



ECLF – Interest Rate Model

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Document Name	Policy for determining Interest Rates and Processing and Other Charges
Document Owner	Resource Team
Security Classification	Internal
Location	Applicable to all ECLF locations
Approver	Risk Working Group
Version control	V3.0

Version	Modification Date	Brief description
V1	November 22, 2007	Adoption of Policy
V2	October 27, 2021	Review of Policy
V3	January 24, 2023	Review of Policy

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1. INTRODUCTION

1.1 BACKGROUND

Reserve Bank of India (RBI) had vide its Circular DNBS / PD / CC No. 95/ 03.05.002/ 2006-07 dated May 24, 2007 and other subsequent communications advised the Boards of Non-Banking Finance Companies (NBFC's) to lay out appropriate internal principles and procedures on determining interest rates, processing and other charges.

PLR (Prime Lending Rate) is the internal benchmark rate used for setting up the interest rate on floating rate loans sanctioned by Non-Banking Financial Companies (NBFC)

2. DEFINITION

2.1 PRIME LENDING RATE

- a. The PLR comprises of the following components: -
 - Funding Cost
 - Cost of Borrowings - It is the cost of raising funds from external sources
 - Debt to Equity Ratio – It is the ratio of Borrowings to Equity
- b. Liquidity Cost – It is the cost of maintaining surplus liquidity on balance sheet
- c. Credit Risk – It is the cost of risk which the business carries on account of the credit worthiness of the borrowers
- d. Opex – It is the operational cost associated with the products
- e. Spread – It is the spread applicable to different products including customer and product specific margin and profitability expectations

3. DESCRIPTION

3.1 PROCESS FOR CALCULATING

- a. Funding Cost is calculated by applying D/E ratio to Cost of equity and Borrowings Cost.
 1. The D/E ratio calculated will be applicable to each business on the basis of repayment tenor and the funding mix. The D/E ratio shall be the same for all businesses of the entity. It will be finalised at the first ALM Working Group Meeting of the financial year on the basis of the financials of previous year.
 2. Borrowing Cost will be the average cost of raising funds through various external sources. This would include coupon rate of the instrument and other financing costs of raising funds such as placement fees and processing fees. This shall be shared and proposed / updated by the Resources Team on a quarterly basis.
 3. Funding Cost shall thus be computed as follows:-

$$\text{Cost of Borrowings*} = \frac{\text{Debt}}{\text{Debt+Equity}}$$

- b. Liquidity Cost – This would be calculated by dividing the net liquidity cost by the average borrowings of the previous quarter. Net liquidity cost will be calculated by subtracting Returns earned from Cost of borrowings. This shall be calculated and proposed / updated by the Resources Team on a quarterly basis.
- c. Credit Risk – It shall be calculated on the basis of professional qualification, stability in earnings and employment, financial positions, past repayment track record, external ratings of customers, credit reports, customer relationship, and future business potentials. This shall be calculated and proposed by the Risk Team annually.

- d. Opex – Opex % shall be computed on Average AUM. The variables costs and relevant fixed costs attributable to the products shall be considered in the operating expenses. The aggregate operating expenses shall be split across product groups as per internal allocation metric. Internal estimation logics for opex can be used to factor in normalized /steady state values where there are periods/instances of investments or significant idle capacity (e.g. COVID). This shall be updated annually by the business and operations team
- e. Spread - It shall be based on the RoE expectations, product margin, customer cohort risk premium and the business environment. It shall be updated quarterly by the business team

3.2 OVERALL REVIEW MECHANISM

Interest rates would be offered to customers on fixed, floating and variable basis. PLR (Prime Lending Rate) is the internal benchmark rate used for setting up the interest rate on floating rate loans sanctioned by the company. The PLRs would be discussed at the quarterly ALM Working Group or whenever scheduled and modified taking into consideration change in any of the component(s). Basis the deliberation at the ALM Working Group on the change in the PLR and its impact on existing and new customers, a final proposal would be made to the ALCO committee for approval to pass on the changes to the existing or new customers.

The PLR rate offered to customers would be changed in a step-up manner on a movement of more than 10 bps. If the change is less than 10 bps, the PLR would be kept unchanged. The PLR would be reset as and when there is change in the PLR which shall be approved by ALCO and as per the terms and conditions mentioned in the customer loan agreement.

Additionally, in case of any extraordinary event or any interim rate change by RBI in between two ALCO meetings, to authorize ALM Working Group Committee to approve change in PLR up to 100 bps and this change shall be ratified at the subsequent ALCO Meeting.

In case of any extraordinary event, the ALM Working Group members shall call a meeting to discuss and review the PLR. The Resources Team will initiate the parameters updation with inputs from various teams and calculate the PLR. The updated PLR shall be presented to the ALM Working Group. The ALM Working Group will deliberate and take the final decision on PLR, within its authority. In case the decision is higher than the authorized limit then a special ALCO meeting shall be called for decision

The ALM Working Group in consultation with business can recommend reducing the customer margins for a cohort in line with fair practice codes, whenever we are able to identify cohorts that are exhibiting good credit behaviour for customer retention.

