MANAPPURAM FINANCE LIMITED (MAFIL)

INTEREST RATE POLICY

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1. Introduction

The Company has been following certain procedures and practices in the matter of fixing interest rates on gold loans and other loans (assets) and NCDs/Subordinated Bonds (liabilities). Interest rates are not controlled by the Reserve Bank of India. However, RBI has vide circular DNBS. CC.PD. No.266/03.10.01/2011-12 dated 26 March 2012 (Guidelines on Fair Practices Code for NBFCs) directed NBFCs to have a documented Interest Rate Policy / Model approved by the Board of Directors which would lay down internal principles and procedures in determining interest rates and other charges on the loan products offered by NBFCs. The specific points referred to in the above referred RBI circular are: -

- Charging of excessive interest rates by NBFCs.

- The need for adoption of an interest rate model along with approach for gradations of risk & rationale for charging differential rates.
- Disclosure of rates of interest rates, changes thereof and publicity thereto.
- Adoption of annualized rates of interest while dealing with customers.

Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 prescribes that the Board of each NBFC shall adopt an interest rate model taking into account relevant factors such as cost of funds, margin and risk premium and determine the rate of interest to be charged for loans and advances. This interest rate policy is put in place in compliance of the SBR guidelines on interest rates.

2. Objectives

The main objectives of the interest rate policy are to: -

- Ensure alignment with best market practices of peers and structural transparency apropos regulatory acceptable elements in the pricing framework.
- Ensure that interest rates are determined in a manner ensuring long term sustainability of business by taking into account the interests of all stakeholders.
- Develop and adopt a suitable model for calculation of a reference rate.
- Enable fixation of interest rates which are reasonable: both actual and perceived.
- Ensure that computation of interest is accurate, fair, and transparent in line with regulatory expectations and market practices.
- Charge differential rates of interest linked to the risk factors specific to products as applicable.

3. Methodology for calculation of interest on loan accounts

The main spirit underlying the methodology is to project a transparent and fair approach to the customers and also be in readiness to adopt the best practices now in vogue amongst the industry peer group keeping in view the peculiarities of the gold loan business and other business of the company.

a. On the daily balances

Interest amount shall be calculated on the daily outstanding balance in the loan account at the applicable rate. Thus, if the annualized rate of interest applicable is R%, the interest amount for each day would be: -

$$\frac{R \times \text{Amount outstanding}}{36500}$$

b. Minimum period for which interest chargeable

Interest shall be charged only for the period the loans are outstanding, subject to a minimum of one day. Interest payable / receivable shall be calculated on the actual daily outstanding balance.

No pre-payment penalty is applicable to gold loans.

c. Basis - number of days per year

Interest shall be calculated based on 365 days a year. Dates of disbursement and closure of account shall both be included for computation of interest. However, MD&CEO may approve any exclusion of date of Disbursement or date of Closure of Account for a particular scheme or loan account as rebate.

d. Compounding

Compounding of interest where applicable, as provided in the loan scheme, shall not be at a frequency more than 1 month / 30 days in a year.

e. Annualised rate of interest

Interest rate quoted shall be on annualized basis only in all documents, internal instructions/communications, and publicity materials (pamphlets, brochures, hoardings, etc).

Where the rates are mentioned in non-annualized form (e.g. in product promotion) the annualized rate shall also be mentioned along with the rate so as to comply with regulatory requirements and Fair Practices Code.

f. Fixed rate / Floating rate

All the loans shall be granted at fixed rate applicable for the whole tenor of the loan or applicable reset period.

g. Maximum/ Ceiling Interest Rate on Loans

Keeping in view the regulatory (RBI) expectations from NBFCs and also the Fair Practices Code the maximum interest rate chargeable shall be fixed at 24% p.a at monthly rest during the normal loan tenure across all states / regions.
Penal charges and other out of pocket expenses charged from the borrowers will be exclusive of the ceilings mentioned above.

