

# CREDIT ASSESSMENT POLICY

Version 1.0

<b>Approved By:</b>	Board of Directors
<b>Review Frequency:</b>	Annual
<b>Policy Reference No.:</b>	SCPL-CAP-002

## 1. Objective and Scope of the Policy

---

Sankalp Capital Private Limited ("Company") is registered with the Reserve Bank of India (RBI) as a non-deposit accepting Non-Banking Financial Company (NBFC). Being an NBFC, the Company is required to comply with the Guidelines and Directions issued by RBI from time to time.

The Company's Credit Assessment Policy is the overarching framework that defines the principles for credit assessment for its lending business. The Company shall duly implement and keep this Policy — including all revisions thereto — up to date, in accordance with any regulatory, corporate, or other legal requirements.

### 1.1 Objectives

The objectives of this Policy are as follows:

- To create a set of standardised policies and procedures for the lending activities of Sankalp Capital Private Limited.
- To institute due diligence for mitigating the level of credit risk and for improving credit quality.
- To establish an underwriting framework.
- To ensure thorough credit review.
- To establish credit concentration norms.

### 1.2 Compliance Commitment

In pursuing its business, Sankalp Capital Private Limited shall operate according to the highest ethical and compliance standards, and shall constantly seek to follow best practices in the industry. This Policy shall not result in the denial of banking or financial facilities to members of the general public, especially those who are financially or socially disadvantaged. Under no circumstances shall contravention of laws and applicable regulations be tolerated.

## 2. Business Segments and Authority

### 2.1 Business Segment

Lending: The Company, through its Credit and Operations Department, aims to extend credit in the form of Personal Loans and Medical Loans (MediLoans) to the public, in accordance with the process laid down in this Policy.

### 2.2 Approving Authority

The Board of Directors (hereinafter referred to as 'the Authority' or 'the Board') shall be the approving and reviewing authority for this Policy.

## 3. Loan Products and Criteria

---

Sr. No.	Criteria	Personal Loans	MediLoans
A.	Age	20 – 60 years	20 – 65 years
B.	Geography	PAN India	Karnataka, Andhra Pradesh, Gujarat, Tamil Nadu, Madhya Pradesh, Maharashtra, Rajasthan,

			Telangana, Uttar Pradesh, Delhi and Goa
C.	Min. Loan Tenure	10 / 60 days	90 days
D.	Min. Loan Amount	₹ 1,000	₹ 20,000

### 3.1 Customer Due Diligence (KYC / CDD) Requirements

The Company shall ensure that:

- i. No account is opened in an anonymous or fictitious / benami name.
- ii. No account-based relationship is undertaken without appropriate Customer Due Diligence (CDD) procedure.
- iii. Mandatory information required to be sought for KYC purpose is clearly specified.
- iv. The CDD procedure is applied at the UCIC level. Accordingly, if an existing KYC-compliant customer desires to open another account or avail any other product or service, there shall be no need for a fresh CDD exercise as far as identification of the customer is concerned.

## 4. Credit Underwriting

### 4.1 Credit Approval Process

The credit approval process commences from the receipt of a customer's request and the processing of the same, including approval of the credit facility. The process concludes with the communication of approval to the customer through a Term Sheet / Sanction Letter and the execution of the Loan Agreement.

### 4.2 Loan Process Journey

Sr.	Step	Personal Loan	MediLoan
A	Mobile Verification	OTP-based authentication via verified providers.	OTP-based authentication via verified providers.
B	Email & Mobile Footprint Analysis	Checks for historical presence and consistency in usage of the e-mail ID and phone number provided.	Checks for historical presence and consistency in usage of the e-mail ID provided.
C	KYC Verification	Basic information such as name, age, marital status, monthly income, address, and gender provided by the customer. PAN and Aadhaar verification done through DigiLocker and/or CKYC.	Basic information provided by the customer. PAN and Aadhaar verification through mandatory VKYC and CKYC.
D	Masked Aadhaar OCR Capture	Extracting address and name for authentication.	Extracting address and name for authentication.
E	Bank Account Validation	Penny Drop verification to ensure account authenticity.	Penny Drop verification to ensure account authenticity.
F	Income Verification via SMS Analysis	Assessing transaction patterns to estimate income stability.	Not Applicable
G	Liveliness & Facial Recognition Checks	Ensuring real-time identity validation.	Ensuring real-time identity validation.

