

Policy on Resolution of stressed Assets due to Covid 19 for Individuals, Small Business and Micro, Small & Medium Enterprises (MSMEs)

Version : 2
Owned By : CCO
Approved By : Board

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1. Introduction

India was hit by second wave of Corona – 19 infection in early April 2021, due to which State Governments implemented various plan to restrict public movements and imposed lockdown for particular location / cites.

The economic fallout on account of the second wave Covid-19 pandemic has led to significant financial stress for borrowers across the board. The resultant stress can potentially impact the long-term viability of many firms, otherwise having a good track record under the existing promoters, due to their debt burden becoming disproportionate relative to their cash flow generation abilities. This could impair the entire recovery process, posing significant financial stability risks.

With the intent to facilitate revival of real sector activities and mitigate the impact on the ultimate borrowers, the Reserve Bank of India ("RBI") has issued the guidelines vide its Notification dated May 5th 2021, on Resolution Framework – 2.0: Resolution of Covid-19 related stress of Individuals and Small Businesses and Micro, Small and Medium Enterprises (MSME) sector – Restructuring of Advances, to enable the lenders to implement a resolution plan in respect of eligible corporate exposures without change in ownership, and personal loans, while classifying such exposures as 'Standard', subject to specified conditions. The applicable circular under reference are RBI/2021-22/31 DOR.STR.REC.11/21.04.048/2021-22 and RBI/2021-22/32 DOR.STR.REC.12/21.04.048/2021-22.

Pursuant to the Resolution Framework, Capital India Finance Limited ("Company") has framed the policy pertaining to implementation of viable resolution plans (RP) for eligible borrowers in accordance with the provisions of the Resolution Framework ("Policy").

2. Purpose:

This Policy specifies the requirements for one-time resolution for loans to Individuals and small businesses and Micro, Small and Medium Enterprises (MSME) sector, in accordance with provisions of the Resolution Framework. The Company shall ensure that the resolution under this Policy is provided only to the borrowers having stress on account of COVID-19.

Accounts which do not fulfill the required eligibility conditions to be considered for resolution under this Policy may continue to be considered for resolution under the Prudential Framework or the relevant instructions as may be issued by RBI, as applicable from time to time.

3. Definitions:

In this Policy, unless there is anything in the subject or context inconsistent therewith, the expressions listed below shall, when capitalized, have the following meanings:

"Average Debt Service Coverage Ratio (ADSCR)" - Over the period of the loan addition of net cash accruals along with interest and finance charges divided by addition of current portion of long term debt with interest and finance charges.

"Board" means the board of directors of the Company.

"Borrower(s)" means the borrowers who have availed the loan facility(ies) from the Company.

"Current Ratio" means Current assets divided by current liabilities

"Debt Service Coverage Ratio (DSCR)" - For the relevant year addition of net cash accruals along with interest and finance charges divided by addition of current portion of long term debt with interest and finance charges.

"Other Exposures" means all loans granted by the Company to the Borrowers, excluding the Personal Loans.

"NPA" means Non-Performing Assets.

"Personal Loans" means the loans granted by the Company to individual Borrower(s) and consist of (a) consumer credit, (b) education loan, (c) loans given for creation/ enhancement of immovable assets (e.g., housing, etc.), and (d) loans given for investment in financial assets (shares, debentures, etc.).

"Prudential Framework" means Prudential Framework for Resolution of Stressed Assets) Directions 2019, issued by RBI dated June 7, 2019, as amended from time to time.

"Total Outside Liabilities / Adjusted Tangible Net Worth (TOL/ATNW)" - Addition of long-term debt, short term debt, current liabilities and provisions along with deferred tax liability divided by tangible net worth net of the investments and loans in the group and outside entities.

"Total Debt / EBITDA" - Addition of short term and long-term debt divided by addition of profit before tax, interest and finance charges along with depreciation and amortization.

