



Pillar 3 Disclosures as of 30th June 2026

ESAF Small Finance Bank Limited is subject to the Basel framework as stipulated by the Reserve bank of India (RBI) under Master Direction “Reserve Bank of India (Small Finance Banks – Prudential Norms on Capital Adequacy) Directions, 2025” dated November 28, 2025.

The Basel framework as per the extant guidelines consists of three-mutually reinforcing pillars:

(i) Pillar 1: Minimum capital requirements for credit risk.

(ii) Pillar 2: Supervisory review of capital adequacy.

(iii) Pillar 3: Market discipline.

Market discipline (Pillar 3) comprises set of disclosures on the capital adequacy and risk management framework of the Bank. These disclosures have been set out in the following sections.

1. Scope of application and capital adequacy

DF-1: Scope of Application

The framework of disclosures applies to ESAF Small Finance Bank Limited (hereinafter referred to as the Bank) which launched Banking Operations on 10th March 2017. Disclosures are made as a standalone entity since the Bank does not have any subsidiary nor does it have any interest in any insurance entity

(i) Qualitative Disclosures:

- a. List of group entities considered for consolidation
- b. List of group entities not considered for consolidation both under the accounting and regulatory scope of consolidation

Name of the entity / country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	% of bank's holding in the total equity	Regulatory treatment of bank's investments in the capital instruments of the entity	Total balance sheet assets (as stated in the accounting balance sheet of the legal entity)
Nil	Nil	Nil	Nil	Nil	Nil

(ii) Quantitative Disclosures:

- a. List of group entities considered for consolidation

Name of the entity / country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	Total balance sheet assets (as stated in the accounting balance sheet of the legal entity)
Nil	Nil	Nil	Nil

- b. The aggregate amount of capital deficiencies in all subsidiaries which are not included in the regulatory scope of consolidation i.e., that are deducted:

Name of the subsidiaries / country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	% of bank's holding in the total equity	Capital Deficiency
Nil	Nil	Nil	Nil	Nil

- c. The aggregate amount (e.g. current book value) of the bank's total interests in insurance entities, which are risk-weighted:

Name of the insurance entities/ country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	% of bank's holding in the total equity/Proportion of voting power	Quantitative impact on regulatory capital of using risk weighting method versus using the full deduction method
Nil	Nil	Nil	Nil	Nil

- d. Any restrictions or impediments on transfer of funds or regulatory capital within the banking group
Nil

DF-2: Capital Adequacy

(i) Qualitative Disclosures: ICAAP enables the Bank to ensure the adequacy of capital to take care of the future business growth and various other risks that the Bank is exposed to, so that the minimum capital required is maintained on a continuous basis and at the times of changing economic conditions / economic recession. The Bank considers both quantifiable and non-quantifiable risks while assessing capital requirements. The Bank considers the following risks as material and has considered these while assessing its capital requirements: i. Credit Risk ii. Market Risk iii. Operational Risk iv. Information security Risk v. Fraud Risk Management vi. Liquidity Risk vii. Credit Concentration Risk viii. Interest Rate Risk ix. Strategic Risk x. Reputational Risk xi. Compliance Risk xii. Human Resource Risk xiii. Group Risk xiv. Outsourcing and Vendor Management Risk etc

(i) Quantitative Disclosures:

- Capital requirement for credit risk: Bank follows standardised approach for credit risk capital requirement. Currently Bank doesn't have securitisation exposures
- Capital requirement for market risk: Not applicable for Small Finance Banks
- Capital requirement for operational risk: Not applicable for Small Finance Banks

Particulars (30-06-2026)	₹ in Cr
Tier I capital –(I)	
Paid Up Capital	515.95
Reserves	1,304.51
Perpetual Debt Instrument	48.00
Total	1,868.46
Deductions – (II)	
Deferred Tax Asset	183.57
Net revaluation gains in Level 3 Instruments	1.51
Total Deductions	185.08
Total Tier I Capital Total (I-II) A	1,683.38
Tier II Capital – (III)	
General provisions on Standard Assets	106.88
Investment Fluctuation Reserve	40.35
Subordinated Debt	695.00
Total	842.24
Deductions – (IV)	0
Total Deductions for Tier II	0
Total Tier II Capital (III-IV) B	842.24
Total Capital (A+B)	2,525.62
CRAR	23.86%

d) CET1, Tier1 and Total capital ratios:

S. No.	Particulars (30-06-2026)	₹ in Cr
A	Capital Requirements for Credit Risk	1,587.59
A.1	For Portfolio Subject to Standardized approach	1,587.59
A.2	For Off Balance Sheet Credit Portfolio	0
A3	For Off Balance Sheet Corporate Guarantee	0
B	Capital Requirements for Market Risk	0
B.1	For Interest Rate Risk	0
B.2	For Equity Risk	0
B.3	For Forex Risk (including gold)	0
B.4	For Commodities Risk	0
B.5	For Options risk	0
C	Capital Requirements for Operational Risk	0
D	Total Capital Requirement (A+B+C)	1,587.59
E	Total Risk Weighted Assets (RWA for all types of assets)	10,583.95
F	Total Capital Funds (Tier I + Tier II)	2,525.62
	CRAR (%)	
A	Tier -1 Capital Adequacy Ratio (%)	15.90%
Ai	CET -1 Ratio	15.45%
B	Tier -2 Capital Adequacy Ratio (%)	7.96%
A+B	Overall CRAR (%)	23.86%

2. Risk exposure and assessment

Risk Governance Framework & Risk Management Structure:

The Bank has set up a risk governance framework based on the following:

- a) The Board of Directors is responsible for overall governance and overseeing of core risk management activities of the Bank and the Bank's risk appetite and related strategies and policies are approved by the Board.
- b) To ensure that the Bank has a sound system of risk management and internal controls in place, the Board has established the Risk Management Committee of the Board (RMCB). The RMCB assists the Board for overseeing and review of the Bank's risk management principles and policies, strategies, appetite, processes and controls.
- c) The Risk Management Committee of the Board (RMCB), the Information Technology Strategy Committee of the Board (ITSCB) and the Audit Committee of the Board (ACB) assist the Board for overseeing and periodical review of the Bank's risk management principles and policies, strategies, appetites, processes and controls.
- d) The RMCB is supported by the Risk Management Department and the Executive Level committees dealing with different functional areas of risk, facilitating effective execution of their responsibilities.
- e) Segregation of duties across the 'three lines of defence' model, whereby front-office/ business functions as the first line, Risk Management and Compliance as the second line and Internal Audit as the third line. The roles are played by the functions and are independent of one another.
- f) Risk appetite is approved by the Board of Directors on an annual basis in order to align risk, capital and business targets.
- g) All major risk classes are managed through focused and specific risk management processes; these risks include Credit Risk, Operational Risk, Market Risk and Liquidity Risk etc. Policies, processes and systems are put in place to enable the risk management capability.

Risk Management function is having appropriate representation on Executive Level Committees of the Bank to ensure that risk view is taken into consideration in business decisions. Stress testing tools and escalation processes are established to monitor the performance against approved risk appetite.

Risk Management Committees

The Risk Management Committee of the Board (RMCB) oversees and periodically reviews the processes and practices of risk management in the Bank. Credit Risk Management Committee (CRMC), Operational Risk Management Committee (ORMC) and Asset Liability Management Committee (ALCO) support RMCB to facilitate effective execution of its responsibilities. The Information Security Governance Committee (ISGC) supports the Information Technology Strategy Committee of the Board (ITSCB). The Risk Management Department (RMD) through its Credit Risk, Operational Risk, Market Risk and Information Security Divisions assists the various committees in effectively managing the risks. The RMD is headed by the Chief Risk Officer (CRO) who reports to the Managing Director & CEO on administrative matters and functional matters. The CRO is responsible for formulating and implementing enterprise-wide integrated risk management systems for identification and management of risks in the Bank.

Credit Risk

Credit risk is the possibility of loss a bank might incur due to the following:

- a) Default due to the inability or unwillingness of a borrower or counterparty to meet commitments in relation to lending, trading, settlement or other financial transactions or,
- b) Reduction in portfolio value arising from actual or perceived deterioration in credit quality of borrowers or counterparties.

The Bank is exposed to credit risk through lending to various segments.