H	Emergency Contact Input	Gathering two reference numbers.	Not Applicable
I	Credit Score Pull	Credit score and delinquency check.	Credit score and delinquency check.
J	Credit Appraisal	Decision to provide credit or not, depending on documents and information submitted by the customer. System analysis to decide credit appraisal and details of credit to be provided.	Decision regarding the amount of credit to be provided or not, depending upon the insured amount as per the insurance policy of the borrower.
K	KFS Documentation & Sanction Letter	Displayed on the digital lending platform for customer review and confirmation.	KFS documentation and Sanction Letter shared via e-mail to the borrower.
L	E-Signing of Loan Agreement	Digital consent for legal validation.	Digital consent for legal validation, via e-mail and SMS.
M	Executed Documents Dispatch	Executed KFS, Sanction Letter and Loan Agreement sent to customer's registered e-mail for record-keeping.	Sent to customer's registered e-mail for record-keeping.
N	Final Disbursement	Secure transfer to verified bank accounts post-validation.	Secured transfer made to the bank account of the respective hospital.

### 4.3 Final Decision on Sanction

The final decision to provide credit or not shall remain solely with Sankalp Capital Private Limited.

## 5. Eligibility Criteria

Sr.	Eligibility Criteria	Personal Loans	MediLoans
A.	Age	20 years to 60 years	20 years to 65 years
B.	Employment	Salaried Individual, Self-Employed Individual, Pensioner	Salaried Individual, Self-Employed Individual, Pensioner
C.	Credit Score	More than 600 or NTC (New to Credit)	More than 600
D.	KYC	CKYC or OKYC. For loans exceeding ₹ 1,00,000 — mandatory VKYC.	Mandatory VKYC
E.	Overdue / Delinquency	Maximum two delinquencies at the time of applying for credit.	Maximum two delinquencies at the time of applying for credit.
F.	Household Income	Minimum household income to be more than ₹ 3,00,000 per annum.	Minimum household income to be more than ₹ 3,00,000 per annum.
G.	Politically Exposed Persons (PEPs)	Should not be a PEP.	Should not be a PEP.

## 6. Risk Categorisation

The parameters for Risk Categorisation of borrowers under Personal Loans and MediLoans are set out in the table below. Each parameter is assessed independently, and the overall risk profile of the borrower shall reflect the aggregate risk across all parameters.

Parameter	High Risk	Medium Risk	Low Risk
<b>Geography</b>	North-East, J&K, Ladakh, Punjab	Bihar, Chhattisgarh, Jharkhand, West Bengal	All other states
<b>Credit Score</b>	Less than 620	620 – 750	More than 750
<b>Delinquencies</b>	2 Delinquencies	1 Delinquency	Nil
<b>KYC Type</b>	CKYC / OKYC / DigiLocker	Not Applicable	VKYC
<b>Profession</b>	PEPs, Daily Wage, Contract Labour, Unemployed	Self-Employed	Salaried Employees, Pensioners
<b>Age</b>	≤ 25 years and ≥ 58 years	45 – 57 years	26 – 44 years
<b>Loan Purpose</b>	Personal Expenses, Others, Financial / Emergency / Cash	Repayment / Credit / EMI, Business, Marriage Function, Travel / Vehicle	Medical / Health / Education, Home Repair

## 7. Pre-Approved Customers

Previous customers of the Company may be eligible for credit based on determined creditworthiness derived from alternative sources of data obtained via application permissions and the repayment history of past loans.

## 8. General Information

- i. All customers shall be informed in detail regarding the features, terms, and conditions of the credit facility, including all applicable charges.
- ii. No discrimination shall be made for the sanctioning of credits on the basis of gender, caste, or religion. However, the Company may choose to develop lending schemes for specific categories of borrowers.
- iii. After sanction of the credit facility, the credit terms and conditions, sanction letter, repayment schedule, and all other relevant documents shall be sent to the customer.

## 9. Credit / Investment Concentration Norms

### 9.1 Exposure Limits

The Company shall not have exposure exceeding:

- 25% of Tier I Capital to a single party.
- 40% of Tier I Capital to a single group of parties.

The Company may exceed the exposure norms mentioned above with prior Board approval for extended limits.

### 9.2 Exemptions from Concentration Norms

Apart from the exposures already exempted from credit / investment concentration norms, the following exposures shall also be exempt:

- i. Exposure norms shall not apply to (a) investments of the Company in shares of its subsidiaries; (b) companies in the same group, to the extent they have been reduced from Owned Funds for the calculation of Net Owned Funds (NOF); and (c) the book value of debentures, bonds, outstanding loans and advances (including hire-purchase and lease finance) made to, and deposits with, subsidiaries and companies in the same group, to the extent they have been reduced from Owned Funds for the calculation of NOF.
- ii. Exposure to the Government of India and State Governments that qualify for zero percent risk weight as per the capital regulations applicable to NBFCs.
- iii. Exposure where the principal and interest are entirely guaranteed by the Government of India.

## **10. Reporting to Credit Information Companies (CICs)**

---

Sankalp Capital Private Limited shall ensure the submission and updation of credit information for its customers on a regular basis to all Credit Information Companies (CICs) as required under applicable laws and regulations.

## **11. Review**

---

This Policy shall be reviewed annually, or as and when deemed necessary, by the Board of Directors of the Company. Any amendments to this Policy shall be approved by the Board and shall be duly recorded.