The above-mentioned ceilings shall be reviewed periodically at quarterly (calendar) intervals or more frequently, as and when required, by the Board of Directors keeping in view regulatory guidelines / directives, intensity of competition in the market, net interest margin target, market rates etc.

h. Notice to borrowers for changes in interest rates, charges etc.

Notice shall be sent to the borrowers in the vernacular language or a language as understood by the borrower of any changes in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges etc. It shall be ensured that changes in interest rates and charges are affected only prospectively.

4. MAFIL Benchmark Lending Rate (MBLR)

Based on the SBR guidelines, MAFIL has adopted a benchmark (MBLR) rate following the following principles:

a. Weighted Average Cost of Funds (WAC) for the preceding quarter.

b. Operating cost for the preceding quarter.
c. Margin (Aspirational margin of 4%).

Explanations:

Cost of funds (borrowing): Being a non-deposit taking NBFC MAFIL is dependent on wholesale diverse sources including Paper backed borrowings from market, Bank funding and External commercial Borrowings (ECB) for its working funds. All these sources have its own dynamics in pricing, fees and tenor. Accordingly, the cost of funds that can be attributed to pricing of our loans will have to be in alignment with these aspects. While additional factors like rating and interest rate outlook etc do impact our funding terms, in the absence of a transparent benchmark on such items MAFIL may consider average cost of funds incurred during the preceding quarter for determination of the benchmark pricing. This indicator shall be reviewed in the event of a large-scale upheaval of rates in the market.

Operating cost: Operating cost is an important element to be forming part of the pricing parameters. The policy endeavours to make this factor more representative by taking into account all the operational expense, like employee cost, administrative cost, depreciation, cost of lease liability arising from lease accounting, taxes etc plus any risk events occurred during the review period.

Margin: Margin factor is an important aspect in pricing which eventually translates as the reward to the shareholders. The policy considers the Return on Assets (ROA) as a representative indicator to be forming part of the pricing.

Calculation of MBLR%:

Particulars	**Q1FY26**
Weighted average cost of fund (borrowing)(WAC) for the preceding quarter	xx.xx%
Rolling 4 quarter average Opex as a % of Rolling 4 quarter Average AUM	xx.xx%

Margin	xx.xx%
MBLR	**xx.xx%**

5. Risk Based Gradation of Interest Rates

The Lending Rate will be different for different categories of borrowers, considering profile of the customer, tenure of customer relationship, past repayment track record, customer segment, market reputation, inherent credit and default risk in the products, subventions and subsidies available, ancillary business opportunities, future potential, group strength and value to lender group, overall customer yield, Loan-to Value (LTV) ratio, nature and value of primary and collateral security etc. The Lending Rate is determined on a case-to-case basis.

Pricing of each loan product will be derived from MBLR after considering the following risks.

a. Credit risk premium

Credit risk premium shall be computed based on the portfolio behaviour, credit cost arrived at on the basis of net write off, Probability of Default (PD) and Loss Given Default (LGD), Credit Score of the borrowers etc.

b. Customer Acquisition and Retention Cost

To enhance market outreach, attract new customers across targeted segments and encourage responsible repayment behaviour, MAFIL shall incorporate a Customer Acquisition and Retention Cost as a component in its interest rate determination framework.

This component represents the commercial cost associated with promotional initiatives, introductory pricing, customer acquisition programmes and incentives designed to improve product competitiveness and encourage timely repayment behaviour. Such initiatives may include promotional concessions in pricing,

introductory offers for specific customer segments, or incentives linked to prompt repayment.

For pricing purposes, this cost component shall be calculated as the annualised expenditure incurred towards customer acquisition and behavioural incentives provided to the customers in the form of interest rebates which are not included in the operational cost and expressed as a percentage of the average Assets Under Management (AUM) attributable to the relevant product segment.

