



**INTEREST RATE POLICY
OF
PAYU FINANCE INDIA PRIVATE LIMITED**

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Authority	Details
Scope	This Interest Rate Policy aims to establish and adopt an interest rate model and describes the mechanism adopted by PayU Finance India Private Limited in determining interest rates, processing and other charges levied.
Drafted by	Business and Product function
Approved by	Board of Directors

Version History

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DEFINITIONS AND INTERPRETATION

1 Definitions

- 1.1 “Applicable Laws”** means all applicable laws, statutes, enactments, acts of central or state legislature, ordinances, rules, regulations, notifications, guidelines, directions, directives, policies, circulars, decisions and any other pronouncements issued in accordance with the Companies Act, the RBI SBR Master Directions, regulatory instructions or any other law applicable to the jurisdiction of India by any central, state, local, or other governmental, administrative or regulatory authority exercising executive, legislative, judicial, regulatory or administrative functions.
- 1.2 “Board”** means the board of directors of PayU Finance.
- 1.3 “Companies Act”** means the Companies Act, 2013, and rules and regulations issued thereunder, as amended from time to time.
- 1.4 “Credit Policy”** means the credit policy of PayU Finance, as amended from time to time.
- 1.5 “Fair Practices Code”** means the fair practice code of PayU Finance, as amended from time to time.
- 1.6 “Interest Rate Policy”** means this Interest Rate Policy as approved and adopted by the Board.
- 1.7 “NBFC”** means a non-banking financial company.
- 1.8 “NBFC-ML”** means a middle layer non-banking finance company as classified under the RBI SBR Master Directions.
- 1.9 “PayU Finance”** means PayU Finance India Private Limited, a company incorporated under the Companies Act, 1956.
- 1.10 “RBI”** means the Reserve Bank of India.
- 1.11 “RBI Act”** means the Reserve Bank of India Act, 1934, as amended from time to time.
- 1.12 “RBI SBR Master Directions”** means the Master Direction - Reserve Bank of India (Non-Banking Financial Company - Scale Based Regulation) Directions, 2023 issued by the RBI dated 19 October 2023, bearing reference number DoR.FIN.REC.No.45/03.10.119/2023-24, as amended from time to time.
- 1.13 “Risk Management Committee”** means the risk management committee of PayU Finance.

2 Interpretation

Unless defined expressly herein, all capitalised terms used in this Interest Rate Policy shall have the meanings assigned to them under the Companies Act, RBI SBR Master Directions, RBI Act, any notification, guideline and/or circular issued by the RBI from time

to time and/or any other relevant policy or business document of PayU Finance (as the case may be).

INTRODUCTION

3 BACKGROUND

- 3.1** PayU Finance operates as a non-deposit taking non-banking financial company and has been categorised as NBFC-ML in terms of the RBI SBR Master Directions. It is engaged inter alia in the business of providing application-based unsecured lending which comprises of loan products such as personal loans, consumer loans, transactional credit, business loans, apart from providing certain technology related services, financial services or a combination of both.
- 3.2** PayU Finance is also exploring opportunities to venture into the secured lending segment. As part of this initiative, PayU Finance has begun acquiring loans through direct assignment agreements with other financial institutions, which are secured by mortgage of properties or by hypothecation of assets of the Borrower or other obligors.
- 3.3** The RBI SBR Master Directions require the board of directors of a NBFC-ML to lay out appropriate internal principles and procedures to determine the interest rates, processing and other charges levied by the NBFC-ML and adopt an interest rate model in this regard.¹
- 3.4** The interest rate model has to take into account various relevant factors such as cost of funds, margin and risk premium for determining the rate of interest to be charged for loans and advances offered by the NBFC-ML.²
- 3.5** In view of the above, the Board has approved and adopted this document as the interest rate policy of PayU Finance.

4 OBJECTIVES

Objectives of this Interest Rate Policy are to:

- 4.1** set out a framework describing the interest rate model adopted by PayU Finance;
- 4.2** provide its borrowers an overview of the method and factors used for calculating the interest rates charged on various lending models of PayU Finance; and
- 4.3** adopt a uniform and consistent approach for determining the interest rates charged to different types of borrowers.