1. Credit risk governance

The objective of credit risk management is to maximize the Bank's risk-adjusted rate of return while maintaining credit risk exposure within acceptable limits. The Bank has put in place a Board approved Credit Risk Management Policy which is reviewed periodically to bring in refinements triggered by evolving concepts and actual experience. The Credit Risk Management Policy sets out the guidelines, principles and approach to manage credit risk for the Bank and a framework to identify, assess, measure, monitor and control and mitigate the credit risks in a timely and effective manner.

In addition, the Bank has the Master Credit Policy and the Loan Collection, Recovery & Stressed Assets Management Policy, approved by the Board of Directors. The Master Credit Policy covers the rules and regulations for processing and sanction of credit, Bank's approach to monitoring of credit, and the Loan Collection, Recovery & Stressed Assets Management Policy covers the rules regarding NPA Management, provisioning, collection & recovery, and mechanisms like compromise settlements, restructuring, legal action, write-off etc.

2. Structure of Credit Risk Management Framework

Risk Management Committee of the Board (RMCB) oversees bank-wide risk management. The senior executive level Credit Risk Management Committee (CRMC) monitors implementation of credit risk management framework across the Bank and provides recommendations to the RMCB and the Board. CRMC ensures implementation of credit risk management policies and procedures, as approved by the RMCB and the Board, across the Bank and recommends changes thereto, considering any changes in the regulatory instructions, business or economic conditions. It also monitors quality of loan portfolio at periodic intervals, identifies problem areas and instructs business units with directions to rectify the deficiencies.

The Credit Risk Division of Risk Management Department, which is supported by all the business units, is entrusted with the responsibility for implementing credit risk identification, assessment, measurement, monitoring and control. Credit risk appetite tolerance limits are drawn up with inputs from the business units and the credit risk parameters and credit exposure / concentration limits set by the Bank's Board of Directors. The Division constructs credit risk identification systems, oversees quality of the Bank's loan portfolio, stressed loans and undertakes portfolio level asset quality reviews with support from the business and credit monitoring functions. The Division looks into early warning signals in the loan portfolio as a whole, analyses the trend of weak exposures, suggests portfolio wise remedial measures and monitors the actions taken.

CRMC of the Bank meets at least once in a quarter to take stock of Bank's credit risk profile, based on the reports placed by Credit Risk Division. An effective governance framework to ensure the independence of the credit risk unit from the business units is implemented.

3. Credit Process

The Loan Policy of the Bank details the credit norms to be adhered to for each of the customer segments. The guiding principles behind the credit sanction process are as under:

- ✓ Know Your Customer' is a leading principle for all activities.
- ✓ The acceptability of credit exposure is primarily based on the sustainability and adequacy of borrower's normal business operations and not based solely on the availability of security.

An empowerment matrix is prescribed to ensure that a competent authority takes informed decisions on credit proposals and on any deviations to the norms. There are separate credit origination and appraisal processes for all types of loans and advances.

4. Credit Scoring/ Rating Models

The foundation of credit risk management rests on the internal credit risk rating system. Credit scoring models are used for evaluating applications for credit. The Bank has developed rating tools specific to most products and market segments to objectively assess underlying risk

associated with such exposures. The score cards/ rating system is validated on an annual basis by back testing with the standards of outstanding loans.

5. Risk Weights

The Bank adheres to RBI guidelines defined under the RBI Master Circular - Prudential Guidelines on Capital Adequacy and Market Discipline - New Capital Adequacy Framework (NCAF) as updated from time to time, for application of risk weights for credit risk measurement and capital computation purposes.

6. Concentration Risk

The Bank manages concentration risk by means of prudential limits prescribed by RBI, as well as internal limits. Credit concentration in the Bank's portfolios is monitored for the following:

- (i) Single party /Group exposure: The Bank has set exposure limits individual borrower-wise and borrower group-wise which are continuously tracked and monitored.
- (ii) Geography-wise exposure: The Bank continuously monitors the geographical concentration of the business and factors the inputs into strategic business planning. The Bank is conscious of its credit concentration in southern states and takes steps to reduce the same by lending in other geographies.

Industry exposure: The Bank's exposure to any single industry is currently not significant.