The frequency of reviewing and the team responsible for each of the components will be as follows:

S.N.	Particulars	Frequency of Review	Team Responsible
A	Funding Cost	Quarterly	Resources
1	Borrowing Cost	Quarterly	Resources
2	Debt to Equity Ratio	Annually	Resources
B	Liquidity Cost	Quarterly	Resources
C	Credit risk	Annually	Risk
D	Opex	Annually	Business
E	Spread	Quarterly	Business

Note: The review frequency stated above is the outer limit; especially for annual items, reviews may happen earlier, in case there is a significant change in any of the above components.

Products:-

1. SME Business Loans (Fixed Rate Product)
2. SME Secured Loans
3. Loan Against Property
 - This PLR is linked with the following products:
 - Loan Against Property (LAP)
 - Small Ticket Loan against Property (STLAP)
 - Construction Financing (CF)

3.3 OTHER CHARGES AND FEATURES

1. Besides normal interest, the Company may levy additional interest for adhoc facilities, penal interest for any delay or default in making payments of any dues. The levy or waiver of these additional or penal interests for different products or facilities would be decided within the limits prescribed under the policy.
2. Besides interest, other financial charges like processing fees, cheque bouncing charges, conversion fees, pre-payment / foreclosure charges, part disbursement charges, cheque swap charges, charges for issue of statement account etc., would be levied by the Company wherever considered necessary. Besides these charges, stamp duty, GST and other cess would be collected at applicable rates from time to time. Any revision in these charges would be implemented prospective basis with due communication to customers. A suitable condition in this regard forms incorporated in the loan agreement.
3. The Company shall disclose the rate of interest and the approach for gradations of risk and rationale for charging different rate of interest to different categories of borrowers in the application form and communicate explicitly in the sanction letter.
4. Annualized rate of interest would be intimated to the customer and the Company shall mention the penal interest in bold in the loan agreement.
5. Interest rates would be intimated to the customers at the time of sanction / availing of the loan and the EMI apportionments towards interest and principal dues would be made available to the customer. Interest shall be deemed payable immediately on due date as communicated and no grace period for payment of interest is allowed.
6. Changes in the interest rates, as and when made, would always be with prospective effect. Such changes in interest rates or in any other charges on the borrowers would be communicated by a mode/ manner as may be deemed fit by the Management and would also be communicated to them through various modes communication such as website updation, email, letters, SMS, etc.

4. ANNEXURES

4.1 LOAN AGAINST PROPERTY

These are the loans which are sanctioned keeping an asset as mortgage with the lender. This asset can either be an owned land, a house, or any other commercial premises. The asset remains as collateral with the lender until the entire loan against property amount is repaid.

Customer can use these loans for business purposes like purchasing machinery, buying raw materials, purchasing equipment, funding of working capital, debt consolidation, etc. These types of loan can also cater to personal requirements like wedding, higher education, home renovation, buying a new home, managing medical expenses, etc. Customer can be an alternative availed unsecured personal loan as it also has no end-use restriction. However, the cost of borrowings is much higher and repayment tenor are short, compared to LAP loan, where interest rate charged are much lower and loan amount can be much higher with higher repayment tenor.

Parameter	Normal Income	Banking Program	Gross Margin Program	Higher FOIR Programs
Maximum Loan Amount	Rs 2500 lacs	Rs 400 lac	Rs 300 lacs	
Maximum Loan Tenure	20 yrs	15 yrs		
Business Vintage	5 Years			
FOIR	80%	NA	60%	150%
LTV	Residential – 70% Commercial – 65%		Residential – 65% Commercial – 60%	
Banking to TO ratio	Minimum 80% of previous year TO	- 60% TO reflection - Max 90% utilization in OD/CC	NA	NA
Financial Norms	- D/E: Not to exceed 4:1 - Current Ratio: Min 1x - Working Capital Cycle: Debtor + Inventory days not to exceed 180 - Positive net worth - Not more than 15% drop in TO/CP	- Drop in turnover / cash profit permissible upto 15% - 2-3 Cr Exposure – No Income Elig norm - 3-4 Cr - Loan amount capping at 3x of Normal Income	D/E: Not to exceed 4:1 - Current Ratio: Min 1x - Working Capital Cycle: Debtor + Inventory days not to exceed 180 - Positive net worth - Not more than 15% drop in TO/CP	<ul style="list-style-type: none"> • No adverse trend - TO (PY vs CY) • No drop in cash profit in (PY Vs CY). • Cash profit includes PAT, Depreciation, Interest and remuneration to partners, directors • To be offered only to non- caution/non negative/non targeted profiles
CIBIL	No Cibil score Cut- Off			750

❖ Risk Grading Summary

Customers are graded under the similar risk grade. However, they are differentiated basis Loan amount, FOIR, LTV and Bureau score, basis the program under which they are on-boarded.

Customer acquired under Income program are considered in lowest risk segment, considering we have full view on the customer financial health, basis declaration on the financial by customer, hence highest exposure is proposed under this program with relaxed bureau norms.