5 OVERVIEW

The Interest Rate Policy is divided into the following parts:

- 5.1 Part 1 (Lending Model)** provides a brief description of the type of lending activities undertaken by PayU Finance from time to time;

¹ Paragraph 45.11.1 and 45.12 of the RBI SBR Master Directions.

² Paragraph 45.11 of the RBI SBR Master Directions.

- 5.2 Part 2 (Interest Rate Model)** sets out the guidelines for determining interest rates charged by PayU Finance in accordance with its lending model; and
- 5.3 Part 3 (Review and Oversight)** describes the procedural aspects for implementing the Interest Rate Policy (such as the manner and periodicity in which the interest rate model is reviewed and amended by PayU Finance).

PART 1 LENDING MODEL

6 BUSINESS SEGMENTS

- 6.1** PayU Finance primarily engages into application-based lending which comprises of loan products such as personal loans, consumer loans, transactional credit, and business loans. The category of borrowers to whom such loans are offered include consumers, individuals and merchants. Further, the loans offered by PayU Finance are made available to the borrowers through: (a) PayU Finance's own digital lending applications ("DLA"), and (b) the DLAs of its affiliate companies and (c) DLAs of other partner lending service providers.

- 6.2** The digital lending business undertaken by PayU Finance usually involves granting loans and credit facilities through automated means, which amongst others, includes borrower acquisitions, loan application processing, disbursements, loan lifetime management, collection and recovery, etc., as may be permitted under applicable laws. Further, PayU Finance also undertakes above digital lending activities through a co-lending model as well.

- 6.3** Primary products offered by PayU Finance are:

6.3.1 Personal Loans (Unsecured)

PayU Finance offers unsecured personal loans of an amount upto INR 7,50,000/- with tenure of such loans being upto 60 months.

One of the variants of such personal loan is Xpress Loans which is offered by PayU Finance for fast disbursals based on leveraging past customer data.

6.3.2 Transactions Credit (Unsecured)

- 6.3.3** PayU Finance also offers a credit facility for checkout payments through its own mobile application and/or third-party mobile/ website-based applications. This credit facility is offered at: (a) selected merchants, (b) other third-party partner apps, and (c) checkout page of the selected merchants. These credit facilities are designed to provide customers with access to credit over a tenure upto 5 years with the following structured components: (i) an overall facility limit for the entire tenure, (ii) a monthly sub-limit for drawdowns, and (iii) a maximum exposure limit. Any amounts availed during a calendar month are required to be either repaid in full or converted into equated monthly instalments (EMIs), in accordance with the credit policy and as per the customer's preference, credit policy and as per customer preference, to be selected within prescribed period. The monthly sub-

limit is not cumulative; it does not carry over or renew and automatically expires at the end of the calendar month. Additionally, the overall facility limit diminishes each month proportionate to the respective monthly sub-limit.

- 6.3.4 Under these credit facilities, usually during the month/ cycle in which the drawdown occurs (that is, the first month or first cycle depending upon user type), no interest is charged to the borrower. This is because PayU Finance receives certain fees from the end merchant, which effectively offsets the interest for this period. However, beyond the first month, interest is charged at the rate specified in the facility documents accepted by the customers.

6.3.5 SMB Lending (Unsecured)

PayU Finance offers loan solutions tailored for small and medium businesses (SMBs) based on their transaction activity, bank account balances and transactions, GST filings and other behavioural characteristics. Under SMB Lending, loans upto INR 30 Lakhs are offered by PayU Finance. The tenure of such loans are upto 24 months. One of key feature of such loans is repayment flexibility which can be daily, weekly, fortnightly or monthly.

6.3.6 Secured Lending

PayU Finance is also exploring opportunities to venture into the secured lending segment. As part of this initiative, PayU Finance has begun acquiring loans through direct assignment agreements with other financial institutions, which are secured by mortgage of properties or by hypothecation of assets of the Borrower or other obligors.

- 6.4 As part of this business, PayU Finance either directly on its own or indirectly through its affiliates or third party service providers, may provide certain ancillary services relating to technology and logistics support to merchants enabling such merchants to offer short term and small value trade credits to their end-consumers by using digital platforms (including digital platforms owned by PayU Finance) and offerings.

7 CATEGORIES OF BORROWERS

The two main categories of borrowers that PayU Finance provides its services to are:

- i. Individual consumers; and
- ii. Entities such as Hindu undivided families (HUF), companies, partnership firms, limited liability partnerships, sole proprietorship, trust, societies, etc.

