



# MANAPPURAM FINANCE LIMITED

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Reference No.: SEC/SE/15/2026-27

Date: April 8, 2026

<b>BSE Limited</b>	<b>National Stock Exchange of India Limited</b>	<b>India International Exchange (IFSC) Ltd</b>
Phiroze Jeejeebhoy Towers Dalal Street Mumbai- 400001 Scrip Code: 531213	5th Floor, Exchange Plaza Bandra (East) Mumbai – 400 051 Symbol: MANAPPURAM	1st Floor, Unit No. 101, The Signature, Building no. 13B, Road 1C, Zone 1, GIFT SEZ, GIFT City, Gandhinagar, Gujarat – 382355

Dear Madam/Sir,

Sub: - **Intimation of Violation of Code of Conduct under SEBI (PIT) Regulations, 2015**

Pursuant to the provisions of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”) and the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons in Securities of Manappuram Finance Limited (“the Company”), we hereby inform you that an inadvertent trade in the equity shares of the Company occurred in the discretionary Portfolio Management Services (PMS) account of a Designated Person, due to an operational lapse on the part of the Portfolio Management Service provider, despite specific prohibitory instructions in place.

The matter has been duly examined by the Company, and appropriate corrective and preventive actions have been initiated. The Company has taken note of the same and ensured necessary safeguards to avoid recurrence of such instances.

Further, reporting of the aforesaid violation, in the format prescribed by SEBI vide Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, titled “Reporting to Stock Exchanges regarding violations under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct (CoC)”, is being submitted as **Annexure A**, in compliance with applicable regulatory requirements.

This intimation is being submitted for your information and records

For Manappuram Finance Limited

**Aparna Menon**  
**Company Secretary**

**Encl: Annexure A**



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## Annexure A

Sr.no	Particulars	Details
1	<b>Name of the Listed company/ Intermediary/Fiduciary</b>	Manappuram Finance Limited
2	<b>Please tick appropriate check box Reporting in capacity of:</b> <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Abhijit Sen
	ii. PAN of the DP	AAHPS6626D
	iii. Designation of DP	Independent & Non-Executive Director
	iv. Functional Role of DP	Independent Director & Chairman of Audit Committee
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	Not applicable
	i. Name of the immediate relative of DP	
	ii. PAN of the immediate relative of DP	
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Manappuram Finance Limited ISIN: INE522D01027
	ii. No. of shares traded and value (Rs.) (Date-wise)	Date: February 03, 2026 No. of Shares: 2,111 Equity Shares Value: Rs. 6,14,828.75
<b>D. In case value of trade(s) is more than Rs. 10 lakhs in a calendar quarter</b>	Not Applicable	
i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI(PIT) Regulations, 2015		
ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI(PIT) Regulations, 2015		
4.	<b>Details of violations observed under Code of Conduct</b>	The transaction occurred in the discretionary PMS account of the



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		<p>Designated Person and has been confirmed by the PMS provider to be the result of an internal operational lapse at their end. The Designated Person had, prior to the transaction, issued explicit instructions to the PMS provider to classify the Company's securities under the "Prohibited Category" to restrict any dealing therein. However, such restriction was not implemented at the system level by the PMS provider, resulting in the said transaction.</p> <p>The Designated Person has confirmed that: the transaction was not undertaken pursuant to any instruction, decision or active involvement on his part; he was not in possession of any Unpublished Price Sensitive Information (UPSI) at the time of the transaction; and there was no intent to contravene the provisions of the PIT Regulations or the Company's Code.</p> <p><i>The aforesaid transaction, being of an involuntary nature, was executed without obtaining prior pre-clearance from the Compliance Officer, as required under the Code for trades exceeding the prescribed threshold.</i></p>
5.	<b>Action taken by Listed Company/Intermediary/ Fiduciary</b>	<p>The matter has been examined by the Compliance Officer and placed before the Audit Committee and the Board, in accordance with the Company's Code of Conduct.</p> <p>Considering the facts and circumstances of the case, including the absence of intent and the confirmation of</p>



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		<p>operational lapse by the PMS provider, the Company has taken the following actions:</p> <ul style="list-style-type: none"> <li>• <i>Noted the violation as a technical / inadvertent non-compliance;</i></li> <li>• <i>Obtained a written explanation from the Designated Person; and</i></li> <li>• <i>Imposed a monetary penalty of Rs. 20,000 (Rupees Twenty Thousand only) in accordance with the Code.</i></li> </ul> <p>The said amount is being remitted to the SEBI – Investor Protection and Education Fund (IPEF) in compliance with applicable regulatory requirements.</p>
6.	<b>Reasons recorded in writing for taking action stated above</b>	The violation was technical and inadvertent in nature. The Designated Person had issued prior instructions to restrict trading. The transaction occurred due to a system-level lapse at the PMS provider's end. The Designated Person was not in possession of UPSI and had no intent to violate the applicable regulations.
7	<b>Details of previous instances of violations (if any), since last financial year</b>	Nil
8	<b>If any amount collected for Code of Conduct violation(s)</b>	
	<b>i. Mode of transfer to SEBI – IPEF (Online/Demand Draft)</b>	online
	<b>ii. Details of transfer/payment</b>	
	<b>In case of Online:</b>	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	<b>Manappuram Finance Limited</b>
	Bank Name, branch and Account number	<b>Axis Bank Ltd, Thrissur 046010200008310</b>



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UTR/Transaction reference Number	AXISCN1304498210	
Transaction date	07-04-2026	
Transaction Amount (in Rs.)	Rs. 20,000.00	
<b>In case of Demand Draft (DD):</b>		
<b>Particulars</b>	<b>Details</b>	
Bank Name and Branch		
DD Number		
DD date		
DD amount (in Rs.)		
9	<b>Any other relevant information</b>	Nil

**Name:** Aparna Menon

**Designation:** Company Secretary & Compliance Officer

**PAN:** AZOPM6957D

**Email ID:** cs@manappuram.com

**Date:** 08.04.2026

**Place:** Valapad, Thrissur