OASIS SECURITIES LTD.
Regd. Off.: A-112 1st Floor, Lodha Supermus MIDC Andheri East Mumbai -400093 MH
Corporate Office: 2nd Floor, C 373 Behind Amar Jain Hospital, Block C ,Vaishali Nagar, Jaipur-302021 Rajasthan
Contact No. 9257056969 • E-mail: admin@oasiscaps.com
CIN: L51900MH1986PLC041499 • Website: www.oasiscaps.com

RELATED PARTY TRANSACTIONS POLICY

1. INTRODUCTION

Oasis Securities Limited ("the Company") has always been pursuing the highest degree of ethical and legal conduct, while transacting business with related parties. As a good corporate governance practice, the Company follows arm's length basis in transacting business with its related parties, which are in the ordinary course of business. The Policy on Related Party Transactions includes material thresholds and the manner of dealing with Related Party Transactions ("the Policy") in compliance with the requirements of the Companies Act, 2013 and the Rules made thereunder and Clause 49 of the Listing Agreement entered into with the Stock Exchanges and Applicable guidelines issued by the Reserve Bank of India ("RBI") for NBFCs. The Policy has been formulated by the Board of Directors, in order to maintain the transparency and procedural fairness of the approval process and disclosure requirement in the conduct of related party transactions. This Policy applies to all transactions executed between the Company and one or more of its Related Parties, which are taken in the best interest of the Company and its shareholders.

2. OBJECTIVE

The objectives of this Policy are:

- To regulate transactions between the Company and its related parties;
- To ensure proper approval, disclosure, and reporting of such transactions;
- To ensure compliance with statutory and regulatory requirements;
- To prevent conflicts of interest.

3. DEFINITIONS

Unless the context otherwise requires:

3.1 Related Party

A "Related Party" shall have the meaning as defined under:

- Section 2(76) of the Companies Act, 2013; and
- Regulation 2(1)(zb) of SEBI LODR Regulations.

3.2 Related Party Transaction (RPT)

A transaction involving transfer of resources, services, or obligations between:

- The Company and a related party; or
- The Company and any other person/entity where a related party has an interest.

3.3 Arm's Length Transaction

A transaction conducted as if between unrelated parties, so that there is no conflict of interest.

3.4 Ordinary Course of Business

Transactions that are:

- Carried out in the normal course of business; and
- Usual for the NBFC's operations (e.g., lending, borrowing, investment activities).

3.5 Material Related Party Transaction

A transaction shall be considered material if it exceeds thresholds prescribed under SEBI LODR (currently 10% of annual consolidated turnover or such other limits as amended from time to time).

4. POLICY APPLICABILITY

This Policy shall apply to:

- All transactions with related parties;
- All Directors and Key Managerial Personnel (KMPs);
- Subsidiaries and associates of the Company.

5. IDENTIFICATION OF RELATED PARTIES

- The Company shall maintain an updated list of related parties based on disclosures received from Directors and KMPs.
- Directors and KMPs shall provide disclosures:
  - At the time of appointment;
  - Annually;
  - Whenever there is any change.

6. APPROVAL OF RELATED PARTY TRANSACTIONS

6.1 Audit Committee Approval

- All RPTs shall require prior approval of the Audit Committee.
- The Audit Committee may grant omnibus approval for repetitive transactions subject to conditions prescribed under law.

6.2 Board Approval

- RPTs not in the ordinary course of business or not at arm's length shall require Board approval.

6.3 Shareholder Approval

- Material RPTs shall require prior approval of shareholders through a resolution.
- Related parties shall abstain from voting on such resolutions.

7. OMNIBUS APPROVAL

The Audit Committee may grant omnibus approval for RPTs subject to:

- Maximum value per transaction;
- Period of approval;
- Justification for the need of omnibus approval.

8. REVIEW AND MONITORING

- The Audit Committee shall review RPTs on a quarterly basis.
- Management shall place details of RPTs before the Committee periodically.

9. DISCLOSURES

9.1 To Stock Exchange

- The Company shall disclose material RPTs as per SEBI LODR requirements.

9.2 In Financial Statements

- Disclosures shall be made as per applicable accounting standards.

9.3 On Website

- The Company shall disclose the Policy on it's website..

10. RELATED PARTY TRANSACTIONS BY SUBSIDIARIES

- The Company shall ensure that subsidiaries (if any) comply with RPT provisions.
- Material RPTs of subsidiaries (if any) shall also require approval as per SEBI LODR.

11. RELATED PARTY TRANSACTIONS NOT PREVIOUSLY APPROVED

In the event the Company becomes aware of a Related Party Transaction with a Related Party that has not been approved under this Policy prior to its consummation, the matter shall be reviewed by the Committee. The Committee shall consider all of the relevant facts and circumstances regarding the Related Party Transaction, and shall evaluate all options available to the Company, including ratification, revision or termination of the Related Party Transaction. The Committee shall also examine the facts and circumstances pertaining to the failure of reporting such Related Party Transaction to the Committee under this Policy, and shall take any such action it deems appropriate. In any case, where the Committee determines not to ratify a Related Party Transaction that has been commenced without approval, the Committee, as appropriate, may direct additional actions including, but not limited to, immediate discontinuation or rescission of the transaction. In connection with any review of a Related Party Transaction, the Committee has authority to modify or waive any procedural requirements of this Policy. This Policy will be communicated to all operational employees and other concerned persons of the Company.

12. ROLE OF MANAGEMENT

Management shall:

- Identify potential RPTs;
- Ensure compliance with approval mechanisms;
- Maintain proper documentation.

13. RESTRICTIONS

- No Director or KMP shall participate in discussions or voting where they are interested.
- Transactions shall not be structured to bypass regulatory requirements.

14. EXEMPTIONS

This Policy shall not apply to:

- Transactions between the Company and its wholly-owned subsidiary (subject to compliance with SEBI provisions);
- Transactions specifically exempted under law.

15. AMENDMENTS

The Board may amend this Policy from time to time in line with:

- Changes in statutory provisions;
- Regulatory guidelines.

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- **Amended w.e.f. 10/04/2026**