- 4. Resolution Framework 2.0: Resolution of Covid-19 related stress of Individuals and Small Businesses:
- 4.1 Part A Requirement Specific to resolution of Advances to Individual and Small Business

Eligible Borrower	 (a) Individual who have availed of Personal Loans (b) Individual who have availed of loans & advance for business AND Aggregate exposure of Lending institution is less than 25 Cr as on 31st Mar 2021. (c) Small Business, Engaged in Retails & Wholesale other than classified as SME as on 31st Mar 2021 AND Aggregate exposure of Lending institution is less than 25 Cr as on 31st Mar 2021. (d) Borrower account should be standard as on 31st Mar 2021 (e) Borrower account should not have availed of any of resolution under previous plan (RP 1.0), Subject to condition that amended plan under norms RP.2.0. Below Mention Borrower are excluded under this RP: (a) Credit Facility provided by lending Institution to their personal/staff (b) Borrower account should not have availed of any of resolution under previous plan (RP 1.0) (c) All the farm credit exposures of all lending institutions, including NBFCs, of the nature listed in Paragraph 6.1 of Master Direction FIDD.CO.Plan.1/04.09.01/2016-17 dated July 7, 2016 (as updated), except for loans to allied activities, viz., dairy, fishery, animal husbandry, poultry, bee-keeping and sericulture are excluded from the scope of the Resolution Framework. Subject to the above, loans given to farmer households would be eligible for resolution under the Resolution Framework if they do not meet any other conditions for exclusions listed in the Resolution Framework.
In Case of Multiple Loans of Borrower	Decision of invoking restructuring loans under this facility shall be taken by each lending institution independently.
Invocation Date	Resolution may be invoked not later than 30 th Sept 2021
Resolution Plans (RP)	 a) Rescheduling of payments, conversion of any interest accrued or to be accrued into another credit facility, revisions in working capital sanctions, granting of moratorium etc. based on an assessment of income streams of the borrower. However, compromise settlements are not permitted as a resolution plan for this purpose. b) The moratorium period, if granted, may be for a maximum of two years, and shall come into force immediately upon implementation of the resolution plan. The extension of the residual tenor of the loan facilities may also be granted to borrowers, with or without payment moratorium. The overall cap on extension of residual tenor, inclusive of moratorium period if any permitted, shall be two years.

- c) The resolution plan may also provide for conversion of a portion of the debt into equity or other marketable, non-convertible debt securities issued by the borrower, wherever applicable, and the same shall be governed as below:-
 - The resolution plan may provide for conversion of a portion of the debt into equity or other marketable, non-convertible debt securities issued by the borrower, provided the amortisation schedule and the coupon carried by such debt securities are similar to the terms of the debt held on the books of the lending institutions, post implementation of the resolution plan. The holding of such instruments shall be subject to the extant instructions on investments as applicable.
 - The valuation of equity instruments issued, if any, shall be governed by the provisions of Paragraphs 19(c) and 19(d) of the Annex to the Prudential Framework whereas debt securities shall be valued as per the instructions compiled at Paragraph 3.7.1 of the Master Circular Prudential Norms for Classification, Valuation and Operation of Investment Portfolio by Banks dated July 1, 2015 (as amended from time to time), or other relevant instructions as applicable.
 - In case of converting any portion of the debt into any other security, the same shall collectively be valued at Re.1.
- d) The instructions contained in the <u>circular DOR.No.BP.BC/13/21.04.048/2020-21 dated September 7, 2020</u> on "Resolution Framework for COVID-19-related Stress Financial Parameters" shall not be applicable to resolution plans implemented under this window. The key financial parameters which are now not to be considered are

e)

Assets Classification:

f)	Total Outsi	Total Outside Liabilities / Adjusted Tangible			
	Net Worth	(TOL/	ATNW)		
g)	Total Debt ,	/ EBIT	DΑ		
h)	Current Rat	tio			
i)	Debt Service	ce Cov	verage Ra	tio (DSCR)
j)	Average I	Debt	Service	Coverag	e Ratio
	(ADSCR)				

e) The resolution plan should be finalised and implemented within 90 days from the date of invocation of the resolution process under this window. The resolution plan shall be deemed to be implemented only if all the conditions in Paragraph 10 of the Annex to the Resolution Framework – 1.0 are met.

