

**SCHEDULE OF CHARGES POLICY
OF
FLAT WHITE CAPITAL PRIVATE LIMITED**

SUMMARY OF POLICY:

Policy Name	SCHEDULE OF CHARGES POLICY
Date of Approval of First Version	17-12-2025
Periodicity of Review	Annual
Prepared By	Prakhar Khandelwal
Approver	Board of Directors

Date of Review	Date of Next Review	Comments/Remarks/Changes
17-12-2025	On or before Dec-2026	Policy Approved

SCHEDULE OF CHARGES POLICY

1. PURPOSE

The Schedule of Charges Policy (“Policy”) defines the various fees, charges, and levies applicable to lending products offered by Flat White Capital Private Limited (FWCPL), a Non-Banking Financial Company (NBFC).

The objective is to ensure:

- Transparency and fairness in levying charges
 - Uniform disclosure of all fees to customers
 - Compliance with RBI regulations on customer protection
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2. REGULATORY FRAMEWORK

This Policy is framed in accordance with:

- RBI Master Direction – NBFC – Scale Based Regulation (SBR) Directions, 2023
 - RBI Fair Practices Code for NBFCs
 - RBI Circular DOR.CRE.REC.66/21.07.001/2022-23 dated September 2, 2022 (Digital Lending Guidelines)
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3. PRINCIPLES GOVERNING CHARGES

- All charges shall be reasonable, non-discriminatory, and transparent
 - No hidden or undisclosed charges shall be levied
 - Penal charges shall be non-compounding and not linked to interest rate
 - Charges shall be disclosed upfront in the Loan Agreement and Key Fact Statement (KFS)
 - Any change in charges shall be prospective only
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4. APPLICABILITY

This Policy applies to:

- All new and existing borrowers

- All lending products including gold loans, and unsecured/personal loans

5. SCHEDULE OF CHARGES (INDICATIVE)

5.1 Loan Processing Charges

Particulars	Charges
Processing Fee	Up to 1%+GST of loan amount
Documentation Charges	Nil
Valuation Charges (Gold Loan)	Nil
GST	As per applicable law

5.2 Interest-Related Charges

Particulars	Charges
Interest Rate	As per sanctioned terms
Interest Servicing	Monthly / Quarterly / At maturity

5.3 Penal Charges (Non-Compounding)

Event	Penal Charges
Delay in payment / EMI	2% p.m. on overdue amount

Penal charges shall be levied only on overdue amounts, shall not be capitalized, and shall not form part of interest.

5.4 Foreclosure / Prepayment Charges

Scenario	Charge
Loan tenure =12 months, closed within 6 months of disbursal	2%+GST

5.6 Documentation & Service Charges

Service	Charges
Statement of Account	Nil (digital)
Physical Statement (on request)	Nil (One time in loan tenure)
NOC / Loan Closure Certificate	Nil

5.7 Legal, Recovery & Auction Charges (Gold Loans)

Particulars	Charges
Legal / Recovery Charges	At actuals
Auction Notice / Publication	At actuals
Storage / Insurance of Gold	At actuals

6. STATUTORY LEVIES

- GST and other statutory taxes shall be charged as per prevailing laws
- Stamp duty shall be borne by the borrower as applicable

7. DISCLOSURE & COMMUNICATION

- Schedule of Charges shall be published on the FWCPL's website
- Charges shall be disclosed in:
 - Loan Agreement
 - Key Fact Statement (KFS)
 - Sanction Letter

- Any revision shall be communicated through website updates or customer notifications
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8. CHANGES IN CHARGES

- Any revision in charges shall be approved by the Board or authorized committee
 - Revised charges shall apply only prospectively
 - Adequate notice shall be provided to borrowers
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9. GOVERNANCE & REVIEW

- The Board of Directors shall have oversight over this Policy
 - The Policy shall be reviewed at least annually or earlier if required
 - Any deviation shall be reported to the Board
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10. ANNEXURE – PRODUCT-WISE SCHEDULE OF CHARGES

Gold Loan

Gold Loan	
Charge Type	Applicable Charges
Processing Fee	Up to 1.0%+GST
Penal Charges	2% p.m.