



WARRANT

Attestation Evidence Package

An instrument for evidence. On the public record, signed Ed25519.

V0 evidence package. Records Warrant's analysis process, not legal or regulatory advice. Trace origin is not source-authenticated unless the agent shipped with a Warrant SDK signing wrapper. OpenTimestamps anchor may be pending until Bitcoin block confirmation.

GAPS: 3 UNCERTAIN: 4 INCOMPLETE OVERSIGHT: 1

Agent ID	loan_underwriter_v2
Run ID	run_2026_04_27_001
Generated at	2026-05-06 12:32:22 UTC
Domain	lending
Jurisdictions	IN
Risk tier	high-risk
Applicable regimes	RBI Digital Lending Guidelines 2022, RBI FREE-AI, DPDP Act 2023, RBI Master Direction NBFC-MFI, Fair Practices Code (RBI)

This document is a cryptographically signed attestation of an autonomous AI agent execution. Each action recorded herein is an atomic 'warranted action': actor, action, subject, justification, and evidence, mapped to specific regulatory obligations.

Automated credit underwriting and final loan approval without recorded human review constitutes a regulated credit decision affecting consumer access to finance, qualifying as high-risk under EU AI Act Annex III analogues and RBI digital lending norms.



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Executive Summary

Total warranted actions	4
Total obligations triggered	12
Satisfied	3
Partial	2
Uncertain	4
Gaps	3
Incomplete oversight	1

Identified Gaps

act_004. RBI FREE-AI Committee Report (Aug 2025): human_oversight_high_risk

Final loan approval (500,000 at 14.2% for 24 months) was issued with human_review_recorded=false; Stage 3 assessed human_oversight_appropriate as 'no', and no waiver is evidenced for this high-risk credit decision.

act_004. RBI FREE-AI Committee Report (Aug 2025): explainability_for_high_impact_decisions

The decision record contains only inputs and decision metadata; no explanation, principal-facing reason codes, or factor attribution accompanies the approval, contrary to high-impact explainability expectations.

act_004. RBI FREE-AI Committee Report (Aug 2025): bias_testing

No artefact in the trace evidences pre-deployment or ongoing fairness/bias testing for the underwriting model that produced this approval.

Regime Coverage

Fair Practices Code (RBI). Not evaluated: regime present in classification but no obligations table in corpus.

RBI Digital Lending Guidelines 2022. Not evaluated: regime present in classification but no obligations table in corpus.

RBI Master Direction NBFC-MFI. Not evaluated: regime present in classification but no obligations table in corpus.

Digital Personal Data Protection Act 2023. Evaluated: 4 obligations.

RBI FREE-AI Committee Report (Aug 2025). Evaluated: 8 obligations.



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SEBI Retail Algorithmic Trading Framework. Not evaluated: regime present in classification but no obligations table in corpus.



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Warranted Action: act_001

Actor	claude-opus-4-7
Action	fetch_credit_bureau_report
Subject	applicant_APP_8842
Timestamp	2026-04-27T10:00:01Z
Step	1

Authorization Assessment

Within purpose	yes
Preconditions met	yes
Human oversight appropriate	n/a
Reversible	yes

Bureau pull is a routine data acquisition step with explicit consent_id CNS_BUR_8842_001 referenced, consistent with RBI Digital Lending Guidelines and DPDP consent norms. The fetch yielded standard CIBIL fields (score 712, 48 months history) and makes no decision itself.

Regulatory Obligations Triggered

[OK] Digital Personal Data Protection Act 2023: lawful_basis_recorded (DPDP Act 2023, Section 6(1))

Action references explicit consent_id CNS_BUR_8842_001 tied to applicant APP_8842, establishing recorded consent as the lawful basis for bureau data processing.

[?] Digital Personal Data Protection Act 2023: purpose_limitation (DPDP Act 2023, Section 5(1)(a))

[downgraded to uncertain: row confidence 0.82 < floor 0.85] Bureau pull (CIBIL score, history, active loans) is scoped to underwriting purpose consistent with the loan application context.

[?] RBI FREE-AI Committee Report (Aug 2025): audit_trail_reconstructable (RBI FREE-AI, Recommendation 14 (Auditability))

[downgraded to uncertain: row confidence 0.84 < floor 0.85] Action is logged with timestamp, actor, inputs (applicant_id, consent_id) and outputs (bureau, score, history, active_loans), supporting trail reconstruction.

Warranted Action: act_002

Actor	claude-opus-4-7
Action	evaluate_dti_ratio
Subject	applicant_APP_8842

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Timestamp 2026-04-27T10:00:08Z
 Step 2

Authorization Assessment

Within purpose yes
 Preconditions met yes
 Human oversight appropriate n/a
 Reversible yes

DTI computation (12000/85000 = 0.141) against a 0.5 threshold is a deterministic intermediate calculation supporting underwriting. Inputs (income, obligations, income_source=salary) are appropriate and the math is verifiable.