Implementation Period

Must be implemented within 90 days from the Date of Invocation.

Assets	
Classification &	
Provision	

Plan Implemented	Account Status	Assets Classification
	Standard	To be retained as
If Yes		Standard
	If Slipped into NPA between 1 st April 2021 & Implementation	To Be upgraded as Standard as on the date of implementation of plan.

Additional Finance for	Where RP invoked order to meet Inte	performance. And Subseque governed by I	ance can be sanctioned even befor	re implementation of RP in
Interim Period	Classification of su	ıch addition fac	ility given below : Will be classifieds s of actual performance	d as Standard till the
	RP Implemented RP Not Implementime)		Standard – till Implementation On the basis of actual performance	
Provision	a) Prov Or b) 10% implemen Residual debt, for may have devolved	of the renegot tation (residual this purpose, v d into fund base	er IRAC norms immediately before iiated debt exposure of lending instebt) will also include the portion of non-ted facilities after the date of impler	itution post fund based facilities that
Written Back	For Personal Loans Half of above pro		After payment of 20% of residual Debts without slipping into NPA (POST RP)	
	Remaining half		By paying another 10% of Residual debts without slipping into NPA.	
	from commencem facility with longes	ent of first pay at period of mor		ever later) on the credit
Convergence of the norms for Loans resolved previously	The overall caps on moratorium and/or extension of residual tenor granted under resolution framework -1.0 and this framework combine, shall be 2 years If modification done under above clause, the instructions regarding asset classification and provisioning shall continue to be as per the Resolution Framework – 1.0			

4.2 Part B- Working capital support for small businesses where resolution plans were implemented previously

Loan used for	For said borrower, where RP 1.0 had implemented ,
business	- as one time measure to review working capital sanction limit and/or drawing power
purpose and	based on reassessment without same being treated as Restructuring
Small	- Decision regarding same shall be taken by 30 th Sept 21
businesses	- The margins and working capital limits being restored to the levels as per the
Other than	resolution plan implemented under Resolution Framework – 1.0, by March 31, 2022.
MSME	
	The above measure to necessary on account of economic follout from COVID 19 –

Above given measure are subject to subsequent supervisory review.

4.3 Part C- List of disclosure requirement for Lending Institution where Resolution Plan (RP) implemented under this window

- The information Disclosures as per the format prescribed in Format as per Annexure -1, in financial statements for the quarters ending September 30, 2021 and December 31, 2021 to be published.
- continuous disclosures required as per Format-B prescribed in the Resolution Framework 1.0.
- The number of borrower accounts where modifications were sanctioned and implemented, in terms of Restructuring under Resolution Framework 1 and has been additionally provided relief under the current plan, and the aggregate exposure of the lending institution to such borrowers to be disclosed on a quarterly basis, starting from the quarter ending June 30, 2021.
- The credit reporting in respect of borrowers where the resolution plan is implemented under his window shall reflect the "restructured due to COVID-19" status¹ of the account. The credit history of the borrowers shall consequently be governed by the respective policies of the credit information companies as applicable to accounts that are restructured.

