



## **POLICY ON RESOURCE PLANNING**

*(Last Amended in the Board dated 8th February 2017)*

### **Brief back ground**

The company, Manappuram Finance Limited is a Non-Deposit taking Non Banking Financial institution operating under a Certificate of Registration from the Reserve Bank of India.. Its operations are spread across the country.

### **Regulatory requirements**

Reserve Bank of India vide its Circular No.DNBS(PD) CC No.349 /03.10.001/2013-14 advised that NBFCs shall put in place before the close of business on September 30,2013, a Board approved policy for resource planning which inter-alia, should cover the planning horizon and the periodicity of private Placement. The policy of the company on resource planning will also cover the objectives of the above regulatory requirement.

#### ***1) Policy for resource Planning.***

##### ***Long term objective.***

The long term broad targets of the company for resource mobilization shall be in the following ratio;

Banks/Institutional funding : 60%

By the issue of NCD : 20%

By the issue of Commercial papers or other money

Market instruments : 20%

At the end of each financial year this shall be reviewed and the progress shall be reported.

**The total resources shall be mobilized from a diversified group of sources so that no single lender shall have an exposure of more than 15% of the overall funding.**

***Planning for short term and long term resources***

The resource planning of the company shall be based on its Asset Liability Matching (ALM) requirement Broadly the planning horizon shall be of following two categories;

- A. Long Term Resources and
- B. Short term resources.

***A. Policy on raising long term resources.***

***1. Tenure***

Considering the fact that the company's business is mainly of lending against gold and the period of the loan is upto 12 months only any resource that could be raised with a maturity profile of more than 12 months can be classified as a long term resource. The proportion of the long term and short term resources for the company shall be fixed from time to time by the ALCO Committee based on the business plans for each year and the ALM pattern to be maintained by the company.

***2. Manner of raising long term resources***

***2.1 Borrowings from banks and other Financial Institutions.***

The company may plan for raising long term resources from banks and financial institutions. The major source of funding for the company as of now is nationalized and other scheduled commercial banks ,All India Financial Institutions and larger NBFCs. While these organized sector shall continue to be the biggest source for meeting the long term as well as short term funding requirement, the company shall develop alternative sourcing of funds from other markets depending on the business requirements.

***2.2 Retained Earnings.***

The company shall plough back its profits in such proportions based on the maintenance of capital adequacy ratio stipulated by regulations from time to time.

***2.3 Issue of Debt Securities.***

The company shall subject to the applicable laws and regulations, issue debt securities depending on its business requirements and the market conditions. The debt securities may be issued in the following manner;

*a. Public issue of Rated Secured Redeemable Non convertible Debentures( NCDs)*

*b. Private placement of Rated and Listed NCDs*

*c. Private placement of Un Listed Rated and Un rated NCDs*

***a. Public issue of NCDs***

The company may subject to the compliance with the applicable provisions of laws/ and regulations may issue Secured Redeemable Non convertible Debentures with maturity period of 12 months and above (NCDs/Bonds) at such intervals by way of public issue at such coupon rates as the company think fit from time to time and shall be listed in one or more recognized stock exchanges in India. The frequency of the issue may be decided by the Board / Committee of the Board from time to time depending on the business environment, market conditions and regulatory provisions in this behalf.

***b. Private Placement of Listed NCDs***

The company may subject to the compliance with the applicable provisions of laws and regulations may issue Secured Redeemable Non convertible Debentures (NCDs/Bonds) at such intervals by way of private placement to such number of subscribers with minimum subscription amount of Rs.5.lacs or such higher minimum subscription as may be prescribed under any law or regulation in force from time to time to such eligible investors including High Net worth Individuals and Institutions. The securities may be listed in one or more recognized stock exchanges in India.

The timing or periodicity of private placement in this manner may be decided by the Financial Resource & Management Committee of the Board based on the market conditions, availability of funds and the business plan of the company and subject to compliance with the statutory/ regulatory requirements.

***c. Private Placement of Unlisted NCDs ( Rated and un rated)***

Based on the business plan of the company for each year, the company may issue Unlisted NCDs to individuals/ institutions or such other class or category of investors. The timing and the amount of issue shall be decided by the Financial Resources and Management Committee of the Board and shall be subject to the statutory and regulatory compliances as may be required from time to time. However, as a policy the company in the ordinary course of its business shall have maximum of 3 such issues during a month and the total number of subscribers in each issue shall not exceed the maximum number of subscribers fixed under any of the applicable laws or regulations.

Private placement of Unlisted Debentures shall be made on the basis of a Disclosure document which shall specify the opening and closing dates of the issue, financial position and performance of the company as per the two latest audited financial statements of the company and of the major risk factors as perceive by the management.

The issue of debentures covered under sub clause a,b,and c above shall be secured on the assets of the company moveable or immovable and a charge shall be registered in accordance with the provisions of the Companies Act,1956.

Further the company shall issue NCDs for the purpose of its own Balance sheet only and shall not grant loans against its own debentures.

***2.4 Issue of Subordinated Debt instruments.***

The Company may for meeting its ALM requirements issue Un Secured Subordinated Debt instruments which are not classified as deposits under the applicable directions of the Reserve Bank of India with a maturity period exceeding 5 years from the date of allotment. This instrument may be issued to such class or category of investors as the Financial Resources and Management Committee of the Board decides from time to time.

## **B. Short Term Resources**

Resources with a maturity of 12 months and less shall be treated as short term resources. The main sources of such resources are bank limits and Commercial papers(CP). Depending on the ALM requirements the company may borrow funds from banks and other financial institutions / corporates from time to time and continue to issue commercial papers with maturity ranging from one month to 12 months.

Subject to applicable laws and regulations the company may also avail inter corporate loans which are exempt from the purview of public deposit under the applicable directions of RBI.

### ***II) Annual Plan for Mix of resources.***

The ideal mix of resources for the company and the resource mobilization program for each financial year shall be decided in advance and shall be properly defined in the business plan for each year. The mix of resources shall be mobilized in accordance with the above policy.

### ***III) Amendment to the policy.***

The policy may be amended from time to time by the Board of Directors on the recommendation of the ALCO which is monitoring the ALM.

### ***IV) Applicability***

The policy shall be effective from the date notified by the Board of Directors.

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