Crestmont Capital Pvt. Ltd.

Policy for Determining Interest Rates, Processing Fees and Other Charges

Policy Code: ATFPL/IRP/2026-27/03 | Version 1.0 | Effective: 31 July 2026

Crestmont Capital Pvt. Ltd.

POLICY FOR DETERMINING INTEREST RATES, PROCESSING FEES AND OTHER CHARGES

Comprehensive NBFC and Digital Lending Governance Policy

This document is maintained as a final policy document. Only the yellow highlighted fields require management confirmation before publication or operational implementation.

Document Control and Company Particulars

Regulatory References

Reserve Bank of India (Digital Lending) Directions, 2025 and all subsequent amendments.

Reserve Bank of India (Non-Banking Financial Companies - Responsible Business Conduct) Directions, 2025, updated directions and fair practices requirements applicable to NBFCs.

RBI directions on Key Facts Statement, Annual Percentage Rate, penal charges, grievance redressal, outsourcing, recovery agents, credit information reporting, KYC/AML, cyber security and customer protection.

Companies Act, 2013, Information Technology Act, Digital Personal Data Protection framework, Contract Act, consumer protection laws and any other applicable law.

In case of inconsistency between this Policy and any binding regulatory requirement, the stricter requirement shall apply automatically. Management shall place such inconsistency before the Board or authorised committee for formal amendment at the earliest feasible meeting.

Purpose and Philosophy

The purpose of this Policy is to establish a comprehensive, transparent, borrower-protective and regulator-ready framework for policy for determining interest rates, processing fees and other charges of Crestmont Capital Pvt. Ltd.. The Policy is designed for digital lending through Askrupee, website publication, internal governance, LSP/DLA control, audit review and Board oversight.

This Policy is deliberately detailed so that business, compliance, technology, recovery, customer service, legal and audit teams can operate from a common control framework and avoid informal practices that may create regulatory, conduct, data, customer protection or reputational risk.

Applicability and Scope

All directors, KMPs, employees and officers of the Company.

All digital lending journeys, including Askrupee and any web/app/API channel.

All outsourced service providers, LSPs, DLAs, collection agencies, technology vendors, call centres, API partners and processors.

All borrowers, applicants, co-applicants, references and customer data subjects to the extent applicable.

All loan lifecycle stages: marketing, application, KYC, underwriting, sanction, KFS, disbursement, servicing, repayment, collection, closure and complaint handling.

Rate Model

This section establishes detailed operating expectations for rate model under the Crestmont Capital Pvt. Ltd. policy framework. It shall be implemented through SOPs, system controls, employee training, LSP contractual obligations and periodic compliance testing.

Pricing shall be based on cost of funds, operating cost, credit risk, borrower profile, tenure, product risk, collection cost, technology cost and reasonable margin.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

ROI/APR range shall be Board-approved: [● ROI/APR range to be inserted]

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Interest shall be communicated upfront and applied consistently as per approved matrix.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Interest and charges shall not be usurious, opaque or hidden.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Operational Procedure

Step 1: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 2: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 3: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 4: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 5: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 6: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Minimum Evidence Pack

Policy approval and version history

Customer-facing screenshot or template

Consent/audit log

MIS extract

Exception register

Training record

Internal audit/compliance review note

Corrective action tracker

Charges and APR

This section establishes detailed operating expectations for charges and apr under the Crestmont Capital Pvt. Ltd. policy framework. It shall be implemented through SOPs, system controls, employee training, LSP contractual obligations and periodic compliance testing.

Processing fee and charges: [● Processing fee and other charges to be inserted]

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Penal charges: [● Penal charge structure to be inserted]

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

APR shall include all charges required under applicable RBI KFS framework.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Charges shall be disclosed in rupees and annualised/effective terms wherever required.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Operational Procedure

Step 1: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 2: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 3: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 4: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 5: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 6: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Minimum Evidence Pack

Policy approval and version history

Customer-facing screenshot or template

Consent/audit log

MIS extract

Exception register

Training record

Internal audit/compliance review note

Corrective action tracker

Penal Charge Discipline

This section establishes detailed operating expectations for penal charge discipline under the Crestmont Capital Pvt. Ltd. policy framework. It shall be implemented through SOPs, system controls, employee training, LSP contractual obligations and periodic compliance testing.

Penal charges shall not be capitalised unless legally/regulatorily permitted.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Penal charges shall be reasonable and commensurate with non-compliance.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Penal interest nomenclature should not be used where RBI requires penal charges.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

No undisclosed collection fee shall be levied by LSP.

Implementation standard: the responsible owner shall map this requirement to system screens, SOP steps, evidence records, maker-checker approval, exception logs and periodic MIS. Any deviation shall be documented with root cause, customer impact, corrective action and closure timeline.

