



ADANI CAPITAL PRIVATE LIMITED

POLICY ON DETERMINING INTEREST RATES

The Reserve Bank of India (RBI) vide notification no. DNBS. 204/CGM (ASR)-2009 dated January 2, 2009 and the Master Circular on Fair Practise Code dated July 1, 2015 has directed all NBFCs to make available the rates of interest and approach for gradation of risk on website of the NBFCs.

The Board hereby formulates and adopts the following policy:

- 1) The interest rate charged to the borrower shall be based on the following factors:
 - Tenor of the Loan
 - Internal and external cost of funds
 - Treasury bill rates and the sovereign yield curve
 - Spreads between the sovereign and the AAA corporate bonds
 - Prevailing PLR of major commercial banks
 - Risk profile of the borrower
 - Market scenario relating to credit risk premia / default premia including CDS spreads
 - Internal Cost of doing business
 - Interest rate offered by other NBFCs
 - Other factors that may be relevant in each case.

- 2) The risk profile of the borrower shall be evaluated on the following factors
 - Nature of industry
 - Profitability track record of the company / group for past three years
 - Profitability Projections during the tenure of the Adani loan
 - Security cover available
 - Profile and market reputation of the borrower / promoter / principal shareholder
 - Defaults on other lenders & manner in which the company / group has dealt with the same
 - Background of the promoter / principal shareholder
 - Other factors that may be relevant in each case.

The rate of interest for same product and tenure availed during the same period by separate customers could vary within a range depending on factors mentioned above.

- 3) The Investment Committee shall determine the interest rates chargeable to the borrower after assessment of the above factors. The range for the interest rates shall be between 12% to 24% p.a.

- 4) In addition to normal interest, the Company may levy penal interest / default interest, processing charges, foreclosure charges, commitment fees, etc. The details of such additional interest and charges will be mentioned in the loan documents.



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- 5) The Investment Committee shall ensure that the borrower is advised of the policy prior to the disbursement.

- 6) This policy shall be subject to review from time to time.