DF-3: Credit risk: general disclosures for all banks

(I) Qualitative Disclosures:

Definitions of past due and impaired assets (for accounting purposes): Non-Performing Assets are identified in the Bank's systems using the standard definition as per norms prescribed by RBI.

A non-performing asset (NPA) is a loan or an advance where;

- I. Interest and/ or instalment of principal remain overdue for a period of more than 90 days in respect of a term loan,
- II. The account remains 'out of order', in respect of an Overdraft/Cash Credit or Demand Loan.
- III. The bill remains overdue for a period of more than 90 days in the case of bills purchased and discounted,
- IV. The instalment of principal or interest thereon remains overdue for two crop seasons for short duration crops,
- V. The instalment of principal or interest thereon remains overdue for one crop season for long duration crops,
- VI. The amount of liquidity facility remains outstanding for more than 90 days, in respect of a securitization transaction undertaken in terms of guidelines on securitization issued by the RBI from time to time.
- VII. In case of interest payments, the Bank should classify an account as NPA only if the interest due and charged during any quarter is not serviced fully within 90 days from the end of the quarter.
- VIII. A working capital borrower account where irregular drawings are permitted in the account for a continuous period of 90 days even though the unit may be working or the borrower's financial position is satisfactory.
- IX. An account where the regular/ad hoc/credit limits have not been reviewed/renewed within 180 days from the due date/date of ad hoc sanctions.
- X. Any loan account in which a fraud is identified.

Resolution of Stressed Assets

Early identification and reporting of stress: In line with the RBI instructions, the Bank recognizes incipient stress in loan accounts, immediately on a daily basis, by classifying such assets as special mention accounts (SMA) as per the following categories:

SMA subcategories	Principal or interest payment or any other amount wholly or partly overdue between
SMA-0	1 to 30 days.
SMA-1	31 to 60 days
SMA-2	61 to 90 days

In the case of revolving credit facilities like Overdraft and Cash Credit, the SMA sub-categories be as follows:

SMA subcategories	Basis for classification – Outstanding balance remains continuously more than the sanctioned limit or drawing power, whichever is lower, for a period of:
SMA-1	31-60 days
SMA-2	61-90 days

'Default' means non-payment of debt when whole or any part or instalment of the debt has become due and payable and is not paid by the debtor.

For revolving facilities like Overdraft and Cash Credit, default would also mean, the outstanding balance remaining continuously more than the sanctioned limit or drawing power, whichever is lower, for more than 30 days.

Discussion of the Bank's Credit Risk Management Policy: The Bank has an integrated Credit Risk Management Policy in place which is reviewed annually. Over the years, the policy & procedures in this regard have been refined because of evolving concepts and actual experience. The policy and procedures have been aligned to the approach laid down in Basel-II and RBI guidelines.

Credit Risk Management encompasses identification, assessment, measurement, monitoring and control of the credit risk in exposures.

Risk Identification, Measurement, and Monitoring:

- Credit risk is identified at both individual account and portfolio levels.
- Special Mention Accounts (SMA) and Non-Performing Assets (NPA) are classified per RBI norms.
- Concentration risk is monitored by sector, geography, product, and borrower group.
- Regular portfolio analysis and reporting to senior risk committees.

Exposure and Concentration Limits:

- Strict prudential limits for single/group borrowers, sectors, geographies, unsecured loans, and sensitive/stressed sectors.
- Additional controls for exposures to NBFCs, real estate, gold loans, and correlated segments.
- Mechanisms for rebalancing the loan portfolio if concentration or delinquency thresholds are breached is in place.

Credit Risk Management Strategies:

- Focus on granular growth, priority sector lending, and small borrower segments.
- Delegation of loan sanction authority based on exposure size and risk grade.
- Risk-based loan pricing and periodic review/renewal of loans.

- Audit mechanisms for loan accounts, legal documentation, and stock/receivable audits.

Risk Mitigation Techniques:

- Internal credit rating and scoring frameworks with defined risk grades (EB1 to EB10).
- Use of collateral, guarantees, and insurance for risk mitigation.
- Stress testing, capital adequacy assessment, and climate-related risk analysis.

Regulatory Compliance:

- Adherence to RBI guidelines on exposure, provisioning, asset classification, and reporting.
- Regular review and update of the policy to reflect regulatory changes.

