



Jain Paras Bilala & Co.

Chartered Accountants

50 Ka 2, Jyoti Nagar, Jaipur - 302005 (Raj.)

Ph.: 0141-2741888, 9314524888, 9929224888

Email: pbilala@yahoo.com, jpbilala@gmail.com

To,

**The Board of Directors,
Digamber Capfin Limited
J 54-55, Anand Moti,
Himmat Nagar, Gopalpura,
Tonk Road, Jaipur-302018 (Raj.)**

Dear Sir/Madam,

This is to certify that we have examined and verified the provisional books of accounts, various documents and other related details in respect of Digamber Capfin Limited having CIN: U67120RJ1995PLC009862 ("NBFC-MFI") (**hereinafter referred to as "DCL" or "the Company"**) & its registered office situated at J 54-55, Anand Moti, Himmat Nagar, Gopalpura, Tonk Road, Jaipur-302018 Rajasthan have been verified as on **September 30, 2024** and as per the verification of above documents and information and explanation given to us the following details have been certified:-

1. RBI DIRECTIONS

The Company is engaged in the business of micro-finance lending under Non-Banking Financial Activities and requires to hold a certificate of registration issued by Reserve Bank of India under Section 45-IA of Reserve Bank of India Act, 1934. Accordingly, the company is holding Certificate of Registration issued by RBI vide Registration no "**B-10.00099**" and following the Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 being an NBFC-ML and Master Direction – Reserve Bank of India (Regulatory Framework for Microfinance Loans) Directions, 2022 and other Master Directions, Circulars and notifications issued by RBI from time to time and as amended from time to time :-

Sr. No	Particulars	Compliance Required	Followed by DCL (as per Unaudited Financial Statements as on September 30, 2024)
1.	Microfinance Loan	NBFC-MFIs are required to maintain not less than 75 per cent of its Total assets as microfinance loans(ML). A microfinance loan is defined as a collateral-free loan given to a household having annual household income up to ₹3,00,000. For this purpose, the household shall mean an individual family unit, i.e., husband, wife and their unmarried children.	Yes, Complied Total Micro Finance Loans: Rs. 867.76 Crores (81.69%) Total Assets as on September 30, 2024: Rs. 1,062.30 Crores



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2.	Assessment of Household Income	<p>RE shall put in place a board approved policy for assessment of household income.</p> <p>Lending MFIs will have to ensure compliance with relating to as a collateral-free loan given to a household having annual household income up to ₹3,00,000. For this purpose, the household shall mean an individual family unit, i.e., husband, wife and their unmarried children.</p>	<p>Yes. Complied</p> <p>In compliance with the RBI Master Direction No RBI/DOR/2021-22/89 DoR.FIN.REC.95/03.10.038/2021-22 dated March 14, 2022, as amended from time to time, DCL has adopted a board approved Household Income Policy and assesses the household income of the borrowers on the following basis:-</p> <ol style="list-style-type: none"> 1. Various information regarding the income, expenses, assets and liability of Borrower provided by her which is being filled in the Assessment Form in the technology. 2. The household income is further assessed from Bank Statement and from checking the same from neighbors. The officials of the company assess the income during house-visit on the basis of income generating assets available with the borrowers. 3. Also, the total indebtedness of the borrowers is being checked from Credit Information Bureau. The information is also verified in their GRT meetings. The technology used by the company does not allow any case to be processed as micro loan where household income is more than Rs. 3,00,000 per annum.
		<p>Each RE shall mandatorily submit information regarding household income to the Credit Information Companies (CICs)</p> <p>Membership of Credit Information Companies will facilitate ensuring compliance with many of these</p>	<p>Yes. Complied</p> <p>They are presently the member of CRIF Highmark, TransUnion CIBIL, Equifax and Experian.</p> <p>The household income of the borrowers is submitted to the CICs.</p>



