5

INTEREST RATE POLICY OF SAMPATI SECURITIES LIMITED

Prepared by Legal & Compliance Team

SAMPATI SECURITIES LIMITED

2ND FLOOR, MRUDUL TOWER, B/H TIMES OF INDIA, ASHRAM ROAD, AHMEDABAD – 380009.

Summary of Policy

Version	Issue and Effective Date	Review Periodicity	Approving Authority	Policy Owner	Confidentiality level
V1	22.04.2022	As and when require/any change in regulatory requirement OR Annually whichever is earlier	Board of Directors	Legal and Compliance Team	Published on the website
V2	18.04.2023	As and when require/any change in regulatory requirement OR Annually whichever is earlier	Board of Directors	Legal and Compliance Team	Published on the website
V3	12.04.2024	As and when require/any change in regulatory requirement OR Annually whichever is earlier	Board of Directors	Legal and Compliance Team	Published on the website
V4	14.08.2025	As and when require/any change in regulatory requirement OR Annually whichever is earlier	Board of Directors	Legal and Compliance Team	Published on the website
V5	03.04.2026	As and when require/any change in regulatory requirement OR Annually whichever is earlier	Board of Directors	Legal and Compliance Team	Published on the website

Details of Last Review

Review Date	Next Review Date	Comments/Remarks/Changes
13.08.2026	April 2026/August 2026	(i) Reviewed in accordance with the Master Direction - Reserve Bank of India (Non-Banking Financial Company - Scale Based Regulation) Directions, 2023 (ii) Reviewed in accordance with the Master Direction/ Circular - Fair Lending Practice - Penal Charges in Loan Accounts

Interest Rate Policy

Background:

In accordance with the guidelines set forth by the Reserve Bank of India (RBI), each Non-Banking Finance Company (NBFC) is required to have its Board approve an Interest Rate policy, taking into consideration factors such as the cost of funds, margin, and risk premium. The approved policy must determine the interest rates for loans and advances. Furthermore, it is mandated that the rate of interest, the approach for risk gradation, and the rationale for charging varying interest rates for different borrower categories are communicated to the borrowers through sanction letters and key fact statements.

The Board of Directors, in its meeting on April 03, 2026, has adopted the revised interest rate policy for Sampati Securities Limited, covering **Non-Digital Loan Products**, including Personal Loans, Business Loans (secured and unsecured), and Loan Against Property (LAP) and **Digital Loan Products** -short-term, small amount loans to individual borrowers via its digital lending platform, 'Creditt+'.

Objective of the Policy:

The primary objective of this policy is to establish benchmark interest rates for different customer segments across both Non-Digital Lending (Non-DLA) and Digital Lending (DLA) products. It aims to ensure fair and transparent lending practices while defining the principles and approaches for charging spreads, thereby determining the final interest rates applicable to customers.

Review of Policy:

This policy will undergo an annual review or interim reviews as needed due to changes required in the policy/model, such as additions or deletions of components forming part of the benchmark calculation.

Organization Structure:

The Board of Directors holds the responsibility for the effective implementation of the Interest Rate Policy within the company.

Qualifying Conditions for Loans

To qualify for a loan from Sampati Securities Limited, applicants must meet the following minimum eligibility criteria, subject to product-specific requirements:

1. **For Non-Digital Loans (Non-DLA):**
   - Applicants must be Indian residents aged between 21 and 65 years.
   - They must have verified income documents or business proof.
   - They must satisfy the company's internal creditworthiness parameters.

2. **For Digital Loans (DLA):**
   - Applicants must be Indian residents aged between 20 and 60 years.

- They must be employed with a minimum monthly income of ₹20,000.

The company reserves the right to apply additional product-specific eligibility criteria based on regulatory requirements, credit risk assessment, or internal policy considerations.

