

# Corporate & Investment Bank

## Procedure for Related Party Transactions (JPMSI)

Current Effective Date: [September 30, 2025]

### TABLE OF CONTENTS

1. Summary or Introduction .....	2
2. Scope.....	2
2.1. Scope Description/Excluded from Scope .....	2
3. Changes from Previous Version.....	2
4. Core Procedure Content .....	2
4.1. Related Party Definition .....	2
4.2. Dealing with Related Party.....	3
5. Consequences of Non-Compliance.....	3
6. Exceptions .....	3
7. Firm References.....	3
8. Procedure Information.....	3

## 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

<b>Lines of Business</b>	<ul style="list-style-type: none"><li>• Currencies &amp; Emerging Markets</li></ul>
<b>Function(s)</b>	<ul style="list-style-type: none"><li>• CEM trading</li></ul>
<b>Locations</b>	<ul style="list-style-type: none"><li>• J. P. Morgan Securities India Private Limited, Mumbai</li></ul>
<b>Legal Entities</b>	<ul style="list-style-type: none"><li>• J. P. Morgan Securities India Private Limited</li></ul>

### 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 – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023
- Master Circular – “Non-Banking Financial Companies – Corporate Governance (Reserve Bank) Directions, 2015”

## 3. Changes from Previous Version

Annual review, with changes to procedure document reference data raltes change in Section 8.

## 4. Core Procedure Content

### 4.1. Related Party Definition

As per Master Direction – Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 as updated from time to time, “Companies in the Group” means as an arrangement involving two or more entities related to each other through any of the following relationships:

- 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) for listed companies

#### **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.

Transaction undertaken with related party will be placed for the review of the Board of the company on an quarterly basis.

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**

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

### **8. Procedure Information**

<b>Unique Procedure ID*</b>	P43770703
<b>Procedure Owner*</b>	Vikram Ramani CEO
<b>Primary Contact*</b>	Vikram Ramani

	CEO
<b>Secondary Contact</b>	Upanshu Mahawar
<b>Effective Date*</b>	September 30, 2025
<b>Last Review Date*</b>	April 25, 2025
<b>Next Review Date</b>	September 2026
<b>Version Number*</b>	4.0
<b>Procedure Storage Location*</b>	<a href="https://corpora.gaiacloud.jpmchase.net/procedure/P43770703/Published/preview">https://corpora.gaiacloud.jpmchase.net/procedure/P43770703/Published/preview</a>
<b>Record Classification Code</b>	CRK1160
<b>RCSA/PARC - Control ID</b>	
<b>Legal Obligation – ELA Procedure ID*</b>	620477