

**ORIX Leasing & Financial Services India Limited**  
**(CIN: U74900MH2006PLC163937)**

**POLICY ON TRADE RELIEFS MEASURES**

**Version 1.0**

## POLICY ON TRADE RELIEFS MEASURES

### I. Preamble:

This Policy is enunciated pursuant to the RBI circular no. RBI/2023-24/117 DoS.CO.CSITEG.SEC.No.9/31-01-015/ 2023-24, dated November 14, 2025, on Reserve Bank of India (Trade Relief Measures) Directions, 2025 ('RBI Circular'). This policy outlines the eligibility criteria, types of relief, procedures, monitoring, and reporting requirements for the Company to grant Moratorium to the Borrowers of the Company in repayment of all Equated Monthly Instalments [principal and/or interest], falling due between the Period (as defined below), in respect of the Term Loan granted by the Company.

### II. Objective:

The objective of RBI Circular is to mitigate the burden of debt servicing brought about by disruptions caused by global headwinds and to ensure the continuity of viable businesses. As a measure of solidarity, to borrowers who have been economically impacted by global headwinds, RBI has permitted all Indian Banks / Indian financial Institutions and NBFCs to offer moratorium to their borrowers on payment of all instalments [principal and interest] falling due between September 1, 2025 and December 31, 2025.

### III. Definitions:

- (1) **"Approval Authority Matrix ("AAM")"** means the authority matrix adopted by the Board of Directors of the Company and as may be amended from time-to-time defining the authority of shareholders, Board of Directors, Committees, Managing Director, Senior Management Personnel etc.
- (2) **'Borrower'** shall mean any borrower of the Company who has availed Term Loan from the Company and the amount due from such Borrower, towards the Term Loan, is still outstanding in the books of the Company during the Period and eligible under para IV of this Policy
- (3) **'Company'** means ORIX Leasing & Financial Services India Ltd. (OLFS).
- (4) **"Collection Committee" or "Committee"** means the Collection Committee of the Company as constituted by the Board.
- (5) **'Equated Monthly Instalment' (EMI)** shall mean monthly instalments payable by the Borrower to the Company towards repayment of the Term Loan availed by Borrower which shall include principal and interest applicable on the Term Loan availed.
- (6) **'Term Loan'** means the loan granted by the Company to the Borrower and having bullet repayment.
- (7) **'Regulated Entities'** means (a) Commercial Banks, (b) Primary (Urban) Co-operative Banks, State Co-operative Banks and Central Co-operative Banks (c) Non-Banking Financial Companies (including Housing Finance Companies) and (d) All-India Financial Institutions.

- (8) **‘Moratorium’** means postponement of repayment of EMI [principal and interest] payable by the Borrower on due date falling during the Period.
- (9) **‘Period’** means duration commencing from September 1, 2025 and ending on December 31, 2025 during which the Moratorium may be allowed to the Borrowers.

#### **IV. Eligibility Criteria:**

The relief under this policy is applicable to all the Borrower upon fulfilment of the following conditions:

- (1) The Borrower is engaged in the business of exports relating to any of the sectors specified at Annexure – 1.
- (2) The Borrower had an outstanding Term Loan facility from OLFS as of August 31, 2025. \*
- (3) The account (s) of the Borrower with all Regulated Entity(s) was/were classified as ‘Standard’ as on August 31, 2025. \*
- (4) The Borrower’s business must be impacted by trade disruptions caused by global headwinds.

\*This condition will have to be verified where OLFS has not sanctioned the export credit facility to the Borrower, but other Regulated Entity(s) have provided export credit to the Borrower. In such case the Borrower may qualify for Moratorium under this Policy in respect of Term Loan availed by the Borrower from the Company subject to the condition that a certification is issued to the Borrower by any other Regulated Entity(ies) which has/have extended export credit to the Borrower.

#### **V. Assessment of Eligibility Criteria of the Borrower:**

The following aspects shall be considered while considering the eligibility criteria of the Borrower:

- (1) The Moratorium on Term Loan shall be provided after obtaining proper request from the Borrower.
- (2) It shall be ensured that the Borrower is facing genuine difficulties arising from trade disruptions caused by global headwinds and not due to any other reasons.
- (3) A 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 August 31, 2025 with all Regulated Entities.
- (4) The viability of the Borrower’s business will be properly established. Existing and projected cash flows will be realistically analysed, considering the challenges being faced by the Borrower due to global headwinds.

Note: Decision of OLFS shall be final and conclusive in this regard and such decision and assessment shall have to be recorded in writing and communicated to the Borrower.

#### **VI. Terms and Conditions of Moratorium:**

Below are the terms and conditions for extending Moratorium to the eligible Borrowers:

- (1) The Company may grant Moratorium in respect of all Term Loans relating to payment of all instalments [principal and interest] falling due between the Period. This will require approval of the Collection Committee as per the structure and mechanism mentioned under Clause 7.3 of the Approval Authority Matrix of the Company.
- (2) The Interest shall continue to accrue during the Moratorium and shall be applied on simple interest basis, without the compounding effect i.e. there shall be no interest on interest.
- (3) The accumulated accrued interest during Moratorium Period may be converted into a funded interest term loan which shall be repayable in one or more instalments after March 31, 2026, but not later than September 30, 2026.