Interest Rate Model:

For Non-DLA Products:

The interest rate for Non-DLA products is determined on the basis of customer profile, creditworthiness, risk category, and loan product type. The rate of interest will generally range as follows:

- Personal Loans (Unsecured): 12% - 24% per annum
- Business Loans (Secured / Unsecured): 14% - 24% per annum
- Loan Against Property (LAP) / Mortgage Loans: 12% - 20% per annum
-

The final applicable interest rate shall depend upon the credit risk evaluation, repayment capacity, tenure, and overall profile of the borrower.

For DLA Products:

The interest rate for loans and advances to individual borrowers will range between 0.1% to 0.5% per day. This daily interest rate is calculated based on the customer's profile, particularly focusing on those categorized as highly risky and underserved within the community. Many of these individuals lack a comprehensive credit history and are not covered by formal credit scoring channels such as Credit Bureaus, Banks, and Financial Institutions.

The company serves individuals who lack access to traditional bank finance and often fall outside formal credit scoring channels. The company offers short-tenure payday loans ranging from Rs. 10,000 to Rs. 35,000, with a loan tenure of 1 to 45 days. The lending process is facilitated through a 100% digital and paperless platform with real-time credit/risk assessment algorithms developed by Credify Technologies Private Limited. The company manages collection through recovery agents appointed by it, both in the field and through tele collection, and its digital lending partner i.e. Credify has an in-house technology team to enhance the loan platform features. The company incurs high customer acquisition costs related to marketing and operations and a delinquency cost of 25% due to the high-risk profile of its customer segment. Funds borrowed at an annual rate of 18% to 24% PA are utilized for lending, working capital, and operational expenses, significantly impacting the company's Profit and Loss Account. Despite these challenges, the company remains dedicated to diligently serving its customers by establishing robust infrastructure and allocating necessary resources.

Standard Rate of Interest and Schedule of Charges

For Non-DLA

Sr. No.	Particulars	Applicable Charges

1.	Rate of Interest (Per annum)	12% - 24% (depending on product & borrower profile)
2.	Processing Charges	Nil to 3% of loan amount
3.	Stamp Duty	At Actuals (as per State law)
4.	Bounce Charges	Nil
5.	Pre-payment Charges	Nil
6.	Foreclosure Charges	Nil
7.	Penal Charges	3% per month on principal outstanding / total outstanding

For DLA

Sr. No.	Transaction	Charges in Rs.
A.	**Rate of Interest (Per day)**	0.1% to 0.5%
B.	**Other Charges**	
1.	Processing Charges (One time fixed)*	3-7% Fixed
2.	Stamp Duty	At Actuals (As per State)
3.	Bounce Charges	NIL
4.	Pre-payment Charges	NIL
5.	Foreclosure Charges	NIL
6.	**Late Payment Charges/Penal Charges (Per day)**	As per the respective loan product KFS and Penal charges policy.

There are no hidden charges. All charges will be communicated upfront in the Sanction Letter and Key Fact Statement (KFS).

Calculation of Annual Percentage Rate or Total Cost of Credit-

The Annual Percentage Rate (APR) of loan is the total annual cost of the loan/ credit in percentage terms. This is deemed to be giving actual cost of the loan/ credit on per annum basis.

Typically, APR is calculated as under:

APR = ((Interest + Fees / Loan amount) / Number of days in loan term)) x 365 x 100

Where 'Interest' is total interest to be paid during the loan tenure. Thus, the APR/ total Cost of Credit can be calculated based on the applicable rate of interest and applicable fee/ charges which have been disclosed in Sanction Letter as well as in Key Fact Statement and it can be used by the customers to compare the costs associated with borrowing across products and/or lenders.

Approach for Gradation of Risk

The rate of interest shall be determined after considering multiple factors including the cost of borrowed funds, tenor-wise cost, prevailing market liquidity, availability of refinance avenues, RBI policy rates, competitive offerings, customer relationship tenure, and overall cost of funds.

In addition, an appropriate **risk premium** shall be applied, which is based on the inherent credit and default risk associated with the product and the individual borrower. This assessment takes into account the customer's segment, financial profile, professional background, stability of income and employment, repayment capacity, overall customer yield, nature and quality of collateral (where applicable), past repayment track record, external credit ratings, and prevailing industry trends.

