Policy on Relief Measures to Borrowers engaged in Exports

Finova Capital Private Limited

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1. INTRODUCTION

This policy outlines the framework for extending relief measures as per Reserve Bank of India (Trade Relief Measures) Directions, 2025 dated November 14, 2025 (hereinafter referred to as "**RBI Directions**"). The objective is to support exporters impacted due to recent market disruptions and help to mitigate the burden of debt servicing brought by trade disruptions caused by global headwinds. This is a combination of relaxation in time period for export realization beside measures to ease debt servicing burden of the exporter. This Policy covers eligibility criteria, procedural steps, compliance requirements and disclosures for implementing the relief measures as directed by RBI.

This policy lays down the "Policy on Relief Measures to Borrowers engaged in Exports" of Finova Capital Private Limited (hereinafter referred to as "**FCPL**" or "**the Company**") in line with the above RBI directions (as amended from time to time). These guidelines mandates to put in place a policy for providing the relief measures specified in the said RBI Directions.

2. SCOPE AND APPLICABILITY

The relief Measures shall apply to the FCPL borrower upon fulfilment of all of the following conditions:

2.1 The borrower is engaged in exports relating to any of the sectors specified at Annex-I of this Policy;
2.2 The borrower had an outstanding export credit facility from any Regulated Entity (RE) as of August 31, 2025, as defined under RBI Directions;
2.3 The account(s) of the borrower with all other REs was/were classified as 'Standard' as on August 31, 2025;
2.4 The borrower's business must be impacted by trade disruptions caused by global headwinds.
If the borrower had an outstanding export credit facility as of August 31, 2025, from any other Regulated Entity (RE), the borrower shall arrange Certification from such RE(s) which has/have extended export credit to the borrower;

3. RELIEF MEASURES

For eligible borrowers as mentioned above, the FCPL may extend following relief measures:

3.1 Moratorium/Deferment

(i) In respect of term loans, the Company may extend a moratorium on payment of all instalments (principal and/or interest) falling due between September 1, 2025 and December 31, 2025 ("Effective Period");
(ii) During the moratorium/ deferment period, interest shall continue to accrue. However, interest application shall be on simple interest basis, without compounding effect, i.e., there shall be no interest on interest;
(iii) The accumulated accrued interest during moratorium/ deferment period may be converted into a funded interest term loan (FITL) which shall be repayable in one or more instalments after March 31, 2026, but not later than September 30, 2026.

3.2 While considering the above reliefs measures, Head of Credit shall 'inter alia' look into the following aspects such as:

a) The relaxations shall be extended after obtaining proper request & supporting documents from the eligible borrower;

b) The assessment would include evaluation of the borrower including facing genuine difficulties arising from trade disruptions caused by global headwinds and not due to any other reasons;

c) Report from Credit Information Company (CIC) will be generated to verify that all accounts in the name of the borrower are classified as “Standard” as on 31st August 2025;

d) The viability of the borrower’s business shall be properly established and existing and projected cash flows will be realistically analysed, taking into account the challenges being faced by the borrower due to global headwinds.

4. ASSETS CLASSIFICATION

4.1 The moratorium period/ deferment, wherever granted, shall be excluded by the Company while calculating the number of days past-due for the purpose of asset classification under the extant IRACP norms;

4.2 Grant of moratorium/ deferment of instalments in accordance with the policy shall not be treated as an event of restructuring in terms of extant regulations. Consequently, such a measure, by itself, shall not result in asset classification downgrade;

4.3 After the expiry of the moratorium/deferment period, the asset classification shall be as per the extant IRACP norms;

4.4 The Company shall report to the Credit Information Companies (CICs) as per the extant instructions, duly taking into account the above-mentioned provisions.

5. POLICY REVIEW & AMENDMENTS

The policy shall be reviewed/ amended by the Board in the event of any regulatory changes and if any contradiction is found between this Policy and RBI guidelines / any other regulatory guidelines, then RBI guidelines would prevail.

ANNEXURE 1

LIST OF ELIGIBLE SECTORS

2-Digit HS Code	Description
03	Fish and crustaceans, molluscs and other aquatic invertebrates.
29	Organic chemicals
38	Miscellaneous chemical products.
39	Plastic and articles thereof.
40	Rubber and articles thereof.
42	Articles of leather, saddlery and harness; travel goods, handbags and similar containers, articles of animal gut (other than silk-worm) gut.
57	Carpets and other textile floor coverings.
61	Articles of apparel and clothing accessories, knitted or crocheted.
62	Articles of apparel and clothing accessories, not knitted or crocheted.
63	Other made-up textile articles; sets; worn clothing and worn textile articles; rags
64	Footwear, gaiters and the like; parts of such articles.
68	Articles of stone, plaster, cement, asbestos, mica or similar materials.
71	Natural or cultured pearls, precious or semiprecious stones, precious metals, clad with precious metal and articles thereof; imitation jewellery; coin.
73	Articles of iron or steel
76	Aluminium and articles thereof.
84	Nuclear reactors, boilers, machinery and mechanical appliances; parts thereof.
85	Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts.
87	Vehicles other than railway or tramway rolling stock, and parts and accessories thereof.
90	Optical, photographic cinematographic measuring, checking precision, medical or surgical inst. And apparatus parts and accessories thereof;
94	Furniture; bedding, mattresses, mattress supports, cushions and similar stuffed furnishing; lamps and lighting fittings not elsewhere specified or included