8 PRICING PHILOSOPHY

PayU Finance follows a risk-based pricing model in accordance with the interest rate model described in Part 2 of this Interest Rate Policy and the interest rates may vary within a range depending on the lending model and business segment of PayU Finance (i.e., type of loans and borrowers).

PART 2

INTEREST RATE MODEL

9 INTEREST RATE

- 9.1** Interest rates offered by PayU Finance can either be on a fixed basis or floating/variable basis based on the factors set out in paragraph 10 below.
- 9.2** Interest rate will be annualized rate to enable the borrower to be informed of the exact rate being levied by PayU Finance³ but may be charged by PayU Finance on a periodic basis as agreed between the borrower and PayU Finance in the relevant loan documentation.
- 9.3** Interest rates are not standardised and may vary within a range based on the type of loan, type of borrower as well as the factors set out in paragraph 10 below. An indicative schedule of interest rates being levied by PayU Finance for various types of lending products offered by PayU Finance is detailed in Annexure 1.
- 9.4** PayU Finance will not charge excessive interest rates as compared to prevailing market trends and the Risk Management Committee may specify the maximum interest rate to be levied by PayU Finance from time to time.⁴

10 FACTORS FOR CALCULATION OF INTEREST RATE

The rate of interest to be levied by PayU Finance is considered on a case-to-case basis and is evaluated taking into account various variables such as type of loan, tenor of loan, EDI and EMI loans due to interest differential, nature of security and/or collateral (where applicable), market volatility, industry trends, etc. These factors can be categorised into two broad heads:

10.1 Internal Factors

PayU Finance determines interest rates by taking into account various elements based on internal assessments, procedures, principles, methods, etc., such as the following:

- 10.1.1 Nature of lending (type and form of loan, frequency of repayment, tenor of loan, secured/unsecured, completely paperless and non-physical model);
- 10.1.2 Nature of security/collateral in relation to the loan;
- 10.1.3 Internal cost factors (including but not limited to customer acquisition cost, operational costs, overall exposure costs, administrative costs, fixed and variable costs, business costs and margins);
- 10.1.4 Risk exposure to cover credit and other risks;
- 10.1.5 Borrower risk profile based on the credit assessment undertaken by PayU Finance. Risk profile is graded basis the factors detailed in Annexure 2; and

³ Paragraph 45.11.3 of the RBI SBR Master Directions.

⁴ Paragraph 45.12 of the RBI SBR Master Directions.

10.1.6 Any other factors considered relevant by the Risk Management Committee from time to time.

10.2 External Factors

Calculation of interest rates also depends on various external factors outside the ambit of PayU Finance such as the following:

10.2.1 Market conditions and trends (such as market liquidity, interest rates prevailing in the market, regulatory and statutory changes, changes in capital requirements, credit and cyclical conditions);

10.2.2 Prevailing and anticipated industry trends such as interest rates offered by competitors;

10.2.3 Inherent credit and default risk in similar business or category of borrowers, particularly trends with sub-groups/borrower segments of the loan portfolio;

10.2.4 Cost of funds on borrowings and costs incidental to borrowing after considering average tenure, market liquidity and refinancing avenues; and

10.2.5 Any other factors considered relevant by the Risk Management Committee from time to time.

11 Other charges

In addition to interest rates, PayU Finance may levy certain additional financial charges as it may deem necessary in relation to the loan offered by PayU Finance to the borrower. An indicative schedule of charges being levied by PayU Finance for various types of lending products offered by PayU Finance is published on the website. These charges will be explicitly communicated to the borrower in writing (physically or electronically) in the manner described in detail in paragraph 12 below. The nature of these charges is as follows:

11.1 Loan related charges

Default interest, prepayment/foreclosure charges, disbursement charges, penal charges, commitment fee, exchange rate charges, credit assessment, late payment charges and/or any other charges set out in detail in the relevant loan documentation and/or explicitly informed to the borrower.

Penalty, if charged, for non-compliance of material terms and conditions of loan contract by the borrower shall be treated as 'penal charges' and shall not be levied in the form of 'penal interest' that is added to the rate of interest charged on the advances.⁵

⁵ Paragraph 45.3.1 of the RBI SBR Master Directions.