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		conditionalities. Accordingly, it is reiterated that every NBFC-MFI has to be a member of all four Credit Information Company (CIC) established under the CIC Regulation Act, 2005.	w.e.f. 01.09.2024, the company is submitting the information with CIC on fortnightly basis.
3	Limit on Loan Repayment Obligations of a Household	<p>Each RE shall have a board-approved policy regarding the limit on the outflows on account of repayment of monthly loan obligations of a household as a percentage of the monthly household income. This shall be subject to a limit of maximum 50 per cent of the monthly household income</p> <p>Each RE shall provide timely and accurate data to the CICs and use the data available with them to ensure compliance with the level of indebtedness. Besides, the RE shall also ascertain the same from other sources such as declaration from the borrowers, their bank account statements and local enquiries.</p>	<p>Yes, Complied.</p> <p>DCL has adopted Loan Repayment Policy in compliance the RBI Master Direction No RBI/DOR/2021-22/89 DoR.FIN.REC.95/03.10.038/2021-22 dated March 14, 2022 as amended from time to time.</p> <p>The monthly loan repayment obligations of the borrower are assessed on the basis of declaration, Bank statement and credit report of the borrower.</p> <p>The technology of the company does not allow the matters for the microfinance loan where the monthly loan repayment obligation including proposed loan obligation by DCL is more than 50% of monthly income of the prospective borrower.</p> <p>The data is being updated on monthly basis in July 2024 and August 2024. Thereafter, the data is updated on fortnightly basis in accordance in RBI notification dated August 08, 2024 on “Frequency of reporting of credit information by Credit Institutions to Credit Information Companies”</p>
4	Pricing of Loans	<p>Each RE shall put in place a board-approved policy regarding pricing of microfinance loans.</p> <p>(i) A well-documented interest rate</p>	<p>Yes, Complied</p> <p>DCL has adopted Loan Pricing Policy in compliance with RBI Master Direction RBI/DOR/2021-22/89</p>



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	<p>model/ approach for arriving at the all-inclusive interest rate;</p> <p>(ii) Delineation of the components of the interest rate such as cost of funds, risk premium and margin, etc. in terms of the quantum of each component based on objective parameters;</p> <p>(iii) The range of spread of each component for a given category of borrowers; and</p> <p>(iv) A ceiling on the interest rate and all other charges applicable to the microfinance loans.</p> <p>A. Interest rate as per policy of the company: Upto 33%</p> <p>B. Processing Fees as per policy of the company: up to 2% plus GST of gross Loan amount. The processing fee will not be included in margin cap or interest cap.</p> <p>C. Insurance charges as per policy of the company: As per actuals</p>	<p>DoR.FIN.REC.95/03.10.038/2021-22 dated March 14, 2022</p> <p>As per the policy, following are the Pricing Components:</p> <p>A. Cost of Funds of company B. Operational Expense (Op-ex) C. Risk Premium D. Expected Profit Margin</p> <p>The range of spread of each component for Microfinance loans is provided in the policy.</p> <p>A. Interest rate :</p> <p>Micro Finance Loans (JLG): Minimum 26.00% p.a. Maximum 27.00% p.a.; <u>w.e.f. 01.08.2024 :-</u> 25.95% p.a.</p> <p><u>Individual Micro Loan (IML):</u> Minimum 25.00% p.a. Maximum 30.00% p.a.; <u>w.e.f 01.08.2024 :-</u> Minimum 25.95% p.a. Maximum 26.62% p.a.</p> <p>B. Processing Fees : 1.5% plus GST for JLG Loans 2 % plus GST for IML Loans</p> <p>C. Insurance charges: Only actual cost of insurance charges as per IRDA guidelines are recovered from its borrowers and are paid to insurance company.</p>
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		<p>D. Prepayment penalty as per policy of the company as RBI guidelines: Not applicable.</p> <p>E. As per policy of the company, 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 as the EMI outstanding amount for the period of delay at the rate of interest charged from the customer.</p> <p>F. GST and other statutory duties & fees : As per Actuals</p>	<p>D. Prepayment penalty: Company is not charging any penalty/fee on prepayment of loan by the borrowers.</p> <p>E. Late payment charges on the overdue amount: Up to maximum interest charged on the overdue amount i.e. Interest on delayed payments shall be charged at Rate of Interest (ROI) from the date of EMI due to the date on which EMI is received on overdue amount only.</p> <p>F. GST and other statutory duties & fees : As per Actuals</p>
5	Fact Sheet	<p>Each RE shall disclose pricing related information to a prospective borrower in a standardized simplified fact sheet</p> <p>Any fees to be charged to the microfinance borrower by the RE and/ or its partner/ agent shall be explicitly disclosed in the fact sheet. The borrower shall not be charged any amount which is not explicitly mentioned in the Fact sheet.</p>	<p>Yes, Complied.</p> <p>Fact sheet is provided to all the prospective borrowers which shows all the relevant information which is required to be given in the same such as Interest rate but normal interest rate and IRR, processing fee, loan amount, loan amortization schedule etc..</p>
6	Guidelines on Conduct towards Microfinance Borrowers	<p>A fair practices code (FPC) based on these directions shall be put in place by all REs with the approval of their boards. The FPC shall be displayed by the RE in all its offices and on its website. The FPC should be issued in a language understood by the borrower.</p>	<p>Yes. Complied</p> <p>DCL has adopted Fair Practice Code in compliance with the RBI Guidelines on Fair Practice Code for Non-Banking Financial Companies vide RBI/2015-16/16 DNBR (PD) CC.No.054/03.10.119/2015-16 dated July 01 2015 along with new amended guidelines wide notification no. RBI/DOR/2021-22/89</p>