## **VII. Asset Classification:**

- (1) The Moratorium, wherever granted, shall be excluded while calculating the number of days past-due for the purpose of asset classification under the extant Income Recognition Asset Classification Provisioning (IRACP) norms applicable to the Company.
- (2) Grant of Moratorium in accordance with this Policy shall not be treated as an event of restructuring in terms of extant regulations and shall consequently not result in asset classification downgrade.
- (3) After the expiry of the Moratorium, the asset classification shall be as per the extant IRACP norms applicable to the Company.
- (4) Reporting to the Credit Information Companies (CICs) shall be undertaken basis the above provisions.

## **VIII. Provisioning:**

- (1) In respect of eligible Borrower accounts which were in default but classified as 'standard' as on August 31, 2025, and where Moratorium is granted as per this Policy, a general provision of not less than 5 % of the total outstanding shall be made in such accounts, by December 31, 2025.
- (2) The above general provision may be adjusted against the actual specific provisioning requirements for slippages from said Borrower accounts. Any residual general provisions at the end of the financial year 2025-26 shall be either written back or adjusted against the provisions required for all other borrower accounts by June 30, 2026.

The above general provisions shall not be reckoned for arriving at net NPAs till they are adjusted against the actual provisioning requirements as under point no. (1) mentioned above. Further, till such adjustments, these provisions shall not be netted from gross advances but shown separately in the balance sheet as appropriate.

- (3) Accrued simple interest during Moratorium will be converted into Funded Interest Term Loan (FITL)
- (4) FITL shall attract the same 5% general provision

- (5) FITL shall be included in Exposure of Default (EAD) for Expected Credit Loss (ECL) computation

#### **IX. Disclosures & Reporting:**

- (1) The Chief Risk Officer will maintain MIS on the reliefs provided to the Borrowers which shall include inter alia Borrower-wise and credit-facility wise information regarding the nature and amount of Moratorium granted.
- (2) The Chief Compliance Officer will submit fortnightly report in a format that may be hosted by RBI on its DAKSH Platform.

#### **X. Documentation:**

Following communication to and from Borrowers will be required for the purpose of documentations with regard to availment of Moratorium by Borrower:

- (1) A request by the Borrower to avail Moratorium along with the proof of documents establishing compliance with the eligibility and assessment criteria mentioned under paragraph IV and V, respectively, above.
- (2) Acceptance of request by the Company for Moratorium and providing of revised repayment schedule of EMI by the Company to the Borrower.
- (3) Acceptance by the Borrower of revised EMI to accommodate the interest accrued during the Period and revised tenure.
- (4) Agreement / Supplemental Agreement to cover the terms and conditions of Moratorium

#### **XI. Publication and Communication:**

This Policy shall be uploaded on Company's website at 'www.orixindia.com' for benefits of Borrower and as required under RBI Circular.

## LIST OF ELIGIBLE SECTORS

Sr. No.	2-Digit HS Code	Description
(1)	03	Fish and crustaceans, molluscs and other aquatic invertebrates.
(2)	29	Organic chemicals
(3)	38	Miscellaneous chemical products.
(4)	39	Plastic and articles thereof.
(5)	40	Rubber and articles thereof.
(6)	42	Articles of leather, saddlery and harness; travel goods, handbags and similar containers, articles of animal gut (other than silk-worm) gut.
(7)	57	Carpets and other textile floor coverings.
(8)	61	Articles of apparel and clothing accessories, knitted or crocheted.
(9)	62	Articles of apparel and clothing accessories, not knitted or crocheted.
(10)	63	Other made-up textile articles; sets; worn clothing and worn textile articles; rags
(11)	64	Footwear, gaiters and the like; parts of such articles.
(12)	68	Articles of stone, plaster, cement, asbestos, mica or similar materials.
(13)	71	Natural or cultured pearls, precious or semiprecious stones, precious metals, clad with precious metal and articles thereof; imitation jewellery; coin.
(14)	73	Articles of iron or steel
(15)	76	Aluminium and articles thereof.
(16)	84	Nuclear reactors, boilers, machinery and mechanical appliances; parts thereof.
(17)	85	Electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers, and parts.
(18)	87	Vehicles other than railway or tramway rolling stock, and parts and accessories thereof.
(19)	90	Optical, photographic cinematographic measuring, checking precision, medical or surgical inst. And apparatus parts and accessories thereof;
(20)	94	Furniture; bedding, mattresses, mattress supports, cushions and similar stuffed furnishing; lamps and lighting fittings not elsewhere specified or included

### Revision History

Adoption/Revision date	Description	Owner/Reviewed by	Version #
11-12-2025	Introduction	Compliance Department (Regulatory)/Credit/Finance & Accounts team	1.0