

ATMOS FINANCE PRIVATE LIMITED

CIN: U65999MH2017PTC295587 | RBI COR: N13.02297

**Procedure for Return of Original Movable /
Immovable Property Documents
to the Legal Heirs of a Deceased Borrower**

Company: Atmos Finance Private Limited

ATMOS FINANCE PRIVATE LIMITED
PROCEDURE FOR RETURN OF ORIGINAL PROPERTY
DOCUMENTS TO THE LEGAL HEIRS OF A DECEASED BORROWER

Version 1.0 | Effective: 26th May 2026 | Approved by the Board of Directors

Approval Date	Version	Approval Authority
26-May-2026	Version 1.0	Board of Directors

1. Overview and Regulatory Basis

Atmos Finance Private Limited ('AFPL' / 'Company') holds original movable and immovable property documents as security in respect of its secured loan products, including Loans Against Property and Home Loans. This document lays down the procedure to be followed for the return of such original property documents to the legal heirs of a borrower in the event of the borrower's demise.

This Procedure has been framed in compliance with para 45.5.1(iv) of the Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 (MD-SBR) and the RBI circular on Responsible Lending Conduct – Release of Movable / Immovable Property Documents on Repayment / Settlement of Personal Loans dated September 13, 2023. It forms part of, and shall be read together with, the Company's Fair Practices Code and Loan Operations Manual.

2. Objective

To provide a clear, fair, and time-bound procedure enabling the legal heirs of a deceased borrower to obtain the return of original property documents held by the Company as security, upon closure of the loan account, and to specify the documentation, timelines, mode of return, designated point of contact, compensation for delay, and grievance redressal available to them.

3. Scope and Applicability

This Procedure applies to all secured loan accounts of the Company in respect of which the Company holds original movable or immovable property documents, and where the borrower (or the sole surviving borrower, in the case of joint borrowers) has deceased. It covers the return of documents both where the loan stands fully repaid / settled and where the outstanding is discharged by the legal heirs.

4. Definitions

Legal Heir — a person legally entitled to succeed to the estate of the deceased borrower under the applicable law of succession, or as established by a succession certificate, legal heir certificate, probated will, or other document of title recognised in law.

Original Property Documents — the original title deeds and other original movable / immovable property documents deposited with or held by the Company as security in respect of the loan.

Loan Closure — the date on which the entire outstanding under the loan account — principal, interest, and all charges — stands fully repaid or settled.

5. General Principle — Return upon Loan Closure

As a general principle, and in line with the Company's Fair Practices Code, the Company shall return all original property documents to the borrower within 30 days of the date of Loan Closure. Where the borrower has deceased, the documents shall be returned to the legal heir(s) in accordance with the procedure set out below.

6. Procedure for Return to Legal Heirs

6.1 Intimation of Demise

The legal heir(s) shall intimate the Company of the demise of the borrower, in writing or through any of the channels published on the Company's website, quoting the loan account number of the deceased borrower and enclosing a copy of the borrower's death certificate. The Company shall acknowledge such intimation within 3 working days and shall inform the legal heir(s) of the documents required and the process to be followed.

6.2 Documents Required to Establish Legal Heirship

The legal heir(s) shall submit the following, to enable the Company to verify their entitlement:

- Death certificate of the borrower issued by the competent authority;
- Proof of legal heirship — a succession certificate, legal heir certificate, probated will, letters of administration, or such other document of title as is recognised in law;
- Identity and address proof (Officially Valid Documents) of the legal heir(s) claiming the documents;
- An indemnity / declaration in the form prescribed by the Company, where applicable.

6.3 Verification by the Company

Upon receipt of the complete set of documents, the Company shall verify the death of the borrower, the status of the loan account, and the entitlement of the legal heir(s). Where the loan account carries an outstanding balance, the Company shall communicate the amount payable, and the return of documents shall follow discharge of the outstanding by the legal heir(s), subject to the Company's legitimate right of lien or set-off.

6.4 Timeline for Return

The Company shall return the original property documents to the legal heir(s) within 30 days of the later of: (i) the date of Loan Closure; or (ii) the date of receipt of the complete set of documents establishing legal heirship (and, where applicable, discharge of any outstanding). The Company shall not cause any avoidable delay in the return of documents once entitlement is established.

6.5 Mode of Return

The original documents shall be returned to the legal heir(s) either in person against a signed acknowledgement, or by registered post / courier with acknowledgement due, as requested by the legal heir(s). The Company shall retain a certified copy of the documents returned, together with the acknowledgement of receipt, in its records.

7. Designated Officer and Contact Details

The following officer is designated as the single point of contact for all requests relating to the return of original property documents to legal heirs. These details shall be displayed on the Company's website.

Particulars	Details
Designated Officer	Anand Dhanke Dhanke
Email	atmosfiance@gmail.com n

Particulars	Details
Address	Atmos Finance Private Limited, A-1007, Kanakia Wall Street, Andheri Kurla Road, Andheri East, Mumbai – 400 093

8. Compensation for Delay

In the event of any delay in returning the original property documents beyond the 30-day period specified in clause 6.4, where such delay is attributable to the Company, the Company shall compensate the legal heir(s) at the rate of ₹5,000 per day of delay, in line with the Company's Fair Practices Code and the applicable RBI circular. This compensation is without prejudice to any other right or remedy available to the legal heir(s).

9. Loss or Damage of Original Documents

If any original property document is lost, misplaced, or damaged by the Company, the Company shall: (i) promptly notify the legal heir(s) in writing; (ii) assist the legal heir(s) in obtaining certified / duplicate copies of the documents from the relevant authority; and (iii) bear the cost of obtaining such certified / duplicate copies. Where the applicable RBI circular provides for additional time in cases involving lost documents, such additional time shall apply, and the compensation for delay shall be computed accordingly.

10. Grievance and Escalation

If the legal heir(s) are dissatisfied with the handling of a request under this Procedure, or if there is a delay, they may escalate the matter through the Company's Grievance Redressal Mechanism as published on the Company's website — commencing with the Grievance Redressal Officer, and, if unresolved, up to the Principal Nodal Officer and thereafter the Reserve Bank – Integrated Ombudsman Scheme, 2021.

11. Record Keeping

The Company shall maintain a record of every request received under this Procedure, capturing: the loan account number and borrower name; the date of intimation of demise; the documents received; the date of verification; the date and mode of return; the acknowledgement of receipt; and any compensation paid. Records shall be retained for the period prescribed under applicable law.

12. Website Publication

This Procedure — including the documents required, the applicable timeline, the designated officer's contact details, the compensation for delay, and the escalation mechanism — shall be published and kept current on the Company's website at www.procredit.co.in, in compliance with para 45.5.1(iv) of MD-SBR.

13. Review

- This Procedure shall be reviewed by the Board of Directors at least annually, or immediately upon any change in applicable law or RBI directions.
- The Compliance Officer is responsible for monitoring regulatory developments and placing any revision before the Board within 30 days of a regulatory change.

Approved by the Board of Directors

Atmos Finance Private Limited | Version 1.0 | 26th May 2026
This document is published on the Company's website www.procredit.co.in

For ATMOS FINANCE PRIVATE LIMITED

Director / Authorised Signatory