# ORG Investments and Holdings Limited Fair Practice Code Policy Version 1.0 Internal



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## **Document Control**

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#### 1. Applications for loans and their processing

- a) All communications to the borrower shall be in the vernacular language or a language as understood by the borrower.
- b) All loan application forms issued by the Company will include necessary information which affects the interest of the borrower, enabling the borrower to make meaningful comparison with the terms and conditions offered by other NBFCs and to take decision. The loan application form will also indicate the documents required to be submitted with the application form.
- c) The company will provide acknowledgement for receipt of all loan applications.

#### 2. Loan appraisal and terms/conditions

a) The Company will convey in writing to the borrower in the vernacular language as understood by the borrower by means of sanction letter or otherwise, the amount of loan sanctioned along with the terms and conditions including annualised rate of interest and method of application thereof and will keep the acceptance of these terms and conditions by the borrower on its record. With respect to the matters pertaining to charging of high interest/penal interest, the Company shall mention the penal interest charged for late repayment in bold in the loan agreement.

#### 3. Rate of Interest

- a) 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 gradation of risk and rationale for charging different rate of nterest to different category of borrowers shall be disclosed to the borrower or customer in the application form and communicated explicitly in the sanction letter.
- b) The rate of interest on public deposits should be annualised rate so that the borrower is aware of the exact rates that would be charged to the account.

#### 4. Disbursement of loans including changes in terms and conditions

- a) The Company will intimate to the borrower of any change in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges etc. The Company also undertakes that changes in interest rates and charges, if any, will be effected prospectively. A suitable condition in this regard should be incorporated in the terms and conditions document in relation to acceptance of public deposits.
- b) Decision to recall / accelerate payment or performance under the agreement will be m consonance with the loan agreement.

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c) The Company will release all securities on repayment of all 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 the borrower. In case if the Company sought to exercise the right of set off against the borrower, a notice about the same with full particulars about the remaining claims and the conditions under which the Company become entitled to retain the securities till the relevant claim is settled/paid will give to the borrower by the Company.

### 5. General

- a) The Company will refrain itself from resorting unethical practices for recovery of loans. The NBFCs should not resort to undue harassment viz; persistently bothering the borrowers at odd hours, use muscle power for recovery of loans etc. as complaints from customers also include rude behavior from the staff of the companies. The Company will ensure that the staff is adequately trained to deal with the customers in an appropriate manner.
- b) The company will not interfere in the matters of the borrowers except for the purpose provided 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
- c) In case of receipt of request from the borrower for transfer of borrower account, the consent i.e. 'no objection' by the company will be conveyed within the reasonable period of 21 days commenced from the date of receipt of request of transfer. Such transfer shall be as per transparent contractual terms in consonance with law.

### 6. Responsibility of Board of Directors

a) The Company has an appropriate grievance redressal mechanism within the organization. Such a mechanism ensures that all disputes arising out of the decisions are heard and disposed of at least at the next higher level. A consolidated report of such reviews may be submitted to the Board of Directors at regular intervals.

### 7. Grievance Redressal Officer Details:

In case of any complaints/grievance, the applicant may contact:
Name : Shri Surjit Kumar Gupta
E-mail : compliance@qrgihl.com
Registered Office Address : 14/3, Mathura Road, Faridabad, Haryana- 121003

If the Compliant is not redressed within a period of one month, the customer may issue to the officer in Charge of the Regional Office of Department of Non-Banking Supervision the Reserve Bank of India under whose jurisdiction our Company is registered.

### 8. Language and mode of communicating Fair Practice Code

a) The Company will convey the terms and conditions in writing to the borrower in the vernacular language as understood by the borrower, in compliance with the Directions issued by RBI in this respect from time to time.



#### 9. Repossession of vehicles financed by NBFCs

a) The Company does not undertake the activity of vehicle financing at present. Appropriate clauses in this respect will be included in the relevant documentation as per RBI guidelines, if the Company decides to undertake such activity in future.

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