Customers acquired under Banking program are capped on the loan amount, considering we do not have full view on the financials. However, TO is derived basis banking transactions and OD/CC utilization, which acts as a surrogate of income, hence exposure has been capped.

Customers acquired under Gross Margin program are under medium risk segment, since customers financial health is checked basis the margin declared by the customer. We have capped the exposure, FOIR and LTV under this program

Higher FOIR program can be classified as highest risk segment, since customer are given higher loan amount than his financials support. To mitigate the risk, we have capped the exposure amount, LTV and Bureau score with financial caveats like no drop in TO and Cash profit.

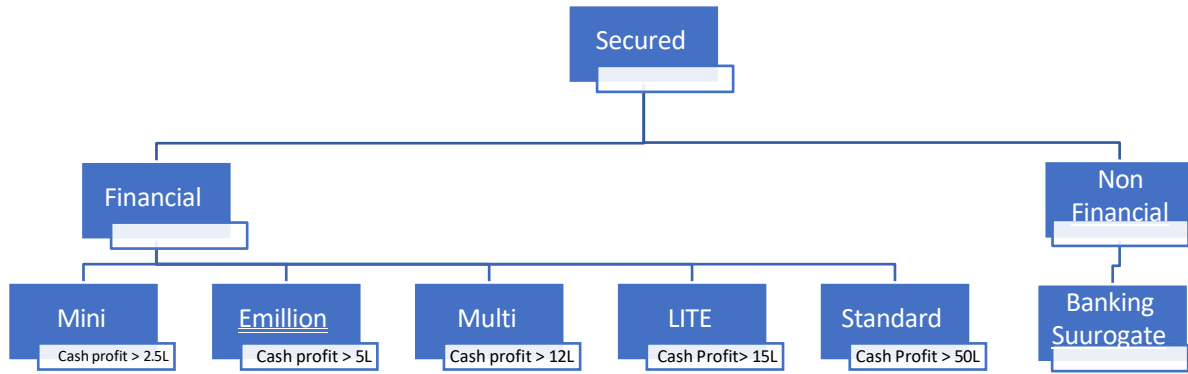
Risk Grading (High to Low)	Program Based
1	Higher FOIR
2	Gross Margin
3	Banking program
4	Normal Income

4.2 SECURED LOANS

These are the loans given against the asset mortgaged with the lender. This asset can either be residential property, commercial property, land or industrial property. The asset remains as collateral with the lender until the entire loan against property amount is repaid.

Customer can use these loans for business purposes like purchase of commercial/industrial property, business expansion, working capital etc.

Risk assessment under this product can be done basis traditional financial data and through surrogate programs. Broad classification done for secured loans is provided below:-



Our risk approach has been to segment the customers, basis few parameters to have relatively better homogenous customer segment rather than same risk score model for all SMEs of different sizes. Then we use risk model within each customer segment to weed out cases which don't meet risk criteria.

Following parameters are used to segment the customers :-

- Unaudited financials/Audited financials
- Cash profit
- Business Vintage/Experience
- Turnover/Networth
- Debt obligation to banking credit/DSCR
- Profitability track record

Table is provided below for easy reference :-

Parameter	Mini Million	Emillion	Multi - million	LITE	Standard
Maximum Loan Amount	Rs 30 lacs	Rs 60 lacs	Rs 100 lacs	500 lacs	25 Cr
Maximum Loan Tenure	8 years	8 years	8 years	10 yrs	10 yrs
Business Vintage	3 Years	3 Years	3 Years	3 Years	5 Years
Turnover/Networth	TO :- 25L to 2 Cr	TO :- 1 Cr min	TO : 3 Cr min	N/w :- Rs.50 Lacs min	N/w :- Rs.100 Lacs min
Cash Profit (min)	Rs 2.5 lacs.	Rs 5 lacs.	Rs 12 lacs.	Rs.15 Lacs	Rs.50 Lacs
Profitability track record	Profitable for last 2 years	Profitable for last 2 years	Profitable for last 2 years	Profitable for last 2 years	Profitable for last 3 years
Unaudited Financials & Income Tax Paid	Audited/ Unaudited basis tax rule IT paid > 0 in Prev FY	Audited Financials. IT paid > 0 in prev FY	Financials should be Audited.	Audited financials	Audited financials
Debt Obligations/ Avg Bank Credit (%)	Maximum – 20%	Maximum – 20%	Maximum 20%	NA	NA
DSCR				1x	1x

There are few other sub products where underwriting is not based on than traditional financial statement. These are aimed to cater to the customers in informal sector wherein more relevant information may be captured through GST, banking etc Currently there is only one such products being offered :-

- **Secured banking surrogate**

These sub products are not comparable to earlier sub products given underwriting is based on different source of data. These are the new initiatives being taken by business to cater to needs of different customer segment.

Risk Grading Summary

Risk Grading (High to Low)	Financial based	Non Financial
1	Mini	Banking Surrogate
2	Emillion	
3	Multi	
4	LITE	
5	Standard	