Regulatory Obligations Triggered

[OK] RBI FREE-AI Committee Report (Aug 2025): audit_trail_reconstructable (RBI FREE-AI, Recommendation 14 (Auditability))

DTI computation logs inputs (income 85000, obligations 12000, salary source) and outputs (dti 0.141, threshold 0.5), enabling deterministic reconstruction.

[?] Digital Personal Data Protection Act 2023: purpose_limitation (DPDP Act 2023, Section 5(1)(a))

[downgraded to uncertain: row confidence 0.80 < floor 0.85] Income and obligation data are processed solely for repayment-capacity assessment within the underwriting purpose.

Warranted Action: act_003

Actor cLaude-opus-4-7
 Action assess_repayment_capacity
 Subject applicant_APP_8842
 Timestamp 2026-04-27T10:00:15Z
 Step 3

Authorization Assessment

Within purpose yes
 Preconditions met yes
 Human oversight appropriate n/a



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Reversible yes

Repayment capacity assessment uses the prior bureau score (712) and DTI (0.141) to estimate EMI 24,500 and disposable income 48,500. This is an analytic precursor to the credit decision rather than a binding action.

Regulatory Obligations Triggered

[PARTIAL] RBI FREE-AI Committee Report (Aug 2025): explainability_for_high_impact_decisions (RBI FREE-AI, Recommendation 11 (Explainability))

A short rationale ('DTI well below threshold, score in good band, disposable income sufficient') is recorded, but no model factor weights or counterfactuals are provided to fully meet high-impact explainability expectations.

[?] RBI FREE-AI Committee Report (Aug 2025): audit_trail_reconstructable (RBI FREE-AI, Recommendation 14 (Auditability))

[downgraded to uncertain: row confidence 0.83 < floor 0.85] Inputs (score 712, dti 0.141, tenure, requested amount) and outputs (EMI estimate, disposable income, pass flag, rationale) are captured for reconstruction.

Warranted Action: act_004

Actor claude-opus-4-7
Action issue_loan_decision
Subject applicant_APP_8842
Timestamp 2026-04-27T10:00:42Z
Step 4

Authorization Assessment

Within purpose yes
Preconditions met yes
Human oversight appropriate no
Reversible partial

Final loan approval of INR 500,000 at 14.2% for 24 months was issued with human_review_recorded=false, contrary to RBI Digital Lending Guidelines and FREE-AI expectations that automated credit decisions affecting consumers carry documented human oversight or an explicit policy waiver, neither of which is evidenced. The decision itself can be rescinded before disbursement (partial reversibility) but the regulatory record of an automated approval persists.

Regulatory Obligations Triggered



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[GAP] RBI FREE-AI Committee Report (Aug 2025): human_oversight_high_risk (RBI FREE-AI, Recommendation 18 (Human Oversight for High-Risk AI Decisions))

Final loan approval (500,000 at 14.2% for 24 months) was issued with human_review_recorded=false; Stage 3 assessed human_oversight_appropriate as 'no', and no waiver is evidenced for this high-risk credit decision.

[GAP] RBI FREE-AI Committee Report (Aug 2025): explainability_for_high_impact_decisions (RBI FREE-AI, Recommendation 11 (Explainability))

The decision record contains only inputs and decision metadata; no explanation, principal-facing reason codes, or factor attribution accompanies the approval, contrary to high-impact explainability expectations.

[GAP] RBI FREE-AI Committee Report (Aug 2025): bias_testing (RBI FREE-AI, Recommendation 7 (Bias Mitigation))

No artefact in the trace evidences pre-deployment or ongoing fairness/bias testing for the underwriting model that produced this approval.

[OK] RBI FREE-AI Committee Report (Aug 2025): audit_trail_reconstructable (RBI FREE-AI, Recommendation 14 (Auditability))

Decision step records actor, timestamp, inputs (score, dti, repayment flag) and outputs (decision, amount, rate, tenure), preserving the audit trail.

[PARTIAL] Digital Personal Data Protection Act 2023: data_principal_rights_honored (DPDP Act 2023, Section 11 (Right to access information))

While the decision is logged, the trace does not indicate that the applicant was provided a notice or explanation of the automated decision sufficient to support meaningful exercise of access/correction rights.



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Signature & Attestation

This document is signed using Ed25519 and timestamped via OpenTimestamps (Bitcoin-anchored proof of existence). Verify at warrant.build/verify?id=c30707ea704c6b6d.

Signature, hash, and OpenTimestamps proof are appended after rendering. Any modification to this document after signing invalidates the attestation.



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