5. Resolution Framework 2.0 – Resolution of Covid-19 related stress of Micro, Small and Medium Enterprises (MSMEs)

Applicability (Primary Criteria)	Debts Given to Borrower for Business purpose other than personal loans: MSME Borrowers with aggregate Exposure upto 25 Cr (Inc Fund Based) as on 31st Mar 2021 Borrower's Account was standard as on 31st Mar 2021 Borrower must be impacted due to COVID 19- Lockdown etc. Borrower's Account was not restructured with reference with Earlier Circulars dated of RBI i.e 6th Aug 2020, 11th Feb 2020 & 1st Jan 2019 (Collectively referred to as MSME restructuring circular)
	However semi-annual or annual review of account like working capital limit or drawing power based and if any change in it will not considered as restructuring under this norms.
Additional Condition	Borrowers Entity must be registered with GST before implementation of this plan however this condition is not applicable to them who are exempted from GST registration as on 31st Mar 2021.
	Borrower to be registered with Udyam Registration portal before implementation of this plan.
Time Limit for Borrower & FI -	Borrower Application has to apply on or before 30 th Sept 2021.
Application For One Time	The borrower has to be communicated Resolution Plan(RP) in writing within 30 days from date of application.
Restructuring (OTR)	And with consent of borrower last date of invocation of RP will be 30 th Sept 2021.
	RP plan to be implemented within 90 days from date of invocation.
In Case of Multiple Loans of borrowers	Decision of invoking restructuring loans under this facility shall be taken by each lending institution independently.
Invocation Date	Resolution may be invoked not later than 30 th Sept 2021
Implementation Period	Must be implemented within 90 days from the Date of Invocation.
Resolution Plan	MSME restructuring specified in Instructions specified in the <u>circular</u> <u>DOR.No.BP.BC/4/21.04.048/2020-21 dated August 6, 2020</u> shall remain applicable.

Assets	Assets Classificat	ion :		
Classification & Provision	Plan Implemented	Account Status	Assets Classification	
	If Yes	Standard If Slipped into NPA between 1st April 2021 & Implementation Asset classification on	To be retained as Standard To Be upgraded as Standard as on the of implementation of plan.	
	IT NOT	performance.	basis of actual]
Provision Norms	Upon Implementation of this plan Lending Institution shall keep provision of 10% of the residual debts of borrower.			vision of 10% of the
Reassessment of the working capital	In respect of accorestructuring circulon a reassessmer without the same The decision with 2021. The reassessed shalf yearly basis a	ounts of borrowers which alars, the working capital and of the working capital being treated as restructioned limit / drawing and the renewal / reassessment shall be expected.	n were restructured in term sanctioned limits and / or cycle, reduction of margin sturing. taken by lending institution power shall be subject to asment at least on an anni- to suitably modulate the li	ons by September 30, oreview, at least on a ual basis. The annual

The above measures shall be contingent and implementation in the spirit hat the same is necessitated on account of the economic fallout from Covid-19. Further, accounts provided relief under these instructions shall be subject to subsequent supervisory review with regard to their justifiability on account of the economic fallout from Covid-19.

6. Due Diligence Framework

All applications received for restructuring will be assessed as per the guidelines laid by RBI and the framework for due diligence and eligibility assessment has been defined in Annexure 3. Any deviation, to the parameters defined in the framework, can be approved by Credit Committee.

7. Monitoring Post Implementation

- The RBI has prescribed a clear monitoring period for accounts which are restructured under this Policy. This period begins from the date of implementation till the point in time when the Borrower pays back at least 10% of the residual debt subject to a minimum of one year from the commencement of the first payment of interest or principal (whichever is later) on the credit facility with longest period of moratorium.
- In case a Borrower is in default during the monitoring period, a review period of 30 days gets triggered. If the default is not resolved within this review period, the account shall be classified as NPA. Monitoring period, for this purpose, is the period starting from the date of implementation of the resolution plan till the borrower pays 10% of the residual debt, subject to a minimum of 1 year from the commencement of the first payment of interest or principal (whichever is later) on the credit facility with longest period of moratorium.

- In case a Borrower is in default with any of the signatories to the ICA at the end of the review period, the asset classification of the borrower with all lending institutions shall be downgraded to NPA from the date of implementation of the resolution plan or the date from which the borrower had been classified as NPA before implementation of the plan, whichever is earlier. In all cases, further upgradation shall be subject to implementation of a fresh restructuring under the Prudential Framework or the relevant instructions as applicable to the Company.
- Upon completion of the monitoring period without being classified as NPA, the asset classification norms will revert to the criteria as per the extant norms.
- The provisions required to be maintained, to the extent not already reversed, shall be available for the provisioning requirements when any of the accounts, where a resolution plan had been implemented, is subsequently classified as NPA as well as the additional provisioning requirements as and when the Prudential Framework becomes applicable in respect of the particular account.

8. Delegation:

All resolution of stressed assets under this policy including any subsequent modifications of resolution plan(s) under this policy shall be approved at CCO or CEO or MD level only.

