects the interest of the borrower, so that a meaningful comparison with the terms and conditions offered by other NBFCs can be made and the borrower can take an informed decision. The loan application form may also indicate the documents required to be submitted with the application form.
- The Company shall devise a system of giving acknowledgement for receipt of all loan applications. Further, generally, the time frame within which the loan application will be disposed of would also be indicated in the acknowledgement.

2. Loan Appraisal and Terms/Conditions

The Company shall convey in writing to the borrower by means of approval letter or otherwise, the amount of loan approved - along with the terms and conditions, including the annualized rate of interest and method of application thereof. It would keep the acceptance of these terms and conditions by the borrower on the Company's files. The Company shall mention the penal interest charged for late payment in the loan agreement and shall furnish a copy of loan agreement, preferably in the vernacular language as understood by the borrower along with a copy of each of all enclosures quoted in the loan agreement to all the borrowers at the time of sanction/disbursement of loans.

3. Disbursement of Loans including Changes in Terms and Conditions

- The Company shall give notice to all its borrowers in the vernacular language as understood by the borrower of any change in the terms and conditions - including disbursement schedule, interest rates, service charges, prepayment charges etc. The Company shall also ensure that changes in interest rates and charges are effected only prospectively. A suitable provision in this regard shall be incorporated in the loan agreement.
- Decision to recall / accelerate payment or performance under the agreement shall also be in consonance with the loan agreement.
- The Company shall release all securities on repayment of its full dues or on realization of the outstanding amount of loan subject to any legitimate right or lien for any other claim the Company may have against its borrowers. If such right of set off is to be exercised, the borrower shall be given notice about the same with full particulars about the remaining claims and the conditions under which the Company is entitled to retain the securities till the relevant claim is settled/paid.

4. General

- The Company shall refrain from interference in the affairs of the borrower except for the purposes provided for in the terms and conditions of the loan agreement (unless new information, not earlier disclosed by the borrower, has come to the notice of the Company).
- In case of receipt of request from the borrower for transfer of borrowal account, the consent or otherwise - i.e., objection of the Company, if any - shall be conveyed to the borrower within 21 days from the date of receipt of any request. Such transfer shall be as per transparent contractual terms in consonance with law.
- In the matter of recovery of loans, the Company shall not resort to any harassment - such as persistently bothering the borrowers at odd hours, use of muscle power for recovery of loans, etc. The Company shall ensure that the staff is adequately trained to deal with the customers in an appropriate manner.
- The Company shall have a Grievance Redressal Forum comprising effective team to resolve disputes arising, if any, in this regard. The said forum will meet within a period of 3 weeks from the date of receiving any grievance intimation. It shall ensure that all disputes arising out of the decisions of lending by the Company's functionaries are suitably heard and disposed of at least at the next higher level. The Company shall periodically review the Compliance of the Fair Practices Code and the functioning of the Grievances Redressal mechanism at various levels of management.
- The Company would display following information on notice board at offices of the company where business is transacted: Name of Grievance Redressal Officer and contact details of the office where customers can direct their grievances.

Contact details of 'the Officer-in-Charge of the Regional Office of DNBS of RBI' to whom customers can contact in case they are not satisfied with resolution provided by company or in case issue remains unresolved for 30 days

5. Wide Dissemination and Periodic Review

The Company shall put the above Fair Practices Code outlined hereinabove on its web site, for the information of various stakeholders. The Company would also review and refine the Code, as may be required periodically - based on its own experience and fresh guidelines, if any, to be issued by the RBI in this regard.

6. Complaints about excessive interest charged by the Company.

The Company shall lay out appropriate internal principles and procedures in determining interest rates and processing and other charges.

7. Regulation of excessive interest charged by the Company

The 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 in the application form and communicated explicitly in the sanction letter.

The rates of interest and the approach for gradation of risks shall also be made available on the website of the Company or published in the relevant newspapers. The information published in the website or otherwise published should be updated whenever there is a change in the rates of interest.

The rate of interest should be annualized rates so that the borrower is aware of the exact rates that would be charged to the account.

8. Internal control system

As the primary responsibility for compliance with the Directions rest with the Company, necessary organizational arrangements will be made to assign responsibility for compliance to designated individuals within the Company and establish systems of internal control including audit and periodic inspection to ensure the same.

Grievance Redressal Mechanism

Grievance redressal mechanism is an instrument or process through which resolution to a grievance is provided to our clients. It is a process in which all the complaints and grievance are received and escalated to the concerned person from specific department to resolve it. Strategic decisions are also made by referring to client grievance and feedbacks. Clients can approach to the

organization with their grievance and complaints and they can get their complaints resolved within the stipulated time frame by following our grievance mechanism.

Customers who wish to provide feedback or send in their complaint may use the following channels between 10.00 am and 6:30 pm from Monday to Saturday (except on national holidays).

- ◆ Call on +7042353322
- ◆ Email us at capitaltrade84@gmail.com
- ◆ Write to us at the below mentioned address:

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In case the complaint is not resolved within the given time or if he/she is not satisfied with the solution provided by the company, the customer can approach the Complaints Redressal Officer. Name and details of Compliant Redressal Officer is as follows:

Company Secretary

Tel. No: 7042353322

Email Id: cs@capitaltrade.in

If the complaint/dispute is not redressed within a period of one month, the customer may appeal to Officer-in-Charge of the Regional Office of Department of Non-Banking Supervision of RBI under whose jurisdiction the Registered Office of the Capital Trade falls.

The details of DNBS are as given below:

The General Manager,

Department of Non-Banking Supervision,

Reserve Bank of India,

6, Sansad Marg, New Delhi – 110 001

Email id: dnbsnewdelhi@rbi.org.in