Operational Procedure

Step 1: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 2: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 3: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 4: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 5: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Step 6: The process owner shall ensure that the relevant transaction, customer communication, approval or control event is recorded with adequate evidence, date/time stamp, responsible user and supervisory review. Where the step is performed by an LSP/DLA/vendor, the Company shall retain contractual audit rights and operational logs.

Minimum Evidence Pack

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Exception register

Training record

Internal audit/compliance review note

Corrective action tracker

GOVERNANCE

Board Ownership

The Board shall own this Policy, approve material changes, monitor management implementation and ensure that the Company does not operate any product, channel or partner arrangement in a manner inconsistent with RBI directions. The Board may delegate day-to-day monitoring to a committee or senior management; however, regulatory accountability remains with the Company.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Management Responsibility

Senior management shall convert this Policy into SOPs, process notes, system controls, maker-checker workflows, vendor obligations, employee training, audit programmes and exception reporting. Each business owner shall ensure that operational teams and LSPs follow the approved policy without informal deviations.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Three Lines of Defence

The first line shall operate the process, the second line comprising compliance/risk/legal shall independently review design and exceptions, and the third line comprising internal audit shall test adequacy and effectiveness. Material gaps shall be escalated with corrective action timelines.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Policy Review

This Policy shall be reviewed at least yearly and earlier upon any RBI circular, product change, technology change, LSP onboarding, adverse audit observation, material complaint trend, data incident or Board direction.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

CUSTOMER

Customer-first Standards

All borrower communication shall be transparent, fair, non-misleading and in a language understood by the borrower. The customer shall not be pressurised through dark patterns, hidden charges, pre-selected options, forced consent or difficult exit flows.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Disclosure Standards

The Company shall disclose lender identity, NBFC status, non-deposit taking nature, product terms, interest, APR, fees, taxes, penal charges, cooling-off rights, grievance contacts, LSP/DLA involvement and repayment schedule before loan acceptance.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Consent Standards

Consent must be specific, informed, purpose-linked, revocable where permissible, separately recorded and preserved in a retrievable audit trail. Bundled consent or silence shall not be treated as valid consent for sensitive actions.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Vulnerable Borrowers

Teams shall exercise additional care for borrowers who appear distressed, financially vulnerable, digitally inexperienced, elderly or otherwise unable to understand consequences. Such borrowers shall not be pushed into repeat loans or refinancing merely for collection targets.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

DIGITAL

Digital Lending App Governance

Askrupee and any other DLA shall be governed as a regulated digital lending interface of the Company. The app journey shall not misrepresent approval status, conceal charges, access prohibited device data or allow LSPs to control loan decisions outside Company-approved rules.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Fund-flow Control

Loan disbursement and repayment must flow directly between the Company and borrower/end-beneficiary except as expressly permitted. LSP pool accounts, pass-through accounts or informal collections are not permitted.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

LSP Accountability

The Company remains responsible for outsourced activities. Every LSP shall be subject to due diligence, contract controls, customer conduct obligations, data processing restrictions, audit rights, complaint reporting, termination rights and periodic performance review.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Prohibited Data Access

The app shall not access contact list, call logs, file/media, telephony functions or other intrusive device resources. Any camera, microphone or location access shall be one-time or need-based, disclosed clearly and supported by consent.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

RECORDS

Record Keeping

The Company shall maintain records of applications, KYC, bureau pulls, underwriting outputs, KFS, consent logs, sanction terms, disbursement, repayment, complaints, recovery actions, notices, settlement, closure and audit trails for the prescribed retention period.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Evidence Quality

Every important customer action shall be evidenced through timestamp, user identifier, IP/device metadata where lawful, document hash/version, OTP/e-sign trail, communication log and maker-checker approval as applicable.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

MIS and Exception Reporting

Monthly MIS shall include loan volumes, pricing, complaints, TAT, recovery exceptions, LSP breaches, data incidents, cooling-off cancellations, NPA movement, write-offs, fraud alerts and regulatory exceptions.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Audit Readiness

Policies, SOPs, logs, Board approvals, contracts, training records, system screenshots and exception closures shall be maintained in a form suitable for statutory audit, internal audit, RBI inspection and management review.

Control expectation 1: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 2: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 3: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Control expectation 4: the responsible owner shall evidence design, operation, maker-checker review and exception closure for this clause through system records, policy attestations, MIS and audit trail.

Detailed Control Matrix

Regulatory Risk and Mitigation Register

SOP Checklist for Implementation

Checklist item 1: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 2: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 3: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 4: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 5: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 6: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 7: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 8: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 9: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 10: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 11: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 12: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 13: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 14: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Checklist item 15: Confirm that the policy requirement is reflected in customer journey, back-office system, lender/LSP contract, website disclosure, employee training, MIS, exception reporting and audit working papers. The compliance team shall mark the item as Complied / Not Applicable / Gap Identified with remarks.

