

Corporate & Investment Bank

Procedure for Related Party Transactions (JPMSI)

Current Effective Date: [September 14, 2023]

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<SUB-LOB OF FUNCTION OF PROCEDURE OWNER>

1. Summary or Introduction

The Board of Directors of JP Morgan Securities India Private Ltd (JPMSI) has adopted the following procedure (“Procedure“) on transactions dealt with the Related Party

2. Scope

Lines of Business	• Currencies & Emerging Markets
Function(s)	• CEM trading
Locations	• J. P. Morgan Securities India Private Limited, Mumbai
Legal Entities	• J. P. Morgan Securities India Private Limited

2.1. Scope Description/Excluded from Scope

This procedure is intended to address requirements under Indian regulations only and should be read in conjunction with applicable Firm wide policies.

The requirements under this procedure are to be applied consistent with the FIMMDA and RBI Circulars, regulations in this regard

- [Master Direction - Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company \(Reserve Bank\) Directions, 2016](#)
- [Master Circular – “Non-Banking Financial Companies – Corporate Governance \(Reserve Bank\) Directions, 2015”](#)

3. Changes from Previous Version

Reformatted to align with Corpora procedure format

Updated the Related party definition as per latest applicable RBI regulation.

4. Core Procedure Content

4.1. Related Party Definition

As per RBI Master Direction – Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company as updated from time to time, Group entities are defined as per the RBI guidelines as an arrangement involving two or more entities related to each other through any of the following relationships and a 'group entity' as any entity involved in this arrangement:

- i. Subsidiary – Parent (as defined in terms of AS 21)
- ii. Associate (as defined in terms of AS 23)
- iii. Joint Venture (as defined in terms of AS 27)
- iv. Related Party (as defined in terms of AS 18)
- v. Investment in Equity Shares of 20 percent or more

vi. Common brand name

vii. Promoter – promote (as provided in the SEBI (Acquisition of Shares and Takeover) Regulations, 1997)

4.2. Dealing with Related Party

The Company will ensure that the transactions with related party will be done at an arm's length.

“Arm's Length Transaction” means a transaction between two related parties that is conducted as if they were unrelated, so that there is no conflict of interest.

The Company will follow the same dealing process that is being followed for a similar third party entity. The terms of dealing or financing to any related party will be similar to finance extended to third parties.

Exposure, disclosure and reporting for the Company's exposure to related parties would be as per accounting standards and RBI guidelines as applicable.

The above procedure is subject to review from time to time and at least once a year

5. Consequences of Non-Compliance

All employees are required to ensure the full compliance with all the applicable regulations, code conduct and internal polices/procedures. Non-Adherence with applicable requirements may expose JPMC and/or its employees to criminal; regulatory; financial and/or reputational risk.

6. Exceptions

NIL exceptions to requirements/provisions mentioned in this procedure

7. Firm References

Firm Policies	<ul style="list-style-type: none">Not applicable
Standards	<ul style="list-style-type: none">Not applicable
Procedures and Other Documents	<ul style="list-style-type: none">Not applicable

8. Procedure Information

Unique Procedure ID*	
Procedure Owner*	Vikram Ramani

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Primary Contact*	Vikram Ramani R724690 CEO
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