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			DoR.FIN.REC.95/03.10.038/2021-22 issued on 14th March, 2022 and modification and as per Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 dated October 19, 2023 (as amended from time to time).
7	Training of Staff	Each RE shall have a board-approved policy regarding the conduct of employees and system for their recruitment, training and monitoring.	Yes, Complied Company has adopted HR manual Policy regarding the conduct of employees and system for their recruitment, training and monitoring
8	Responsibilities for Outsourced Activities	Outsourcing of any activity by the RE does not diminish its obligations and the onus of compliance with these directions shall rest solely with the RE	The company is using technology of Conflux Technologies Private Limited hence this arrangement is falling under the material outsourcing. The company is complying with all the norms prescribed by RBI for the same.
9	General Guidelines related to Recovery of Loans	Each RE shall put in place a mechanism for identification of the borrowers facing repayment related difficulties, engagement with such borrowers and providing them necessary guidance about the recourse available	Yes, Complied.
		Recovery shall be made at a designated/ central designated place decided mutually by the borrower and the RE. However, field staff shall be allowed to make recovery at the place of residence or work of the borrower if the borrower fails to appear at the designated/ central designated place on two or more successive occasions	Yes, Complied. Collection is made at Center meeting. Centre Meeting is held at a central designated place in the locality.
		The REs shall have a due diligence process in place for engagement of recovery agents, which shall, inter alia, cover individuals involved in the recovery process	The company has not entered in any tie-up with any collection agency and all the collection is being done by its all employees only.