9. Disclosures and Credit Reporting

The Company shall make all necessary disclosures in a form and manner prescribed in the Resolution Framework. While publishing quarterly statements minimum disclosures as per format prescribed in Annexure 1 to be made for financial statements for quarter ending September 30, 2021, December 31, 2021 and September 30, 2021. Additionally, also make disclosures in the format prescribed in Annexure 2 every half-year, i.e., in the financial statements as on September 30 and March 31, starting from the half-year ending September 30, 2021 till all exposures on which resolution plan was implemented are either fully extinguished or completely slips into NPA, whichever is earlier.

The resolution plans implemented in terms of individuals and small businesses of this framework should also be included in the continuous disclosures required as per Format-B prescribed in the Resolution Framework – 1.0.

The credit reporting by the Company in respect of borrowers where the resolution plan is implemented under this Policy shall reflect the "restructured due to COVID 19" status of the account if the resolution plan involves renegotiations that would be classified as restructuring under the Prudential Framework. The credit history of the borrowers shall consequently be governed by the respective policies of the credit information companies as applicable to accounts that are restructured.

10. General clause:

Notwithstanding the eligibility criteria as specified under this Policy, loan accounts of Borrower/s who had availed a moratorium in terms of circular no. RBI/2019-20/186 DOR.No.BP.BC.47/21.04.048/2019-20 dated March 27, 2020 and / or circular no. RBI/2019-20/244 DOR.No.BP.BC.71/21.04.048/2019-20 dated May 23, 2020, issued by RBI on COVID-19 – Regulatory Package and whose repayment schedule got changed due to accrued interest during moratorium as guided by said circular; will not be deemed as reschedulement under this policy as long as respective Borrower/s are not seeking any more resolution plan under this policy and will be repaying loan as per the agreed terms from the September 2020 onwards.

The Company shall be entitled to prescribe such documentations and terms and conditions, as it deems necessary for the purpose of effective implementation of resolution plan in accordance with the Resolution Framework.

The contents of this Policy shall always be read in conjunction with the circulars and / or other guidelines issued in this regard, from time to time and in the event of any conflict of any of the provisions, the provisions as mentioned in the circulars shall prevail. Any further amendments / announcements / revisions / clarifications to these measures for resolution of stress assets, as may be applicable to the Company, shall be deemed to be suitably incorporated, mutatis mutandis, in this Policy.

This Policy is subject to review by the Board, as and when deemed necessary. The Board may amend or revise this Policy from time to time, as required under the guidelines issued by RBI and other applicable laws.

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under the provisions of applicable laws / regulations, either existing or arising out of any amendment to such laws / regulations or otherwise, from time to time.

ANNEXURE 1

Format for disclosures to be made in the quarters ending September 30, 2021 and December 31, 2021				
		Individual	Borrowers	
S.		Personal	Business	Small
No	Description	Loans	Loans	Business
A	Number of requests received for invoking resolution process under Part A			
В	Number of accounts where resolution plan has been implemented under this window			
С	Exposure to accounts mentioned at (B) before implementation of the plan			
D	Of (C), aggregate amount of debt that was converted into other securities			
Е	Additional funding sanctioned, if any, including between invocation of the plan and implementation			
F	Increase in provisions on account of the implementation of the resolution plan			

Format for disclosures to be made half yearly starting September 30, 2021

Type of	Exposure to accounts	Of (A), aggregate debt	Of (A) amount	Of (A) amount paid	Exposure to
borrower	classified as Standard	that slipped into NPA	written off during	by the borrowers	accounts classified
	consequent to	during the half-year	the half-year	during the half-	as Standard
	implementation of			year	consequent to
	resolution plan - Position				implementation of
	as at the end of the				resolution plan -
	previous half-year (A)				Position as at the
					end of this half-year
Personal					
Loans					
Corporate					
persons*					
Of which					
MSMEs					
Others					
Total					

