

MORATORIUM PERIOD POLICY (Version 1.1)

In light of the recent development in the global scenario, where we are witnessing shutdown on account of crisis triggered by Corona Virus (Covid-19) pandemic, Satin Finserv Limited ("SFL" or "the Company") has assessed the situation and the likely impact on its collection/recovery.

On March 27, 2020, the Reserve Bank of India announced various measures including moratorium on EMI payment for term loans/ deferment of interest in working capital facilities (RBI Notification Reference No.: RBI/2019-20/ 186 DOR.No.BP.BC.47/21.04.048/2019-20 "COVID-19 – Regulatory Package" dated March 27, 2020). Further vide RBI guidelines RBI/2019-20/244 DOR.No.BP.BC.71/21.04.048/2019-20 dated May 23, 2020, RBI has permitted to extend the moratorium period by further 3 months.

Moratorium for the Borrowings

As per the RBI guidelines lenders (as stated above) are permitted to grant a moratorium of three months on payment of all instalments falling due between March 1, 2020 and August 31, 2020. The repayment schedule for such loans as also the residual tenor, will be shifted across the board by six months after the moratorium period. Interest shall continue to accrue on the outstanding portion of the term loans during the moratorium period.

Hence post moratorium the repayment schedule will be shifted by 6 months for each installment during the tenure of the loan and accordingly the tenure will increase by 6 months.

Company plans to approach all our lenders to avail the moratorium. For the initial 6 month of moratorium, where in no instalment is required to be paid, Interest will be accrued by the lenders. Company has taken a view that we will continue to pay the interest during the moratorium period.

The repayment schedule will be as follows after the availment of the moratorium: -

Original Repaymen t Schedule Month	Apr-20	May-20	Jun-20	Jul- 20	Aug-20	Sep-20	Oct-20	Nov- 20	Dec- 20
Revised Repaymen t Schedule	Only Interest to be served					Apr 20	May-20	June- 20	July 20

Following are the RBI Guidelines with respect to the moratorium

1. Moratorium

- Lender can give the maximum moratorium up to 31st August 2020 as permitted in the RBI Guidelines (as amended from time to time) for all loans. The repayment schedule for such loans as also the residual tenor, can be shifted across the board by three months after the moratorium period. To explain, repayment falling due in Mar 2020 will be due/collected in September 2020, repayment falling due in Apr 2020 will be due/collected in October, 2020 and repayment falling due in May 2020 will be due/collected in Nov 2020.
- Lender can collect repayment from the customer who wants to repay as per original schedule to avoid accrued interest for the moratorium period. Lender should not collect any repayment through one-to-one during the lockdown period –Such customers have to pay digitally.

Lender to also give moratorium to loan which was delinquent as on p:/1st Mar 2020.

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2. Accrued interest

- Lender may accrue interest on the outstanding portion of the loan during the moratorium period.
- Lender to calculate accrued interest for the moratorium period at the interest rate agreed in the original agreement of the loan.
- Lender can collect absolute amount of interest accrued in the moratorium period upfront or proportionately over the residual tenor (with increased installments) or towards the last/additional installment with or/after loan closure. It should be reported as due when it is due.

In view of the above said guidelines and requirement and taking the cognizance of the current situation, SFL with the motto of Customer First policy, proposes to allow its needy customers who are facing temporary financial difficulties to plan their finances better and avail moratorium of three months on repayment of their instalments falling due between March 01, 2020 to August 31, 2020 for all its borrowing and. This moratorium will enable the borrowers to balance the economic fallout from Covid-19. This will be applicable for the wholesale as well as retail borrowers of SFL.

Reserve Bank of India, vide its circular dated 27-03-2020 and has permitted various lending institutions to grant a moratorium of three months on payment of all instalments falling due between March 1, 2020 and May 31, 2020. Further, vide a circular dated May 23, 2020 permitted to extend the Moratorium period till August 31, 2020. And the policy with respect to said extension was also noted and approved by the Board in the meeting held on June 03, 2020.

- i) Credit Head & CFO (Authorized Officials) are authorized to take a decision on deferment of repayment of principal / interest on company's borrowings based on prevailing situation.
- ii) As far as SFL's borrowers are concerned, Customers who want to continue with the original schedule of installments will be allowed to continue with the option after a request from them.
- iii) As far as SFL's borrowers who want to exercise the moratorium, Credit Head, and CEO (Authorized Officials) are authorized to take operational decision on the moratorium.
- iv) Based on the geography/segment or any other pertinent factor Authorized Officials may decide to propose or defer all the interest/principal payments due from 01st March 2020 to 31st August 2020, subject to the consent of the borrowers. Hence, it is proposed to grant a moratorium of three months on payment of all instalments falling due between March 1, 2020 and August 31, 2020. The repayment schedule for such loans as also the residual tenor, will be shifted across the board by three months after the moratorium period. Interest shall continue to accrue on the outstanding portion of the term loans during the moratorium period. However, many borrowers have already paid installments in the month of March 2020. Such borrowers shall be granted deferment for period starting the date of last instalment payment in the month of March, 2020 up to 31st August, 2020, subject to the consent of the borrowers.
- v) No penalty shall be charged for deferred installment for both fresh loan disbursements and for existing loan repayments during this period. Rate of Interest accrued during moratorium will be same as per rate charged on term loan.
- vi) Overdue interest will not be levied only for the EMI due during the moratorium period. This relaxation is applicable for the moratorium operating period only.

- vii) In case any borrower does not want deferment of installment, he / she will have to communicate the same to the Company. Non- communication or delayed communication shall be treated by default as acceptance of deferment by that particular borrower(s).
- viii) The rescheduling of payments, including interest, will not qualify as a default for the purposes of supervisory reporting and reporting to Credit Information Companies (CICs) by SFL.
- ix) The existing instalments falling due up to 29th February 2020 will have to be paid as early as possible and penalty will be levied on any defaults of such installments as per existing guidelines.
- While our recovery and Branch staff shall make all possible efforts for recovering the overdue in time, they have to adopt softer approach (wherever required) in view of the prevalent conditions.
- xi) Authorized Officials are authorized by the Board to approve any operational procedures/guidelines as may be required to implement the policy and make any changes to the policy in line with the directions/guidelines issued by RBI from time to time.
- xii) The decision on the deferment of installment shall be applicable to all loans irrespective of loan asset classification. However, such deferment will not be applicable in case voluntary payment/prepayment by borrowers voluntarily.
- xiii) The Authorized Officials are authorized to approve any operational procedures/guidelines as may be required to implement the policy and make any changes to the policy only in line with the directions/guidelines issued by RBI from time to time.
- xiv) This policy will come into force with effect from 28th March 2020 and remain effective till August 31, 2020.