The resulting percentage shall form part of the interest rate build-up and shall be added to the MAFIL's Benchmark Lending Rate (MBLR), along with other applicable components including Credit Cost, to arrive at the applicable interest rate for each product segment.

c. Return Adjustment factor

A return adjustment factor (negative or positive) shall be considered and applied to the interest rate charged ,based on prevailing market conditions.This ensures that the Interest rate pricing framework remains responsive and adaptive to changes arising from both micro and macro economic forces influencing market.The return adjustment factor will have a threshold of +/- 5% of the derived yield.

The above-mentioned threshold shall be reviewed periodically at quarterly (calendar) intervals or more frequently, as and when required, by the Board of Directors keeping in view regulatory guidelines / directives, intensity of competition in the market, net interest margin target, market rates etc.

d. Differential Pricing

As a predominant gold loan lender (75% of the standalone AUM is contributed by gold loan) and risk profile of the borrowers under the MSME lending activities are largely uniform, MAFIL do not propose to differentiate borrowers based on the credit risk rating models.

As necessitated by business or strategic reasons, the Company may consider under certain situations a differentiated interest rate structure for its products. This will follow a policy framework based on defined parameters with the objective of market penetration or to counter competition and will be approved by a committee where CRO is a compulsory participant.

This will be within the overall policy framework explained in the policy. Any deviation from policy necessitate approval from the policy approving authority.

e. Weight Determination in Pricing Framework

For the purpose of deriving the lending rate, equal weights are assigned to each of the three fundamental components—Cost of Borrowing, Operating Expenses (Opex), and Margin. By assigning the same weight to each component, the pricing framework ensures that funding costs, operational efficiency, and sustainable margins are given balanced consideration in the determination of interest rates.

Given the granular nature of the retail loan book, particularly under MSME lending activities, the risk profile of borrowers is largely uniform. Accordingly, differential pricing at the individual customer level is not applied, as variations in credit risk across individual retail borrowers are minimal. Instead, a credit risk premium is computed at the segment level, based on portfolio characteristics, repayment behaviour, and risk parameters such as Probability of Default (PD) and Loss Given Default (LGD).

This credit risk premium is then applied homogeneously within each segment, ensuring fairness, transparency, and consistency in pricing. By maintaining equal weights for the cost, opex, and margin components, and applying a uniform segment-level risk premium, the Company achieves a balanced, transparent, and risk-aligned approach to interest rate determination.

6. Pricing of Gold Loans

a. Rate of interest, benchmarking to MBLR.

- Considering the nature of the gold loans (collateral valuation being vital) the major inherent risk is the Loan to Value (LTV) or Loan per Gram. Since a higher LTV translates to a higher risk it stands to reason that LTV and Interest rate should be correlated. Accordingly, assuming all other factors to be the same a higher LTV loan should attract a correspondingly higher interest rate as compared with a lower LTV loan.
- The LTV linkage with interest rate shall be at the time of sanction of loan and cannot be changed subsequently due to movements in the overall collateral coverage arising from market movements in gold prices.

- Where substantially low rates of interest are charged on certain / special schemes or in specified regions / areas / branches the maximum amount per borrower shall be appropriately restricted and checks put in place to prevent misuse of the facility. Such schemes shall be periodically reviewed and appropriately modified to meet with the overall objectives of floating such schemes.

b. Rebate on Gold Loan interest

Considering the competition in the market, MAFIL introduced new gold loan schemes with rebates. Schemes offering rebate on the interest rate may be considered on the ground that customers are regularly servicing interest payable on loans. The extent of rebate may vary from scheme to scheme. Rebate considered in cases where interest payable has been serviced by the due dates without any default. For computation of the product pricing the rebate will be factored in as a cost.

c. Due date for servicing interest

Interest shall be serviced as per the terms of sanction of the credit facilities, ie. Monthly, quarterly, half yearly or at the end of the tenure of the loan along with principal. Interest will be calculated from the date of disbursement and shall be charged till the day of closure of the account.