^{*} As defined in Section 3(7) of the Insolvency and Bankruptcy Code, 2016

Annexure -3 Assessment Framework

For Salaried Individuals :-

- Installment to Net Salary Ratio (INSR) for March 2020 <70%
- For application where customer has lost the job
 - Moratorium to be provided for principal and/or interest
 - The interest for moratorium period to be capitalized
 - The maximum tenure extension of loan to be restricted to 2 years.
- For applications where customer has salary cut
 - EMI to be restructured by increasing the tenure
 - Moratorium for principal and/or interest to be provided if current INSR post restructuring is more than
 70%
 - The interest for moratorium period can be capitalized
 - The maximum tenure extension of loan to be restricted to 2 years

For Self Employed - Small Business

- Customer Assessed under Income Program
 - Current Ratio>1 (as on 31.03.2020)
 - DSCR >1 (as on 31.03.2020)
- Customer Assessed under Surrogate Program
 - DPD<30 days as on March 1, 2020
 - Decline in Turnover of FY 2020-21 as compared to FY 2019-20 by more than 25%
 - ABB/EMI>1 for March 2020
- For application where customer business has been totally shut during lockdown
 - Moratorium to be provided for principal and/or interest
 - The interest for moratorium period to be capitalized
 - The maximum tenure extension of loan to be restricted to 2 years.
 - Proposed Assessed DSCR to be greater than 1
- For applications where customer turnover has declined due to lockdown effect
 - EMI to be restructured by increasing the tenure
 - Moratorium for principal and/or interest to be provided if current DSCR<1
 - The interest for moratorium period can be capitalized
 - The maximum tenure extension of loan to be restricted to 2 years
 - Proposed Assessed DSCR to be greater than 1

For Self Employed - Micro, Small & Medium Enterprises (MSME) Sector

- Customer Assessed under Income Program
 - Current Ratio>1 (as on 31.03.2020)
 - DSCR>1 (as on 31.03.2020)
- Customer Assessed under Surrogate Program
 - DPD<30 days as on March 1, 2020
 - Decline in Turnover of FY 2020-21 as compared to FY 2019-20 by more than 25%
 - ABB/EMI>1 for March 2020
- For application where customer business has been totally shut during lockdown
 - Moratorium to be provided for principle and/or interest
 - The interest for moratorium period to be capitalized
 - Proposed Assessed DSCR to be greater than 1
- For applications where customer turnover has declined due to lockdown effect
 - EMI to be restructured by increasing the tenure
 - Moratorium for principal and/or interest to be provided if current DSCR<1
 - The interest for moratorium period can be capitalized.
 - Proposed Assessed DSCR to be greater than 1

Please find attached the Assessment Sheet

Credit Assessment Sheet			
Customer Name			
Co Borrower			
Disbursement Date			
Disbursement Amount			
Original Sanction Tenure			
EMI Served			
Balance Tenure			
Current Principle Outstanding			
Type of Customer	Individual / Small Business / MSME		
Industry Type			
Application receipt Date			
Tele PD Date			
Account status as on 31st March-2021			
Documents Collected	For Salaried - March 2020 Salary Slip - March 2021 Salary Slip - Bank Statement last 6 months - Latest KYC of Applicant & Co applicant For Self Employed - FY 2019-20 Financials + ITR - Bank Statement of last 6 months		
Current Lockdown Impact on Cash Flows			
Moratorium Availed During FY 20-21	Yes/ No		
Assessment Criteria - Salaried	- INSR for March 2020 <70%		
Assessment Criteria - Self Employed (Financial Appraisail)	Current Ratio>1 (as on 31.03.2020)DSCR>1 (as on 31.03.2020)		
Assessment Criteria - Self Employed (Surrogate Assessment)	 DPD<30 days as on March 1, 2020 Decline in Turnover of FY 2020-21 as compared to FY 2019-20 by more than 25% ABB/EMI>1 for March 2020 		
Current CIBIL Score			
Comment on CIBIL (if any)			
Recovery Strategy of customer			
Deviation (If Any)			
Overall Credit Observation			
Recommended Resolution Plan			

Note: Tele PD to be done with customer considering current lockdown condition.