



RP-S-08

**MANAPPURAM FINANCE LIMITED (MAFIL)
POLICY FOR DETERMINATION OF MATERIALITY AND DISCLOSURE OF MATERIAL EVENTS/
INFORMATION**

Version Control		
Version Number	Description	Date
Version 1	Renewal/Amendment	05-11-2015
Version 2	Renewal/Amendment	18-05-2022
Version 3	Renewal/Amendment	12-05-2023
Version 4	Renewal/Amendment	10-08-2023
Version 5	Renewal/Amendment	13-08-2024
Version 6	Renewal/Amendment	20-03-2025
Version 7	Renewal/Amendment	30-03-2026

Effective Date : **30-03-2026**
Next Review Date : **30-03-2027**
Policy Owner : **Secretarial Department**
Prepared By : **Secretarial Department**
Custodian : **Company Secretary**
Reviewed by : **Policy Review Committee**
Approved by : **Board of Directors**



FOR DETERMINATION OF MATERIALITY AND DISCLOSURE OF MATERIAL EVENTS/INFORMATION *(Last Amended in the Board dated March 20,2026)*

A. INTRODUCTION

This Policy is drafted as per the requirements under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (LODR) and applies in respect of Disclosure of material events in relation to Manappuram, its Directors, Promoters, Key Managerial Personnel, Senior Management Personnel as required under LODR.

B. DEFINITIONS

All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the SEBI's LODR, 2015 and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued thereunder, as amended from time to time.

"Audit Committee or Committee" means Audit Committee constituted by the Board of Directors of the Company, from time to time under provisions of SEBI LODR, 2015, and/or the Companies Act, 2013.

"Board of Directors or Board" means the Board of Directors of Manappuram Finance Limited, as constituted from time to time.

"Key Managerial Personnel", in relation to a company, means—

- (i) the Chief Executive Officer or the managing director or the manager;
- (ii) the company secretary;
- (iii) the whole-time director;
- (iv) the Chief Financial Officer;
- (v) such other officer, not more than one level below the directors who is in whole-time employment, designated as key managerial personnel by the Board; and
- (vi) such other officer as may be prescribed;



“LODR” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“Material Events” are those that are specified in Para A of Part A of Schedule III of the LODR.

“Other Events” are those as may be decided from time to time and in accordance with Para B of Part A of Schedule III, as specified in sub-regulation (4).

C. AUTHORISED PERSONS AND THEIR RESPONSIBILITY FOR DETERMINATION OF MATERIALITY OF EVENTS

The Company Secretary will be the custodian of the disclosure process. The contact details of the Company Secretary are: - Email: - cosecretary@manappuram.com and telephone: - 0487-3050408

The Company's Key Managerial Personnels (KMPs) shall jointly and/ or severally determine Materiality of Information/ Events and Dissemination of the same as covered by this Policy. KMPs upon determining the materiality of the events, shall inform the Company Secretary about the events and the Company Secretary shall inform the Stock Exchanges about the particulars of the event within the timelines provided under the LODR.

Company Secretary or his/ her designee, in each case, pre-approve in consultation with CEO and CFO any deviation from the Policies and Procedures outlined in this Policy.

The Senior Management Personnel and such other persons, as determined by the aforesaid Authorized Persons shall be relevant Employees for the purpose of this Policy, to identify potential event or information pertaining to their functional roles and report the same to the aforesaid Authorized Persons.

D. MATERIALITY ASSESSMENT

The Company shall consider the following Criteria and Principles when determining the Materiality of Events/ Information mentioned in Regulation 30 (4) of the 2015 Regulations:

Qualitative Criteria:

- i. Whether the omission to report the particular event or information is likely to result in discontinuity or alteration of the event or information already publicly available;



- ii. Whether the omission to report an event or information is likely to result in a significant market reaction if the said omission came to light at a later date;

Quantitative Criteria:

- i. Whether the value or the Expected Impact in Terms of Value exceeds the lower of the following:
 - a. two percent of turnover, as per the last audited consolidated financial statements of the company;
 - b. two percent of net worth, as per the last audited consolidated financial statements of the company, except in case the arithmetic value of the net worth is negative; or
 - c. five percent of the average of absolute value of profit or loss after tax, as per the last three audited consolidated financial statements of the company.

[Note: in terms of SEBI Circular dated July 13, 2023, the average of absolute value of profit or loss is required to be considered by disregarding the 'sign' (positive or negative) that denotes such value as the said value / figure is required only for determining the threshold for 'materiality' of the event and not for any commercial consideration].

For the avoidance of doubt, events listed in Para A - Part A of Schedule III of LODR shall be disclosed without application of materiality criteria.

E. TIMELINES FOR DISCLOSURE

The Company shall disclose all events or information within the timelines specified in the Applicable Laws.

F. DISCLOSURE OF THE POLICY

This Policy will be uploaded on the Website of the Company.

G. LIMITATION AND AMENDMENT

In the event of any conflict between the provisions of this Policy and of the Act or LODR or any other statutory enactments, rules, the provisions of such Act or LODR or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the LODR, Act and/or applicable laws in this regard shall automatically apply to this Policy subject to the approval of Board of Directors.