7. Pricing of products of other verticals, benchmarking to MBLR

Rate of interest for products of each vertical shall be benchmarked to MBLR. While pricing each product underlying credit risk premium shall be factored in.

Products offered and features thereof shall be straight forward, transparent and simple to understand so as to comply with the letter and spirit of RBI guidelines. Features of each product, especially the differential features, should be clearly explained to and understood by the prospective borrower before sanction. Operational personnel should be well equipped in this regard.

Maximum Pricing for each Vertical:

Verticals	MBLR (%)	Credit cost (%)	Customer Acquisition & Retention Cost (%)	Maximum Price (%)
	(A)	(B)	(C)	(A+B+C)
Gold loan	xx.xx%	xx.xx%	xx.xx%	xx.xx%
Vehicle Finance	xx.xx%	xx.xx%	xx.xx%	xx.xx%
MSME & Allied (Secured)	xx.xx%	xx.xx%	xx.xx%	xx.xx%

Each business vertical shall adopt a standardized protocol for determining the Credit Risk Premium. This protocol must be validated on a quarterly basis during the Asset-Liability Committee (ALCO) meetings. Additionally, the Risk Committee shall review the methodology periodically to ensure consistency, transparency, and alignment with the overall risk appetite and market conditions.

8. Indicative range of interest linked to MBLR

Indicative range of interest for various verticals / products of MAFIL based on their MBLR is given below.

Verticals / segments / product	Interest Rate Range *
Gold loans	9.90 – 24.00%
Commercial vehicle	14.00 – 24.00%
Car Loan	14.00 – 24.00%
Two-wheeler	15.00 – 24.00%
Other secured loans	12.00 – 22.08%

These rates are subject to review by ALCO on a quarterly basis.

9. Lending below MBLR linking to external benchmarks

As a business organization to meet competition and promotion of products, MAFIL will have to offer interest rates below MBLR. MD&CEO is empowered to approve

interest rate below the MBLR bearing in mind the overall profitability of the company, competitive scenario, business focus and the underlying risk exposure.

For the big-ticket loans like corporate loans where operating expenses are lower, MAFIL may benchmark the rate of interest based on the 10-year G-sec rates, Treasury bill rate, repo rates, etc, with appropriate risk premium and effective rate may be less than the MBLR.

10. Pricing under Co-Lending

MAFIL shall enter into co – lending arrangement as partner lender for efficient capital deployment, business growth etc. Lending under such co – lending arrangement, the originating lender/RE besides carrying the credit risk on themselves may also incur operating cost plus other incidental costs associated with the custody and servicing of the underlying. As per regulations the ultimate pricing to the customer will be the blended rate of both the originating RE and the partnering RE. While originating lender will have their own rate based on parameters applicable to them, MAFIL being the partnering RE is required to fix and quote the interest rate based on our parameters including the credit risk if applicable.

Accordingly, such arrangement shall have separate parameters besides the cost of funds. Accordingly, the following parameters will be applicable:

Cost of funds - (marginal cost/portfolio cost) plus profit margin in terms of return on equity in the range of 15% to 20% of the capital deployed.

While quoting the rate, the Co-lending Committee is to be mindful of the rate that MAFIL may get for similar lending to any alternative counterpart with the same risk profile. The Co-lending committee is authorized to fix pricing under the Co-lending arrangement on a case-to-case basis, broadly following this principle. All transactions to be reported to ALCO for its analysis and information.

11. Processing fee, Prepayment premium and recovery of Out-ofPocket Expenses

a. Gold loans

The Company may also levy other charges such as loan processing fees, insurance (of gold ornaments), processing charges for delivery of gold against lost pawn ticket, safe custody charges (due to failure to take delivery of gold ornaments immediately after closure of account), statement of account etc. In addition, the Company shall be entitled to recover costs incurred in connection with postage, legal costs etc. The above charges shall be pegged at reasonable levels and in the spirit of Fair Practice.

