Loan Pricing Policy 5.0

Digamber Capfin Limited

Document Control Page

Document Name	:	**Digamber Capfin Limited – Loan Pricing Policy (Formerly known as Interest Rate Policy)**

Prepared By	:	**Finance Department-Digamber Capfin Limited**
Reviewed By	:	**Compliance Department - Digamber Capfin Limited**
Approved By	:	**Board of Directors**
Document Owner	:	**Compliance Department - Digamber Capfin Limited**

Classification	:	**Internal Use Only**
Distribution List	:	**Digamber Capfin Limited**

Revision History	
Dates	**Status**
29.03.2017	**Approved**
31.03.2018	**Reviewed**
24.08.2019	**Reviewed**
05.09.2020	**Reviewed**
24.08.2021	**Reviewed**
26.03.2022	**Amended**
26.05.2022	**Reviewed**
06.11.2023	**Amended and Renamed (Approved through circular resolution)**
20.07.2024	**Amended**
21.08.2024	**Amended**
08.11.2024	**Amended**

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INTRODUCTION

Digamber Capfin Limited (hereinafter referred to as "Company" or DCL or Digamber) is registered as NBFC MFI. During the course of its operations, the company strictly adheres to various directions, guidelines, circulars, instructions, etc. as issued and stipulated by the RBI from time to time.

The interest rate of the loans charged by the NBFC-MFIs to its microfinance borrowers had been determined and regulated by the RBI based on the cap (i.e. Cost of Fund + 10% margin or Average base rate of top 5 commercial banks * 2.75 times whichever is low). This was de-regulated through the revised regulatory guidelines for the microfinance industry issued by RBI i.e. Circular no RBI/DOR/2021-22/89 DoR. FIN.REC. 95/03.10.038/ 2021-22 dated 14th March 2022. Under the new guidelines, Digamber shall put inplace a board-approved well-documented interest rate model/approach for arriving at the all- inclusive interest rate.

As the interest cap has been removed by the RBI, keeping in view of the double bottom line of client centricity and business sustainability, now the onus of fixing the interest rate in a responsible mannerlies with the Risk Management Committee (RMC) of DCL.

Board of Directors has a key role in the interest rate pricing of DCL as the pricing policy needs to be approvedby them. Regular review and monitoring implementation of pricing guidelines shall be done by Risk Management Committee (RMC) which is a Committees of the board.

The RMC shall ensure the interest rate pricing is undertaken with necessary due diligence as the same is subject to regulatory inspection by RBI and close monitoring by SROs. The ceiling of interest rate and other charges are to be fixed by the Board of Directors. The minimum and maximum ceiling of the interest rate should be defined in the pricing policy document. Digamber shall review the ceiling on the interest rate periodically keeping in view of the industry trends and standards released by the SROs.

POLICY COVERAGE

This Board approved policy covers the following: -

- Components of pricing applicable for all loans (Microfinance and Non-Microfinance)
- Spread applicable for microfinance loans
- Ceiling on the interest rate and all other charges applicable to microfinance loans
- Delegation of authority for pricing approval

COMPONENTS OF PRICING FOR LOANS

The components of pricing and their delineation are as follows:

i) Finance Cost/Cost of Fund
ii) Operational Expenses
iii) Credit Risk Premium (for determination of risk based price)*

iv) Product Risk Premium
v) Expected Profit Margin

* on the basis of Credit Score

Formula of Pricing: Finance Cost/Cost of Funds (on the basis of Extended Internal Rate of Return method) + Operational Cost + Credit Risk Premium+ Product Risk Premium + Expected Profit Margin

Periodicity of calculation: For better and more precise measure, the period for computing the pricing should not exceed one year and should not be less than one month.

i) Finance Cost/Cost of Fund

DCL borrows funds through various means encompassing term loans, debentures, external commercial borrowings, subordinate debts etc. The Cost of Funds shall denote the Borrowing Cost and will be calculated through Extended Internal Rate of Return method.

Borrowing cost shall include all costs & expenses borne by the Company in relation to borrowing or arrangement of debt, including interest rate/coupon, upfront/processing fees, impact of collateral, syndication/arranger fees, taxes, etc.The expected cost of funds will be considered while determining the interest rate.

ii) Operational Expenses

It pertains to costs related to the end-to-end loan cycle. Considering the business model with significant human touch points, Digamber's cost of operations is greatly influenced by manpower costs, underwriting & collections, operations, depreciation on fixed assets and infrastructure, technology cost, management and administration, sales, marketing & promotions, Legal & compliance costs, etc.

iii) Credit Risk Premium

Credit Risk Premium based on the credit score of the borrower. The company may adopt or explore the credit risk-based pricing methodology for deciding the pricing of the loan on the basis of the credit risk involved with the borrower. Indicative methodology is given below given table:-

Particulars	Credit Score Range	Credit Risk Premium
Credit score	751 and above	0.00%
	701 and 750	0.25%
	651 to 700	0.50%
	601 to 650	0.75%
	401 to 600	1.00%

iv) Product Risk Premium

The company deals in the unsecured loan product and carries a high risk which has been increased from last some time. Since the product is unsecured hence there are very minimum alternatives and solution for the recovery of the loan.

The main risks involved are as under (not conclusive):-

- Moral hazard if borrowers assume they won't face consequences for defaulting.
- Lack of financial literacy leading to misuse or misunderstanding of products.
- External factors like economic downturns, natural disasters, or political instability.
- Over-indebtedness due to multiple borrowings.
- Rumors like Karza Mukti (Loan waivers) through which borrowers behavior has been changed and they consider it as right to not to pay etc.
- Targeted segment which carries extra risk of misusing the legal provisions which protects them
- Increasing challenges related to ring leaders

The calculation of the Product Risk Premium will be done based on the past trends in the segment.