11.2 Administrative costs and charges

Charges and costs involving loan processing, service charges, processing fees, documentation charges, borrower care, registration, handling charges or and/or any other charges set out in detail in the relevant loan documentation and/or explicitly informed to the borrower.

11.3 Taxes

PayU Finance will recover all taxes, duties, stamp duty, cess levied upon the charges incurred by PayU Finance for rendering services to the borrower in accordance with the applicable rates.

12 DISCLOSURES TO BORROWER

12.1 PayU Finance will inform the borrower in writing in English language and where required under Applicable Laws and requested by the borrower, PayU Finance shall endeavour to provide in the vernacular language requested by the borrower, all relevant details in relation to the loan offered by PayU Finance including all necessary documentation to be entered into in relation to the loan (i.e., terms and conditions, loan agreements, sanction letters along with all relevant enclosures).⁶ PayU Finance will also endeavour to make terms and conditions in relation to the borrowings available on its website in vernacular languages most understood by its borrowers.

12.2 The information provided by PayU Finance in accordance with paragraph 12.1, all charges proposed to be levied by PayU Finance in accordance with this Interest Rate Policy as well as any other disclosures required to be made under Applicable Laws are set out in the loan documentation of PayU Finance.

12.3 PayU Finance shall provide a Key Facts Statement (KFS) to all prospective borrowers to help them make an informed view before executing the loan contract, as per the standardised format prescribed in the Circular on 'Key Facts Statement (KFS) for Loans & Advances' issued by the RBI dated 15 April 2024 having reference number RBI/2024-25/18 DOR.STR.REC.13/13.03.00/2024-25, as amended from time to time.⁷

12.4 Policies and Procedures

The following other policies are also relevant for the purposes of this Interest Rate Policy:

12.4.1 *Credit Policy* – The Credit Policy(ies) of PayU Finance outlines the parameters and processes for credit appraisal, approval, risk guidelines and other credit principles and procedures of PayU Finance. The Lending Model and Interest Rate Model described in this Interest Rate Policy are based on the pricing philosophies set out under the Credit Policy(ies).

12.4.2 *Fair Practices Code* – All relevant disclosures in relation to the Lending Model and Interest Rate Model of PayU Finance (including this Interest Rate Policy) are

⁶ Paragraph 45.1 of the RBI SBR Master Directions.

⁷ Paragraph 45.2.3 read with Annex XXVII of the RBI SBR Master Directions.

disclosed in the Fair Practices Code of PayU Finance in accordance with the directions of the RBI.⁸

12.5 Form of Documentation

The loan documentation of PayU Finance and all related documents (including communications sent to, or received by, the borrower) may either be in physical or electronic form.

PART 3 REVIEW AND OVERSIGHT

13 BOARD APPROVAL

The Board has reviewed, approved and adopted this document as the Interest Rate Policy of PayU Finance.

14 RISK MANAGEMENT COMMITTEE

The Risk Management Committee will oversee the implementation of this Interest Rate Policy. The Risk Management Committee will be responsible for monitoring the interest rates charged by PayU Finance as per this Interest Rate Policy and provide necessary updates and recommendations to the Board in this regard.

15 PERIODICITY OF REVIEW

This Interest Rate Policy will be reviewed by the Board and/or the Risk Management Committee on periodical basis as may be deemed appropriate by the Board and/or the Risk Management Committee to ensure compliance with any modification, amendment or supplementation to the RBI SBR Master Directions, the RBI Act and the rules made thereunder.

16 COMMUNICATION

16.1 As per the RBI SBR Master Directions, an NBFC-ML has to disclose to its borrower, the rate of interest, approach for gradations of risk and rationale for charging different interest rates to different categories of borrowers.⁹

16.2 Accordingly, PayU Finance will inform the borrower in writing (physically or electronically) about the rate of interest and other charges contemplated to be charged by PayU Finance (including any amendments thereof) before and at the time of availing and sanctioning the loan in the loan application/sanction letter/key facts statement of PayU Finance and this Interest Rate Policy.

16.3 The rate of interest and the approach for gradation of risk published on the website of PayU Finance or otherwise published by PayU Finance shall be updated whenever there is a change in the rates of interest.¹⁰

⁸ Paragraph 45.12 of the RBI SBR Master Directions.