Guidance rates are as under:

Description	Range of charges	Exceptions
Loan processing, Appraisal charges, Insurance etc.	Will be capped at 1% of the loan amount. A reasonable minimum and maximum in absolute terms may be prescribed.	Segment borrowers (i.e. small borrowers), Special schemes may be exempted from such charges.
Delivery against lost Pawn Ticket - processing charges	Between a minimum of Rs 75 and maximum of Rs 100 per pledge	
Safe custody charges – when borrower does not immediately take delivery of the pledged gold ornaments	Between 0.10% to 0.25% per month subject a reasonable minimum and maximum in absolute terms	
Statement of account	Free of cost, if demanded within 30 days of closure of account. In other cases, Rs. 25.	
Postage, Courier charges etc	Reimbursement basis	

Note: The above charges are excluding GST.

b. Non-Gold Loans

Verticals	Processing fee (%) - Excluding GST	Prepayment Premium (%) Excluding GST
Commercial vehicle	1%	2%
Car Loan	1%	2%
Farm Equipment	1%	2%
Two-wheeler	1%	2%
Unsecured loans	1%	2%
Other secured loans	1%	2%

Out of pocket expenses will be charged on reimbursement basis.

12. Annual Percentage Rate (APR):

APR is the annual cost of credit to the borrower which includes interest rate and all other charges associated with the credit facility. The rate shall be computed on the net disbursed amount using IRR approach and reducing balance method. The maximum APR should not exceed 28%. Branches offices shall provide KFS to all the borrowers as per RBI circular RBI/2024-25/18 DOR.STR.REC.13/13.03.00/2024-25 dt. April 15, 2024, which shall inter alia contain APR.

13. Penal Charges

a. Penal Charges (Late payment charges) on overdue loans/ Instalments

When the gold loans remain outstanding beyond the 'normal' tenure penal charges may be charged. However, charges should not exceed 2% p.a. of the outstanding amount and chargeable only during the period of default.

Penal charges shall not be compounded. Penal charges provisions shall be calculated and will apply only after the expiry of the 'normal' tenure.

Penal charges may be waived, in full or in part, in deserving cases with the reason being recorded by Managing Director & CEO.

For the other loans, on the overdue instalments penal charges will be charged. However, it should not exceed 1.5% of outstanding per month and will be chargeable during the period of default.

Applicable rate of penal charges for gold loans and other retail loans are given in the following table.

Sl No	**Description**	**Penal Charges**
1	Gold Loans remain overdue after the due dates	2% per annum on the entire outstanding until actual payment.
2	Late payment of EMIs or loan instalments (Other than Gold loans).	1.5% per month on the overdue portion, till actual payment.
3	Cheque Bounce charges	Rs 300/- to Rs.500/-
4	NACH / ECS bounce charges	

Penal/Bounce charges for corporate loans, including lending to NBFCs shall be fixed on a case-to-case basis by the Approving Authority of the Loans.

b. Penal charges for non-compliance of other material terms and conditions

Sl No	**Description**	**Penal Charges**
1	Delay in perfection of securities	3% per month on the outstanding loan till the securities are perfected.

2	Delay in submission of financial statements or other documents specified in the sanction letters / financing agreements.	2% per month on the outstanding from the due date for submission of the financial statements and till submission of the statements.
3	Down gradation of external credit rating of the borrower.	3% p.a. on the outstanding from the date of down gradation till the external rating is upgraded to the agreed rating.
4	Non-compliance to the financial covenants	0.25% per month on the outstanding till the financial covenant has been satisfied as mentioned in the sanction letter.
Note: • MAFIL reserve a right to increase the rate or recall the loans, if the noncompliance persists for more than 2 quarters. • Penal charges may be applied after giving 15 days' notice to the borrowers. The notice period shall be mentioned in the financing agreements and sanction letters.		