Since there is equal risk exists for the segment hence the Product Risk Premium will be uniform for all the geographies where the company operates and for all of its loan products.

v) Expected Profit Margin

Digamber ensures a reasonable profit margins for the organization to achieve steady growth and sustainable ROI for its stakeholders. At the same time, the profit margins should be reasonable so as not to put an excessive burden on borrowers.

SPREAD APPLICABLE FOR MICROFINANCE

The range of spread of each component for Microfinance loans is as follows:

Component	Range	Rationale
Cost of Funds	13% to 15%	It include all costs & expenses borne by the Company as mentioned above. This is calculated on Extended Internal Rate of Return method method
Operational Cost	7% to 9%	It includes costs related to the end-to-end loan cycle. Considering the business model with significant human touch points, Digamber's cost of operations is greatly influenced by manpower costs, underwriting & collections, operations, depreciation on fixed assets and infrastructure, technology cost, management and administration, sales, marketing & promotions, compliance costs, etc.

Credit Risk Premium	As per indicative methodology as mentioned in table given above	Credit Risk Premium (based on the credit score of the borrower). The company may adopt or explore the credit risk based pricing methodology for deciding the pricing of the loan on the basis of the credit risk involved with the borrower.
Product Risk Premium	Up to 5%	It covers all the risks as mentioned above
Profit Margin	Up to 4.00%	It is based on post-tax expected ROA and net surplus. Digamber ensures a reasonable profit margin for the organization to achieve steady growth and sustainable ROI for its stakeholders. At the same time, the profit margins should be reasonable so as not to put an excessive burden on borrowers. The company anticipates the margin up to 4.00% which includes partly upfront as one time processing fee and remaining margin which will be amortized over a period of the loan tenure as part of cost of fund. The percent of the same will be decided from time to time by the Risk Management Committee.

CEILING APPLICABLE FOR MICROFINANCE

The ceilings on interest rates and other charges shall be as follows –

Item	Ceiling for Microfinance Loans
Interest Rate	Up to a maximum of 33% (This is the maximum ceiling for Microfinance loans. The rate will be charged keeping in view of various components such as cost of funds, operational cost, product risk premium and reasonable profit margins keeping in view of the risk profile of the borrower
Processing Fee (excluding GST) (Processing Fee will be charged on the sanctioned loan amount)	Up to 2% plus GST of gross loan amount. The Processing Fee will be a component of profit margin of the company.
Insurance Charges	As per actuals. Only actual premium of life insurance calculated on the basis of loan amount will be collected from the borrowers (insurance coverage will also include the coverage for spouse) and collected amount will be paid to insurance company/insurance agent by the company.
Prepayment penalty	Not applicable
Late payment charges on the overdue amount	No Penal interest will be charged by the company for delay. For Late Payment of EMI by the borrower, the broken period interest will be charged on the EMI outstanding amount for the

	period of delay at the rate of interest charged from the borrower.
GST and other statutory duties & fees	As per actuals

For loans other than microfinance loans, the range of interest to be charged shall be upto 4% over and above the interest charged on Microfinance Loans.

PRICING APPROVAL

Interest rates and other charges shall be periodically approved by the RMC within the ceilings set by Board of Directors through this policy. Any deviation to the policy terms shall be approved by the Board of Directors.

TRANSPARENCY AND DISCLOSURE

- ✓ Digamber shall disclose pricing-related information to a prospective borrower in a standardizedsimplified factsheet/Key Fact Statement/loan card in language understood by the borrower as indicated by RBI.
- ✓ Interest rates and other charges/fees charged by Digamber on microfinance loans shall not be usurious.
- ✓ Any fees to be charged to the microfinance borrower by Digamber shall be explicitly disclosed in the factsheet/Key Fact Statement/loan card. The borrower shall not be charged any amountwhich is not explicitly mentioned in the standardized and simplified factsheet/Key Fact Statement/loan card.
- ✓ For Micro Finance Loans, no Penal interest will be charged by the company for delay. For Late Payment of EMI by the borrower, the broken period interest will be charged as the EMI outstanding amount for the period of delay at the rate of interest charged from the borrower.

  The above terms & condition will be duly disclosed to the borrower at the time of on boarding the borrower.
- ✓ There shall be no pre-payment penalty on microfinance loans. However, pre-payment and delayed payment shall be applicable for Non-Microfinance Loans.
- ✓ DCL shall prominently display the minimum, maximum and average interest rates charged on microfinance loans in all its offices and branches and details on its website.
- ✓ Any change in the interest rate or any other charge shall be informed to the borrower well inadvance and these changes shall be effective only prospectively
- ✓ Any non-qualifying / non microfinance loans the maximum interest rate charged can be higher by upto 4% of maximum interest rate charged on microfinance loans.

- ✓ Issuance of non-credit products will be with full consent of the borrowers and fee structure for such products will be explicitly communicated to the borrower in the loan card itself.

- ✓ The load of Product Risk premium may vary keeping in view of the credit score of the borrower which will be resulted into differentiation in the interest rates to the end borrower

REVIEW & MONITORING

It is important to ensure that the DCL undertakes a regular review of its product prices and makes suitable changes. The review shall be done on a quarterly basis or as and when required. Any deviationto the policy terms and defined ceilings beyond the delegation authority of the Risk Management Committee shall be approved by the Board.

Digamber Capfin Limited

Address: J 54-55, Anand Moti, Himmat Nagar, Gopalpura, Tonk Road, Jaipur-302018, Rajasthan.