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10	Capital Requirement (i) Existing NBFC	<p>Current Net Owned Funds (NOF) at Rs. 5 Crore (Rs. 2 Crore in NE Region)</p> <p>By March 31, 2025: ₹7 Crore (₹5 Crore in NE Region)</p> <p>By March 31, 2027: ₹10 crore</p>	<p>Yes. Complied</p> <p>The DCL's level of NOF is Rs. 254.53 Crore as on September 30, 2024.</p>
11	Formation of SRO	<p>All NBFC-MFIs shall become member of at least one Self-Regulatory Organization (SRO) which is recognized by the Reserve Bank and shall also comply with the Code of Conduct prescribed by the SRO.</p>	<p>Yes, DCL is a member of SA-DHAN. Sa-Dhan Membership No.: 350</p> <p>Yes, Code of Conduct prescribed by SRO is complied by DCL</p>
12.	Monitoring of Compliance	<p>The Responsibility for compliance to all regulations prescribed for MFIs lies primarily with the NBFC-MFIs themselves.</p> <p>Compliance function and role of CCO</p>	<p>Yes, DCL has taken appropriate measures to comply with the regulations prescribed for MFIs and on NBFCs falling under Middle Layer. The Company has appointed Mr. Dilip Morwal as its Chief Compliance Officer (CCO) w.e.f. 21st June 2024. Further, based on the nature of the compliances, various departments are entrusted with the responsibility to ensure timely Compliances.</p> <p>The overall responsibility to oversee the compliances falls with the various Committees of Board of Directors of the company.</p> <p>Also, the report on the status compliances are tabled before the Audit Committee on quarterly basis.</p>
13.	Capital adequacy	<p>NBFC-MFIs shall maintain a capital adequacy ratio consisting of Tier I and Tier II Capital which shall not be less than 15 per cent of its aggregate risk weighted assets. The total of Tier II Capital at any point of time, shall not exceed 100 per cent of Tier I Capital.</p>	<p>As on September 30, 2024, The CRAR consisting of Tier I & Tier II capital of the Company is 29.44 % of its aggregate risk weighted assets.</p> <p>Aggregate risk weighted assets: Rs. 1002.24 Crores.</p> <p>Tier I Capital: Rs. 249.90 Crores</p> <p>Tier II Capital: Rs. 45.16 Crores</p>



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15	Other Important norms	Corporate Governance Norms, Information technology related norms, Customer Grievance mechanism, Asset Liability Management Mechanism, Risk Management Mechanism	The company is complying various other norms such as Corporate Governance Norms, Information technology related norms, Customer Grievance mechanism Asset Liability Management Mechanism, Risk Management Mechanism as applicable on the company.
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Note: Remaining assets not covered in Micro Finance Loans were also in accordance to the regulation specified in this behalf.

2. Asset Classification:

Stages	Asset Classification as per SMA and NPA	Category	Amount (in Crores)
STAGE-I	SMA-0	Standard	827.01
STAGE-II	SMA-1		12.58
	SMA-2		11.10
STAGE-III	NPA	Sub- standard	26.01
		Doubtful	32.87
TOTAL			909.56

Note: Ageing Analysis relates to only Own Portfolio excluding off balance sheet portfolio related to DA transactions.

- Gross NPA & Net NPA of the Company was **6.47% & 2.44%** respectively for September 30, 2024.
- Provisioning Norms:** Company has made provisions as per its board approved ECL policy, however the provisions created in books of accounts are higher than the IRACP norms issued by RBI and amended time to time.
- Adjusted Debt Equity Ratio and Adjusted Leverage Ratio of the Company was **1.18** and **3.06 times** respectively for **September 30, 2024**.
- NBFC-MFIs shall approach their Boards for fixing internal exposure limits to avoid any undesirable concentration in specific geographical locations:

As per the Risk Management policy, the Company has set the ceiling for the geographical exposures at the state, District and branch level. The limits are as follows-

Geographical location	Threshold Limit	Status as on 30.09.2024
State level	Upto 28%	Highest Concentration in a state is 25.13%
District level	Upto 4 %	Highest Concentration in a District is 3.35%
Branch level	Upto 2%	Highest Concentration in a Branch is 1.25%



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7. The loan funds availed will be lent to individuals and/ or groups of individuals in the form of JLGs/SHGs for non-farm and income generating activities.
8. DCL also does not take collateral security/deposit for their loans falling under Micro Finance Loans.
9. DCL also complies with all the guidelines issued by RBI vide RPCD.Co.Plan 66/04.09.04/2010-11 dated May 3, 2011 (Bank loans to MFIs – Priority Sector Status and as may have been updated and issued from time to time by RBI in connection with the above guidelines and Master Direction – Reserve Bank of India (Regulatory Framework for Microfinance Loans) Directions, 2022. Loan portfolio of DCL is eligible to be covered under priority sector status.