⁹ Paragraph 45.11 of the RBI SBR Master Directions.

¹⁰ Paragraph 45.11.2 of the RBI SBR Master Directions.

- 16.4** The documentation adopted by PayU Finance (as described in detail in paragraph 11 of Part 2 of this Interest Rate Policy) allows the borrower to make an informed decision with respect to the loan. The borrower's acceptance of such terms and conditions (including any amendments thereof) will be taken and recorded by PayU Finance in writing (by physical or electronic means).

17 AMENDMENTS

- 17.1** Any amendments to this Interest Rate Policy will be reviewed and approved by the Board.
- 17.2** Provisions of this Interest Rate Policy are subject to amendment in accordance with Applicable Laws (including rules, regulations, notifications) on the subject as may be issued from time to time. In case any provisions of this Interest Rate Policy are inconsistent with Applicable Laws (including any subsequent amendment(s), clarification(s), circular(s), etc.) then such provisions of Applicable Laws shall prevail over the provisions hereunder and this Interest Rate Policy shall stand amended so that it complies with Applicable Laws from the effective date of the change in Applicable Laws.

18 PUBLICATION

This Interest Rate Policy will be displayed on PayU Finance's website in compliance with the directions of the RBI and will be updated periodically to include any changes/amendments in the rate of interest or otherwise.¹¹

¹¹ Paragraph 45.11 of the RBI SBR Master Directions

ANNEXURE I

Indicative Interest Rate

(as on 1 Dec 2025)

Type of Product	Interest Rate per annum Maximum (%)
(1) Personal Loans (Unsecured)	36
(2) Transactions Credit (Unsecured)	39
(3) Loan to SMB Merchants (Unsecured)	
(i) EDI construct	39
(ii) EMI construct	36
(iii) Credit line construct	36
(4) Loan Against Property (Secured)	25

Note:

- (i) The Interest Rates specified above are indicative only and are subject to change. The Interest Rate recorded in facility documents will be binding over this site.
- (ii) The Interest Rate shown are on per annum basis on the outstanding amount.
- (iii) PayU Finance reserves the right to revise the Interest Rate from time to time, at its sole discretion.
- (iv) Processing Fee may be charged as per below indicative rates:
 - a. For facility amount upto INR 25,000 - upto INR 1,500
 - b. For facility amount greater than INR 25,000 - upto 6% of the loan amount
 - c. For secured facility amount – upto 3% of the loan amount

ANNEXURE 2

Factors considered in determining risk profile of borrowers:

No.	Factors Considered	Description
1	Profile and financial stability	Each borrower's financial health and standing are assessed by analysing various factors such as employment history, income stability and overall financial management practices.
2	Credit history (vintage on bureau, bureau profile, repayment across trade lines, enquiry trend etc.)	Each borrower's credit history is assessed in detail, including reviewing their credit bureau report, examining payment history across various credit lines, and counting all credit inquiries to ensure a complete understanding of their credit behaviour.
3	Duration of relationship with the Borrower	Length of the relationship with each borrower is considered, as a longer association provides us with greater insights into borrower creditworthiness and repayment habits, which is crucial for a comprehensive financial evaluation.
4	Default risk in related borrower segment	Historical default rate among borrowers with similar characteristics to the borrower in question is considered. This provides insights into the overall risk associated with lending to borrowers in a particular segment.
5	Income of the borrower	The borrower's loan repayment capacity is evaluated by considering their income level. A borrower in a high-income bracket is viewed as more likely to maintain stability and make timely repayments.
6	Fixed Obligation to Income ratio	The borrower's repayment capacity is evaluated by comparing their monthly debt obligations to their monthly income. A borrower with minimal debt has greater financial flexibility within their budget to meet loan repayment obligations compared to a borrower burdened with high debt.
7	Geographic (location) of the Borrower	Economic conditions and historical default rates in the borrower's geographic location are taken into account. Borrowers from regions with strong economic growth and low unemployment rates are typically seen as having a reduced likelihood of default.
8	Regulatory stipulations, if applicable	Any applicable regulatory stipulations are also duly taken into consideration.
9	Any other factors on a case-by-case basis, as applicable.	In addition to the above factors, any other relevant information is also considered on a case-by-case basis. This could include the borrower's assets and other factors that may impact their ability to repay the loan.