c. Other conditions

- "The agreement with the borrower shall contain clause to the effect that MAFIL (the company) shall have the right to levy penal charges and out of pocket expenses viz legal charges, postages, recovery expenses etc in addition to interest in the event of any material default / non-compliance of terms and conditions of the sanction order / financing agreements" Charges payable should be communicated at the time of sanction
- The penal charges shall not be capitalised to the principal or compounded.
- Penal charges will be recognized on accrual basis for gold loans and on cash basis for non-gold loan verticals.

d. Accounting treatment of Penal Charges

As per para 9(e) of IND AS 115, revenue shall be recognised only when it is probable that the entity will be able to collect the consideration or not. Considering

uncertainties surrounding realisation of the Penal charges, as per the market practice in this regard, it shall be recognised on cash basis except for Gold Loans. As underlying collaterals are liquid and certainty in realisation of the charges is higher, for gold loans, penal charges may be recognised on accrual basis.

e. Disclosure requirement

a) New loans from 1st January 2024:
   - Quantum and reason for penal charges shall be clearly disclosed in the loan agreement and most important terms & conditions / Key Fact Statement (KFS) as applicable.
   - Penal charges shall be disclosed through website under interest rates and service charges.

b) Existing loans: Intimate the borrower of the regulatory change by way of sending intimations or by disclosing it on the website.

c) Common to existing and new loans: Intimate all borrowers about the applicable penal charges at the time of sending reminders for paying EMIs / instalments and non-compliance of material terms and conditions.

f. Variations / taxation

- The actual rates from time to time shall be fixed by the ALCO within the band / limits mentioned under each head and reviewed at quarterly intervals.
- ALCO shall have the authority to implement any other reasonable / justifiable charge from time to time, subject to reporting to the Board for ratification.
- Taxation regulations as applicable shall be complied with. The rates may be inclusive of taxes or exclusive of taxes as per the decision of ALCO based on the recommendations of the Business Heads.
- Discretion to waive / reduce the charges shall be vested with the Business Head on a case-to-case basis based on the approved delegated powers.

14. Powers of ALCO to vary interest rate

There may be extremely exceptional economic situations that may result in a change in the liquidity environment and the availability of funds to the Company and may

warrant an emergency change in the interest rates. The ALCO under the Chairmanship of MD&CEO will have the authority to amend the rates and the indicative table above with appropriate disclosure in such circumstances as a temporary measure. These changes shall be submitted to the Board through Risk Management Committee for ratification in the ensuing meeting**.**

15. General

- Interest rate re-setting - loans other than gold loan: To mitigate interest rate risks in the longer tenor loans in the verticals like commercial vehicles, MSME, personal loans, Micro Home Finance, Corporate etc. Sanctioning Authorities shall have the powers to prescribe rate of interest reset on quarterly / half yearly / annual / 2- or 3-year basis. Interest reset clause shall be incorporated in the sanction letters, wherever applicable. Loan agreements with the borrowers shall also be modified to include interest reset clause.

- Appropriation of charges and interest:

  Gold Loans: Remittances to the borrowers' account shall be appropriated in the order of Interest, Penal charges and principal. Other charges like auction expenses, insurance etc will be collected at the time of settlement.
  Non-Gold Loans (other than vehicle loans): Remittances to the borrowers' account shall be appropriated in the order of bounce / legal charges, overdue EMI, Penal charges and current EMI.
  Vehicle Loans: Remittances to the borrowers' account shall be appropriated in the order of overdue EMI amount, current EMI, penal charges, and bounce charges.

  Advance payments made by the borrowers shall be netted from principal /accrued interest for computation of interest.

  Interest should be charged for the amount actually disbursed. No interest shall be charged between the date of sanction and the date of disbursement.

- The rates of interest for the same product and tenor availed during same period by different customers need not be standardized but could be different for different customers depending upon consideration of factors like credit risk.
- MAFIL shall intimate the borrower loan amount, annualized rate of interest, periodicity of interest application, tenure, and amount of monthly instalment application at the time of sanction of the loan.
- MAFIL also offers variable and equated monthly instalments schemes.

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