Policy Review and Custody:

- The policy is reviewed annually by the Risk Management Department and approved by the Board.
- All updates and amendments are documented, and the policy remains valid until the next review.

The policy aims to ensure a robust, diversified, and resilient credit portfolio, supporting the bank's mission of financial inclusion while maintaining regulatory compliance and sound risk management practices.

(ii) Quantitative Disclosures:

Exposure – Facility Type (₹ in Cr) (30-06-2026)

S. No.	Exposure Type	Amount
1	Gross Loans & Advances (Excluded Loan against Term Deposits - ₹338.48 Cr;)	22,877.03
2	Add: Undrawn exposure	172.48
3	Total Credit Exposure –Fund Based (1+2)	23,049.51
4	Add: Non-Fund Based Exposure (Excluded Bank Guarantee against 100% Liquid securities coverage – ₹1.24 Cr)	0
	Total Credit Exposure (Total of 3+4 above)	23,049.51

Geographic distribution of credit exposure (₹ in Cr) (30-06-2026)

S. No.	Exposure Type	Amount
1	Domestic Fund Based (Excluded Loan Against Term Deposits - ₹338.48Cr)	23,049.51
2	Domestic non-fund based (Bank Guarantee of ₹1.24 Cr with 100% Cash collateral)	0
3	Foreign Fund Based	0
4	Foreign Non-Fund Based	0
Total		23,049.51

Sector wise distribution of Gross Loans & Advances (₹ Cr) (30-06-2026)

S. No.	Industry Classification	Gross Loan Portfolio	% Share
1	Agriculture and Allied Activities	15,857.15	68.30%
2	Industries Sector	403.90	1.74%
3	Trade & Services	1,493.38	6.43%
4	Personal Loans and other Loans	5,461.08	23.52%
Total		23,215.51	100.00%

Maturity pattern of Assets (₹ in Cr) –As on 30-06-2026

Maturity Bucket	Cash, Balances with RBI	Balances with Banks, Money at Call & Short Notice, Term Deposits and other placements	Investments	Loans & advances *	Fixed assets	Other assets	Total
Day – 1	456.15	88.39	1096.31	131.99	0.00	89.35	1,862.18
2-7 Days	0.00	0.00	0.00	791.97	0.00	23.49	815.45
8-14 Days	0.00	0.00	0.00	923.96	0.00	27.40	951.36
15-30 Days	24.56	0.00	165.06	2111.91	0.00	54.81	2,356.34
31 Days and up to 2 months	44.94	85.20	302.03	1781.98	0.00	27.40	2,241.55
Over 2 Months and up to 3 months	40.89	18.93	295.58	1781.98	0.00	27.40	2,164.79
Over 3 Months and up to 6 months	152.53	0.06	1025.13	4689.16	0.00	54.81	5,921.68
Over 6 Months and up to 1 year	169.08	0.06	1136.38	4082.77	0.00	328.84	5,717.12
Over 1 Year and up to 3 years	300.38	0.67	2018.79	3913.75	0.00	0.00	6,233.59
Over 3 Years and up to 5 years	2.19	0.00	14.71	594.34	0.00	0.00	611.24
Over 5 years and up to 7 years	0.08	0.00	0.51	182.68	539.02	672.75	1,395.04
Over 7 years and up to 10 years	0.13	0.00	0.87	145.71	0.00	0.00	146.71
Over 10 year and up to 15 years	0.00	0.00	0.00	530.55	0.00	0.00	530.55
Over 15 years	0.00	0.00	0.00	299.43	0.00	0.00	299.43
Total	1,190.93	193.30	6,055.37	21,962.18	539.02	1,306.25	31,247.04

Amount of NPA as on 30-06-2026 (₹ in Cr)

Category	Amount
Amount of NPA (Gross)	1,253.34
Substandard	643.40
Doubtful	602.17
Doubtful1	593.90
Doubtful2	8.09
Doubtful3	0.18
Loss	7.76
NPA Provision	1,069.21
Net NPA	184.12
Advances	
Gross Advances	23,215.51
Net Advances	22,146.30
NPA Ratios	
Gross NPAs to gross advances (%)	5.40%
Net NPAs to net advances (%)	0.83%

