PENAL CHARGES POLICY

Prepared by Legal & Compliance Team

SAMPATI SECURITIES LIMITED

2nd Floor, Mrudal Tower, B/h Times of India, Ashram Road, Ahmedabad, Gujarat, India, 380 009

Penal Charges Policy

Summary of Policy

Version	Issue and Effective Date	Review Periodicity	Approving Authority	Policy Owner	Confidentiality level
V1	12.04.2024	As and when require/any change in regulatory requirement	Board of Directors	Legal and Compliance Team	Available in Public
V2	07.02.2025	As and when require/any change in regulatory requirement	Board of Directors	Legal and Compliance Team	Available in Public
V3	03.04.2026	As and when require/any change in regulatory requirement	Board of Directors	Legal and Compliance Team	Available in Public

Details of Last Review

Review Date	Next Review Date	Comments/Remarks/Changes
07.02.2025	April 2025	(i) Reviewed in accordance with the Master Direction - Reserve Bank of India (Non-Banking Financial Company - Scale Based Regulation) Directions, 2023
03.04.2026	April 2027	(i) Reviewed in accordance with Reserve Bank of India (Non-Banking Financial Companies - Responsible Business Conduct) Directions, 2025

Index

1. Introduction:

This policy outlines the framework for levying penal charges on loans provided by Sampati Securities Limited in accordance with the guidelines set forth under Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025 and subsequent clarifications/directions issued by the RBI.

The objective of the penal charges is to ensure credit discipline and to enforce compliance with the material terms and conditions of the loan agreement. These charges are not intended to generate revenue above the contracted interest rate, and they will be levied solely for non-compliance with the loan terms.

2. Applicability of Penal Charges:

Penal charges will be applicable in the following scenarios:

- Non-payment of dues on the agreed-upon due date.
- Breaches of any terms and conditions of the loan agreement, including but not limited to, failure to maintain the required balance in the loan account, default in repayment.
- Delays in repayment or partial payment of dues, as defined in the loan agreement.

3. Quantum of Penal Charges:

- The quantum and reason for penal charges shall be clearly disclosed by the NBFC to the customers upfront in the loan agreement and Terms & Conditions/ Key Fact Statement as applicable.
- Penal charges shall be levied in amount as specified in the loan documents.
- Penal charges shall not be expressed as a percentage of interest rate, but as a amount communicated upfront to the borrower.
- The applicable penal charges shall be applied on a daily basis, commencing from the date of default or breach of loan terms, and calculated based on the days past due as indicated in the KFS.
- The methodology for calculation shall be transparent as disclosed in the loan documents.

4. No Capitalization of Penal Charges:

- Penal charges will not be capitalized, meaning that no additional interest will be computed on the penal charges.

5. Levying of Penal Charges:

- Penal charges will be levied only when there is a failure to comply with the significant terms and conditions of the loan agreement.
- These charges will be applied on a daily basis or as per the loan product terms and will be calculated based on the principal amount as provided in the Key fact statement / loan agreement. The charges will not be compounded or capitalized.

6. Board Approval:

This Penal Charges Policy has been formulated and approved by the Board of Directors of Sampati Securities Limited, in line with the RBI Master Directions and our internal compliance requirements. The quantum and terms of the penal charges have been set to ensure fairness and consistency in the application of the policy.

7. Disclosure of Penal Charges:

- The penal charges applicable to the loan account will be clearly disclosed to the borrower in the loan agreement / Key Fact Statement (KFS).
- The penal charges and the reasons for their levying will also be disclosed on our website, under the section on Interest Rates and Service Charges, and made available to the borrower at the time of loan disbursement.

8. Compliance with RBI Guidelines:

- This policy will be reviewed and updated regularly to ensure compliance with the RBI Master Directions on Fair Lending Practice.
- Sampati Securities Limited is committed to maintaining transparency in all matters related to the penal charges and adhering to the principles outlined by the RBI to avoid any form of discrimination or undue penalty imposition.

9. Customer Support:

Any borrower who has concerns or queries regarding the application of penal charges or feels that they have been wrongly charged will be encouraged to contact our Customer Support Team for clarification and resolution.

This Penal Charges Policy is effective from 03.04.2026 and will remain applicable until further amendments or revisions are made in compliance with any changes to RBI regulations or other relevant guidelines.

Approved by:
Board of Directors
Samapti Securities Limited
Date: 03.04.2026

SAMAPTI SECURITIES LIMITED