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

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Policy Owner : Secretarial Department
Prepared By : Secretarial Department
Custodian : Company Secretary
Recommended by : Audit Committee
Approved by : Board of Directors

POLICY FOR DETERMINATION OF MATERIALITY AND DISCLOSURE OF MATERIAL EVENTS/INFORMATION

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 ("LODR").

B.DEFINITIONS

All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the LODR 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 ("Companies Act, 2013"), as amended from time to time.

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

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

C.OBJECTIVES OF THE POLICY

The objectives of this Policy are as follows:

a. To ensure that the Company complies with the disclosure obligations to which it is subject as a publicly traded company as laid down by the LODR
b. To ensure that the information disclosed by the Company is adequate, accurate, timely and transparent.
c. To ensure that corporate documents and public statements are accurate and do not contain any misrepresentation.
d. To provide a framework that supports and fosters confidence in the quality and integrity of information released by the Company.
e. To ensure uniformity in the Company's approach to disclosures.

D.TYPE OF INFORMATION

The information covered by this Policy shall include "information related to the Company's business, operations, or performance which has a significant effect on securities investment

decisions" (hereinafter referred to as "material information") that the Company is required to disclose in a timely and appropriate manner by applying the guidelines for assessing materiality.

Events or information specified in Para B of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed based on application of materiality criteria.

Events or information specified in Para A of Part A of Schedule III of Regulation 30 of the SEBI Listing Regulations will be disclosed without any application of the guidelines for materiality.

E.AUTHORISED PERSONS

The Board of Directors have authorized the Company Secretary along with the CFO/ Managing Director/ Executive Director for the purpose of determining materiality of an event or information and for the purpose of making disclosures to stock exchange(s). The Company Secretary will be the single point of contact for the above signatories who are authorized to determine materiality and make distributions covered by this Policy.

The contact details of the Company Secretary are: -
Email: - cs@manappuram.com and telephone: - 0487-3050408

F.MATERIALITY ASSESSMENT

Materiality will be determined on a case-to-case basis depending on the facts and the circumstances pertaining to the event or information.

The following criteria will be applicable for determining materiality of event or information:

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 omission of an event or information whose 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 Master Circular for compliance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 by listed entities, 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, it is reiterated that events listed in Para A - Part A of Schedule III of LODR shall be disclosed without application of materiality criteria.

G.TIMELINES FOR DISCLOSURE

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

H.OBLIGATIONS OF INTERNAL STAKEHOLDERS AND COMPANY SECRETARY FOR DISCLOSURE

a. Any event or information, including the information specified in Para A and Para B of Part A of Schedule III of the SEBI Listing Regulations shall be forthwith informed to the Company Secretary upon occurrence, with adequate supporting data/information, to facilitate a prompt and appropriate disclosure to the stock exchanges.
b. The Company Secretary along with the CFO/ Managing Director/ Executive Director will then ascertain the materiality of such event(s) or information based on the above guidelines.
c. On completion of the assessment, the Company Secretary shall, if required, make appropriate disclosure(s) to the stock exchanges.

I.DISCLOSURE OF THE POLICY

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

J.LIMITATION AND AMENDMENT

In the event of any conflict between the provisions of this Policy and of the LODR, the provisions of LODR shall prevail over this Policy. Any subsequent amendment / modification in the LODR, shall automatically apply to this Policy.