

Corporate Office: A9, Sector 3, Noida - 201301, U.P, India
Registered Office: CP-3, Sector-8, IMT Manesar,
Gurgaon, Haryana-122051
Tel: +91 120 3667180
CIN: U65923HR2008PTC046947

VAMA SUNDARI INVESTMENTS(DELHI) PRIVATE LIMITED

DEBT RECOVERY POLICY :

(Approved at the Board Meeting held on 7TH July, 2021, 20th March, 2023, 18th March, 2024 and reviewed on 31st March, 2025)

The Company is promoter of HCL group Companies, which are mainly engaged in Information Technologies (IT) & IT enabled services (ITES), IT Infrastructure and Healthcare Services. The Company, being an Investment & financing company, is engaged in the business of investment activities/holding and financing the business operations of the HCL group companies, which are directly or indirectly either controlled or significantly influenced by the Company.

The company is a registered Core Investment Company ('CIC-ND-SI') as per the provision of the Reserve Bank of India Act, 1934 and is registered with RBI as a CIC-ND-SI vide certificate of registration No. N-14.03494 dated June 14, 2019.

The Company extends loan to group Companies, group philanthropic and educational entities for supporting to pursue various projects/initiatives undertaken by them.

The Company may extend loan to Companies/Entities outside the group as an exceptional case, and it will be granted with the specific approval of the Board of Directors of the company based on credentials of the borrower and viability of projects being undertaken by them.

The Ministry of Finance has, *vide* notification dated 24.02.2020 specified that non- banking financial companies (NBFCs), having assets worth Rs. 100 crore and above, shall be entitled for enforcement of security interest in secured debts of Rs. 50 lakhs and above, as financial institutions for the purposes of the said Act. The loan limit for debt recovery of NBFCs has been reduced to Rs 20 Lakhs.

The Company will have the right to proceed under SARFAESI if:

- The debt (including principal and interest) amounts to Rs. 50 lakhs or more; **and**
- The debt is secured by way of security interest

The debt collection / recovery policy of Vama Sundari Investments(Delhi) Private Limited("Vama Delhi") is for loans extended to entities outside the group. The collection policy will not affect the rights of Customer against the Company, including the right of the Customer to obtain redress as applicable under various licensing conditions, rules, regulations, directions and orders etc.

The payment against Company loans has a stipulated due date, which is appended on monthly bills & will be decided by the Company taking into account periodicity of billing and usage by Customer. All the practices adopted by the Company for follow up and recovery of dues and repossession of Company assets will be in due consonance with all applicable laws and regulations. The essence of Company's policies / procedure for collection & recovery of dues are reproduced below

The Company will send detailed monthly bill to Customer on predefined bill date (bill cycle). Such bill shall include details of all charges, due date of the payment, delay

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payment charges, reference information about appended collection / recovery policy & billing dispute resolution mechanism of the Company.

LOANS AND ADVANCES

- A. Before offering any kind of fund based or non fund based non-banking facility the Company will assess the ability of the customer (prospective borrower) to repay.
- B. Loan application forms of Vama Delhi will include necessary information which are likely to affect the interests of the prospective borrower, so that a meaningful comparison with the terms and conditions offered by other Non Banking Finance Companies can be made and an informed decision taken by the prospective borrower. The loan application form shall indicate the documents required to be submitted along with the application form. The format of Sample loan application form is given in the Policy on Demand/Call Loan of the Company.
- C. The borrower shall be given information regarding interest rates, terms & conditions for loan, other charges and such other information which may affect the interests of the borrower in a clear and precise manner.
- D. The penal interest charged for late repayment should be highlighted in bold in the loan agreement.
- E. Vama Delhi shall convey in writing to the prospective borrower the fate of the loan application by means of sanction letter or otherwise The sample sanction memorandum/ advice is given in the Policy on Demand/ Call Loans. In the case of sanction of loan, the sanction letter shall contain the amount sanctioned, annualized rate of interest at which loan is sanctioned, mode & time at which the interest will be charged (whether monthly or quarterly) and other terms and conditions applicable to loan. Vama Delhi shall keep the record of acceptance of these terms and conditions by the Borrower.
- F. In terms of Master Direction-Non Banking Financial Company-Non Systematically Important Non-Deposit taking Company (Reserve Bank) Directions, 2016 dated September 1, 2016 Vama Delhi shall not charge foreclosure charges/pre-payment penalties on all floating rate term loans sanctioned to individual borrowers.
- G. A copy of the loan agreement along with all the annexures referred in the Loan agreement should be sent to the Borrower at the time of sanction/disbursement of loan.
- H. Vama Delhi shall inform customer/borrower about any changes made in the terms and conditions like disbursement schedule, interest rates, service charges, prepayment

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charges etc applicable to the loan. Vama Delhi shall ensure that such changes shall be effected prospectively. The Loan Agreement shall contain a specific clause to this effect.

- I. In case of shortfall in security given which may require borrower to give additional security or due to some other reason loan needs to be recalled or payment needs to be done earlier than schedule, same shall be communicated to borrower.
- J. In case borrower has any difficulty after loan is disbursed, same would be given consideration and Vama Delhi shall sort it out on priority basis.
- K. The Company shall release all securities on repayment of all dues or on realization of the outstanding amount of loan (unless otherwise directed by the client, in writing, to retain the same with the company for future transactions) subject to any legitimate right or lien or dues for any other which Vama Delhi may have against the Borrower. If such right of set off is to be exercised, then Vama Delhi shall give a notice to the Borrower with full particulars of the remaining claims and the conditions under which NBFCs are entitled to retain the securities until the relevant claim is settled/paid
- L. Post disbursement supervision would be constructive.
- M. The decision of Vama Delhi to recall / accelerate payment or performance shall be in consonance with the terms of the loan agreement. Vama Delhi shall release all securities upon repayment of all dues or on realization of the outstanding amount of loan subject to any legitimate right or lien for any other claim it may have against borrower. The borrower shall be given due notice with full particulars about the outstanding claims in case such right of set off is to be exercised.
- N. Vama Delhi shall not interfere in the affairs of the borrower except for the purposes provided for in the terms and conditions of sanction of the loan, (unless new information, not earlier disclosed by the Borrower, has come to the notice of the Company).
- O. In the matter of recovery of loans:
 - a) The Company shall resort only to remedies which are legally and legitimately available to it and will avoid using recovery measures during odd hours of the day.
 - b) Company's collection policy shall be built on courtesy, fair treatment and persuasion. Efforts will be made in building customer confidence and long term relationship.

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- c) The staff deputed to make recovery calls shall identify themselves and shall provide details with regard to outstanding claims to the customer.
- d) The Company shall give appropriate training to all of staff on the manner in which they have to deal with the customers.

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