Further declared that the loan availed from the bank being fully utilized for on-lending to borrowers for activities which qualify as priority sector lending as per extant RBI- FIDD direction on NBFC On lending (FIDD.CO.Plan.BC.No.5/04.09.01/2022-23 dated May 13th 2022) and / or Master Direction on MFI on Priority Sector Lending (PSL) – Targets and Classification (RBI/FIDD/2020-21/72 dated September 4th 2020).

10. DCL complies with KYC/AML norms as stipulated by the RBI Master Direction - Know Your Customer (KYC) Direction, 2016 and Prevention of Money Laundering Act, 2002 and Prevention of Money Laundering (Maintenance of Records) Rules, 2005 and updation to these guidelines as may be issued from time to time.
11. DCL complies with RBI/FED/2018-19/67 FED Master Direction No.5/2018-19 (Master Direction - External Commercial Borrowings, Trade Credits and Structured Obligations) and Foreign Exchange Management (Borrowing and Lending) Regulations, 2018 and Foreign Contribution (Regulations) Act, 2010 including guidelines regarding FDI/ FEMA/ ECB and is in compliance with the said Act and regulation there under by Central and State laws.
12. The status of the Company's Paid-up Share Capital as on September 30, 2024 is Rs. 9,89,32,460.00 /- divided into Equity Shares of Rs. 10/-each.
13. DCL complies with the RBI Guidelines on Corporate Governance vide notification dated December 02, 2011 and RBI Master Circular on "Non-Banking Financial Companies – Corporate Governance (Reserve Bank) Directions, 2015" vide dated July 01, 2015 & amendments thereafter, if any and Chapter XI of RBI Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 on **Governance Guidelines** as amended from time to time.
14. There is no interlocking/ diversion of its funds in its associates/ subsidiaries: - **Not applicable as DCL does not have any associates/ subsidiary company.**
15. DCL complies with Non-Banking Financial Company-Systemically Important Non-Deposit Taking Company and Deposit taking Company (Reserve Bank) Directions, 2016 norms as stipulated by the RBI vide Master Circular ref: RBI/DNBR/2016-17/45 Master Direction DNBR. PD. 008/03.10.119/2016-17 September 01, 2016 and amendments thereafter upto the extent as applicable to NBFC MFIs.



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16. The Company is regular in depositing all statutory dues including Provident Fund, Employee State Insurance dues, Income Tax, Cess, Goods and Service Tax, Municipal /Revenue Dues and all other material statutory dues as applicable with appropriate authority and there are no statutory dues/liabilities pending or payable by the company.
17. The Company is running its business through own capital and through amount borrowers from various banks, NBFCs and financial institutions under multiple banking arrangements and as on date all accounts are running regular and conduct of accounts is satisfactory & falls under standard account.
18. The company's account is not an NPA in any of the banks/ institutions.

This certificate is being issued pursuant to circular No. RBI/2010-11/505 Ref. RPCD.Co.Plan.66/04.09.04/2010-11 dated May 3, 2011, Bank loans to Micro Finance Institutions (MFIs) – Priority Sector status issued by the Reserve Bank of India and amendments thereafter, if any and Master Direction – Reserve Bank of India (Regulatory Framework for Microfinance Loans) Directions, 2022. The terms used in this certificate have the same meanings as used and contained in the said guidelines.

This certificate has been issued on the basis of Quarterly Unaudited Books of accounts.

This certificate supersedes our earlier certificate dated 28.10.2024 issued vide UDIN 24415632BKCKMJ3588

For Jain Paras Bilala & Co.

Chartered Accountants

FRN: 011046C

(CA Manoj Kumar)

Partner

M. No. 415632

Place: Jaipur

Date: 20th Nov 2024

UDIN: 24415632BKCKMQ6556