TREATMENT OF WILFUL DEFAULTERS AND LARGE DEFAULTERS POLICY

BACKGROUND:

VM Vinimay Private Limited is an NBFC registered with the Reserve Bank of India (RBI). The Company is classified as a Middle layer NBFC pursuant to Master Direction - Reserve Bank of India (Non-Banking Financial Companies – Treatment of Wilful Defaulters and Large Defaulters) Directions, 2025 dated November 28. 2025. This policy is being framed and adopted as per the Master Directions on Treatment of Wilful Defaulters and Large Defaulters in Non-Banking Financial Companies.

Keeping in view the RBI Guidelines as cited above, the following internal guiding principle are therefore laid out by the Board of Directors of VM Vinimay Private Limited. This policy should always be read in conjunction with RBI guidelines, directives, circulars, and instructions.

OBJECTIVE:

The aim of this policy is to establish a robust framework for identifying, monitoring, and managing wilful and large defaulters of the Company. This policy aims to strengthen the financial health of the organization, to put in place a system to disseminate credit information about wilful defaulters, prevent recurrence of defaults and facilitate timely recovery of dues. It plays a crucial role in maintaining the integrity of the financial system by outlining the measures and consequences for the borrowers who deliberately default on their financial obligations. The policy aligns with the appropriate guidelines of Reserve Bank of India (RBI).

DEFINITIONS:

"Board" means Board of Directors of the Company.

"Company" means VM Vinimay Private Limited.

"Senior Management" The Key Managerial Personnel of the Company and the employees who are categorized as the Senior Management by the Audit Committee of the Company.

VM VINIMAY PVT. LTD.
KOLKATA