



RP-S-08

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 : **Manoj Kumar V R, Company Secretary**
Reviewed by : **MAFIL Policy Review Committee**
Approved by : **Board of Directors**



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FOR DETERMINATION OF MATERIALITY AND DISCLOSURE OF MATERIAL EVENTS/INFORMATION

(Last Amended in the Board dated August 10,2023)

A. INTRODUCTION

Equity shares of Manappuram Finance Limited (the “Company” or “Manappuram”) are traded in India on the BSE India Limited and the National Stock Exchange.

The requirements under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended (LODR) have been considered while drafting this Policy for determining Materiality for Disclosures (the “Policy”)

The Policy 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. AUTHORISED PERSONS

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 shall jointly and/ or severally determine materiality of information/ events and dissemination of the same as covered by this Policy. 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 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 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.



Board of Directors, CEO, CFO, Key Managerial Personnel and all other words not defined herein shall have the same meaning as assigned to those terms under the LODR, Companies Act, 2013 (the Act) or any other applicable laws or regulations, as the case may be.

C. MATERIALITY ASSESSMENT

Information should be regarded as “material” if there is a substantial likelihood that a reasonable investor would consider such information important in making a decision to buy, sell, or hold a security or where such information is likely to have a significant effect on the market price of the security. Either positive or negative information may be material. Further an information or event may also be regarded as material, if whose value or the expected impact in terms of value, exceeds the thresholds prescribed under the LODR. Materiality will be determined on a case-to-case basis depending on specific facts and circumstances relating to the information/event.

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

D. TIMELINES FOR DISCLOSURE

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

E. DISCLOSURE OF THE POLICY

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

F. 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.

G. Board’s Approval:

This policy was approved by the Board of Directors at its meeting held on November 05, 2015.