Accordingly, Sampati Securities Limited may adopt a differentiated pricing model under which the rate of interest for the same product and tenor, availed during the same period, may vary from one customer to another depending on one or a combination of the above factors. Hence, the interest rate charged may differ across customers, even within the same loan category.

What are the factors that affect Interest Rates:

- Credit Bureau Scores
- Tenure of Loan
- Income
- Occupation
- Repayment History
- Default risk/risk premium
- Any other factors that may be relevant in a particular case

Risk based approach for Customer Categorised

Company follows a risk-based pricing model, wherein the final lending rate applicable to a customer is determined by adding a risk premium over the base rate. The risk premium is dependent on the borrower's creditworthiness, financial stability, repayment capacity, collateral, and overall risk profile.

This approach ensures that customers with stronger repayment capacity are offered preferential rates, while those with higher default risk are charged higher spreads to compensate for the associated risk.

Parameters Considered for Risk Assessment

The Company evaluates customer risk using both external credit data and internal assessment models. Key parameters include:

i. Credit Bureau Score / Risk Score Range (CIBIL, Experian, CRIF, Equifax)
ii. Repayment History with Sampati Securities and other lenders
iii. Income & Employment / Business Stability (salary vintage, employer category, audited business financials)
iv. Debt-to-Income (DTI) Ratio and leverage levels
v. Collateral Availability (for secured loans)
vi. Customer Relationship Tenure and behavioural score
vii. Loan Type (secured vs. unsecured, short-term vs. long-term)

Explanation of Risk Score Range

The Risk Score Range is an internal scoring mechanism of the company calibrated on a scale of 0 to 700, where:

- Lower scores (Below 210) indicate excellent repayment capacity and low default risk.
- Higher scores (Above 426) reflect weaker repayment ability and higher credit risk.
- Scores in the middle range (305 - 405) represent average risk customers, attracting moderate spreads.

The score is derived by mapping credit bureau ratings with internal evaluation metrics such as repayment history, income stability, DTI ratio, and security coverage.

Risk Categorisation Matrix

Risk Score Range	Category	Risk Level	Indicative Customer Profile	Interest Rate Impact
426 - 700	Poor	High Risk	Low bureau score, irregular income, high leverage, weak repayment history, mostly unsecured loans	Highest spread above base rate
406 - 425	Below Average	High Risk	Limited bureau history, inconsistent income stability, occasional delays	Higher spread above base rate
350 - 405	Average	Medium Risk	Moderate bureau score, stable but average income, acceptable repayment history, partly secured loans	Base rate + moderate spread
305 - 349	Good	Medium Risk	Fair bureau score, stable employment, regular repayments with minor delays, secured or partly secured exposure	Base rate + low-to-moderate spread
255 - 304	Good	Low Risk	Strong repayment history, stable employment/business, low DTI, secured loans	Base rate or marginal spread
210 - 254	Excellent	Low Risk	High bureau score, long and clean repayment history, strong financial profile, adequate collateral	Base rate or preferential pricing

Below 210	Excellent	Low Risk	Exceptional repayment capacity, high income stability, very low leverage, quality collateral	Preferential pricing, lowest spread

Key Principles

i. Customers with High Risk scores shall attract higher spreads above the base rate.
ii. Customers with Medium Risk scores shall be priced at moderate spreads, depending on their repayment capacity and security offered.
iii. Customers with Low Risk scores shall be eligible for preferential pricing and lower spreads.
iv. The final rate of interest may differ even within the same product category, depending on the overall customer profile and credit evaluation.
v. This risk-based approach ensures compliance with RBI's guidelines on fair lending and transparent pricing.

Communication Framework

Interest rates would be intimated to the customers at the time of sanction/availing of loan.

Interest rate policy would be uploaded on the website of the company. The same can be accessed at https://www.sampati.co.in/our-policies.html.

SAMPATI SECURITIES LIMITED