Approval Matrix

The above annexure forms an integral part of this Policy and shall be used by management, audit, compliance and operations teams for implementation testing and evidence collection.

RBI-Safe Exclusion List

The above annexure forms an integral part of this Policy and shall be used by management, audit, compliance and operations teams for implementation testing and evidence collection.

Pending Management Confirmation Register

The above annexure forms an integral part of this Policy and shall be used by management, audit, compliance and operations teams for implementation testing and evidence collection.

Management Certification and Finalisation

This Policy is approved for use as a final policy framework. Yellow highlighted items shall be completed by management before external publication or operational reliance where such information directly affects customers, regulators, vendors or Board oversight.

Policy Code	ATFPL/IRP/2026-27/03
Version	1.0
Board Approval Date	31-07-2026
Effective Date	31-07-2026
Review Frequency	Yearly and event-based
Approving Authority	Board of Directors
Applicable Product / Channel	Askrupee
NBFC Status	Non-Deposit Taking Company - Investment Credit Company
Deposit Status	The Company is a non-deposit taking NBFC and does not accept public deposits.

Legal Name	Crestmont Capital Pvt. Ltd.
CIN	U65100WB1990PTC049122
RBI Certificate of Registration	B.05.03608
NBFC Category	Non-Deposit Taking Company - Investment Credit Company
Registered Office	EP-Y-16, Sector - V, Kolkata, Kolkata, West Bengal, India, 700091
Corporate Office	Plot No. 123, Street No. 17, MIDC, Marol, Andheri (E), Mumbai, Maharashtra, India, 400093
Books of Account maintained at	Plot No. 123, Street No. 17, MIDC, Marol, Andheri (E), Mumbai, Maharashtra, India, 400093
Website	[● Website URL to be inserted]
Customer Care	[● Customer care email and phone to be inserted]
Grievance Officer	[● Nodal Grievance Redressal Officer name and designation]
Grievance Contact	[● GRO email, phone and address]

	Minimum Standard	Owner	Frequency	Evidence
ntified	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
ompleted before consent	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
al applied	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
ained	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
ssed	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
ity control mapped	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
escalation defined	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
ting enabled	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,
n requirement confirmed	Required control	Business / Compliance / Technology as applicable	Monthly or event-based	Policy, SOP, system log, screenshot,

Risk	Rating	Mitigation
Mis-selling / inadequate disclosure	Medium/High	KFS, APR, terms, cooling-off and website disclosure before acceptance
LSP misconduct	High	Due diligence, contract, training, monitoring and termination rights
Data over-collection	High	Need-based data collection, no prohibited permissions, consent logs
Coercive recovery	High	Approved scripts, agent training, complaint monitoring and disciplinary action
Wrong fund flow	Critical	Direct RE-borrower fund flow and reconciliation
Unapproved pricing/charges	High	Board-approved pricing grid and KFS validation
Unresolved grievances	High	30-day escalation and RBI Ombudsman disclosure

Particular	Policy position / control requirement
Policy owner	Compliance / Business Head as relevant
Recommending authority	Managing Director / CEO / Compliance Head
Approving authority	Board of Directors
Review cycle	Yearly and event-based
Exception approval	Board / authorised committee, with reasons recorded

Particular	Policy position / control requirement
No public deposit acceptance	Website and app must not imply deposit acceptance.
No RBI endorsement statement	RBI registration cannot be shown as product approval.
No LSP fee from borrower	LSP fee shall be paid by the Company.
No prohibited mobile data	No contacts, call logs, file/media or telephony access.
No coercive recovery	No threats, harassment, public shaming or misleading criminal consequences.
No automatic limit increase	No limit enhancement without borrower request and assessment.

	Policy position / control requirement
RL	[● Website URL to be inserted]

	Policy position / control requirement
care details	[● Customer care email and phone to be inserted]
ils	[● GRO email, phone and address]
ist	[● LSP/DLA partner name(s), if any, to be inserted]
	[● ROI/APR range to be inserted]
penal charges	[● Processing fee and other charges to be inserted]; [● Penal charge structure to be inserted]
f period	[● Cooling-off/look-up period to be inserted after Board approval]
us	[● Management to confirm CIMS reporting status for Askrupee DLA; if app qualifies as DLA, reporting should be completed as per RBI Digital Lending

Particular	Name/Designation	Signature/Date
Prepared by	Compliance / Legal	
Reviewed by	Senior Management	
Recommended by	Managing Director / CEO	
Approved by	Board of Directors	