Movement of Gross NPA & Net NPA, FY 2026-27 (₹ in Cr)

Particulars	Gross NPA	Net NPA
Opening balance at 01-04-2026	1213.86	382.44
Add: Addition during the period	74.72	56.56
Less: Reduction / Upgradation / Write-off / Asset Sale	35.24	254.88
Closing balance at 30-06-2026	1253.34	184.12

Movement of NPA Provisions, FY 2026-27 (₹ in Cr)

Particulars	Amount
Opening balance at 01-04-2026	831.42
Add: Provision made during the period	251.27
Less: Write off/ write back excess provision	13.47
Closing balance at 30-06-2026	1069.21

Movement of General Provisions for Standard Assets, FY 2026-27 (₹ in Cr)

Particulars	Amount
Opening balance at 01-04-2026	102.91
Add: Provision made during the period	3.98
Less: Provision reversed during the period	-
Closing balance at 30-06-2026	106.89

Amount of non-performing investment: Nil

Amount of provisions held for non-performing investments: Nil

Movement of provisions for depreciation on investments: Not Applicable, as the Bank follows the revised RBI fair value-based investment valuation framework and does not maintain a separate depreciation provision on investments

DF-4: Credit risk: disclosures for portfolios subject to the standardised approach**(i) Qualitative Disclosures**

In accordance with the Operating Guidelines for Small Finance Banks (SFBs), the Bank assesses credit risk under the Basel II Standardized Approach. Accordingly, capital requirements for credit risk are computed in line with the Standardized Approach prescribed by the Reserve Bank of India (RBI).

Standardized approach classifies exposure based on type of counterparty, nature of facility, amount of exposure, purpose/activity of exposure, asset financed, security/credit risk mitigates, external credit rating of the exposure/counterparty etc. and prescribes differential risk weights for each class of exposure. Risk weights so applied for each exposure are aggregated to arrive at risk exposure of the Bank under Standardized approach.

Under this framework, regulatory capital requirements for corporate exposures are based on external credit ratings assigned by External Credit Assessment Institutions (ECAIs) recognized by the RBI, as per its guidelines dated November 28, 2025.

The domestic ECAs recognized by the RBI include CRISIL Ratings Limited, Credit Analysis & Research Limited (CARE), India Ratings and Research Private Limited (India Ratings), ICRA Limited, Acuite Ratings & Research Limited, Brickwork Ratings India Private Limited, and Infomerics Valuation and Rating Pvt. Ltd. (INFOMERICS).

The RBI's Basel framework for Small Finance Banks prescribes the scope and eligibility criteria for the use of external credit ratings. The Bank considers external ratings for risk-weighting purposes only when such ratings comply with the regulatory conditions stipulated by the RBI.

The key features of the Bank's framework for the application of external ratings are as follows:

1. The Bank uses only those external ratings that have been solicited by the borrower/counterparty.
2. Bank will consider the external rating done by RBI approved ECAI
3. Bank loan ratings that do not disclose lender details are not considered eligible for capital computation purposes.
4. The Bank ensures that the external rating of the facility/borrower has been reviewed at least once by the ECAI during the previous 15 months and is in force on the date of its application.
5. When a borrower is assigned a rating that maps to a risk weight of 150%, then this rating is applied on all the unrated facilities of the borrower and risk weighted at 150%.
6. Treatment of Multiple Ratings is as per the RBI guidelines. Where two ratings are available, the lower of the two ratings is used for risk-weighting purposes. In case where three or more ratings are available, the second-lowest rating is used for determining the applicable risk weight.

(ii) Quantitative Disclosures:

Credit Exposures by Risk Weights (30-06-2026) (₹ in Cr)

S. No.	Risk Weight	Exposure
1	Below 100% risk weight	9,658.69
2	100% Risk weight	2,758.76
3	More than 100%	10,632.06
Total		23,049.51

Credit Risk Mitigation (30-06-2026) (₹ in Cr)

S. No.	Particulars	Exposure	Credit Risk Mitigant	Net Exposure
1	Gold Loan	9,728.15	9,712.83	15.32
2	Loan against FD	338.48	338.48	0

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